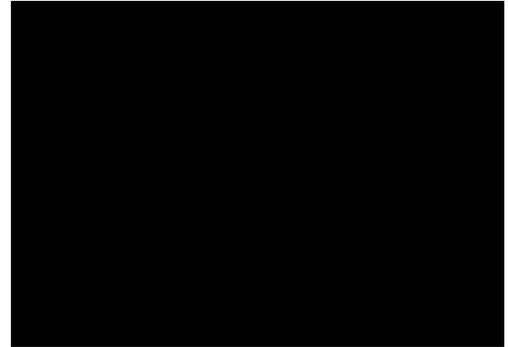




Ms Anna Ironmonger
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**Growth, Environment
& Transport**



BY EMAIL ONLY

28 September 2019

Dear Anna

Re: Boughton Monchelsea Neighbourhood Development Plan - Regulation 16 Consultation

Thank you for consulting Kent County Council (KCC) on the Boughton Monchelsea Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the Neighbourhood Plan.

Section 3.0 Background to the Neighbourhood Plan

3.1 A Brief History

The County Council is pleased to see that the history of the Parish includes archaeological aspects of Boughton Monchelsea's past. There are however further aspects which KCC recommends are also referenced, as detailed below.

The Parish has considerable potential for the discovery of Palaeolithic archaeological remains. Pleistocene mammalian remains have been found in loam-filled fissures in the Lower Greensand (Hythe Beds) at the quarries. These include bovid, red deer, horse, hyena, mammoth and woolly rhinoceros. Mesolithic flints have been found at Furfield Quarry and Neolithic axes and knives have been found in the Parish.

It was during the iron age that the area began to be used more intensively. The Iron Age enclosure at Quarry Wood Camp had extensive outlying remains including earthworks that

still exist along the lane. An iron age ditch, possibly part of a wider earthwork complex, has been found at Roman Way. There are possible iron age features at Pested Bars Road, a late iron age occupation site at Furfield Quarry and at Amber Green Cottage, and there have been numerous discoveries of iron age coins from across the Parish. The area was well used during the period, partly perhaps due to a fork in the Roman road in the Four Wents area, but also probably due to the presence of Ragstone quarries. In addition to the bath-house mentioned in the text, there was a walled cemetery at Lockham Wood, a building at Roman Way and occupation at Furfield Quarry and Pested Bars Road.

There is less evidence of Anglo-Saxon activity in the area, but features have been found in the Pested Bars Road area. Medieval activity would have focused on the village of Boughton Monchelsea and there are numerous medieval buildings, mostly farmhouses, in and around the village which also includes St. Peter's Church.

3.2 Why do we need a Neighbourhood Development Plan?

Current challenges

This section of the Neighbourhood Plan discusses the need to maintain the Parish's rural character and plan settlement growth carefully. There are now a number of tools to help with this. KCC has worked with English Heritage (now Historic England) and the Kent Downs and the High Weald Area of Outstanding Natural Beauty (AONB) Teams to prepare guidance on how historic farmsteads in Kent can be assessed for their suitability for new development or change of use¹. Where such development is permitted, it is important that it is in keeping with the existing character in terms of size, layout, routeways, massing and materials and that any archaeological remains associated with former phases of use are treated appropriately in the development control process.

3.4 The relationship between the draft Neighbourhood Plan and Maidstone and national planning policies

Public Rights of Way and Access Service

KCC recommends that reference to the County Council's Rights of Way Improvement Plan (ROWIP) is included within the Neighbourhood Plan. This will enable successful partnership working to continue and deliver improvements to the Public Rights of Way (PRoW) network in Boughton Monchelsea. Joint delivery of the strategic plan will ensure significant benefits and its omission could result in significant loss of access to additional funding opportunities.

Section 4.0 About our Parish

4.4 Designated and non-designated heritage assets in the parish

The text states that Appendix 3 contains a list of non-designated heritage assets in the Parish and that these have been identified by the local community. However, all of the items are architectural features and buildings and it does not include any archaeological sites or

¹ <http://www.highweald.org/look-after/buildings/farmsteads-and-hamlets.html>

historic landscape features, which are also eligible to be considered as heritage assets. No list of non-designated heritage assets can ever be truly comprehensive, as new assets are being identified all the time, but if the appendix is intended to be as comprehensive as possible, it should state that it only comprises architectural assets and other heritage assets can be found on the Kent Historic Environment Record². The County Council would support this policy with the proposed modifications.

4.5 Parish Landscape Character and Landscape Assessment

Boughton Monchelsea is an historic landscape that contains many surviving historic features, such as the patterns of tracks, lanes and hedgerows that give character to the Parish. When considering the impact of either development or intensive agriculture on the countryside, it is important to understand the historic development of the landscape so that its essential character can be conserved. The Kent Historic Landscape Characterisation (2001) has identified the broad historic character of the landscape of Kent. Where it is to be applied locally, further study is needed to refine its conclusions, but it remains an essential tool for understanding Boughton Monchelsea's landscape. To be fully effective in local planning and development management, the Historic Landscape Characterisation should be backed up by more detailed case-by-case analysis at a parish level, to add greater detail through secondary sources. This would make a good volunteer project for the Parish Council and KCC would be happy to discuss this further.

Section 5.0 Policies and Proposals

Highways and Transportation

The County Council, as Local Highway Authority, has no additional comments to raise further to those previously set out within the KCC response to the Regulation 14 consultation dated 7 June 2019.

Waste Management

The County Council, as Waste Disposal Authority, has a statutory responsibility under the Environmental Protection Act 1990 for the handling and final disposal/treatment of all waste collected from residential properties within the administrative boundary of Kent.

The County Council requests that consideration is given within the Neighbourhood Plan to the pressure that additional housing will place upon waste infrastructure for the handling and disposal/treatment of waste. Delivery of new homes within the Boughton Monchelsea Parish will place significant demand upon KCC Household Waste Recycling Centre (HWRC) facilities in the area. It will also increase demand for recycling facilities that deal with kerbside collected waste, known as Material Recycling Facilities (MRFs), for which there is a national shortage.

The County Council requests reference to the need for development contributions towards new waste infrastructure in the wider area, from new housing developments within the

² www.kent.gov.uk/HER

Parish. KCC acknowledges that there are currently no waste management facilities within the Boughton Monchelsea Parish. These types of facilities are strategic in nature, serving a wide area, typically at district level. The Maidstone HWRC at Tovil, which serves the residents of Boughton Monchelsea Parish, is at operational capacity and hence any increase in waste tonnages in the future, as a result of development, would require mitigation.

KCC has recently submitted two projects for inclusion in Maidstone Borough Council's Infrastructure Delivery Plan, both of which are required to increase waste capacity at the Maidstone HWRC as a direct consequence of planned residential development in parishes such as Boughton Monchelsea. The County Council also has a larger strategic project to secure processing capacity at MRF for all recycling collected at the kerbside by the Waste Collection Authority.

Sustainable Business and Communities

The County Council welcomes the focus given to climate change and the environment throughout the Neighbourhood Plan.

Emergency Planning and Resilience

All policies within the Boughton Monchelsea Neighbourhood Plan should take into account of declarations and commitments regarding climate and ecological emergencies made by Maidstone Borough Council and KCC.

5.1 Parish – Wide Policies (PWP)

Waste Management

The County Council requests that waste is referenced within this section as a parish-wide policy; and that the need for expansion of the Maidstone HWRC in the short term and relocation in the longer term is also acknowledged. Parishes such as Boughton Monchelsea will find accessing these facilities more difficult in the future as demand from new development across the borough increases, and capacity issues will mean queues to use the facility will increase unless identified projects are supported. Similarly, additional capacity at Material Recycling Facilities will be required. The County Council will request developer contributions from new housing developments in order to support the delivery of additional capacity required as a result of growth. The County Council proposes adding new policies and supporting to set out the following:

- That the construction of new dwellings will create a requirement for additional capacity at household waste recycling centre (HWRC) facilities and Material Recycling Facilities (MRF) to serve the Parish.
- That the Neighbourhood Plan supports additional investment in HWRC capacity through the expansion of the existing Maidstone HWRC in the short term and in the long term supports its relocation to allow further required increase in capacity over the life of the Local Plan.

- That contributions from housing developments are made towards a strategic project to secure processing capacity at an MRF for kerbside collected recycling.

PWP 5 - Improving landscape and amenity access between South Maidstone and Boughton Monchelsea

The County Council notes the inclusion of the wording ‘Public Rights of Way’ (PRoW) as an example of suitable recreational use. The inclusion of a specific PRoW reference within this policy text is welcomed and supported as it will help enable KCC to continue delivering PRoW network improvements across the Parish.

PWP 11 - Protecting woodland areas and planting native tree and hedge species

The County Council is supportive of planting trees / hedgerows but would recommend that the location of planting is considered to ensure it is in suitable locations. For example, wildflower meadow planting may conflict with tree planting.

PWP 12 - Biodiversity in New Development

The County Council is generally supportive of this policy although would recommend reference is given to the forthcoming Environment Bill and net biodiversity gain requirement.

The County Council would also recommend that this policy makes reference to the need for ecological surveys to be submitted as part of any planning application. Ecological surveys will identify the most appropriate enhancements and highlight if tree planting is appropriate.

Map 11 (Page 40) – Amenity & Access Improvements

It is presumed that the ‘proposed footpaths/bridleways/cycleways’ on this map are aspirational routes which have been requested by the public during the consultation process for this Neighbourhood Plan. KCC would be keen to understand any details of additional suggestions for improvements to the PRoW network put forward by the Parish Council or local residents.

PWP 6 - Sustainable connections

This policy is supported by the County Council, as it would ensure that new developments provide opportunities for walking and cycling, which would encourage active lifestyles. However, it is requested that additional text is inserted into the policy wording, stipulating that applicants for new developments engage with KCC, as the Local Highway Authority, to develop sustainable transport links and contribute towards PRoW network enhancements to achieve this objective.

PWP 15 - Planning obligations and Community Infrastructure Levy

The increased population, as a consequence of future development, will undoubtedly add to the pressure on, and importance of, the surrounding PRoW network. It is critical therefore that some general wording is included within this policy to support future requests for

funding, to ensure that these highly regarded links are not degraded as a result of new growth.

New development provides opportunities to secure investment in the PRow network, which could enhance opportunities for active travel and outdoor recreation across the Parish. Developer contributions could be used to upgrade existing routes or create new path links that address existing network fragmentation issues. KCC would welcome future engagement with the Parish Council to consider local aspirations for access improvements, which could be delivered through development contributions.

5.2 Health and Wellbeing Policies (HWB)

HWB - Supporting local community facilities

The County Council notes the inclusion of additional criteria, requesting that proposals provide '*adequate access and parking, and in the case of new facilities, are located so as to be accessible by public transport if possible*'. Whilst this additional criterion is welcomed, additional wording should be included within the text that specifically focuses on sustainable transport connections to the community facilities. Developers should be expected to provide, or contribute towards, the creation of high quality walking and cycling routes, to encourage active travel within the Parish.

5.3 Rural Housing Policies (RH)

Minerals and Waste

The County Council, as Minerals and Waste Planning Authority, recognises that some of the proposed sites are entirely within the built-up urban boundary of Maidstone and are thus exempt from any land-won mineral safeguarding considerations.

The following are outside the defined urban boundary and are coincident with the safeguarded Hythe Formation (Ragstone) in the Maidstone Mineral Safeguarding Area (MSA).

1. Langley Park, Sutton Road
2. Boughton Mount, Boughton Lane
3. Leywood Farm, Green Lane
4. Junction of Church Street and Heath Road

The Neighbourhood Plan does not include a Minerals Assessment for the above sites within its evidence base. It is noted however that the Inspector examining the 2017 Maidstone Local Plan expressly removed the safeguarding effect of the Kent Minerals and Waste Local Plan Policy CSM 5: Land-won Mineral Safeguarding for both the Sandgate Beds and the Hythe Formation (Ragstone). Therefore, these sites are also exempt from mineral safeguarding considerations.

RH 6 - Design of new housing development / RH 8. New dwellings in open countryside

There should be a requirement for applicants to show recorded PRow on their development plans. Where PRow would be directly affected by development proposals, plans should clarify intentions for accommodating, diverting or enhancing paths.

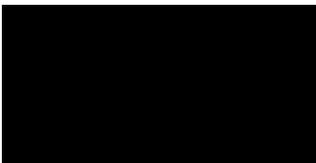
The policy should state that new developments provide sustainable transport choices, with walking and cycling routes available that provide realistic alternatives to short distance car journeys. New development should provide for a rich movement network and choice of routes that incorporate active frontages.

Appendix 5 – Boughton Monchelsea Masterplan – Landscape Enhancement Proposals

Several projects within the appendix are focused on improvements to the PRow network, including the creation of new routes, enhanced user accessibility and higher quality signage. KCC would welcome engagement with the Parish Council to consider the delivery of these projects and potential sources of funding for the works.

KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely



Barbara Cooper
Corporate Director – Growth, Environment and Transport