



Strategic Planning,
Maidstone Borough Council,
Maidstone House,
King Street, Maidstone,
Kent ME15 6JQ

December 8th, 2021

Dear Sir/Madam,

**Response to Maidstone Local Plan Review Submission Local Plan consultation
(Regulation 19)**

I am writing this letter as a private resident of Kent, and it is my representation to Maidstone Borough Council's Regulation 19 Submission Local Plan consultation.

I firmly believe that the Maidstone Local Plan Review is totally **unsound and not legally compliant** because of the presence in the plan of *Policy No LPRSP4(A): Heathlands Garden Settlement*. The reasons for my representations are as follows:

The **transport** infrastructure in this isolated rural area cannot support an increase of 5,000 or more homes in the area. The roads, in what is an outlying area of countryside, are already massively overstretched, not just the single carriageway A20 but most of the smaller B and unclassified roads – none of which have seen any major improvements, despite significant development throughout Maidstone and Ashford boroughs, over the past decades.

Public transport is scarce, and the railways are overstretched, under-invested and congested. The promise to deliver a new motorway junction is **unsound** and there is no prospect that one will be delivered in the either the short or medium term. The Highways England precedent is that a development of this nature needs to be of 10,000 homes or more to justify the construction of a new motorway junction. That promise, therefore, cannot be delivered.

Although this project claims that a new railway station will be constructed on the slow Ashford to Maidstone rail line, there is no technical justification or other evidence to show whether, or how, this new station could happen.

One suggestion is to close Lenham and even Charing stations to deliver a single, new Heathlands station. This proposal would be counter-productive because the 1500 additional dwellings that must be delivered in the Lenham Neighbourhood Plan will rely on improved access through the existing Lenham railway station, while the significant housing developments in Charing village will depend on the existing Charing station.

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An isolated location such as Lenham Heath cannot possibly absorb an additional 12,500 people and the demand on resources that will bring. Because Heathlands is so unsustainably remote, the existing **infrastructure** is totally inadequate to serve the proposed new settlement.

Residents of the new houses would have to travel long distances by car to reach basic services such as hospitals, secondary schools, and employment. It's a pattern of development that exacerbates the need to travel by car instead of reducing it. These journeys would add considerably to carbon emissions which is contrary to national and local policies on climate change.

It will be prohibitively expensive to establish a new settlement with a provision for all the essential services that would be vital for a community of this nature and size.

The proposal contains unrealistic promises on **employment and industry** and claims that Heathlands will deliver around 5000 jobs, and there is no evidence to support this. Neither is there any credible evidence that an isolated location such as Lenham Heath could attract investment on a sufficient scale to generate this number of new jobs. Even if something on this scale could be achieved, most of the workers would already live in larger urban areas such as the Medway Towns, Maidstone, and Ashford. Commuting over substantial distances would be wasteful on resources and would generate excessive carbon emissions which is contrary to government policy on climate change.

Any local plan should ensure that in a significant area of housing development, such as Heathlands, provision should be made for local shops and other facilities which would:

- avoid an overall increase in travel
- provide access to essential shopping, community, health and secondary education facilities for those without access to a car
- encourage vibrant and diverse neighbourhood/district retail centres.

Maidstone's Local Plan has little provision at Heathlands for such facilities.

People living in and adjacent to the rural areas that would be impacted by such a major development chose to live there because it was peaceful and relatively isolated from urban disturbance. Building the 5000 houses and creating developments for 5000 jobs at Lenham Heath would destroy the local **environment**. It would also eliminate the green 'buffer' that currently exists between the east of Maidstone Borough and the western boundary of Ashford Borough.

The revised plans now extend the site much closer to the Kent Downs Area of Outstanding Natural Beauty (AONB), which occupies much of the higher ground adjacent to Lenham Heath. It is therefore not possible to visibly screen such a massive project from one of the nation's most valuable countryside assets. Lenham Heath itself has the benefit of numerous local environmental assets including the headwaters of the River Stour into which the development will drain. Maidstone Borough Council claims that a new water treatment plant will be built but there is no evidence of how they will do it in the plan. All of these important assets would be destroyed and overwhelmed by massive urbanisation on the scale proposed.

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Increased traffic, congestion, and **pollution** from 5,000 houses will only increase greenhouse gases and this would bring is an increased risk to the environment and health. It's completely unacceptable in these times, when we hear so much about global warming, that a huge housing development is being planned in this remote area. The effects of the urbanisation of a remote, rural area in Lenham Heath are contrary to international treaty commitments such as the Paris Agreement (2015) and the Glasgow Agreement (2021).

The rural landscape in the Lenham area contains many different types of animals and plants. The proposed housing scheme has little regard for the preservation of the **environment** and its protection. This garden community is far too large and will destroy too much of the environment.

This is a remote rural **location** of good quality agricultural land on the extreme fringes of the Borough. Planning to locate masses of houses and people where there has been nothing similar before doesn't make any planning sense. It is bad planning and an expedient solution which is simply pushing the 'problem' of required development to the remote and unpopulated areas at the fringes of the borough. The Local Plan should build houses where they are most needed, closer to the town centre in the surrounding urban and suburban areas which also provide significant brownfield site opportunities.

There has been a consistent lack of **consultation**. Maidstone Borough Council has shown little regard to the views of local people. Key information has been consistently hidden from public view – especially from those communities not necessarily sited within the borough that will be negatively affected by this development. This has been confirmed by the Head of Planning at Ashford Borough Council and by the Ashford MP, the Rt Hon Damian Green. Key decisions appear to have been made in secret.

This scheme is complex and there are serious questions about its **viability**. It is clear from reports in the media that many landowners have not agreed to sell their land. There appear to be big issues that have not been resolved about the local mineral sites, train stations and road junctions. The process has been riddled by weaknesses in the Council's evidence base at every stage.

The absence of an acceptable level of management competence, which has been a hallmark of this project so far, is inflicting worry and uncertainty on people living within and alongside the affected area. It seems unfair that local people should have such uncertainty inflicted upon them by such a poorly thought-out scheme.

In conclusion, this plan is woefully lacking in **soundness**. The choice of Lenham Heath for a garden settlement is not acceptable or justified because the evidence to justify why the Lenham Heath Heathlands site is an appropriate and proper location is inadequate and insufficient.

Even though the Heathlands development achieves the lowest score against the objectives in the **Sustainability Appraisal**, this appears to have been totally disregarded despite the proposed area for development being in such a sensitive location. It appears that this choice of site has been driven by political preference and expediency, placing this new settlement in a highly sensitive rural location at the extreme edge of the Borough.

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This Plan is not sustainable and is highly unlikely to be deliverable because it is insufficiently **viable** and will not be capable of attracting financial support and investment that it requires.

This proposed settlement would be situated on the Borough border and there are so many "duty to cooperate" issues that have not been resolved. It is evident that there has been little or no consultation with Ashford Borough Council and the rural communities bordering this development that will be severely affected by it. It is also clear that the plan has been devised independently and without sufficient reference to the various infrastructure service and transport providers.

There has been no consultation with anyone in the neighbouring parishes, such as Egerton which abut the proposed development site, and which will be adversely affected by it, demonstrating that Maidstone Borough Council's planning team has failed in its Duty to Co-operate with other authorities on a significant development that crosses administrative boundaries. There is no accurate record of common ground between the various bodies.

It is contradictory to national planning policy because it is an unsustainable location in a highly sensitive site adjacent to the North Downs AONB and remote from major infrastructure and services. Contrary to the guiding principles of the NPPF, where new garden community proposals are meant to be 'community-led', Maidstone Borough Council has failed to undertake any public consultation, demonstrate community input, or otherwise, to inform the principles of the proposed settlement.

This lack of consultation is a serious planning matter and, combined with the reasons listed above, the scheme should be withdrawn from the local plan.

Yours faithfully,

Peter Rawlinson