

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

SESSION 8 - EMPLOYMENT POLICIES AND ALLOCATIONS

3. EMP1(5) WOODCUT FARM

Issue (iii) Whether the proposed allocation is justified and consistent with national policy and whether it would be effective in terms of deliverability

Qn8.17 Having regard to the conclusions of the Secretary of State in relation to the heritage impacts of the larger KIG proposal and to the Planning Committee's conclusion of a less than substantial adverse impact on the setting of one Grade II listed building, would heritage impacts alone be capable of being outweighed by the public benefits of the development? and

Qn8.18 Would there be scope for mitigation in the scale, design or mix of the development to reduce its landscape and visual or heritage impacts to an acceptable degree when weighed with the economic or other public benefits of the scheme? and

Qn8.19 What reasonable alternatives for a development of similar strategic scale may have a less adverse landscape or visual impact, including in their effect on the AONB and its setting?

CPRE Kent set out its serious concerns about this allocation in its representation on the Regulation 18 Consultation 2015 and set out the reasons why we consider that the allocation was unsound.

Planning history for the development of employment locations at and around M20 Junction 8 shows that this is a controversial area for development, first with the Kent International Gateway application and then more recently with the Waterside Park application. Both of which were refused on appeal / inquiry.

The planning appeal for employment uses on land to the south at Waterside Park was refused. The Inspector raised concerns regarding the visual and landscape impact, including the setting of the AONB; the loss of countryside; harm to the setting of heritage assets; the impact of development reducing gaps between existing scattered developments to give the appearance of a mass of development which would be detrimental to the wider landscape and rural character; that workers would predominantly access the site by private car / motorcycle; the high sensitivity of walkers using the public rights of way in the AONB. These concerns also apply to the Woodcut Farm Site.

The Sustainability Appraisal (ORD 006) assesses the allocation as scoring red for access to centres, proximity to bus stop or train station or cycleways and landscape capacity to change. The scoring for listed buildings is amber - but only because this criterion provides for amber or green, and not red - so it is still the worst assessment that the SA allows for. It is noted that there is inconsistency between the Sustainable Appraisal (ORD 006) Table 4.4 Employment site options and ORD 006 Appendix B - Employment Site Options.

The allocation site lies within the Landscape Character Study White Heath Farmlands area (ENV 001) states that *'This is a sensitive location in that the landscape provides the setting to the Kent Downs AONB to the north.'* The summary of actions includes: *'Improve the rural setting of the Kent Downs AONB through avoiding further urban edge influences and expansion of motorway services to the north of the M20.'*

It is noted that the Council's Planning Committee at its meeting of 30 June 2016 resolved to refuse application 15/503288 for 46,623 m² mixed commercial development (B1(a), (b) and (c), and B8) for the following reason:

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'The proposed development would be harmful to the character and appearance of the countryside, Special Landscape Area, and the setting of the Kent Downs Area of Outstanding Natural Beauty and any benefits are not considered to outweigh this harm. It would also cause less than substantial harm to the setting of the Grade II listed building 'Woodcut Farm' and any public benefits are not considered to outweigh this harm. The development would therefore be contrary to saved policies ENV21, ENV28, and ENV34 of the Maidstone Borough-Wide Local Plan 2000 and advice within the National Planning Policy Framework 2012.'

In CPRE Kent's view the deletion of the Woodcut Farm allocation would not make the plan unsound.

4. WATERSIDE PARK - ADDITIONAL OR ALTERNATIVE SITE PROPOSAL

Qn8.21 Do participants agree or disagree with the SA assessment and how might the reduced scale of the development now proposed by the Representor affect those conclusions?

CPRE Kent does not consider that this site is a suitable location for development.

Planning history for the development of employment at and around M20 Junction 8 shows that this is a controversial area for development, first with the Kent International Gateway application and then more recently with the Waterside Park application. Both of which were refused on appeal.

The Inspector raised concerns regarding the visual and landscape impact, including the setting of the AONB; the loss of countryside; harm to the setting of heritage assets; the impact of development reducing gaps between existing scattered developments to give the appearance of a mass of development which would be detrimental to the wider landscape and rural character; that workers would predominantly access the site by private car / motorcycle; the high sensitivity of walkers using the public rights of way in the AONB.

In CPRE Kent's view nothing has changed to alter or remove these concerns.

The Sustainability Appraisal (ORD 006) assesses the allocation as scoring red for access to centres, proximity to bus stop or train station or cycleways and landscape capacity to change. The scoring for listed buildings is amber - but only because this criterion provides for amber or green, and not red - so it is still the worst assessment that the SA allows for. It is noted that there is inconsistency between the Sustainable Appraisal (ORD 006) Table 4.4 Employment site options and ORD 006 Appendix B - Employment Site Options.

NPPF paragraph 35 requires developments to be located and designed where practical to, inter alia, give priority to pedestrian and cycle movements, and have high access to quality public transport facilities; and consider the needs of people with disabilities by all modes of transport.

This area is 1.5km from the nearest edge of the Maidstone urban area and is nearly 4 miles from the town centre. It is not well located for pedestrians, cyclists or people with disabilities. It is also not well served by public transport. It has one bus service and this only provides an hourly weekday service linking Maidstone and Ashford. The Sustainability Appraisal Technical Appendix B: Employment Site Options Interim Sustainability Findings September 2015 considers the nearby Woodcut Farm site and concludes that the site is not easily accessible to a cycle route, train station, bus stop or the Maidstone urban area.

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Paragraph 37 states that policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment.

The allocation of land in this location is contrary to the NPPF and therefore unsound.

5. RURAL BUSINESS DEVELOPMENT - POLICIES DM20 AND DM41

Issue (v) Whether the policies for rural business development are justified and would be effective and consistent with national policy

Qn8.29 What does 'priority' mean in this context and is the policy wording clear enough to be effective?

CPRE Kent is concerned that the criterion could allow an intensification of use in such buildings to the detriment of the locality. We consider that the following text should be added to the end of the criterion: *'provided the economic development, in terms of its scale and impacts, is suited to the site and appropriate for the location.'*

Qn8.30 - 34 on Policy DM41

CPRE Kent has commented on Policy DM41 in Hearing Session 11 as follows:

CPRE Kent would be happy to withdraw this concern regarding external lighting if our suggested change for DM7 is accepted.

Where our comment on DM7 was:

NPPF paragraph 125 deals with light pollution and sets out that by encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. It would be reasonable and consistent with the NPPF for the policy to include a new criterion 3 that reads along the following lines: *'Where lighting would have an adverse impact on residential areas or properties, or the countryside the Council will include conditions on the hours of operation.'*

Proposed change PC/51 is welcomed. It does not however address our concern set out above.