

MAIDSTONE BOROUGH LOCAL PLAN REVIEW

DRAFT PLAN FOR SUBMISSION (REGULATION 19)

OBJECTION TO SOUNDNESS ON BEHALF OF LENHAM PARISH COUNCIL

POLICY LPRSS1(6)

MAIDSTONE BOROUGH SPATIAL STRATEGY

MARDEN REASONABLE STRATEGIC DEVELOPMENT LOCATION

LPC FOUR

1. Lenham Parish Council objects to policy LPRSS1(6) which identifies Lenham Heath (Heathlands) as a garden community.
2. Lenham Parish Council believes Marden to be a sustainable location for a significant residential development whereas Lenham Heath is not.
3. LPC would wish policy LPRSS1(6) to be amended to delete Lenham Heath and substitute it with Marden.
4. LPC believes Maidstone Borough Local Plan Review (MBLPR) is heavily biased in favour of the Council's own development scheme at Lenham Heath whilst not including other more sustainable locations for development.
5. The main reasons the parish council supports Marden in substitution for Lenham Heath are given in Appendix LPC2 attached to this objection.

APPENDIX LPC 2

WELWYN HATFIELD CASE STUDY

The Welwyn Hatfield Situation: Settlement Pattern

1. During the consultation on the MBLPR, Lenham Parish Council (LPC) has been monitoring the experience of other Local Plans during their examinations. As a consequence, LPC believes the experience with other examinations may be very helpful in the examination of MBLPR.
2. Melvyn Middleton is the inspector appointed for the Examination of the Welwyn Hatfield Local Plan (WHLP). The inspector's preliminary conclusions and advice are dated 16th October 2020. The Local Plan had been submitted for examination in May 2017. The inspector had, in December 2017, asked the Council to submit additional housing sites to meet housing requirements.
3. In the WHLP an issue arose in relation to eight villages that were to be excluded from the Green Belt (Inspector 16 October 2020, para 101).
4. The Inspector concluded as follows on this issue at paragraphs 104 and 105:

104 Notwithstanding the policy objective of achieving a proportionate distribution of development, the proposed distribution of new housing development, in the submitted plan, is heavily biased towards four of the eight excluded villages, Brookmans Park, Cuffley, Little Heath and Woolmer Green. No market or affordable housing is proposed at Digswell or, following the clarification of the special nature of the residential accommodation at Marshmoor, in Welham Green either. This is despite them each having a railway station with frequent services to Welwyn Garden City, Hatfield and beyond, putting them among the most sustainable locations within the Borough from a movement perspective. Additionally, little new development is proposed at Oaklands and Mardley Heath or Welwyn.

105 There is no objective justification for this disparity before the Examination and without such evidence the proposed distribution among the villages is likely to be found unsound. There is undeveloped land within walking distance of both of the above railway stations and also within walking distance of Marshmoor, which is intended to be the Borough's flagship employment site. This site is adjacent to Welham Green railway station and has quick access from Welwyn North (Digswell) as well as from Brookmans Park railway stations. These stations along with Welham Green also have direct, quick access to the large existing employment area to the east of Welwyn Garden City station.

5. In summary:

- (i) The proposed distribution of new housing development was ‘heavily biased’ towards including development in four of the eight villages which had been excluded from the Green Belt (GB).
- (ii) Some of the villages with no development had a railway station with frequent services, putting them among the ‘most sustainable locations’ within the Borough.
- (iii) Some of the villages with no development had direct quick access to a large existing employment area.
- (iv) There was no objective justification for the disparity (of excluding sites in the most sustainable locations) before the examination. This evident disparity between the evidence base of the plan and the spatial strategy proposed was likely to result in the plan being ‘found unsound’.

Conclusion for MBLPR

- 6. Whilst no two planning situations can ever be directly comparable, LPC believes some important parallels can be drawn from this case study. Marden has a railway station with fast and frequent services to London and other nearby employment centres (e.g. Tonbridge and Ashford).
- 7. Marden has its own employment area with provision for this to expand.
- 8. In the Maidstone Borough call for sites exercise development was proposed at Marden on a significant scale. Such development would meet obvious sustainability credentials.
- 9. The Sustainability Appraisal (SA) of the MBLPR (paragraph 4.47) states that Lidsing performs most strongly, followed by Marden. The same paragraph states that Heathlands performed least well across the range of sustainability objectives.
- 10. The SA (Chapter 10), gives no convincing explanation as to why Marden was not selected but refers to clear political desire to limit growth in rural settlements. The Heathlands proposal extends very close to Lenham village, which is a rural settlement.
- 11. The decision in MBLPR has clear parallels with WHLP. Marden is acknowledged within the evidence base as performing better than Heathlands on sustainability objectives.

12. The conclusion of LPC is that MBLPR is heavily biased in supporting Heathlands but rejecting Marden for significant development. The degree of bias is such that LPC believes that MBLPR is unsound in respect of the spatial strategy set out in policy LPRSS1(6).

Changes to the Plan sought to address soundness issues

13. LPC believes the Heathlands proposal should be deleted from the MBLPR in its entirety.
14. LPC would wish LPRSS1(6) to be worded as follows:

“6. New, sustainable Garden Settlements are identified at Marden and Lidsing which will provide new homes, jobs and services, all delivered to garden community principles”.
15. LPC believes the MBLPR needs a radical rethink to avoid the evident bias in the spatial strategy towards allocating land within the Maidstone Borough Council’s own development proposal. For consistency with WHLP, Heathlands should be deleted and the strategy refreshed, giving full and proper consideration to including development at sustainable locations such as Marden.