



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

Our ref: DHA/14589  
26 November 2020

**By E-Mail Only to [neighbourhoodplanning@maidstone.gov.uk](mailto:neighbourhoodplanning@maidstone.gov.uk)**

Dear Sir or Madam,

### **OTHAM PARISH COUNCIL HAS PREPARED A NEIGHBOURHOOD DEVELOPMENT PLAN**

On behalf of Bellway Homes, I am writing with regards to the Regulation 16 Public Consultation of the Otham Parish Neighbourhood Plan (which commenced on 16 October and closes on 27 November 2020).

Bellway Homes are currently have two planning applications submitted for the residential development of land west of Church Road (strategic housing allocation H1 (8) of the adopted Maidstone Local Plan) which are currently being considered at appeal.

Bellway Homes are objecting to the draft Neighbourhood Plan on the basis that the Neighbourhood Plan does not comply with the strategic policies of Maidstone Borough Council adopted Local Plan (2017). This is in line with Maidstone Borough Council's views and objections to the draft plan.

The National Planning Policy Framework (NPPF) states that Neighbourhood Plans should:

- Support the delivery of strategic policies set out in local plans, shaping and directing development that is outside of the strategic policies (paragraph 13);
- Avoid unnecessary duplication of policies that apply to a particular area (paragraph 16(f)); Only contain non-strategic policies (paragraph 18); and
- Be in general conformity with the strategic policies contained in any development plan that covers their area (paragraph 29).

Draft Policy AC1 of the Neighbourhood Plan states:

- *Housing development will be supported if it does not result in the coalescence of the village of Otham with urban Maidstone or other villages.*
- *Within the parcels of land identified as having high or moderate anticoalescence value (shown on map 6.1), any development which results in a significant adverse impact on maintaining its anti-coalescence function will not be supported.*

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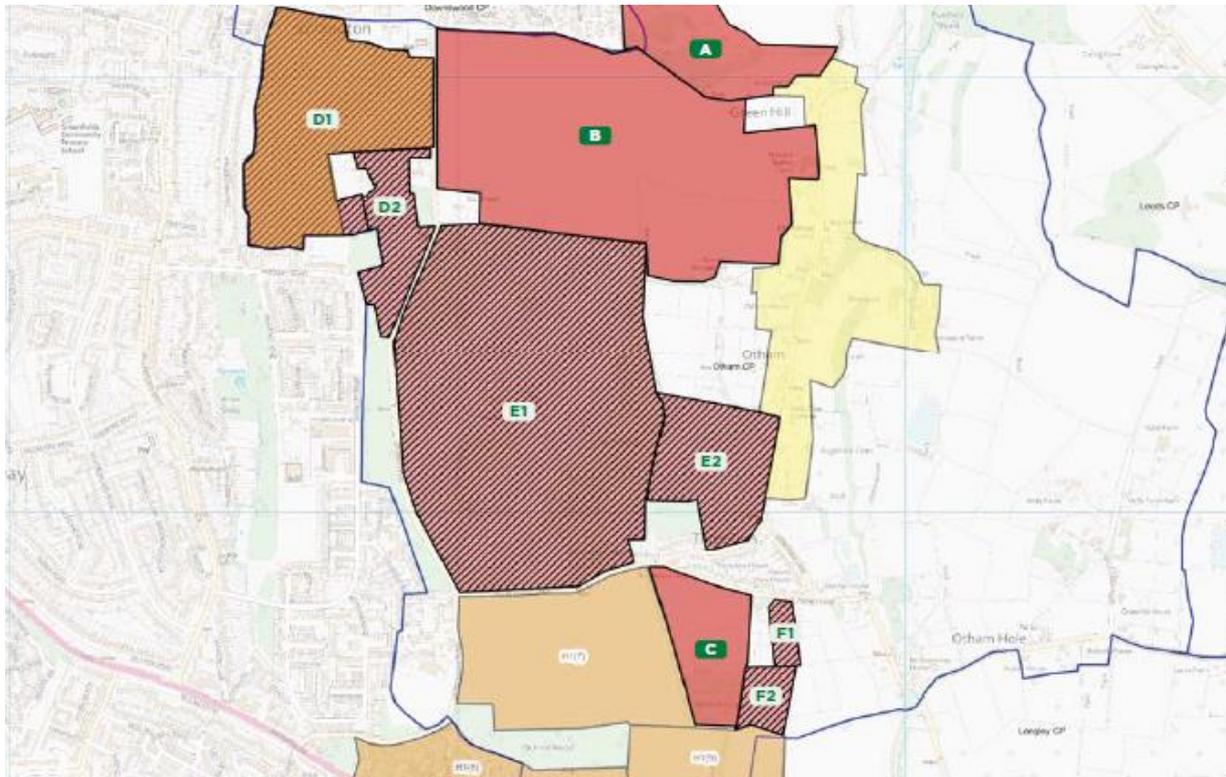
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Map 6.1 identifies three areas of high anti-coalescence function (A/B/C) and six areas of moderate anti-coalescence function (D1/D2/E1/E2/F1/F2).



Policy AC1 criterion 2 does not support the delivery of the strategic policies of the adopted Maidstone Borough Local Plan, it does not comply with strategic policies SS1(9) and SP1 or policy H1 (8). The purpose of the Local Plan anti-coalescence policy is to prevent the merging of settlements and to protect their individual character, not to stop development. Policy AC1 criterion 2 seeks to introduce restrictions to development that go above and beyond what is required by policies SS1(9) and SP17.

Additionally, the anti-coalescence layers shown on map 6.1 overlap:

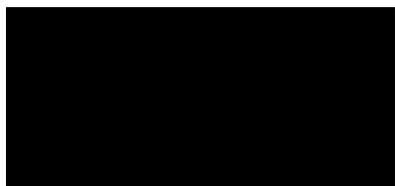
- A housing site allocation at West of Church Road, Otham (Map 6.1 Area D1), contrary to local plan strategic policy H1(8); and
- Part of the designated Len Valley Landscape of Local Value (Map 6.1 Area A), contrary to local plan strategic policy SP17(6); and Map 6.1 is not clear on the extent of the anticoalescence policy northwards for Area A; and



- Designations of Local Green Space areas proposed in the neighbourhood plan, which will have protection equivalent to national Green Belt policy (Map 6.1 Areas part D2, part C and F2).

Consequently, Bellway Homes raises objection to the second criterion of policy AC1 and seeks the deletion of the criterion, together with the deletion of map 6.1 and supporting text on page 24 of the neighbourhood plan.

Yours sincerely,



Matthew Woodhead  
*Director*