ANNEX 3

Subject: Comment in relation to the "call for sites"

From [redacted]

To: "clerk@mardenkent-pc.gov.uk" <clerk@mardenkent-pc.gov.uk>

Tue, 26 Nov 2019 22:34:27 +0000

Dear Sirs

We attach our objection, already sent to MBC in respect of a "Call for Sites" submission on land in Dairy Lane, Chainhurst, Marden (Site 54). Our comments equally apply to other sites in Chainhurst (Sites 304, 123 and 213) in relation to sustainability, namely transport, flooding, local services, conserving and enhancing the natural environment, heritage and isolation.

To conclude, it has clearly been established that development in the countryside around Chainhurst is isolated and unsustainable. This site or any in Chainhurst for housing is unjustified when taking into account the reasonable alternatives submitted under the "Call for sites 2019". The allocation of these sites in Chainhurst would be inconsistent with Government National Planning Policy.

Site 54 was previously rejected in the last Maidstone BC Local Plan (2017). The Councils "Strategic Housing & Economic Development Land Availability Assessment published in January 2016 stated under Table H2 –Rejected Housing Sites: **Dairy Lane, Chainhurst** (Site Ref HO35) that **" The site is located in the open countryside and removed from an established settlement and associated services. Development would cause harm to the open character of the countryside.**"

Nothing in planning policy terms has changed since the last assessment was made by Maidstone BC in 2016. **These sites in Chainhurst should be rejected as suitable for housing.**

Yours sincerely

[redacted]

- Objection submission on Dairy Lane Chainhurst.docx Microsoft Word document - 1012 KB

By email and by post

Strategic Planning Team
Maidstone Borough Council
Maidstone House
King Street
Maidstone
ME15 6JQ

18 November 2019

Dear Sirs

Response to "Call for Sites" Submission on Land in Dairy Lane, Chainhurst, Marden (Site 54) made by Ms J Carter & Mr D Ranwell of Platt House.

As a local resident likely to be affected by this submission we wish to submit our objections to the owner's suggestion that this site is a suitable and sustainable location for housing.

The National Planning Policy Framework (NPPF) states there is a legal requirement that Plans should be prepared with the objective of contributing to the achievement of sustainable development. It also states that Plans must be "justified", taking into account the reasonable alternatives and based on proportionate evidence.

When you examine this submission you see there is little evidence that could support this site for housing. We set out or comments as follows:

1. **Small and Medium sized site**: The owners refer to the NPPF requirement that the Planning Authority should provide "*at least 10%" of their housing requirement on sites no larger than one hectare*" (para 68 NPPF). The owners show an area outlined in red on their submitted plan and confirm the area as 3.51ha in Call for Sites Form. This site cannot be classed as a small or medium sized site under the definition of the NPPF. If this site was allocated at an average of 15 dwellings per hectare the housing density that could be achievable amounts to 53 dwellings which would practically double the size of this tiny unsustainable hamlet.

2. **Sustainability**

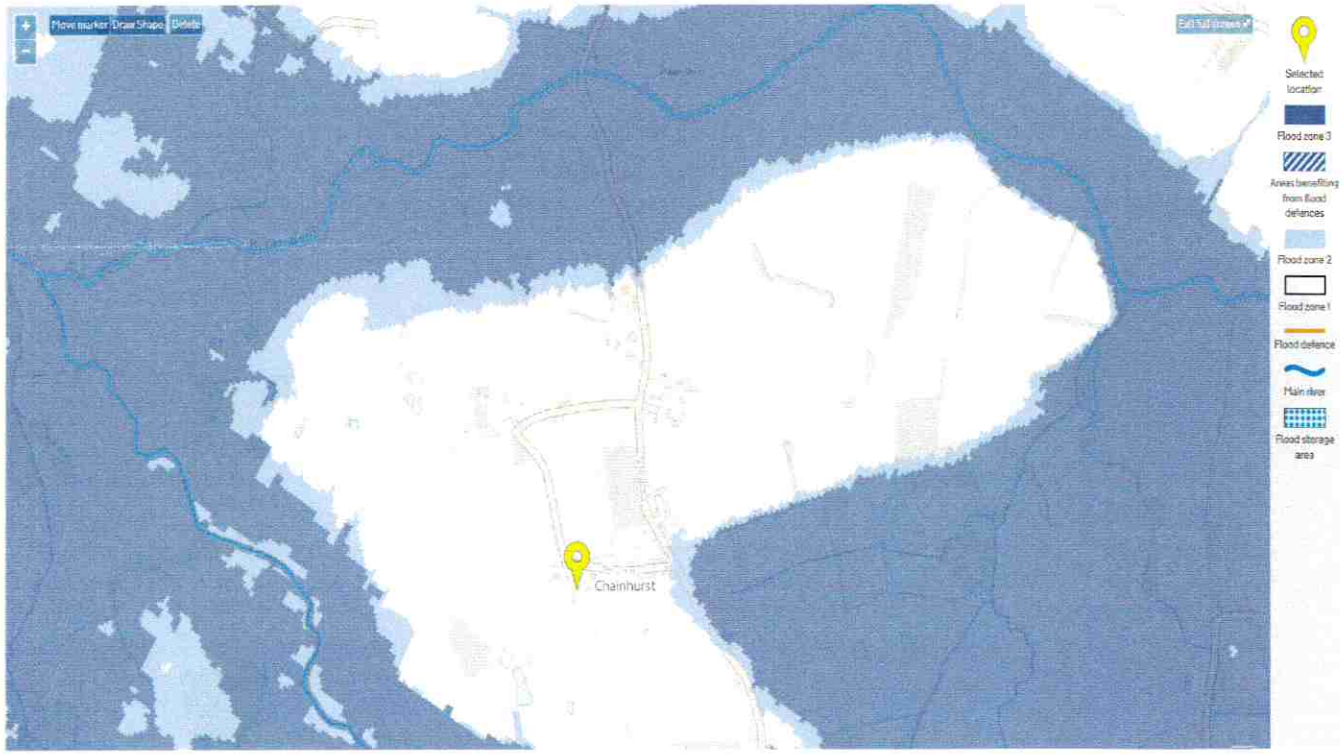
2.1 Transport: The NPPF state that development should be focused on locations which are or can be made sustainable, through the need to travel and offering a genuine choice of transport modes. This submission site is over 2.6 miles from Marden

(measured to the Railway Station). It has no safe pedestrian (no pavement) or cyclepath linking it to the nearest sustainable settlement of Marden.

Chainhurst has an extremely limited bus service at the end of Dairy Lane with two services per weekday restricted to schooldays only to and from Maidstone and no bus service at the weekend. Any development from this site will be heavily reliant upon car use. This would increase congestion and emissions and reduce air quality and public health making this site unsound in sustainable terms.

2.2 Flooding: Although the actual site falls outside the designated flood plain. The village of Chainhurst itself becomes completely isolated in any flood event as can be seen from the Environmental Agency Flood map. Access to facilities and for emergency services were impossible in December 2013 when the whole village was cut off.

Flood Map for Chainhurst



2.3 Local Services: The nearest railway station, primary school, medical centre, post office and other local services are over 2.6 miles away in Marden. Access to these facilities will require the use of a private car. Chainhurst has no regular or reliable public transport or any safe pedestrian or cycle link to the sustainable settlement of Marden.

2.4 Employment: The owner refers to "an established B1 industrial estate". The site we assume they refer to is the very small former Dairy Rd Farm Yard. This is a site of just 3 small metal framed agricultural buildings is occupied by a Landscaped company

employing approximately 10 people (none of which reside in the village) and another unit occupied by a local car enthusiast who we understand uses the space more as a hobby than a business and doesn't employ anyone. The remaining unit is used for personal use by the owner. We understand there has been no submission made by the owner of this farm yard to extend the premises and no proposal to use any of its remaining field for employment use. There are therefore no local employment opportunities locally that could deliver employment opportunities in Chainhurst. The nearest industrial estate is in Pattenden Lane, Marden over 2 miles away.

2.5. Conserving and enhancing the natural environment: The NPPF recognises the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystems services- including the economic and other benefits of versatile agricultural land, trees, hedgerows and woodland. This 3.51 hectare site offers an opportunity for significant habitat and biodiversity locally. It forms a central greenspace around the residential properties along Dairy Lane and acts a wildlife corridor linking habitats and ecosystems with the River Teise?

2.6 Heritage: There are several listed buildings and others known as "non –designated assets" (para 197 NPPF) which will be affected by the proposed scale of development in the historic settlement of Chainhurst. Not only will the scale and nature of development be out of character of this remote hamlet but the impact on traffic noise and pollution will cause significant harm to its character and setting.

2.7 Isolation: The NPPF (para 79) state clearly **"Planning policies and decisions should avoid the development of isolated homes in the countryside"**

3. **Conclusion**

It has clearly been established that development in the countryside around Chainhurst is isolated and unsustainable. This site or any in Chainhurst for housing is unjustified when taking into account the reasonable alternatives submitted under the" Call for sites 2019". The allocation of this site or any other in Chainhurst would be inconsistent with Government National Planning Policy. The owners of the site recognise that this site was previously rejected in the last Maidstone BC Local Plan (2017). The Councils "Strategic Housing & Economic Development Land Availability Assessment published in January 2016 stated under Table H2 –Rejected Housing Sites: **Dairy Lane, Chainhurst** (Site Ref HO35) that " **The site is located in the open countryside and removed from an established settlement and associated services. Development would cause harm to the open character of the countryside**."

Nothing in planning policy terms has changed since the last assessment was made by Maidstone BC in 2016 on this site. **This site and other proposed in Chainhurst should be rejected as a suitable housing.**

Yours sincerely