

STAPLEHURST PARISH COUNCIL

5th October 2011

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Dear Sirs

Response to Draft Core Strategy Regulation 25 Consultation

We welcome the publication of the Draft Strategy and your invitation to comment. Together with related development documents, this will be a vital resource in guiding and, where necessary, restraining development.

This is particularly the case with the recent publication of the Draft National Planning Policy Framework which could lead to much more development, in many cases in the wrong places, than Maidstone residents might accept. Our first comment would therefore be that every aspect of the Core Strategy and related documents should be reviewed to ensure that they not only meet NPPF requirements (once these are finalised) but also are worded in such a way that local policy cannot be over-ruled by the endeavours of developers where these do not align with local needs and wishes.

In response to your specific questions:

1 Do you think we have got the Core Strategy right for Maidstone Borough?

We would support most of the overall approach the Strategy takes so long as the points made below are taken into account and that you robustly resist any external pressures to increase the housing targets above 10,080. There need to be stronger definitions in many areas, particularly 'sustainable development'. This is required if the Strategy is to pass the soundness tests and be capable of defending decisions at planning enquiries into specific development applications.

We question the funding approach as highlighted at Para 8.5:-

'It would be extremely unlikely that the finance arising from all of these resources would be sufficient to fund the total amount of infrastructure provision that is being sought'.

.....as this seriously undermines the whole credibility of the Core Strategy.

2 Do you agree with the vision of the Core Strategy?

Yes - although there is a huge imbalance between the resource allocation to the town centre urban area and to the rural areas (particularly the RSCs). This is evidenced within the current Core Strategy at:

Para 6.21The number of rural and agricultural businesses found in villages and RSCs account for just under 30% of all firms in the borough and these make an important contribution towards the overall success of the local economy and Para 3.1 – 28% of the population live in rural areas including RSCs.

IDP Draft:

- Urban Total £138,398,736
- RSC total: £3,089,313 (2.2%)
- Staplehurst sub total: £400,953 (0.28%)

3 Do you agree with the aims and objectives of the Core Strategy?

We have not found any strategic aims set out in the Core Strategy; only passing reference in various sections. It would be useful to have a Core Aims statement. We generally agree with the Spatial Objectives, except where these differ from the points made above and below.

4 BOROUGH-WIDE STRATEGY (CS1)

Do you agree with this policy?

Mainly but:

- This section should clearly specify that developments must be sustainable in line with Policy CS6
- We do not agree with development at Junction 8 which would be in clear contravention of Policy CS5 and would set a clear precedent for contraventions elsewhere in the Borough.
- The last paragraph makes a vague reference to “timely”. For example transport infrastructure must be in place before development where this is appropriate (e.g. in Staplehurst in particular where the roads infrastructure cannot handle any new development).

5 MAIDSTONE TOWN CENTRE (CS2)

Do you agree with this policy?

In general yes although we have no view on the “Quarters” concept. With regard to the second and third paragraphs of CS2 regarding design and riverside land, we would point out that MBC have shown no inclination or ability to follow such policies in the past (as evidenced by the Law Courts, Fremlin Walk, Sainsbury, Museum extension and Travelodge amongst others which makes us dubious about the Council’s commitment to such a policy in future. However we would welcome a change in both policy and implementation.

6 MAIDSTONE URBAN AREA (CS3)

Do you agree with this policy?

Yes, although neither this policy nor CS7 address the serious inadequacies of the A229 southern approach route, particularly between the south of Bishops Way and Sheal’s Crescent junction with Loose Road. CS3 Para 4 – needs to include Park and Ride as a specific item.

7 RURAL SERVICE CENTRES (CS4)

Do you agree with this policy?

It is hard to comment without knowing the number of houses proposed for Staplehurst. However, the parish will resist any new housing development unless new and improved infrastructure is provided prior to occupation. The parish recognises the requirement to provide affordable housing to meet local needs. But, a balance must also be maintained between different types of housing, including houses at the middle and higher end of the market.

Whilst we appreciate that you propose aiming for 40% of new build to be “affordable” in the Borough overall, this must be based on an objective assessment of local need for each area rather than putting a lot of affordable housing in localities that don’t need it and from which the new residents would have to spend

considerable time and expenses on commuting which they could not afford. For example in Staplehurst our survey indicates a need of only 24 affordable homes and there is a current application in for 6 affordable dwellings for older people which, if approved, should be part of the total of 24.

The reporting on RSCs from Para 610 onwards lacks consistency across the communities. It is as if different authors have contributed.

If any Housing Needs Survey is to be referred to then there is a need for consistency in highlighting common aspects – such as numbers of houses etc...

Para 6.15 Staplehurst

The Staplehurst Housing Survey 2010 is given one line and this is not accurate. It should read ... *highlights a potential need for some 24 affordable dwellings in the village*

The current transport infrastructure is not good with poor bus services and a lack of integration with timetables. This is borne out by;

Para 7.11'there has been a steady decline in service to the south of the borough due to cuts in central government subsidy

CS4 – The Policy should include

'Protect the distinctive character of each individual settlement designated as an RSC'

The railway station may be an asset but it brings its own inherent problems to the area, with excessive traffic and parking issues across the RSC, as main train passengers drive to Staplehurst from Cranbrook, Hawkhurst and even Rye...

Groundwater flooding is an issue for Staplehurst and parts of Staplehurst are in the Flood Zone as shown at Maidstone Borough Key Diagram.

Why should future development in Staplehurst be used as an opportunity to assess the current system water drainage system? Why is Staplehurst not assessed now - in advance of any future development?

8 COUNTRYSIDE (CS5)

Do you agree with this policy?

We do not consider that this policy is meaningful or could be used in assessing development applications. It is also based on the incorrect notion that only the Kent Downs AONB is of any significance in our Borough. It is our view that the landscape of the Vale of Kent (broadly Marden-Staplehurst-Headcorn and up to the edge of the Greensand Ridge) has a special character which is very uncommon in South East England. Essentially it is a quiet area not bisected by motorways and other dual carriageways or major developments. The area is accessible by train which means that the three RSCs and smaller settlements sit within an area which offers leisure and opportunities to those residents and to people living in the more intensively developed areas to the north and beyond. This is even more true for the parts of the Borough neighbouring the High Weald AONB.

This should be recognised and protected by a countryside policy that is robust and effective and we do not believe CS5 is.

9 SUSTAINABLE DESIGN AND DEVELOPMENT (CS6)

Do you agree with this policy?

No. This section needs substantial strengthening particularly in view of the Government's proposal that there should be a "presumption in favour of sustainable development" which it has not defined. Planning consultants and lawyers will be able to use this lack of clarity to push through all forms of development unless the MBC Core Strategy and all related documents clear set out what criteria must be met before any development can be approved. MBC's proposed Sustainable Objectives are worthwhile but we strongly recommend that this section includes a very clear Policy which could be:

"CS6 Sustainable Development and Design (reverse the order as below)

Developments will only be permitted where it is clearly shown that it meets all of the following criteria:

- 1 That the building complies with:
 - a If residential; achieve a minimum of Code for Sustainable Homes level 4 from April 2013. A minimum of level 5 must be achieved from April 2016.
 - b If non-residential of 1000m² (gross) and above; achieve BREEAM very good from April 2013. BREEAM excellent will be achieved from April 2019. c From April 2013 ~~If residential of 10 units and above, or non-residential of 1000m² (gross) and above;~~
 - d All residential and non-residential buildings of 100 m² and above provide at least 10% of their energy from decentralised, energy from waste, renewable and/or low-carbon energy sources.
 - e Achieve sustainable water resources management including grey water recycling
- 2 Buildings respond to their local context in a positive, forward looking manner, and help to establish or maintain local distinctiveness, while remaining appropriate for their purpose.
- 3 Buildings take into account any adopted or endorsed supplementary design guidance, with a view to optimising the potential of any site, both internally and in relation to surrounding uses.
- 4 ~~Seek to e~~Developments enhance the townscape or landscape in which they are set, while affording protection to any identified heritage assets; this shall include landscape screening around the fringe of the urban area and the RSCs so as to eliminate any adverse visual impact on the surrounding countryside.
- 5 Developments are not be built in flood risk areas unless the risk can be demonstrably eliminated
- 6 Developments incorporate greenspace and amenity land, play areas, pedestrian and cycle ways and public seating
- 7 Developments are well located to public transport services including provision for bus stops and pedestrian and cycle ways to transport hubs.
- 8 Developments avoid or fully mitigate any additional road congestion and pollution by relating well to the main road network and contribute in full to any improvements required as a result of the development
- 9 Developments conserve and enhance the Borough's biodiversity and geodiversity by including and connecting well with wildlife corridors which should run from within urban developments to the open countryside.
- 10 Developments incorporate appropriate crime prevention measures through high quality design and implementation."

The emphasis of this section needs changing. It is not about "development proposals in the borough will..." but insisting that criteria are met. Planning policy should set standards rather than make requests.

10. SUSTAINABLE TRANSPORT (CS7)

Do you agree with this policy?

No. The Policy itself would be of no use at a planning appeal and needs rewording taking account of our comments below on the narrative preceding it. Furthermore the comments we make elsewhere about transport infrastructure preceding development should be addressed in a new CS7.

Parking

This should also cover individual RSCs too. In Staplehurst there are three main parking problems:

- a New estates do not have enough parking for residents and visitors due to the previous restrictive Kent parking standards. Future estates must have adequate parking. Lack of parking does not encourage people to use sustainable transport; it just causes parking problems and congestion.
- b There is not enough parking at the station. The surfaced car park is often full and that together with high charges leads to lots of parking problems on nearby roads and housing estates. MBC must seek to provide more parking at the station and must insist (in the Core Strategy) that any retail or other development on the station premises, provides more parking for passengers plus whatever is needed for the retail units themselves. In the meantime, Network Rail should provide at least sufficient parking for current needs. Our evaluation indicates at least 800 spaces to modern standards are needed.
- c There is not enough parking at the existing Parade which causes problems all around it. There is no obvious solution to this but nearby developments must have enough parking for residents, employees and visitors.

Rail and Bus

More emphasis needs to be given to improving bus services on the main rural routes which should include ensuring developments contribute to the bus infrastructure; e.g. stops, potential routes through some developments etc...

Developments must improve access to railway stations and contribute to improving train/bus interchange, station parking (inadequate in quality and amount at Staplehurst).

Cycling and Walking

Whilst we support this section it should apply to RSCs too. For example better cycle connections to the station would reduce car use.

The Core Strategy should address the development of a network of safe routes across neighbouring rural communities e.g. Marden to Staplehurst.

Roads

Staplehurst lies on the A229 primary route which carries heavy long distance lorry and car traffic as well as meeting local needs. Apart from serious safety hazards, this causes major congestion and hence pollution particularly at its junction with the Marden-Staplehurst-Headcorn route. This has not been addressed, despite the huge increase in Staplehurst's population since 1960. If more residential and business development occurs in Staplehurst it must be preceded by improvements to the road network. In particular a new Marden Road to Maidstone Road link (with a junction to a Lodge Road extension) is greatly overdue and this should be included in the Core Strategy. This will not only take traffic from the west to the north of Staplehurst but particularly will take most of the traffic to/from the housing estates that are west of the A229 that is going to/from Maidstone and Staplehurst Station. This will reduce traffic at the main crossroads and on the exiting A229 from that point until the junction with the new road.

11. ECONOMIC DEVELOPMENT (CS8)

Do you agree with this policy?

Although we have no specific comments to make on the draft of this section:

- a We are surprised it is silent about large retail developments at or near RSCs or other rural locations. Whilst we do not have a policy view on this in Staplehurst (as we will need to consult our residents), it is important that the Core Strategy ensures any such development does not damage existing retail outlets (which have drastically declined in the RSCs). If large retail developments use existing premises they must provide alternative premises for displaced businesses so as not to lose employment.
- b In Staplehurst any new business premises should be located either in Lodge Road (or its extension to the proposed link road) or on a small scale as part of farm diversification.

CS 8 – needs to include 'Existing business sites to be fully developed and utilised before opening new sites'.

Centre Hierarchy

We would support this and would like to see more small retailers in the centre of Staplehurst

12. HOUSING MIX (CS9) Do you agree with this policy?

No, not as it stands. The greatest demand across the borough is for three and four bed houses; however this does not easily equate to the general need for affordable housing in RSC areas where land prices are generally higher.

The CS9 policy appears to be contradicted by Delivery of Spatial Objectives para.11.
'To provide for the type of future housing that meets the changing needs of the borough's population, including provision for an ageing population and family housing, affordable housing at 40%.....'

It should not be left to developers to justify the housing mix or profile.
The Housing Mix is surely different across Urban and Rural areas.

13. AFFORDABLE HOUSING (CS10) Do you agree with this policy?

We agree in part but draw your attention to;-

- CS10 1 a – 40% is the required figure if the Borough is to address the Affordable Housing need.
- CS10 1b – Amend toA financial contribution (rate to be confirmed) towards the provision of *'affordable and appropriate pitches, off site, for gypsies and travellers'*.
- CS10 2 – Accepting a lower percentage rate dwelling requirement under 40% will lead to all developers arguing the viability of all developments.

The Core Strategy must have a mechanism for highlighting the minimum percentage rate based on the size of the development. The same can be said for financial contributions

14. LOCAL NEEDS HOUSING (CS11) Do you agree with this policy?

No, not as it is currently drafted.

Para 7.29*It is not intended that the majority of rural settlements will receive any planned market housing at all as this would exacerbate the problem.*

There is confusion across the Core Strategy with the use of the terms Rural Settlement and Rural Service Centres. The above para 7.29 could lead to developers flooding the RSCs with market housing.

The Core Strategy needs to

- Define both terms, clearly indicating whether an RSC is a Rural Settlement or not
- List all communities across the Borough as to whether they are urban, rural settlements, rural service centres or otherwise

CS11 5, 6 and 7 – it is not clear where the figure 5 years is derived from. Why 5 years?

15. GYPSY AND TRAVELLER ACCOMMODATION (CS12)

Do you agree with this policy?

No. It lacks the detail required to make any progress in this area.

MBC has been slow to provide leadership in this area hence the number of Temporary Approvals taking place. The Core Strategy needs to go beyond 2016 in some detail, so that communities can plan ahead.

If the Core Strategy is not adopted until 2013 then the figure of 71 pitches (CS12 para.1) will surely have changed.

Although *'the borough has a significant number of gypsy pitches...Page 65 para7.31'* there is no mention of the number of approvals since 2006.

Current pitches (approved or otherwise) must be listed in detail to show weaknesses in site provision across the Borough, highlighting reasons for identifying future sites.

16. NATURAL ASSETS (CS13)

Do you agree with this policy?

Neither this section nor the Economic development section emphasise the need to avoid loss of good farmland to hard development. Any greenfield development is likely to lead to some loss of farm capacity so a policy is needed to prioritise protection of the higher grades but also to make it clear that any loss of farmland will be resisted until all brownfield land has been used.

Green and Blue Infrastructure

The GBI section should including protection and enhancement of greenspace in and around rural service centres – e.g. buffer zone, new parks or informal spaces. This should be reflected in CS13 8.

Biodiversity

This should cover the entire green infrastructure, not just reserves. i.e. no loss of countryside, green corridors, landscaping within developments (including species selecting etc.). We have no doubt that Kent Wildlife Trust will comment on this in line with their Living Landscape approach and their guidance should be followed.

17. INFRASTRUCTURE DELIVERY (CS14)

Do you agree with this policy?

No. We consider the allocation of resources wrongly favours nearly all expenditure being made in the urban area. For example, we were told at the consultation meeting in Staplehurst on 14th September that a Marden Road/Maidstone Road link road was unaffordable as would be any measures to encourage better bus services.

However the draft IDP proposes spending £11m on new and improved Park and Ride, at least £10m on motorway junctions and a total of £29.55m on transport all in the urban area and no expenditure at all in any of the RSCs or the wider rural area. If even part of the Park and ride budget was spent on better bus services (perhaps including some small rural car parks; e.g. next to the Marden Road/Maidstone Road link) then private car traffic could be greatly reduced with a variety of environmental and financial benefits.

Note our previous comment re IDP Draft

- Urban Total £138,398,736
- RSC total: £3,089,313
- Staplehurst sub total: £400,953

We feel that CS14 is not sufficiently robust enough to deter developers from using every excuse for stating abnormal costs or threatening the viability of a development, in order to reduce the Community Infrastructure Levy.

We therefore feel that CS14 should be specific with regard to the circumstances in which developers could attempt to reduce the Community Infrastructure Levy.

General Comment

The Core Strategy is not clear about Education and Healthcare Provision. We had had numerous questions about this aspect and clarity is sought regarding these two important areas. It would also benefit all concerned, if there was an appendix listing all those areas not directly covered by the Core Strategy.

We are having on-going discussions with your staff about this and attach the current version of what we consider should be included for Staplehurst RSC.

If any MBC staff member wishes to work further on specific areas then Councillors Simon Green and John Kelly are only too willing to assist.

Yours faithfully

Parish Councillor John Perry
Chairman of Staplehurst Parish Council
With the support of the Staplehurst Rural Settlement Group

Scheme	Location	Lead Development Agency	RSC cost estimated	Delivery phasing 2006-11, 2012-16, 2017-21, 2022-26.	Funding source and section 106 already collected/committed
New Community Building including hall(s) and rooms suitable for leisure, sports, young people, meetings, events, performance, clubs, community offices and community café. A new building on the existing Village Centre site or a new site or a major transformation of the Village Centre.	Staplehurst	SPC, Staplehurst Village Centre Trust	£2m +	2012-16	CIL, MBC, lottery, other
Improvements to Marden Road - Station Road crossroads to deal with additional traffic generated by the development and/or changed traffic patterns associated with the development and more widely; note station.	Staplehurst	KCC highways	?	2012-16, 2017-21, 2022-26	Developer
New junction(s) with existing road(s) providing access to/from the new development.	Staplehurst	KCC Highways	?	2012-16, 2017-21, 2022-26	Developer
Creation of, or a contribution towards, new off-site open space within the Parish of Staplehurst or Upgrading, or a contribution towards the upgrading, of an existing area of public open space within the Parish of Staplehurst or Creation of, or a contribution towards, wildlife and/or woodland amenity areas within the Parish of Staplehurst, with appropriate public access provision.	Staplehurst	SPC MBC?	?	2012-16, 2017-21, 2022-26	Developers (direct in kind), CIL, other
Marden Road - Maidstone Road link road with junction to Lodge Road extension.	Staplehurst	KCC Highways	?	2017-21 - pre new housing development	CIL, KCC, Department for Transport
Traffic calming and safety measures on the wider network to deal with additional traffic generated by the development and/or changed traffic patterns associated with the development including streetlights	Staplehurst	KCC Highways	?	2012-16, 2017-21, 2022-26	Developer
New or improved roadside footways/cycle-ways and public rights of way to provide safe non-motorised user routes to/from the development whilst linking to existing communities.	Staplehurst	KCC Highways	?	2012-16, 2017-21, 2022-26	Developer
Village Signposts for Main Public Assets – including the historical	Staplehurst	SPC?	?	2011	County Councillor

features and qualities of the village centre.					
Allotments - purchase of land for development of 50 plots.	Staplehurst	SPC	?	2012-16,	CIL & ?
Allotments - contribute towards the development of existing allotment(s)?.					
Improvements to the facilities at Staplehurst Primary School <i>(will need to identify specifics)</i>	Staplehurst	KCC	?	2012-16, 2017-21, 2022-26	CIL, KCC
Improvements to Staplehurst Health Centre <i>(will need to identify specifics)</i>	Staplehurst	PCT successor	?	2012-16, 2017-21, 2022-26	PCT successor, CIL, Malling Health
Improvements to Existing Parking – Bell Lane etc....take over Bell Lane?					
Provision of New Parking Areas – sites to be determined <i>(this aspect has to be considered as well as income generation)</i>					
Toilets – <i>(area for further consideration)</i>					
Acquisition of land/exchange of land with a view to build Affordable Housing?					