

# MAIDSTONE BOROUGH COUNCIL LOCAL PLAN EXAMINATION

## SESSION 7 RURAL SERVICE CENTRES

This statement is made by Lenham Parish Council (R19154) supported by Sandy MacKenzie (R19314) on behalf of Lenham Neighbourhood Plan Group.

### ISSUE (i) Whether the designation of rural Service Centres is justified as the most appropriate strategy when considered against any reasonable alternatives?

Qn7.1 If the level of housing identified in the Local Plan is confirmed at 18,560 (or a similar figure), what reasonable alternative strategy would be preferred by those who oppose the scale of housing development proposed at the rural service centres and why?

#### 1. Alternative Strategy

##### 1.1. Definition of Rural Service Centre (RSC):

- 1.1.1. The issue is not about the designation as an RSC. The question is RSC for whom and to what purpose?

Most of these centres fulfil the role of RSC already. They already serve a rural community which lives in hamlets and farmsteads located in the countryside where no services are available. This rural community relies on the services provided by the RSCs.

The assumption that certain services exist means that the location is automatically targeted for development after Maidstone but without actually considering properly the limits and constraints on the location e.g. close proximity to AONB, drainage and sewerage, railway service that is slow and infrequent and does not encourage significant use.

1.1.2. The problem is that MBC in its spatial strategy has given these RSCs a different function:

Accommodating housing allocations which apparently cannot be accommodated in the town, the urban fringe or other urban areas. Thus RSCs serve the need of the town and take on the function of suburbs.

1.2. Issues with this interpretation of RSC:

1.2.1. RSCs are not cost effective in the longer run.

Public Services such as waste disposal, street cleaning, sewerage disposal can be provided much more effectively both from a cost and ecological perspective in areas of high density.

Private services run on commercial lines, for example clubs, cinemas, sport centres, theatres will not locate in RSCs but in areas with high population density (town and urban fringe).

1.3. A dispersed development strategy is environmentally most damaging:

1.3.1. The need to travel is an integral part of this spatial strategy. Residents of RSCs, in most instances, already have to travel long distances for every aspect of life (work, leisure, education, service provision) which we feel is not appropriate even considering that travel can place via public transport. The RSCs all have a railway connection which is desirable but the slow and infrequent service provided from Lenham and Harrietsham simply acts to encourage the use of car transport either to the end destination or to Headcorn so as to use the faster and more frequent service available from there.

Even so these journeys invariably cannot be taken from beginning to end with one means of transport; additional transport will likely be involved whether it be car to the station or bus to and from the final destination.

The location of development in RSCs simply means even more people will be on the move at rush hour (with the total hours of commuting time increasing as opposed to instead of quality of life time).

1.4. Some services can be provided more efficiently both in terms of cost and ecological impact if they operate on a larger scale:

1.4.1. Large capacity sewerage works are fitted with anaerobic digesters which remove pollutants such as nitrate and phosphate from effluent. The damage to the watercourse into which the cleaned effluent is discharged is much less.

1.4.2. The very worst scenario is when many small sewerage works discharge effluent without tertiary treatment in one waterbody. The accumulation of nitrates and phosphate can seriously damage aquatic life.

1.5. A dispersed development strategy does not strategically address different social needs:

1.5.1. Different needs in the population make RSCs less attractive for a certain sector of the population.

1.5.2. It is more difficult to find part time work for a parent who has childcare responsibilities if this parent lives in a RSC with few employment opportunities.

1.5.3. Educational choice is more difficult to achieve if families live in RSCs. There are school children in rural Maidstone Borough who have to travel 2 hours daily on a school bus to reach their school of choice.

1.5.4. Strategic reliance on a single rural secondary school, as in Lenham, will have the consequence that many families will not exercise educational

choice for the children as the associated travel would burden the organization of family life.

1.5.5. Young people who enjoy an active social life find RSCs unattractive on account of the lack of desired facilities.

#### 1.6. Alternative Strategy: Living in Town/Urban areas:

1.6.1. Maidstone Borough benefits from a high proportion of the Borough sitting within or in the setting of Areas of Outstanding Natural Beauty. It is a core principle of the Spatial Strategy Framework that the character, beauty and diversity of the countryside is enhanced and protected while development supports land-based activities and other aspects of the countryside economy.

1.6.1.1. Large scale development, rather than proportionate development, of an RSC will not meet this core principle.

1.6.2. In addition to Maidstone, designate an area adjacent to Maidstone to be developed (or create a new settlement with the goal of it developing into a town i.e. not a new village as was considered at one stage). Consideration should be given to using a new town being planned by a neighbouring authority such as Ebbsfleet.

1.6.3. Location should be based on defined (fixed) selection factors:

1.6.3.1. landscape impact

1.6.3.2. ecological networks

1.6.3.3. existing population density in the area

1.6.3.4. ability to deliver employment close to the location

1.6.3.5. ease of providing Infrastructure

1.6.4. Develop midrise buildings near to town centres. Recognise a goal of focussing on apartment living and give efficient effect to the Maidstone Borough occupancy forecast of 1.9 person per dwelling).

1.7. Take opportunity of to deliver economies of scale:

1.7.1. Large capacity sewerage works.

1.7.2. Opportunities for several secondary schools (dependencies from existing schools) would decrease need to travel.

1.7.3. Regular bus services within this town and into this town from outlying areas.

1.8. Employment / Mixed Development Area:

1.8.1. We believe that Detling Airfield which is strategically well located between the M2 and M20 would, for reasons covered by KCC, make an ideal location for warehousing / mixed development.

1.8.2. Detling Airfield is partly a brownfield site.

1.8.3. It is not overlooked from the AONB and would not impact on the amenity qualities of other areas of AONB.

1.8.4. Modern warehousing operations operate largely automatically and do not need many staff so avoiding the need for heavy inward commuting.

**ISSUE (ii) Whether the designation of Lenham as a Broad Location for 1,500 dwellings is justified, effective and consistent with national policy?**

(See attached copy of letter of representation dated 18<sup>th</sup> March 2016 from Lenham Neighbourhood Plan to the Spatial Policy Team, Maidstone Borough Council)

No. We do not support the conclusions of the McClusky Sustainability Appraisal (2014, updated 2016). It is neither justified nor effective nor consistent.

A. Sustainability

- a. The sustainability appraisal compared Lenham with Headcorn only (one has to ask why no comparison was made with Marden or Staplehurst, or all three RSCs together, as they are only a few miles from each other?)
- b. Lenham was chosen in part because of problems with sewage disposal in Headcorn. The situation of sewage disposal in Headcorn is so bad that any development in Headcorn is not sustainable. The Draft Local Plan however allocates housing growth in Headcorn. This would involve upgrading of sewerage works in Headcorn to current standards. Lenham sewerage works has been shown not to be able to cope with the proposed tripling of the population due to lack of flow of surface water.
- c. The location “Lenham” was chosen as the presence of a secondary school was seen as an advantage when compared with other RSCs. The question has to be asked whether a ‘small’ rural secondary school (with less than 1000 places) can be classed as an advantage in supporting a 100% enlargement of a village and the service centre.



- i. The allocation of land at Lenham as 'broad allocation' ignores NPPF guidelines as follows:

i. Landscape:	§109, § 110
ii. Wider benefits of ecosystem services:	§ 109
iii. Agricultural Land quality (NPPF 112): 110	§ 109, § 110
iv. Wider benefits of ecosystem services:	§ 109
v. Agricultural Land quality	
vi. Planning for potential brownfield site use: 111	§ 109 § 111
vii. Heritage sites (NPPF 129)	

18<sup>th</sup> October 2016