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From the Clerk:
Mrs Janet Burnett
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5/5/2014

Dear Sir / Madam Sutton Valence Parish Council Comments on Regulation 18 Consultation: MBC Draft Local Plan.

The Parish Council has studied the Draft Local Plan document and has identified the following headline subjects for comment:

- Projected housing numbers
- Designation of Sutton Valence as a "Larger Village"
- Infrastructure issues
- Lack of consultation with parishes
- Alternative KCC Plan

### Projected housing numbers

Following the passing of the Localism Bill in 2011 and the transfer of responsibility for strategic planning to LPAs, Maidstone's initial approach was to adopt the former Regional Spatial Strategy's housing growth number of 10,080 dwellings for the period 2011-2026.

In 2013 this number increased to 14,800 for the period 2011-2031, prompting a call for sites (SHLAA) as MBC had to demonstrate a 5-year supply of housing building land. It was stated that the results of the SHLAA would inform as to whether or not the increased 14,800 target was deliverable and sustainable. MBC now maintain that the housing need has risen to 19,600, prompting the need for a further SHLAA and for the introduction of a third tier in the settlement hierarchy called "Larger Villages" .Sutton Valence is one of those proposed as a "Larger Village".

The Parish Council believes that an increase of 19,600 dwellings between 2011-31 represents an unrealistic assessment of Maidstone's needs for the future and that the requirement to identify additional housing land to support this number will have a negative affect on overall quality of life within the Borough and, under current proposals, will be particularly detrimental to rural locations, including our own.

Designation of Sutton Valence as a "Larger Village"

The Parish Council rejects the inclusion of Sutton Valence as a "Larger Village".

There has been no meaningful dialogue with MBC as to the methodology involved in the designation of the Parish in this category nor to the wider implications of membership of this group.

The fact that the Draft Plan included categorisation of the Parish as a "Larger Village" ahead of any material discussions between the parties involved suggests that lines have already been drawn.

We would, however, make the following points in response SP4-5.53 as contained in the Draft Plan:

• Sutton Valence School is a private, fee paying establishment. As such, there is only a handful of children residing in the Parish who attend. Furthermore, teaching staff reside locally in housing provided by the school or independently outside of the Parish. It follows, therefore, that the

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School's presence has little or no impact on educational needs or housing development related to the Local Plan. The Prep School site is in Chart Sutton Parish Council area, not Sutton Valence

- Sutton Valence Primary School is the only state school within the Parish. There is a limited number of available places before physical expansion would be necessary.
- The vast majority of secondary schoolchildren travel to state schools outside the Parish
- There are only two playing pitches in the Parish, both located next to the village hall. Adjacent playing pitches belong to Sutton Valence School
- The village post office, the only shop in the centre of the village selling basic food items, has announced closure in the summer of this year.
- The mobile library, which visits once a week, is not available to many working families because of its timing.

The Draft Local Plan identifies the Greensand Ridge as a landscape of local value and states "The Greensand Ridge....will be protected and maintained as (a) landscape of local value". The proposal to designate Sutton Valence as a Larger Village, therefore, will detract from this objective as more development is made possible on land adjoining the Ridge.

The Parish Council calls for its designation as a "Larger Village" to be reviewed as part of the consultation process.

Sutton Valence will support well designed, small scale housing and business developments that meet local needs and are in keeping with the character, scale and demands of a medium sized parish. The Parish Council will be informed by its community as to the type and size of development it wishes to embrace. It is worth stating, however, that at this early stage in the development of a Neighbourhood Plan, it is the view of the Parish Council that small, dispersed sites would be preferable to a larger development which would not be in keeping with the character and scale of our Parish.

Sutton Valence has already contributed to an expansion of dwelling numbers with the addition of 18 new homes since 2011. The development at Haven Close is widely acknowledged as a success in terms of its size (12 homes) quality of build and architecture (in keeping with the village vernacular). We are grateful to MBC for its important role in this project and would view Haven Close as a blueprint for any potential future project.

#### Infrastructure Issues

The Parish Council has major concerns regarding the lack of a properly funded and agreed infrastructure programme to support the Draft Plan:

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#### A274

This arterial road is already overstretched at key times within the day and joining from the village roads is becoming increasingly difficult due to traffic levels and speed. It is extremely difficult for pedestrians crossing this road at any time of day and there are calls for a pedestrian or pelican crossing to be installed close to the primary school to aid safer passage.

An increase in housing of over 400 at Headcorn and the development of the Barradale site on the Headcorn Road will add to traffic from the south of the village. The proposed large developments at Langley Park, North of the Sutton Road at Otham and Bicknor Farm will add to traffic from the north as traffic comes south to join the M20 at J8 and as parents drive their children to the Academy at Linton crossroads. These will converge on the Five Wents crossroad which is overstretched now at peak times and which has a poor safety record. Warmlake crossroads also has a poor safety record and increased traffic will only serve to add to the frequency of accidents. Improvements to the Willington Street junction and a bus lane on Sutton Road will do nothing to ameliorate the safety issues at these two dangerous junctions within our Parish.

Additional A274 traffic will encourage increased usage of small rural roads which are the most accident prone of all UK road sectors. The current poor condition of many rural roads is already a cause for concern

Given the projected growth in population within the Borough, where are the plans to increase capacity in terms of medical services, schools, community facilities, power supply, potable water supplies, sewage disposal, waste disposal, public transport and improvements in air quality? The Draft Plan does not attempt to answer any of these.

#### Lack of meaningful consultation

MBC has not listened to parish councils in the development of the Draft Local Plan

At meetings of the Joint Parish Group this has been the main subject for discussion and the consensus is that parishes are marginalised and decisions have already been taken and published before parishes are informed.

Sutton Valence was not involved in the decision for its classification as a "Larger Village" and therefore was not given an opportunity to understand the process or how and why decisions had been taken leading to this change of status. Similarly, no direct notice was given to announce the 2013 SHLAA even though there were seven potential sites proposed within our Parish.

This has led to a climate of mistrust between the Borough and the parishes which exists to this day .This is frustrating because the parishes have extensive knowledge of their areas, people, strengths and weaknesses and so have a lot to contribute. They feel much has been imposed upon them and that they have been sidelined in this process.

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#### Alternative KCC Plan

Sutton Valence PC supports the alternative plan put forward by KCC for the following reasons:

- It believes the housing target of 14500 homes is more realistic, deliverable and sustainable.
- Development will focus more on land within Maidstone urban area close to the town centre and also within other villages and settlements.
- Due consideration is given to affordability and infrastructure constraints/programmes
- It provides for a green belt around the existing urban area thereby preventing urban coalescence
- It promotes a more inclusive role for parishes and gives due consideration to Neighbourhood plans

Members of the Parish Council would welcome the opportunity to discuss these comments with MBC as part of the consultation process at any time.

Janet Burnett Clerk to the Parish Council