



The countryside charity

Kent

Planning application 23/504068

Outline application with some matters reserved (access only sought) for the removal of 2 former agricultural sheds and erection of up to 117no. dwellings and associated infrastructure including partial footways on Albion Road.

Land East Of Albion Road And North Of Copper Lane Marden Kent TN12 9EG

We are CPRE, the countryside charity. Formed in 1926, CPRE is a registered charity and one of the longest established and most respected environmental groups in England, with over 40,000 members and supporters living in our cities, towns, villages and the countryside. CPRE Kent is the largest of the CPRE County branches with over 1,300 members, including over 160 parish councils, civic societies and other Kent organisations and companies.

Our vision is of a beautiful and thriving countryside that enriches all our lives, and our mission is to promote, enhance and protect that countryside.

We believe that the planning system is a toolbox for achieving better – for people, nature and the economy – while supporting the delivery of more badly-needed homes to end the housing crisis.

Overall, it is our position that local planning authorities should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that plan led development is sustainable and in accordance with national planning policy.

We object to this application on the following grounds:

- Loss of greenfield land
- Adverse impact on biodiversity and the inappropriateness of mitigating habitat loss in areas of proposed open space
- Loss of trees

CPRE Kent objects to the principle of residential development on greenfield land. Representations to this effect were made at the public consultation stages of the emerging Local Plan and reiterated at the Examination hearing sessions.

Notwithstanding this objection in principle, in recognition of the fact that this site is allocated in the Council's local plan review for 113 dwellings under policy LPRSP6 CPRE Kent wishes to make the following points.

Reference is made at paragraph 4.3 of the applicant's planning statement that a mix of building types and heights will be provided from apartment buildings at 2.5 storeys, two storey dwellings and bungalows at one storey and 1.5 storeys in height. It is not clear from the building heights layout plan where these reported bungalows are to be sited, as the single storey buildings all appear to be

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Registered charity (number 1092012), limited company registered in England (number 4335730)

garages. Clarification is sought as to whether this is a typing error, or indeed there are to be bungalows included within the housing mix, which would be welcomed.

Table 3.4 of the planning statement sets out proposed transport/highways improvements – do these meet the policy tests set out in LPRSP6 in terms of the provision of key infrastructure as detailed within the policy? In terms of connectivity and encouraging active travel we would query what steps have been taken to ensure that there will be linkages to the Russet Grove development in order both developments can assimilate into the community, rather than being independent/isolated extensions to the village.

CPRE Kent campaigns to ensure that new development is sustainable and that active travel and sustainable transport are placed at their heart. As such, it is considered that a network of active travel routes – which don't necessitate sharing space with cars on the public highway - should be explored.

Conditions will need to be applied to any forthcoming planning permission to ensure that these measures are put in place and retained in perpetuity in a timely manner and certainly prior to the completion of the development. In this way, good patterns of active movement can be established and become habit at the earliest opportunity.

The applicant states that Biodiversity Net Gain in habitat and hedgerow units is in excess of the requirements set down in the Environment Act. Notwithstanding this, CPRE Kent has grave concerns about the impact of the proposed development on existing ecology and habitats across the site.

As set out in the applicant's ecology appraisal and planning statement, it is clear that existing habitats will be destroyed. For example, there is evidence of a badger sett on the parcel of land through which access to the site will be gained from Thorn Road.

The mitigation being put forward relies on the translocation of species and the creation of new habitats, within the proposed areas of open space on the southern portion of the site. This is not acceptable.

The open space for residents to enjoy for recreational purposes cannot at the same time be identified for biodiversity mitigation. A separate mitigation area will be needed to properly compensate for loss of habitat of the species identified on site.

Furthermore, grouping together habitats for the species identified on site on a single swathe of land – each with very different requirements in terms of habitat needs – will not adequately compensate for habitat loss.

In the event that outline planning permission is forthcoming for this site CPRE Kent would like to see planning conditions restricting external lighting (in the interest of retaining dark darks in this location, in the interests of existing and future wildlife populations).

In terms of existing tree coverage, it is noted that the middle section of the central line of silver birch trees are to be felled. It's not clear from the arboricultural report why this is considered necessary. In addition, it's not clear from the report what groups of trees are actually being referred to, as the individual trees and groups have not been sufficiently clearly identified on the accompanying plans.

Two tree groups (G39 and G41) are noted as being silver birch. Described as being overgrown windbreaks. In other words, mature trees. In a climate change emergency felling of any tree should be very, very carefully considered. With the remaining two sections of the tree belt across the site being kept, it would be reasonable to expect that the full tree line could be retained and the site layout amended to work around this valuable placemaking line of trees, carbon store, landscape amenity and habitat.



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The Kent Branch of the Campaign to Protect Rural England is a registered charity (number 1092012), and is also a company limited by guarantee, registered in England (number 4335730).
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