



Strategic Planning
Maidstone Borough Council
Maidstone House
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By email only

Our reference: P.07.035.2691

9th December 2021

Dear Strategy Planning

RESPONSE TO THE MAIDSTONE BOROUGH COUNCIL LOCAL PLAN REVIEW DRAFT
PLAN FOR SUBMISSION (REGULATION 19) CONSULTATION IN RELATION TO THE
OMISSION OF LAND NORTH OF JUBILEE FIELDS (WETLANDS FARM), SWEETLANDS
LANE, STAPLEHURST

We are writing on behalf of Mr Kevin Gray in respect of the Local Plan Review Regulation 19.

The site at Wetlands Farm has been submitted as part of the call for sites process for Maidstone Borough Council in 2019, and as part of Maidstone Borough Council's Regulation 18 Preferred approaches consultation which formed part of the second stage of the Local Plan review in 2020.

These current representations are being made in respect of Maidstone Borough Council's Local Plan Review Regulation 19, which is the third public consultation on the review of the adopted Local Plan 2017. The first review consultation took place in 2019 and was entitled 'Scoping, Themes and Issues' and the second consultation was entitled 'Preferred Approaches'.

In line with Government requirements for local plan reviews, this letter is being prepared in accordance with paragraphs 31 and 33 of the National Planning Policy Framework which requires that *"The preparation and review of all policies should be underpinned by relevant and up-to-date evidence."* (para 31) and *"Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy"*. This letter seeks to clarify the current position for Wetlands Farm/Land north of Sweetlands Lane and provide evidence of its suitability for residential development.

Site summary

The site extends in total to circa 2 hectares and lies on the eastern side of Staplehurst adjoining the north side of Jubilee Fields, the villages recreation ground.

Lawful Development Certificate under reference MA/12/1871 confirmed the lawful use of part of the site for the manufacture of wooden fencing products. This Certificate was granted on 12 August 2013. The site therefore partly comprises a lawful business use (i.e. falling within the definition of brownfield land).

Sustainable development

The golden thread at the heart of the National Planning Policy Framework (NPPF) is a presumption in favour of sustainable development and this runs throughout the Framework.

Paragraph 7 of the NPPF states that *"the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs"*.

Paragraph 8 of the NPPF states that there are three overarching objectives to sustainable development, which are interdependent and need to be pursued in mutually supportive ways. These are an economic objective, a social objective, and an environmental objective.

Paragraph 9 of the NPPF states *"Planning policies and decisions should pay an active role in guiding development towards sustainable solutions"*.

Paragraph 10 of the NPPF states *"So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development."*

Paragraph 11 specifically refers to how Plans and decisions should apply a presumption in favour of sustainable development, with 11 a) stating *"For plan-making this means that: all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"*.

Paragraph 38 of the NPPF states *"Decision makers at every level should seek to approve applications for sustainable development where possible"*.

Paragraph 105 of the NPPF relates to promoting sustainable transport and states *"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making"*.

These policy requirements highlight the importance of the presumption in favour of sustainable development. These requirements must be given due consideration through the Local Plan review.

Staplehurst

Staplehurst is defined as a Rural Service Centre within both the adopted Local Plan (2017) and the Regulation 19 Local Plan Review. Maidstone Borough Spatial Strategy identified that Rural Service Centres will be the secondary focus for housing development with the emphasis on maintaining and enhancing their role and the provision of services to meet the needs of the local community.

Staplehurst is the largest of the rural service centres in terms of population and size and has several key community services and facilities that you would expect from a settlement of this size. It also has good transport infrastructure, including a train station, with trains to London and Ashford.

Staplehurst has seen recent growth to the west of Station Road, with site H1 (49) being allocated for up to 400 dwelling in the adopted Local Plan 2017. Work has commenced and been completed (in part) within a section of this wider allocated site for 186 dwelling under planning reference 15/510186/FULL. Moreover, land at Home Farm has a draft allocation in the Regulation 19 Local Plan Review for approximately 49 dwellings, this is located to the west of Wetlands Farm. The adopted allocation and draft allocation clearly indicate that the Council considers this part of Staplehurst to be a suitable location as an extension to the village.

There is existing vehicular access to the site from Sweetlands Lane, however, the site does also abut Headcorn Road which could provide an alternative access point if considered necessary. Furthermore, subject to the necessary agreements it may be possible for the site to link into the allocated/draft allocated sites to the west.

The site adjoins Jubilee Fields (Staplehurst's sports facility) subject to discussions with the Parish Council a pedestrian link and footpath could be provided from the site into and through Jubilee Fields to join the village's paved area on Headcorn Road immediately outside the entrance to Jubilee Field, from where all of Staplehurst's services and facilities, including the railway station can be reached entirely on pavements and which would provide a viable alternative to the private vehicle to reach these services.

School, shops, doctors' surgery and bus stops are all located at the centre of Staplehurst village, and as previously stated can all be reached via pavements. Furthermore, Staplehurst's main sports and recreational facilities are located at Jubilee Field, which adjoins the site to the south. Policy C5 of the Staplehurst Neighbourhood Plan (2016-2031) indicates that Jubilee Field is considered the best location for further investment in sports and recreational facilities for the village. So, a key village amenity is adjacent to the site.

It is noted that Paragraph 9.13 of the pre-amble to the Neighbourhood Plan Objective 2, seeks to encourage more people to walk. It says the existing and future footpaths around the village need to be generous, well-surfaced, safe and well-connected. The Neighbourhood Plan Objective 3 says the proposed layout for new development sites must deliver a series of connected streets and lanes that will ensure a choice of routes for new and existing residents. Policy E1 requires all new development sites on the edge should integrate positive planting and recreational routes along their boundaries and within their layouts to help define a long-term edge to the village and respond to the needs of residents on the existing village edge.

Policy C5 of the Staplehurst Neighbourhood Plan seeks to maintain and enhance the Jubilee Field sports and recreation site, including the development of new and improved facilities at the site. Paragraph 8.14 says through the planning obligations linked to future development in Staplehurst, an appropriate level of funding will be directed towards the sports and recreation facilities to ensure it will meet the needs of a growing village.

This submission proposes to either incorporate the provision of footpath and other improvements considered by the Parish Council appropriate to meet the needs of the community here, or make a financial contribution towards such requirements.

In connecting the site to the Jubilee field in this way, the proposal is considered to contribute towards the objectives of Staplehurst's Neighbourhood Plan.

Conclusion/Summary

It is put forward that Wetlands Farm would provide the opportunity to provide additional housing across the plan period on a sustainable site. It would provide a logical rounding off and extension to Staplehurst being contained by Headcorn Road to the east and Jubilee Fields (recreational ground) to the south. As stated previously, this site occupants a sustainable location adjoining Staplehurst's recreation ground (a key village amenity), whilst all the other village services/facilities can be accessed entirely by pavements, thus providing a genuine alternative to the private vehicle to reach these facilities.

The site is considered both suitable and available for development and there are no perceived constraints that would preclude the allocation of this site for housing within Maidstone Borough.

Yours sincerely



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