

## **BOXLEY PARISH COUNCIL'S RESPONSE TO THE MAIN MODIFICATIONS CONSULTATION FOR MAIDSTONE BOROUGH COUNCIL'S LOCAL PLAN REVIEW**

**This consultation closes on the 13<sup>th</sup> November 2023 and residents are urged to respond and have their say on how Maidstone is developed. Links below to the consultation.**



<https://letstalkmaidstone.uk.engagementhq.com/local-plan-review>

### **Boxley Parish Council is responding to the Main Modifications MM16 relating to LPRSP4(b) pages 20-32 on document ED121 Schedule of Main Modifications to the Regulation 19 Maidstone Local Plan Review**

The Council (BPC) views the following Main Modifications as lacking sufficient detail for the following reasons:

#### **LPRSP4 (B)**

##### **Proposed MBC paragraph to follow paragraph 6.77: Impact of new development on the integrity of the North Downs Woodlands SAC.**

(Introductory paragraph)

It is not acceptable to wait until nitrogen deposition exceeds the criteria set out in the IAQM guidance. For consistency it is essential that mitigation and an effective strategy are included in the Local Plan for developers to follow.

(Sub-paragraphs)

- i. Not enough detail in the current proposal to enable proper answers.
  - a. Will the school be built before first occupation and by who?
  - b. Who will build the proposed medical facilities? Will anyone be in place to operate them before first occupation? Will they be open at first occupation?
  - c. Commercial facilities – who will build them? Will they be open at first occupation?
- ii. The very nature of the layout of Boxley village (and Bredhurst) precludes any possible meaningful mitigation further to that already in place.
- iii. It is obvious that whoever drafted this modification has not actually tried to walk or cycle up or down Boxley Hill. In the heart of the AONB this already busy road is very steep and narrow with steep banks either side. There is therefore no scope for improved facilities for pedestrians or cyclists. Their absence would lead to almost total reliance on motor vehicles for anyone wishing to access Maidstone via this route.
- iv. Mere access to an EV charging point is not enough. Every house needs to have an EV charging point fitted as standard.
- v. No comment.
- vi. No comment.

- vii "Off-site planting" should be made "on-site planting". If planting is off-site with no restrictions as to distance it would not mitigate air pollution within the development. Mitigation measures as detailed in Air Quality planning guidance 2017 require using green infrastructure to absorb dust and other pollutants. This given the size of the proposed garden village would require all mitigation measures to be on site.
- viii We cannot see how this is possible. The new spur link to Junction 4 may not be completed until some 1,340 houses have been built. By then residents will have routes using the existing network embedded and any mitigation of this nature will be ineffective.
- ix We fail to see how the proposed location for higher density apartment type accommodation will reduce vehicle ownership.
- x This is directly against current government strategy which is encouraging people to return to offices and reduce home working.
- xi This should be an MBC policy document and integral to the Local Plan.

The above issues need to be addressed for the plan to be considered sound.

### **Proposed amendments to Policy LPRSP4(B)**

The Council (BPC) views the following criteria deficient for the following reasons:

#### **1) Phasing and Delivery**

##### **Preliminary**

More detail is required for the plan to be sound. The Transport Assessment needs to be completed before the development is added to the Local Plan. The transport modelling has been proved incorrect by BPC when compared with the actual traffic surveys BPC have conducted and commissioned. The criteria for the Monitor and Manage Strategy needs to be set out at the Local Plan Stage. It is not good enough to wait until monitoring shows a problem as it will then be too late to put in any mitigation.

##### **Phase 1**

For this to be sound the completion of the M2 J4 spur needs to be implemented at this stage to avoid overwhelming local roads. If this spur is not completed until 2038 some 1,340 houses will be completed.

##### **Phase 2**

- For the plan to be sound all mitigations should be addressed in phase 1, including off-site traffic mitigations in Boxley and Bredhurst which are difficult to envisage. It is too late to implement a Monitor and Manage strategy in phase 2.
- For the plan to be sound the primary school should be started in Phase 1. If not completed until 2038 the residents of some 1,340 homes will be using existing overstretched facilities and established off-site habits will be entrenched. The children will already be enrolled in schools and unlikely to change schools, leading to off-site school run traffic on all roads around the development.
- Similarly with medical facilities, you would potentially have some 1,340 households using existing facilities that cannot cope with the existing population. There is provision for Section 106 contributions to construct the school but no such provision for the medical facilities giving no guarantee that they will ever be constructed or operational.

The comments in Phase 1 and Phase 2 are supported by paragraph c) which states that the environmental mitigations must be delivered in advance of construction and that requisite infrastructure is ready to operate upon occupation. This paragraph needs to be amended to first occupation.

#### **2) Housing**

- b) The target of 40% affordable housing is acceptable but pricing should be at a rate that is affordable for residents on the average wage for Maidstone. Much

'affordable' housing is often outside the range of local residents and relies on government schemes such as 'Help to Buy', which is only currently available in Wales.

### **3) Masterplanning and Design Parameters**

- b) How can the Capstone Valley be enhanced when so much land will be taken away to be built on. Land that is already an inherent part of the landscape.
- c) Boxley Parish Council cannot see how Capstone Valley's utility will be significantly enhanced for recreation when three quarters of it is built on.
- d) Boxley Parish Council do not see how a positive out-facing edge can be achieved from the AONB or Bredhurst.

### **4) Employment/Commercial**

Boxley Parish Council has concerns about the Employment Site not being started until phase 2. By the time it is completed some 1,340 houses will have been constructed. Without employment opportunities these residents will have to work off site with all the associated road journeys creating additional unsustainable pressure on local roads.

Boxley Parish Council wishes to see the employment site started at the same time as the housing.

### **5) Infrastructure**

- b) Boxley Parish Council would like this to remain unchanged and a new secondary school created in the Capstone area. No known plans exist for Maidstone Borough Council to build a secondary school in the north of the borough. Currently most secondary school pupils use Medway schools which are already at capacity. Increasing the capacity of existing schools is a short term solution when a long term one is required.
- d) The loss of 31 ha of natural/semi-natural open space is unacceptable for no given reason or explanation. This development together with the two already approved will concrete over three quarters of Capstone Valley. These 31 hectares are vital for environmental sustainability and connectivity.

### **6) Transport Connections**

- a) Direct access to the M2 must be created at latest before first occupation to avoid overwhelming local roads. It would also be the best, safest route for construction traffic.
- f) This statement is very generalised and it is not possible to properly quantify a response when no detail is given. Boxley Parish Council already deals with current rat running issues through Boxley Village on behalf of residents and having had extensive contact with Kent County Council Highways department fail to see what measures can be put in place that would have any effect on people's habits. More detail is required on what measures are proposed. Monitor and Measure is not acceptable as short-cutting through local roads will be well established and any measures put in place when a problem develops are unlikely to change established habits. How can telling a motorist to spend more in fuel and time on his journey to work by avoiding 'rat running' through the villages be justified? This is surely never going to work in practicable terms.
- g) No comment possible without the Supplementary Planning Document.

### **7. Environmental**

- b) Looking at the new key diagram this is not achievable on site, especially with the loss of 31ha of open space.