

Local Plan Review Response

Boxley Parish Council would like to comment on the following aspects of the Local Plan Review.

1. Call For Sites

Ref 196 Land at Willow Farm, Sandling and Ref 216 Rochester Meadow Sandling

These comments are for both sites as they are adjoining.

Boxley Parish Council do not feel that these sites are suitable for development for the following reasons:

Sustainability

1. There are no local shops, schools, play areas or GP Surgeries. This means that all residents are reliant on motor vehicles to access basic services. This makes the proposed development unsustainable.
2. There is a very limited bus service. There are no bus stops sufficiently near to the site. There is no safe pedestrian access from the site to the nearest bus stops. MBC's consultation documents indicate that required mitigation measures are unfeasible due to the need for third party land and the sites unsuitable on sustainability grounds.
3. There is no local employment so residents have to travel out of Sandling to work. More development would mean more vehicle movements on narrow lanes that would not cope with an increase of traffic from 65 additional houses.
4. The nearest schools are oversubscribed with waiting lists for all years. Buses to secondary schools have to be caught on the A229 near the Running Horse public house. Any residents in the proposed development would have to travel outside the area to school. This would not meet the requirements for sustainable development.
5. Both Boarley Lane and Tyland Lane are very narrow, mostly single track, country roads. The applicant proposes widening Tyland Lane to accommodate some of the additional traffic created. The application states that this will require purchasing third party land. Given the huge opposition from residents to this proposal it is very unlikely that the applicant would be able to purchase the land needed. The development cannot be permitted without improvements to the road infrastructure. This development would produce an estimated 600 additional traffic movements a day which is not sustainable on narrow roads that already have problems with congestion at peak times. MBC's consultation documents indicate that the required mitigation measures (widening of Tyland Lane) are not feasible due to the requirement for third party land and deem the sites unsuitable on access grounds.
6. Sandling's utility services (gas, electricity and broadband) are already at capacity due to their age, with many residents having issues. Broadband is provided by overhead lines. 65 additional properties would only exacerbate

the problems. There is an overhead power line across the site access that would need to be buried.

7. Water supplies are already under serious pressure throughout the south-east because storage capacity has not kept pace with population growth and aquifer levels diminishing. The latter is likely only to worsen with climate change and additional reservoirs demand substantial investment and available land.
8. There are no local services (the nearest shops are at Penderden Heath at least a 30-40min walk away). This means residents will be reliant on their private cars and/or delivery services. This makes this proposal not in line with current Government Policies on sustainable development.
9. Boarley Lane, Tyland Lane and Grange Lane have no footpaths or streetlighting which would again lead to a reliance on vehicles.
10. It would be almost impossible for construction traffic to access this site from the proposed access in Boarley Lane due to its narrowness. Site lines would be difficult to achieve without creating a hazard in view of the large number of vehicles accessing and exiting the site from and to the lane if that option was pursued.
10. Tyland Lane is used as a cut through and has the national speed limit. It has a lot of on street parking which makes it single track in most places. This makes it both narrow and dangerous to other drivers and pedestrians due to fast moving vehicles and no footpath.
11. The stretch of Boarley Road after the Yew Tree public house that dips under the M20 regularly floods resulting in the closing of the road. This would be even more problematic with 65 additional dwellings needing to access and use local roads.

Heritage and Conservation

MBC's consultation documents indicate that these sites would have a significant negative effect on the historic environment

12. A Roman burial site was found in Rochester Meadows in 1937. The artifacts found are currently on display in Maidstone Museum. There has never been a full archaeological assessment of the site and this must be carried out before the applicant does any further clearance or work on the site.
13. The site is 230 metres from the land in Boxley Abbey which is a designated Conservation Area and Scheduled Ancient Monument. These areas should be protected. The development would adversely affect the views of the protected St Andrew's Chapel which is located close to the proposed access.
14. The development sits just outside the AONB but would be visible from it. Widening Tyland Lane would be an incursion into the AONB. Boxley Parish Council is not likely to support any development that affects the AONB.

Environmental Impact

15. The development would be mainly on greenfield sites leading to a loss of wildlife habitat. It should be noted that the developer has already cleared a large number of trees, ancient trees and established hedgerows, some of which were on a KCC owned verge. He has also bulldozed the site, filled in a stream and dug it out again. All this work was carried out without any

ecological assessment and BPC assume that this was to avoid having to carry one out. The stream was reported to contain newts and the trees bats. Both of these are protected species although no evidence of their presence remains on the site.

16. The streams (not a culvert as stated by the applicant) flow has been affected by the works already carried out. Without the trees to help absorb the water, excess run off has caused localised flooding both under the M20 and near the Millstream House. The damage to the stream needs urgent assessment to prevent further occurrences.
17. Light pollution from the development would have detrimental effect on wildlife. The area has several species of bat and owl which would be adversely affected by any increase in light pollution.
18. Previous planning applications for the Willow Farm site have been refused as they 'would harm the character and appearance of the surrounding area'. These were just for small developments of one or two houses on the Willow Farm site. Something on this scale is completely unacceptable.
19. There is a gas reduction station adjacent to Rochester Meadows and the safe proximity of housing to this has not been addressed.

Air Quality

20. The site is close to both the M20 and A229, Bluebell Hill. The volume of traffic on these major roads is considerable. There are frequent accidents leading to standing traffic. The resulting air quality would be poor. This is backed up by the Air Quality Status report for Maidstone 2019 which has a diagram of air quality contours which clearly show the junction of the A229/M20 as having one of the highest levels of pollution.

Published information on the proposed Blue Bell Hill improvement works in preparation for the Lower Thames Crossing suggest that pollution (and noise) from the resulting increased volume of traffic is likely to worsen in the short to medium term. This will be even more detrimental to health

In short Boxley Parish Council strongly believes that these sites are completely unsuitable for development. They would have a negative impact on the village of Sandling. They would be removing a valuable green buffer between Sandling and the M20 and be detrimental to the AONB. They would cause a loss of valuable wildlife habitat and cause additional problems with existing flooding.

There is very strong opposition from residents with over 200 joining a group to campaign against this development in just one week. This is a huge response given the small size of Sandling.

Creation of a New Garden Community at Lidsing

Boxley Parish Council strongly object to this proposal for the following reasons:

1. It obliterates the 'protected' strategic gap between Medway and Maidstone and will join Lordswood/Princes Park/Walderslade and Hempstead into one big urban

sprawl. The strategic gap was designed to prevent this occurrence. It provides a vital green lung between dense housing areas and as such should not be built on. Boxley Parish Council cannot see that joining Medway and Maidstone together has any advantages that would justify the removal of the 'protected' strategic gap.

2. This development would result in a substantial loss of greenfield land that forms part of the setting to the Kent Downs Area of Natural Beauty and contributes to the area's open space needs.
3. The development will have a major impact on the flora and fauna in the area, contrary to paragraph 118 of the NPPF.
4. It would put considerable strain on Bredhurst Village and its services.
5. It would put additional strain on already oversubscribed secondary schools.
6. It would put additional strain on Medway and Maidstone's overstretched Health services.
7. *'Discussions have been held with Medway Council's Education Advisor and provision is made within the masterplan vision plan for a 2-form entry primary school with capacity to increase to a 3-form entry school in the future if required. 'What consultation has taken place with Maidstone Borough Council. As this development is wholly in Maidstone, surely their educational requirements are more relevant.*
8. *'Discussions have also taken place with the Housing Manager at Medway Council where a lower percentage and alternative tenure split is normally requested. We propose to involve Medway's Housing Manager in further discussions on the housing mix'. Again, why no consultation with the borough in which the proposed development sits.*
9. The development requires built infrastructure directly in the AONB. The planting of woodland does not mitigate the incursion as the proposed road will alter the appearance of the AONB.
10. *'The suitability of this location for employment was identified in Medway's evidence base to the local plan review also being recognised as a general location for employment at the Future Medway Development Strategy Consultation Stage of the Local Plan which was consulted on in March 2018. 2.3 The development team has previously engaged with Medway Council's Economic Development team after identifying the potential suitability of this location as a business park as part of a wider development masterplan'. Again, where is the consultation from the Maidstone side. There is already a large industrial park in Lordswood. Is another one that close really necessary.*
11. There is plenty of provision for East/West traffic movements towards Medway but none for North/South to Maidstone. The only route from North to South would be through Boxley Village which already has severe traffic problems. BPC understands residents may use the new link road to access the M20, M2 and Bluebell Hill junctions but even the Developer agreed vehicles would still use Boxley as a cut through. There is no provision in the plans for a Boxley bypass to alleviate potential problems.
12. Boxley Parish Council questions whether this Lidsing development is being proposed to facilitate access to the Gibraltar Farm development which is currently on hold due to issues with access. The Gibraltar Farm proposal is directly adjacent

to the Lidsing one and would make the total combined development size 2,450 houses.

13. Boxley Parish Council has questions about the number of cars per household the traffic assessments would be based on. The Developer has confirmed that 2 spaces per household would be allocated and anticipated that there would be 1,100 car movements during peak hours with 10-12,000 vehicle movements in a 24-hour period. If even part of this traffic feeds through to Boxley village or Walderslade Woods it would cause enormous problems with already congested roads. Walderslade Woods would take vehicles onto the already over capacity Junction 3 of the M2.
14. BPC notes that all the improvements seem to be of an advantage to Medway with none for Maidstone even though the development is in Maidstone Borough.
15. This development would destroy Capstone Valley and the beautiful rural landscape enjoyed by residents of Kent and Medway for leisure activities.
16. Boxley Parish Council have struggled to find detailed information on this Development even after a presentation by the Developer. We believe more information should be made available to the public on what is a massive rural development which so impacts the environment and wellbeing of residents. There is also a need for much more consultation, particularly what benefits there are for Maidstone and the potential traffic issues it will cause for Boxley Parish.
17. It is stated throughout the proposal that the whole development has one landowner. This is not true. Part of the land is owned by a local farmer who has no intention of selling his land. The area of land designated for the new road link to Junction 4 is owned by 2 Bredhurst residents. Part of the land is owned by Medway Council. Until it can be established that these other landowners wish to sell and support the development, the proposal should go no further.
18. The proposal includes provision to make Bredhurst school a full form entry instead of its current half form entry. Presumably, the additional pupils will come from the new development. Bredhurst school has no parking and the current pupil numbers cause traffic chaos at the beginning and the end of the school day. Where does the developer propose that these additional vehicles will park?
19. It is also noted that the landowner intends to retain ownership of all community areas. These should be managed by MBC or Boxley Parish Council for the benefit of the community.

In conclusion, Boxley Parish strongly objects to this development. The loss of the 'protected' strategic gap and incursion into the AONB are unacceptable and not mitigated by any potential benefits of the proposed development. Any potential benefits would be for Medway and not Maidstone in which the development would sit. As Maidstone already has a 5 year housing supply, is this development necessary or needed.