

**MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION
WRITTEN SUBMISSION BY CPRE KENT &
MAIDSTONE DISTRICT COMMITTEE OF CPRE KENT**

SESSION 5B - SOUTH EAST MAIDSTONE STRATEGIC DEVELOPMENT

Qn5.13 Given the amount and location of development that is already committed what would be the marginal impacts in these regards of the developments that have not as yet been granted planning permission?

Allocation sites H1(8) 440 dwellings and H1(9) 335 dwellings [775] represent 21.7% of the SE Maidstone Strategic Development.

The impacts of the sites will be additional traffic congestion on the Sutton Road and at the Wheatsheaf Junction, a potential increase in air quality, effect on the setting of listed buildings, and reduce the green gap.

The Wheatsheaf junction lies within the Maidstone AQMA [see Appendix 1]. At 2013 there were three Diffusion tube monitoring points at or near to the junction [see Appendix 2]. The Maidstone Borough Council LAQM Progress Report 2013, Bureau Veritas Air Quality, October 2013 at Table 3 of the Progress report shows that Site 53 at the Wheatsheaf PH had a 'worst case exposure', and Appendix A to the report provides data on NO₂ monthly from January to December. This shows that only during July and December did NO₂ were concentrations under the annual mean average of 40µg/m² (as set out on page 26) , for the rest of the year they exceeded 64, on reached 93.7 in November [see Appendix 3].

A recent Planning Opinion of Robert McCracken QC on Air Quality and emissions¹ sets out that:

'65 ... planning authorities have a duty in their decision making to seek to achieve compliance with the Directive's limit values.

66 Where a development would cause a breach in the locality of the development they must refuse permission.

67 Where a development would in the locality either make significantly worse an existing breach or significantly delay the achievement of compliance with limit values it must be refused.

68 Where limit values are not exceeded in the locality planning authorities must try to prevent developments from worsening air quality and to achieve best air quality ...'

It seems highly unlikely that the allocations will not have a detrimental effect on Maidstone AQMA, especially when considered in combination with housing allocations and planning permissions in the south east strategic development location, as well as allocations and permissions at Headcorn, Coxheath, Staplehurst, Marden and Boughton Monchelsea which are likely to result in increased traffic at the Wheatsheaf junction.

With regards to listed buildings and their settings allocation H1(8) will have an effect on the setting of The Rectory, Church House, the Monument to Thomas Carter, Church of St Nicholas, and Monument north of Church of St Nicholas listed buildings. Whilst allocation H1(9) The effect on the setting of Bishops, Rumwood, Tile Barn and Langley Park listed buildings. Evidence will be required that the scale of development can be accommodated on the sites without adversely affecting the setting of these listed buildings.

¹ Air Quality and emissions. Clean Air in London; Air Quality Directive 2008/50/EC and Planning Opinion of Robert McCracken QC, Frances Taylor Building. E-law January/February 2016

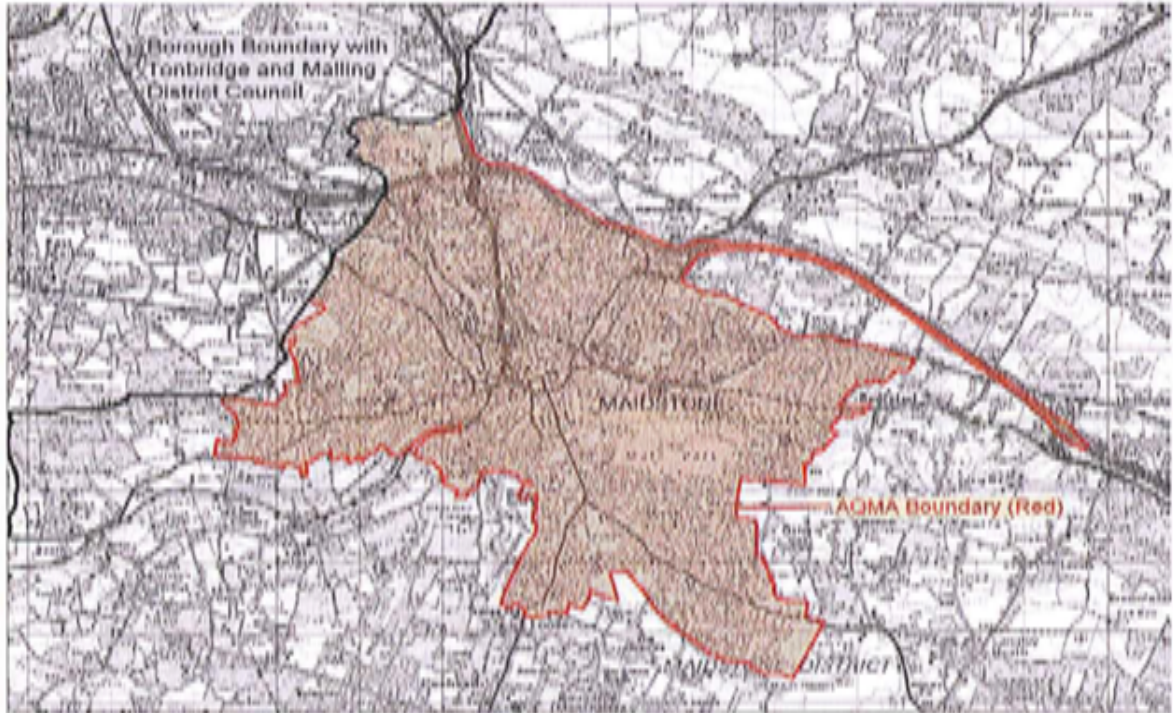
MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION
WRITTEN SUBMISSION BY CPRE KENT &
MAIDSTONE DISTRICT COMMITTEE OF CPRE KENT

Appendix 1: Figure 1 Maidstone AQMA

Bureau Veritas Air Quality

Maidstone Borough Council

Figure 1 Maidstone AQMA



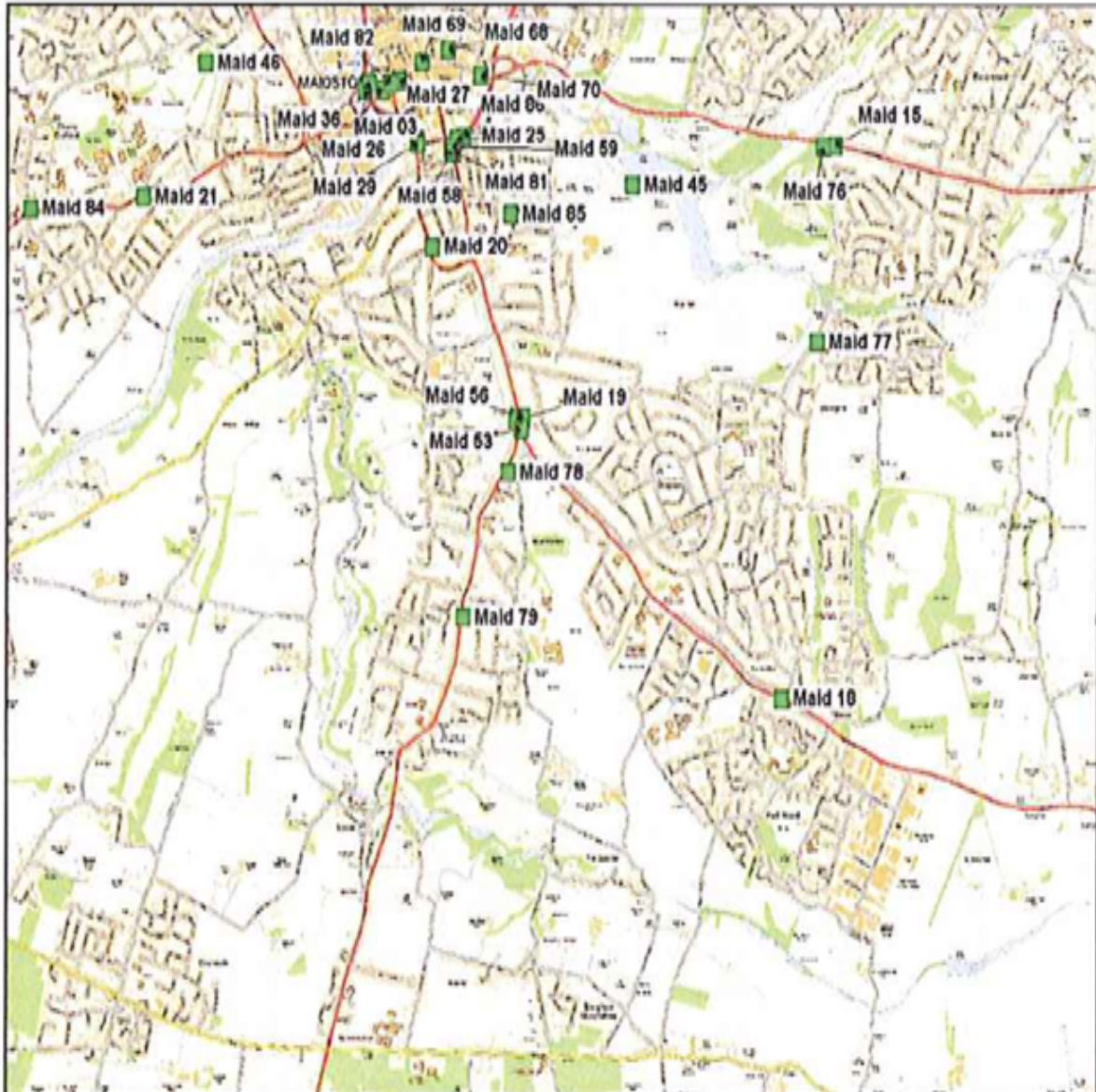
MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION
WRITTEN SUBMISSION BY CPRE KENT &
MAIDSTONE DISTRICT COMMITTEE OF CPRE KENT

Appendix 2: Figure 4 Location of Diffusion tube monitoring - South Maidstone

Bureau Veritas Air Quality

Maidstone Borough Council

Figure 4 Location of Diffusion tube monitoring – South Maidstone



**MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION
WRITTEN SUBMISSION BY CPRE KENT &
MAIDSTONE DISTRICT COMMITTEE OF CPRE KENT**

**MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION
WRITTEN SUBMISSION BY CPRE KENT &
MAIDSTONE DISTRICT COMMITTEE OF CPRE KENT**

Appendix 3: Appendix A: QA:QC Data

Bureau Veritas Air Quality

Maidstone Borough Council

Monthly Diffusion Tube Results

Site Ref	NO ₂ Concentrations µg/m ³											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Maid 03 Tube 1	63.2	59.6	66.8	44.5	51.1	36.5	30.2	34.6	48.8	49.1	61.0	57.4
Maid 03 Tube 2	48.7	48.9	64.6	47.2	41.6	45.1	25.5	39.4	40.6	60.1	54.5	56.2
Maid 03 Tube 3	45.0	60.9	51.7	52.4	38.6	33.7	42.1	38.3	47.4	52.5	59.0	56.2
Maid 06 Tube 1	26.9	44.3	26.8	13.8	12.1	9.2	21.6	18.6	14.3	20.9	22.1	25.0
Maid 06 Tube 2	25.3	26.7	26.6		13.2	9.7	16.5	14.2	14.9	18.5	23.2	25.4
Maid 06 Tube 3	25.7	26.7		13.6	11.1	9.8	33.9	14.0	15.2	18.8	22.2	25.0
Maid 10	43.2	53.5	51.0	36.1		24.7	11.3	23.8	36.2	39.5	37.1	51.0
Maid 11	40.8	39.9	35.2	29.3	26.0	29.0	11.3	37.0	34.8	36.8	40.1	41.3
Maid 12	52.3	42.2	30.0	31.3	26.6	24.9	11.5	30.3	31.9	39.8	42.7	38.9
Maid 14	45.1	40.5	51.5	35.7	38.4	26.3	27.0	24.6	39.2	22.8	35.5	46.0
Maid 15	40.0	37.0	38.6	25.5	24.2	19.9	20.3	20.7	37.8	24.5	28.6	33.9
Maid 18	37.6	34.4	51.2	27.7	32.6	21.1		17.2	29.8	29.6	28.7	32.6
Maid 19	36.4	38.8	44.6	30.5	30.4	21.1	42.3	21.6	29.4	30.8	29.3	34.1
Maid 20	49.4	44.9	51.6	32.4	39.6	26.0	39.0	21.6	29.1	34.4	34.7	49.5
Maid 21	55.0	50.2	53.0	39.1	38.1	26.2	27.4	26.2	37.0	42.6	45.7	
Maid 22	57.9	42.8	47.2	32.5	28.1	27.7	36.0	31.3	36.3	35.3	43.3	47.0
Maid 24	39.0	39.7		27.4	29.1	16.1	21.9	19.1	28.9	29.5	31.8	37.2
Maid 25	46.5		60.9	41.5	43.9	33.5	23.1	37.9	42.8			
Maid 26	49.7	47.4	45.3	38.6		35.3	31.3	35.7	40.0	40.9	38.8	47.9
Maid 27	57.4	55.6	58.5	43.4	48.9	39.5	36.7	37.8	45.9	46.9	53.9	53.9
Maid 29	47.7	51.9		35.7	29.5	21.6	24.0	23.8	32.4	37.7	43.7	50.9
Maid 36	54.3				59.0	35.6	15.8		59.7	52.3	51.5	62.7
Maid 41	54.2	47.9	50.2	46.2	37.9	39.9	17.1	50.3	47.8	46.1	59.4	
Maid 44	64.0	63.7	65.8		56.7		27.2	35.4	46.6	51.3	48.6	61.3
Maid 45	35.1	35.2	30.4	21.8	21.5	15.7	42.6	17.4	22.4	26.7	15.8	34.3
Maid 46			12.6	16.4			52.1	11.4			23.9	25.1

**MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION
WRITTEN SUBMISSION BY CPRE KENT &
MAIDSTONE DISTRICT COMMITTEE OF CPRE KENT**

Bureau Veritas Air Quality

Maidstone Borough Council

Site Ref	NO ₂ Concentrations µg/m ³											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Maid 49	57.6	59.8	63.9	48.4	49.4	42.2	42.6	37.1	48.7	50.0	45.6	54.6
Maid 50	36.0	39.8	42.1	25.2	25.8	15.0	24.6	21.0	23.7	27.6	33.2	34.9
Maid 51	65.9		72.4	54.6	52.8	35.1	24.2	38.2	47.8	60.3	55.4	57.9
Maid 52	64.8	54.9	70.5	52.2	46.7	43.2	39.6	45.1	50.4	55.7	63.1	52.3
Maid 53	64.4	75.9	80.5	77.1	68.0	67.2	37.0	67.7	72.9	72.8	93.7	36.2
Maid 55	51.0	53.8	59.8	55.6	39.7	46.3	71.3	64.2	49.1			
Maid 56 Tube 1	37.4	44.4	40.9	31.8	32.0	22.7	36.8	26.3	30.4	31.3	42.3	87.3
Maid 56 Tube 2	36.6	39.6	41.1	30.4	31.0	21.0	42.9	25.3	29.2	32.3	38.0	
Maid 56 Tube 3	39.8	36.1	40.3	30.5	34.6	22.4	37.8	25.8	27.1	30.7	36.3	
Maid 57 Tube 1	58.8	47.9	53.4	43.1	48.8	33.1	21.0	33.8	45.7	47.1	50.4	50.0
Maid 57 Tube 2	45.7	58.1	55.2	45.7	47.2	30.6	32.4	47.0	53.1	49.5	54.2	51.4
Maid 57 Tube 3	58.2	51.6	58.4	42.3	48.4	35.3	36.6	36.6	51.1	43.5	50.4	44.2
Maid 58	113.4	105.0	112.1	118.4	92.1			109.4	101.8	103.4		
Maid 59	87.6	3.8	88.5	101.4	122.0			81.3	75.3	90.3		
Maid 63	44.6	45.8	51.8	42.1	37.3	38.2	29.6		44.7	43.0	59.9	57.1
Maid 65 Tube 1	46.2	41.7	37.5	28.1	23.1	22.8	34.8	25.6	29.3	33.2		
Maid 66 Tube 1	32.5	47.1	41.3	42.8	34.5		24.2	42.5	29.8	42.6	55.9	41.6
Maid 66 Tube 2	43.8	42.9	48.5	42.6	34.1	38.7	25.6	43.1	29.6	40.2	55.9	45.4
Maid 66 Tube 3	37.2	46.4	47.3	41.2	33.8	38.2	20.4	44.2	26.5	46.3	55.8	44.4
Maid 67	32.6	32.5	38.9	23.7	22.6	17.2	104.3	18.5	29.4	23.4		30.5
Maid 68	48.9	56.2	50.2	39.5	33.5		34.9	38.6	44.3	46.7	48.3	50.8
Maid 69	41	38.4	32.9	26.3	22.5	21.2	24.1	26	29.6	33.6		41.7
Maid 70	61.9	58.4	58.3	44.5	42.3	35.6	25.6	42.8	48.1	47.1	51	58.1