

LOCAL PLAN REVIEW

Main Modifications Consultation –
Representation form



Part 1: Personal Details

All responses must contain your full name and postal address for your response to be processed as part of this consultation.

Your name will be published alongside your representation on our consultation portal. All demographic and contact data will be removed. Please note, if you under 18 we will not publish your name, only your representation, please do specify your age if this is the case.

****If you are representing another person or organisation, please complete the title, name and organisation (where relevant) boxes below in the personal details column and complete the agent details column.***

	Personal Details*	Agent Details (if applicable)
Title	Cllr	
First Name	Vanessa	
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Part 2: Your representation

Please use a separate sheet for each representation.

For help on how to complete this questionnaire please see guidance notes located at the end.

1. Please state which proposed Main Modification you are making a representation on (e.g. MM1)

(Please use a separate form for each proposed Main Modification you wish to make a representation on)

LPRSP4(B) - MM16

2. Do you consider the Local Plan Review Main Modifications to be legally compliant?

(Please tick appropriate box and include any relevant comments / reasons in the comments box below)

Legally compliant? Yes No

3. Do you consider the Local Plan Review Main Modifications to be sound?

(Please tick appropriate box and include any relevant comments / reasons in the comments box below)

Sound? Yes No

If you answered 'NO' to sound (question 3) please tick below why you consider that the Local Plan Review Main Modifications are not sound?

(please tick all that apply).

Not positively prepared

Not justified

Not effective

Not consistent with national policy

If you have answered 'No' in Questions 2 - 3 please set out your reason and what precise change to the proposed Main Modification will make it sound / legally compliant.

Please add your representation here:

(Continue on a separate sheet if required)

Please see attached.

Please tick this box if you wished to be kept informed about the Inspector's Report and/or Adoption of the Local Plan Review

Representations must be received by **5pm on Monday 13th November 2023**. Late representations cannot be accepted.

Representations can be submitted:

(1) Online using the Council's web based consultation portal at:

<https://maidstone.objective.co.uk/kse/>

(2) By email using this form to: ldf@maidstone.gov.uk

(3) By post using this form to: Strategic Planning, Maidstone Borough Council, Maidstone House, King Street, Maidstone, ME15 6JQ

Introduction

1. The proposed modifications detailed at MM16 do not mitigate the extensive harm that would be caused to Bredhurst, Lidsing, Walderslade, Lordswood, Boxley and all neighbouring areas should the Lidsing Garden Village development proceed.
2. The modifications detailed at MM16 do nothing to enhance LPRSP4(b) which remains unsustainable, undeliverable, unviable, and unsound. The Lidsing allocation must be removed from the Plan in its entirety.

Garden Settlement & Strategic Development Locations

3. LPRSS1, MM7 (6) states 'new, sustainable Garden Settlements are identified at Lenham Heath and Lidsing which will provide new homes, jobs and services, all delivered to garden community principles.'
4. The Lidsing Garden Village proposal (LPRSP4(b)) does not adhere to 'Garden Community Principles' as set out in Government Policy. It would create a dormitory development which will not enhance the natural environment, will not provide integrated and accessible transport systems but instead will be heavily car dependant forcing vehicles onto unsuitable country lanes which are already used as 'rat runs' between Medway and Maidstone.

North Downs Woodlands Special Area of Conservation (SAC)

5. The impact of new development on the integrity of the North Downs Woodlands SAC must be afforded a much higher level of consideration. The wording inserted after para 6.77 is unhelpful and gives little assurance of the protection of this area. It is wholly inadequate to state '*if nitrogen deposition exceeds the screening criteria set out in IAQM guidance (1% of the SAC's critical load for nitrogen deposition), then mitigation will be required*'. It is imperative that mitigation measures must be agreed at the onset before limits are exceeded.
6. The wording continues '*applications must clearly demonstrate through project-level HRA that the Mitigation Strategy is appropriate, can be feasibly implemented and will be sufficient to fully mitigate any identified adverse effects on the SAC*'. This paragraph demonstrates that there is no mitigation in place at this stage and, therefore, the Lidsing allocation is not justified and is unsound.

Further MM Wording:

7. *'Applicants should have regard to the following package of mitigation measures which may be deployed, either in isolation or in-combination, as and when necessary and appropriate for air quality. The mitigations, which are in no particular order and are not exclusive, are as follows:*

- i. Green Travel Planning focussed on employment facilities, commercial facilities, schools, and the use of transport connections within and adjacent to the development.*

It is farcical to use the words 'green travel planning' in relation to Lidsing Garden Village. The proposed development is miles from the nearest train station and the roads south of the site towards Maidstone are unlit country lanes totally unsuitable for cyclists or pedestrians. If Lidsing Garden Village proceeds it will be almost totally car dependant.

- ii. Traffic calming to discourage access/egress via Boxley and Bredhurst.*

There is already extensive traffic calming throughout Bredhurst and Boxley and there is no capacity to add to this. The examples given by the promoter at the Stage 2 Hearing all demonstrated traffic calming measures in urban not village settings and all required street lighting which neither village has nor wants. The proposals put forward at the Stage 2 Hearing would reduce the road width in Bredhurst which would not allow farm vehicles to access fields. In addition, Boxley Village has a number of listed properties so road widening in this location is not an option.

- iii. Provision of cycle and pedestrian facilities to encourage sustainable modes of transport via Boxley and Bredhurst.*

This is a absurd proposal as it would entail cyclists and pedestrians to use narrow, unlit country lanes, most of which the national speed limit of 60mph applies. Boxley Hill itself is 2.6km long with an average gradient of 5.9% and a maximum of 15.7% at its steepest part. The route is bordered by ancient woodland, arable fields and is in the AONB, therefore, widening or straightening of the road is not an option.

- iv. *On-site measures to encourage/increase take up of low emission vehicles, such as EV charging points.*

It must be mandatory that EV charging points are installed for all new dwellings.

- v. *HGV and other vehicle "site servicing" and "delivery route" management strategies.*

It is difficult to envisage how HGVs and other vehicles will access the site or what 'management strategies' could entail as much seems dependant on the new west/east link road which requires Medway Council to sell land adjacent to North Dane Way. Medway Council remain adamant they will not sell this land and are totally opposed to the Lidsing development. Without the west/east link, HGVs will have to negotiate single track country lanes if exiting the M2 at junction 3 or through residential roads in Hempstead if exiting the M2 at junction 4. The alternative route from this junction would be through the unlit lanes of Bredhurst.

- vi. *Strategic road signage strategy.*

The Local Plan cannot be found sound without this in place.

- vii. *Off-site planting at agreed locations and species.*

Details of locations and species must be provided at the Main Modification stage. It is not sufficient to provide this information at a later stage. Proposals must also give evidence as to the effectiveness of 'off-site' planting and how this will mitigate poor air quality and pollutants which development at Lidsing will generate.

- viii. *The design of residential layouts and configuration of estate roads in a manner which discourages access/egress via Boxley and Bredhurst.*

This is not physically possible unless all vehicles are to use equally unsuitable residential roads through Hempstead or unlit country lanes (Westfield Sole Road, Capstone Road or Ham Lane).

- ix. *Typologies of development located at the southern sector of the site which generate lower car ownership levels of trip rates, i.e.: higher density apartment type accommodation, older persons accommodation.*

There is no evidence to support that higher density apartments or older persons accommodation will result in lower car ownership.

- x. *Home and flexible working supported by broadband infrastructure to encourage and enable people to drive less.*

Home and flexible working is only available to a limited number of roles so would probably not be applicable to the majority of residents.

- xi. *Low emission strategy at south of site and through Boxley/Bredhurst.*

A low emission strategy should be applied to the whole of the site, not just to the south and through Boxley/Bredhurst. Residents in Lordswood, Walderslade and adjoining locations in Medway will be subject to increased and unacceptable emission.

Phasing and Delivery

Preliminary

8. The wording here is very weak with insufficient detail to comment.
9. The major flaws in the deliverability of essential infrastructure needed to make Lidsing Garden Village 'sound' cannot and should not be addressed by an SPD.
10. The monitor and manage strategy is not an acceptable approach. The NPPF states growth must be aligned with infrastructure, not that infrastructure will be considered as an afterthought.

Phase 1 - (No later than 2028 to 2032 – circa 590 houses in the first five years)

11. There is no methodology or evidence to support the delivery of the 1st phase of 590 houses which appears to be totally reliant on the new east/west link road from North Dane Way to Maidstone Road. This was amended at the Stage 2 Hearing and is referred to as the 'interim scheme'. It was submitted without any viability evidence, detailed assessments, or Highway Authority approval.
12. The 'interim scheme' is dependent on 3rd party land with no guarantee it will be available and no transport modelling has been presented.
13. How can a statement be made that during this stage, the West- East link road will be completed and will facilitate the full orbital bus route? As has been repeatedly said,

there is absolutely no assurance that the West-East road will ever be completed as Medway Council continue to state that the land needed for this, which is under their control, will not be sold.

14. What does 'proportionate secondary school contributions received' mean? It appears that 590 houses will be built without any assurance of school places being available.

Phase 2 - (2033 to 2038 – cumulative total of 1340 houses completed by 2038)

15. The statement - 'completion' of the M2 J4 spur, with 'possible' interim utilisation of existing Maidstone Road bridge crossing to allow the employment development to commence early in this stage' is a grave concern. There could be 1340 houses built plus employment development with no supporting road infrastructure.
16. Consultation with local communities at this stage to discuss mitigation requirements is far too late in the process. By this time, local communities will have already suffered greatly and the occupants of 1340 houses will have formed established travel patterns.
17. It is not acceptable to state that towards the end of this stage (2038) as necessitated by demand, that the replacement bridge crossing could be opened. From the very start of this process, residents were informed that a replacement bridge crossing would be built but it seems, like many other issues, this has been watered down and it appears that there is no clear intention of constructing the originally proposed link to M2 junction 4.
18. There is insufficient evidence to support the 'interim' arrangement of connecting to Maidstone Road and inadequate calculations of cost.
19. The main modifications do not give confidence that the original M2 junction 4 scheme will ever be completed. This is a fundamental flaw and, therefore, the proposed development at Lidsing is unsound and undeliverable.
20. There is no assurance of the transfer of land or costings for the 3FE primary school or health care centre which could result in new occupants without necessary local facilities.

Phase 3 (By 2042 - cumulative total of 2000 houses)

21. No details given as to how proportionate secondary school contributions will be received.

Housing

22. The 40% “target” for affordable housing provides no obligation to provide any particular figure. Evidence previously submitted has already questioned the viability of the development because of unknown land and infrastructure costs. There is a real danger that the scheme promoters will not be able to meet an appropriate level of affordable housing.

Masterplanning and Design

23. Paragraph e) relating to restriction of “floor plates” has been deleted. Will this reduce the protection for the AONB?
24. There is no definition of what ‘positive enhancements’ can be made to the Capstone Valley and to the setting of the AONB. If Lidsing proceeds, along with other applications being fought by Medway Council from the same promoter, the entire Capstone Valley will be developed.
25. The statement that the development will create ‘a positive out-facing edge when viewed from the Medway urban’ is totally disingenuous. Medway residents currently have far-reaching views over open farmland and they are furious this could be lost forever to a housing estate.
26. At 3j – mention is made of a ‘green bridge connection across the motorway’. There are no details as to how, where or when this would be delivered, neither have any viability or technical assessments been provided. It is a baseless statement without evidence to support its implementation.

Employment/Commercial

27. With the woefully lacking detail of infrastructure provided, it is difficult to understand how people will travel to the 2,000 new jobs nor is there evidence that the strategic road network has the capacity for new workers in addition to the occupants of the 2000 houses. It is naïve to believe that a high percentage of jobs will be taken by the new occupants. Realistically, new workers will come from far and wide which again will create huge traffic issues for the whole area.

Infrastructure

28. No strategy has been provided for additional Secondary School accommodation in the Capstone Valley. Undefined contributions will not ensure that additional capacity will be provided. Land for such facilities has not been identified and the cost of construction has not been assessed.
29. Similarly, there is a chronic shortage of hospital capacity and health facilities in the Medway area and there is no assessment or strategy for addressing the situation with Medway Council or the Regional Health Authority.
30. The unexplained deletion of paragraph d (v) relating to the provision 31Ha of open space appears to be a major departure from the original Garden Village principles and is totally unacceptable.

Transport Connections

31. The first paragraph must refer to the need for consultations with Medway Council who will be the relevant Highway Authority for many of measures associated with site access arrangements and off-site transport/highway mitigations.

Environmental

32. There has been no assessment of the impact of the development on wildlife and biodiversity. It is essential that before any development takes place there is a fully detailed ecological and landscape study. The huge loss of open farmland will be detrimental to many species particularly ground nesting birds such as the “red listed” Skylark, birds of prey and many other species.
33. The target for 20% biodiversity improvement is completely without any technical basis and is unachievable. This is particularly the case given the proposed deletion of the provision of 31 Ha of open space mentioned above (Infrastructure – paragraph 30).

Conclusion

34. The numerous reasons detailed above clearly demonstrate that the proposed development at Lidsing – Policy LPRSP4(B) is not justified, ineffective and unsound and must be deleted.