

To: Marion Geary, Maidstone Borough Council:
mariongeary@maidstone.gov.uk
and all the recipients of my email dated 14 October 2023

Edward Thomas,
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14 October 2023

23/504068/OUT | OUTLINE APPLICATION | LAND EAST OF ALBION ROAD & LAND NORTH OF COPPER LANE MARDEN TN12 9EG [FORMALLY, LPRSA314 & LPRSA295 RESPECTFULLY]

I email to forward comments/observations on the above proposal, which I understand is open for comments until 26 October 2023. I submit this response in a personal capacity as a long-standing resident of Marden, which is informed by my role as a policy advisor within the local government sector.

In summary, it is judged that the site is “unsuitable” for development. The Maidstone Borough Council (MBC) Strategic Land Availability Assessment (“SLAA”) and the Regulation 19 consultation and the Sustainability Appraisal, acknowledge this, but also conclude that the sites are “viable” - this is contradictory. In addition, based on the documentation in the public domain, the approach taken by MBC to the sites selected in Marden do not appear to have followed an evidenced-based approach.

To quote MBC’s response to a recently refused planning application in a similar vicinity, this is “an ‘open’ site in the countryside and any proposed built form would be significantly visible, introducing built form, hardstanding and other residential paraphernalia, which would not enhance or positively contribute to the character of the Site or wider area”.

The reason this site has been selected by MBC for their Local Plan is to prevent the development of the land to the North of Marden (next to the railway station). This is a false premise as, next year, there will likely be a Labour Government who are clear they want to see more houses built across the country. They will look for large sites and invite proposals, like a ‘Call for Sites’. They also intend to dilute Local Planning Authorities (like MBC) role. So, to conclude, granting permission for his site is unlikely to prevent the Land North of Marden proposal.

This application should be referred to the MBC Planning Committee and be refused for the reasons detailed below. However, if MBC decide to approve this proposal, I also include some mitigations, which I believe would improve the proposals.

This response into several themed sections. A [summary](#) is also included.

Connectivity/Transport/ Highways , including: <ul style="list-style-type: none">○ Site access○ A Mitigation which should be dismissed○ Traffic safety○ ‘Access to Public Transportation & Services’	Environment , including: <ul style="list-style-type: none">○ Landscape Character○ Flood risk & Drainage Sewage Design Housing density
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SUMMARY

23/504068/OUT | OUTLINE APPLICATION | LAND EAST OF ALBION ROAD & LAND NORTH OF COPPER LANE MARDEN TN12 9EG [FORMALLY, LPRSA314 & LPRSA295 RESPECTFULLY]

CONNECTIVITY/TRANSPORT/ HIGHWAYS

For connectivity to the village, it is welcomed that the main vehicular access to the proposed site would be from Albion Road, with emergency access, access for cyclists and walkers from Copper Lane only. **Access to the site, for construction and for the life of the development, also should be via Albion Road.** Thought should also be given to the designation of Copper Lane as a '[Quiet Lane](#)', to make it primarily for walkers, cyclists, and equestrian users only.

However, the visibility splays of a new entrance onto Albion Road, as detailed, would be a concern, as it would be very close to a dangerous corner (Albion Road/Thorn Road/Plain Road). To remedy this, the property known as the 'Howlands', adjacent to, and believed to be owned by the landowner of Land East of Albion Road (LPRSA314), should be demolished to enable better, and safer, access to the site. The 'Howlands' building is now, in any case, not aligned with the building line of the recent 'Russet Grove' development.

Due to the, increasingly, dangerous junction of Albion Road/Thorn Road/Plain Road, removal of the grass triangle at the junction of Plain Road/Albion Road and Thorn Road, should be considered. The fingerpost could be moved into the field opposite (in Thorn Road), subject to the landowner's consent, as was the position until the early 2000's. It is further recommended that all hedges and greenery on all sides of the junction should be maintained at a low height, to improve visibility.

The 30 mile-an-hour limit on sections of Plain Road and Thorn Road should be extended to the whole length of Thorn Road. This should be coupled with physical traffic calming measures along Albion Road/Thorn Road and Plain Road.

Care needs to be taken in the design of any new pavements/footways, and/or lighting, in this location to retain the character of the rural lane.

ENVIRONMENT

Dwellings, on the combined sites, should be single storey, or a maximum of two storeys, to account for the sensitivity of the landscape; and not follow the bad example of the social housing on the 'Russet Grove' development which is three storeys and consequently intrudes on the landscape.

All existing trees and hedgerows on the boundaries of the combined sites should be retained and enhanced.

The proposal says that development should "avoid suburban paraphernalia on [the] more sensitive southern settlement edge". This is welcome and ideally would extend to ensuring that only low-level LED pillar/bollards are used to light the site, which is the method employed on the recent Millwood Designer Homes' Windsor Meadow development.

Providing Sustainable Drainage Systems (SuDS) for all new developments should be a deciding factor in determining planning applications.

There would need to be significant work to ensure that not only are the developable sites mitigated against surface water flooding, but also the established properties downward of the site – notably along Thorn Road.

SEWAGE

There are significant issues with connecting into sewage facilities to the north of the site. Mainly as these are uphill of the site and may require pumping. Thought should be given to the construction of, or linking in with, facilities to the south of the site as what is essentially being proposed is unsustainable in the long-term.

DESIGN

Ensuring that neighbouring resident's amenity is protected should also apply to properties in the vicinity of Land North of Copper Lane (LPRSA295). For example, the established properties along Thorn Road.

HOUSING DENSITY

The draft MBC Local Plan allocates 113 new houses for the two combined sites. Whereas the proposal from the developers increases this to 117. **Due to the sparsity of the existing environment and the open countryside, the density of the proposed housing, at 113, is inappropriate and should be avoided on an edge of village location, and a reduced number per hectare/acre, should be considered.**

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FULL RESPONSE

23/504068/OUT | OUTLINE APPLICATION | LAND EAST OF ALBION ROAD & LAND NORTH OF COPPER LANE MARDEN TN12 9EG [FORMALLY, LPRSA314 & LPRSA295 RESPECTFULLY]

CONNECTIVITY/TRANSPORT/ HIGHWAYS

Site access

For connectivity to the village, it is welcomed that the main vehicular access to the proposed site would be from Albion Road, with emergency access, access for cyclists and walkers from Copper Lane only.

It is stated that "Safe and suitable access can be achieved from Albion Road to the west of the proposed site in the form of a simple priority junction. This is in keeping with the character of Albion Road and the same junction form as the newly constructed access serving the consented development of 117 dwellings on the former Marden Cricket and Hockey Club land [H1(46)] immediately to the north of this proposed site" (25: Accessibility: Access).

However, the visibility splays of a new entrance onto Albion Road, as detailed, could be a concern, as it would be very close to a known dangerous junction (Albion Road/Thorn Road/Plain Road).

The Maidstone Borough Council (MBC) Strategic Land Availability Assessment (“SLAA”) also states that a ‘Mitigation Required’ to make site LPRSA314 [Land East of Albion Road] feasible is the “Removal of existing resident parking on Albion Road, or widening Albion Road, requiring 3rd party land”.

The SLAA also states that a ‘Mitigation Required’ to make Land North of Copper Lane (LPRSA295) feasible is the “widening of Copper Lane, requiring 3rd party land, or [to enable] access onto Albion Road through site 314 [Land East of Albion Road] and the removal of existing resident parking on Albion Road”. Additionally, the ‘MBC Local Plan Review: Regulation 18b Preferred Approach Consultation 2020’ stated that a condition to be considered before development is permitted is that both sites should be “appropriately integrate[d]” to “provide vehicular and pedestrian connections with [the] site Land East of Albion Road”. **As stated above, it is welcomed that the decision has been taken for the main access to the site to be via Albion Road. Clarity is sought that this will remain the position, and what traffic calming measures MBC/KCC Highways intends to put in place to make the Albion Road access point safe.**

The ‘MBC Local Plan Review: Regulation 18b Preferred Approach Consultation 2020’ also states that a condition for access onto Albion Road is the “creation of new pavements and crossing points for pedestrian use”. Additionally, the ‘Transport Statement’ also states that – “...site visits have revealed that there is the potential to introduce a new footway on the eastern side of Albion Road, connecting the proposed site with the new footway on the eastern side of Albion Road (currently under construction) to the north of the access for the new development situated to the north. This would provide a continuous footway link into the village centre”. **Care needs to be taken in the design of any new pavements/footways, and/or lighting, in this location to retain the character of the rural lane.**

MITIGATIONS

For connectivity to the village, it is welcomed that the main vehicular access to the proposed site would be from Albion Road, with emergency access, access for cyclists and walkers from Copper Lane only. **Access to the site, for construction and for the life of the development, also should be via Albion Road.**

However, the visibility splays of a new entrance onto Albion Road, as detailed, would be a concern, as it would be very close to a dangerous corner (Albion Road/Thorn Road/Plain Road). To remedy this, the property known as the ‘Howlands’, adjacent to, and believed to be owned by the landowner of Land East of Albion Road (LPRSA314), should be demolished to enable better, and safer, access to the site. The ‘Howlands’ building is now, in any case, not aligned with the building line of the recent ‘Russet Grove’ development.

MBC/KCC Highways should install traffic calming measures in place to make the Albion Road access point safe.

Care needs to be taken in the design of any new pavements/footways, and/or lighting, in this location to retain the character of the rural lane.

A mitigation which should be dismissed

The SLAA states that the ‘Mitigation Required’ to make Land North of Copper Lane (LPRSA295) feasible is the “widening of Copper Lane, requiring 3rd party land, or [to enable] access onto

Albion Road through site 314 [Land East of Albion Road] and the removal of existing resident parking on Albion Road”.

With maximum return on investment being the predominate factor for developers, with there already being a squeeze on profits due to rising inflation, the cost of widening and upgrading a lane of half a mile in length and all the associated works (culverts, reconstructing the road so that is around 1 metre in depth for its whole length etc.) would be a prohibitive cost.

The widening Copper Lane would also materially affect the landscape and rural character of this part of Marden, for example, this would result in a loss of hedgerows. It would also potentially open it up to yet further development.

The fact that the Regulation 18b Preferred Approach Consultation 2020 stated that development “proposals shall be designed to appropriately integrate and provide vehicular and pedestrian connections with site Land east of Albion Road”, indicates that access to the two sites should via Albion Road, not Copper Lane.

Traffic safety

Neither of the proposed access points to/from the site (Albion Road & Copper Lane) are safe for the volume of traffic that will be generated from 117 houses.

The National Planning Policy Framework (NPPF) [Paragraph 109] states that – “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”.

The applicants ‘Transport Statement’ states that – “Personal injury accident (PIA) date has been obtained from Crash Map for the most recently available five-year period. The study area covers Albion Road and its priority junctions with Roundel Way, Stanley Road and Plain Road. The date shows that there have been no recorded injury accidents during the five-year period and as such it can be seen that the local highway network in the vicinity of the proposed development site is operating safely”.

The Albion Road/Thorn Road/Plain Road junction is a known hazard, with traffic turning out of Plain Road onto Albion Road having very restricted visibility. This has not always been the case. Until the early 2000s (before the construction of the ‘Russetings’ cottages) this junction was more visible from Plain Road and Albion Road – another example of lack of strategic planning by MBC – see adjacent Image 1.



This said, access from Copper Lane would not be sensible either. Copper Lane is a single-track rural lane which is unsuitable for heavy vehicles and/or significant traffic flows.

The Thorn Road/Copper Lane junction is also unsafe. There is a dangerous bend in the road, bordering this site heading toward Staplehurst. In addition, the Copper Lane/Thorn Road junction has restricted visibility for vehicles in all directions.

Drivers do not currently adhere to the 30mph speed limit on Thorn Road and Copper Lane is subject to a derestricted speed limit. The speed limit needs to be enforced on Albion/Thorn Road.

In terms of traffic impact, it is stated that - "The Transport Statement (May 2019) ...identifies and assesses the impact of increased traffic generation resulting from an additional 60 dwellings on the local road junctions. It concludes that there would be a very modest level of traffic generation. There are no current junction capacity issues, and the junctions are operating with spare capacity. As such it is anticipated that the proposed development traffic can be accommodated on the local highway network without 'severe' impacts, in accordance with the requirements of the revised National Planning Policy Framework" (27: Tangible and infrastructure constraints Traffic impact).

As far ago as 1973 Kent County Council was of the view that the local road network in Marden was not capable of supporting additional growth in traffic – "The benefits to the village and the region to be derived from planned large-scale growth or piecemeal growth are too uncertain to override the environmental disadvantages inherent in the loss of village status, the social and physical stresses likely to arise, particularly in respect of facilities such as road capacity", and "the existing road pattern...is likely to stay and as a result, special care needs to be taken, not to overload this network more than is necessary to ensure Marden's stability and prosperity" (Marden Village Informal District Plan, Kent County Council 1973). Nothing has materially changed with the layout and design of the road network in the intervening 50 years. The reality is that there has been no investment in updating the infrastructure that is required to take additional housing.

It cannot be said that the additional vehicular movement from 117 new houses would be a "modest level", given the recent cumulative increased traffic from two other recent developments ('Russet Grove' and the 'Windsor Meadow development). The traffic survey also only modelled for 39 houses for the Land East of Albion Road (what was LPRSA314).

A concerning aspect of this development is the undoubted increase in traffic due to this, and other proposed developments. There have been several cars in ditches in Thorn Road, that are not referred to in the documentation. One notable accident concerned a car destroying a refuse bin while swerving to avoid another car, instead of slowing down. The speed of traffic along Thorn Road/Albion Road is becoming a cause of concern – which it is believed is due to drivers using Thorn Road and then Copper Lane (which is unsuitable for heavy traffic) as a short cut instead of using the designated Howland Road, which is often difficult to transverse due to cars being parked along the entrance to it from Marden village.

MITIGATIONS

Due to the, increasingly, dangerous junction of Albion Road/Thorn Road/Plain Road, removal of the grass triangle at the junction of Plain Road/Albion Road and Thorn Road, should be considered. The fingerpost could be moved into the field opposite (in Thorn Road), subject to the landowner's consent, as was the position until the early 2000's. It is

further recommended that all hedges and greenery on all sides of the junction should be maintained at a low height, to improve visibility.

The 30 mile-an-hour limit on sections of Plain Road and Thorn Road should be extended to the whole length of Thorn Road. This should be coupled with physical traffic calming measures along Albion Road/Thorn Road and Plain Road.

Thought should be given to the designation of Copper Lane as a '[Quiet Lane](#)', to make it primarily for walkers, cyclists, and equestrian users only.

Access to Public Transportation & Services

The 'MBC Local Plan Review: Regulation 18b Preferred Approach Consultation 2020' stated that a condition to be considered before development is permitted, for Land East of Albion Road (LPRSA314), would be "increased bus service regularity and a new bus stop" and, for Land North of Copper Lane (LPRSA295), the "provision of a new bus service to service the site", and the "widening of Copper Lane and surrounding roads to provide sufficient bus access".

The SLAA says, under 'Issue/Constraint', that "a bus route is within 400m of the whole site, but the service is on insufficient regularity". Then, under 'Impact on developable land area/capacity/site suitability', it says that "required mitigation unfeasible due to the scale of the site and an insufficient number of units to support a new bus route and the requirement for 3rd party land", and because of this, that the "site [is] recommended as unsuitable on sustainability grounds". But later, the SLAA says that the "site is assumed to be viable".

Additionally, the Sustainability (SA) of Maidstone Local Plan Review Regulation 19 consultation (section 7.276) SA objective 7: Sustainable Travel further stated that "the site-specific policy requires improvements to local bus services".

However, as a County Councils Network (CCN) report highlights (the CCN is part of the Local Government Association (LGA)) – [Reversing the decline of county buses](#), **this aspiration isn't really feasible. The report concludes that "there were 97 million fewer bus journeys in 2019 across 36 counties compared to a decade ago due to a £348 million funding gap". In summary, there is no desire on the part of private bus companies to extend their bus services, unless there is a significant business reason/opportunity, and County Council's (whose responsibility it is to subsidise bus services) do not have the resources to subsidise additional services. This is reflected in the 2017 Kent County Council Kent County Council - [Bus Transport Select Committee Report](#). A potential bus provider would not think this represents a viable business opportunity. The single bus service provider which currently runs through Marden, from Maidstone to Goudhurst, would be of the view that potential passengers could pick up the service along Albion Road.**

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ENVIRONMENT

'Landscape Character'

The SLAA states that "the Landscape Character Assessment identifies that the site[s are] is within the Staplehurst Low Weald landscape character area, which forms a part of the Low Weald landscape character type. The overall condition of the area is considered to be Good, and the

sensitivity to be High, with an overall recommendation to Conserve”. But then the SLAA says that the “site is assumed to be viable”.

In addition, the Sustainability Appraisal states (in section 7.284) for the combined sites, that, “in relation to SA objective 16: Landscape, negligible effects have been identified for the strategic policy LPRSPSP6(e): Marden. The GIS-based site options work identified significant negative effects for sites 295 [Land North of Copper Lane] & 314 [Land East of Albion Road] in relation to SA objective 16: Landscape. The entirety of Marden, including these sites, lies in the Staplehurst Low Weald Landscape Character Area (LCA), which has been assessed as highly sensitive. The site-specific policy for site 295 [Land North of Copper Lane] & 314 [Land East of Albion Road] requires structural landscaping to soften the impact of development on the wider landscape, requires the development to be integrated into the slope of the land and requires the design to take into account the High Weald AONB”.

The SLAA also states on ‘Local Nature Reserves/ Local Wildlife Sites/ Special Area of Conservation/ Ecology (including ponds) Hedgerows’ that it is “unlikely that on-site mitigation can be fully Implemented”. But then the SLAA says that the “site is assumed to be viable”.

The ecology report for Land East of Albion Road (LPRSA314) recommends the “retention and enhancement of the hedgerow networks and trees”.

Site Land North of Copper Lane (LPRSA295) is in open countryside and bounded by greenfield land on both sides. This will have a material effect on the landscape and rural character. It is welcomed that the developers are proposing “more limited development within the lower/southern part of the site”. It is also welcomed that the developers are proposing to retain and reinforce “perimeter hedgerows and trees and retain historic field boundaries”.

In addition, the field to the west of site Land North of Copper Lane (LPRSA295) was purchased by residents to prevent development encroachment. One of the owners has stated this field “has not been put forward for development in this or any other plan. This agricultural field is in open countryside and will remain so”. However, to the owner’s surprise, this field has been included in the settlement boundary map (Map 42).

Site characteristics for LPRSA295

The proposed site lies outside of the Settlement Boundary for Marden and is in open countryside. As the Completed Call for Sites Submission Forms states that “The proposed development site is contained by Copper Lane to the South but is effectively surrounded by countryside on all four sides. It does not adjoin the Settlement boundary for Marden”. “The land is generally flat, sloping gently from north to south” (19: Description of site characteristics).

The sloping aspect of the site presents an issue in terms of surface water flooding risk, please see the [section on flooding below](#).

MITIGATIONS

If the development proceeds, the dwellings should be single storey, or a maximum of two storeys, to account for the sensitivity of the landscape; and not follow the bad example of the social housing on the ‘Russet Grove’ development which is three storeys and consequently intrudes on the landscape.

All existing trees and hedgerows on the boundaries of both sites should be retained.

The proposal says that development should “avoid suburban paraphernalia on [the] more sensitive southern settlement edge”. This is welcome and ideally would extend to ensuring that only low-level LED pillar/bollards are used to light the site, which is the method employed on the recent Millwood Designer Homes’ Windsor Meadow development.

Flood risk & Drainage

The Sustainability Appraisal states (in section 7.280) that for both 295 [Land North of Copper Lane] & 314 [Land East of Albion Road], that “in relation to SA objective 12: Flooding, negligible effects have been identified for the strategic policy LPRSP6(e): Marden. The GIS-based site options work identified a significant negative effect for both sites 295 [Land North of Copper Lane] & 314 [Land East of Albion Road], given that the site contains land identified as being at risk of flooding from surface water (1 in 30 years). The site-specific policy for site 295 [Land North of Copper Lane] requires that the south part of the site around the existing ponds be kept free of development, reducing this effect”.

The completed Call for Sites Submission Forms state (in section 27. Tangible infrastructure constraints) also states that “Surface water drainage is not likely to be a constraint. Following initial investigations, it is considered that SW can be managed on-site with an attenuation system controlled to the existing rate of greenfield run-off, with rights to connect into an existing surface water pipe in the adjacent field to the south which in turn connects to a pond/watercourse. A suitable drainage strategy which incorporates SUDS can be delivered”.

It is noted that the developer’s proposal states that “the majority of the potential development site is categorised as being at ‘very low’ risk of long-term surface water flooding”.

The application sites may not be liable to significant surface water flooding. However, the ditches southward at the junction of Thorn Road and Copper Lane, and along Copper Lane (which the above surface water pipe runs into), frequently overflow and the fields abutting both sides of Copper Lane are often saturated as a result of run-off from further up-hill. Building on the former Cricket and Hockey Club site (‘Russet Grove’) has already resulted in additional surface water flooding, and the proposals will result in, additional surface water flooding.

PLEASE SEE THE IMAGE 2 AT THE END OF THIS SECTION (page 11). This illustrates the position surface water flooding from both December 2019 and December 2020. This is due to the cumulative effects of climate change, resulting in increased rainfall in the winter months in recent years, but also due to new housing developments being constructed on ground higher to the highlighted locations. Further development will exacerbate this situation.

The planning solutions that have been devised, for example for the former Marden Cricket and Hockey Club site (‘Russet Grove’), to take into account surface-water drainage, have been on the basis of a 1:100-year weather event. However, it has been evident from the last 21 years that the increase of wet and stormy winters is becoming more and more frequent, which is an indication of a change in our weather conditions and increased climate change.

This is not a unique issue, as **the majority of Marden, apart from the historic village centre is prone to localised flooding, and safe dry access is not always possible into Marden – as roads into the village are often flooded during the winter.** As the former Cricket and Hockey Club applicants 'Landscape and Visual Impact Assessment' stated – "Generally the area around Marden is low lying and gently undulating between 20m AOD and 30m AOD. The most common geology throughout the area is Wealden Clay. Soils are generally heavy, deep, fertile loams, silts and clays but they are often seasonally waterlogged with ponds, watercourses and ditches being common throughout the area".

The original planning application for the former Cricket and Hockey club site ('Russet Grove') proposed a Sustainable Drainage System (SuDS) "to reduce runoff rates and mitigate against the impact of increased runoff volumes" was installed.

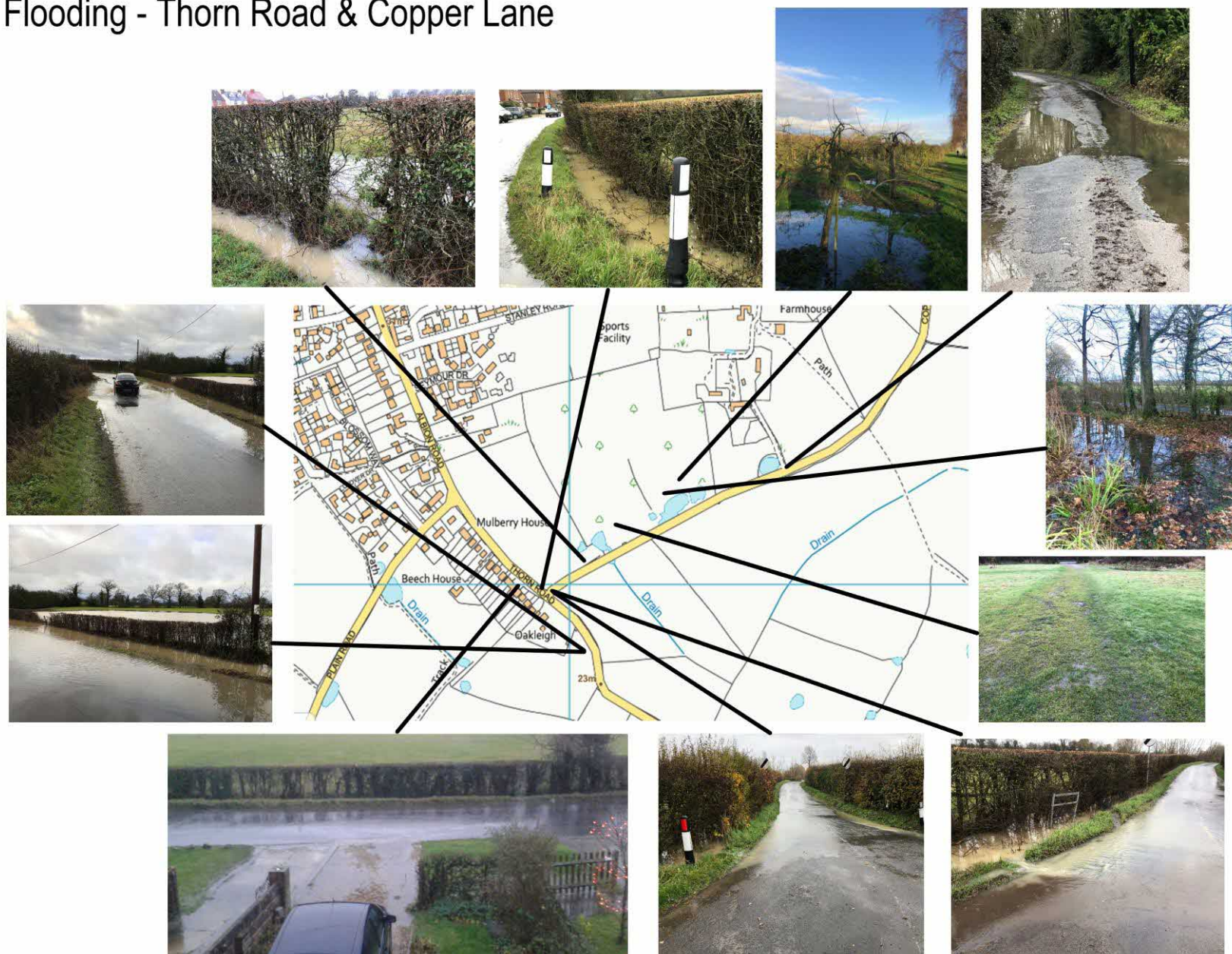
The Sustainability Appraisal of Maidstone Local Plan Review Regulation 19 Pre-Submission Consultation also says (in section 7.285) that for the combined sites, "greater clarity [is required] over the requirement for flood resilience on site, including SuDS features, given [the] risk of surface flooding both within the sites and in the wider area. This might be incorporated into existing water bodies on-site and should also provide additional habitat to mitigate impacts of development on local biodiversity".

MITIGATIONS

Providing Sustainable Drainage Systems (SuDS) for all new developments should be a deciding factor in determining planning applications.

If an application was to proceed, there would need to be significant work to ensure that not only the developable sites is mitigated against surface water flooding, but also, the established properties downward of the site – notably along Thorn Road.

Flooding - Thorn Road & Copper Lane



SEWAGE

There are long-standing issues with the sewerage systems in Marden, in fact this has been one of the issues that has constrained the over development of Marden in the past, as another planning application's supporting documentation recently concurred – “it is probable that there will be insufficient capacity within the existing network for this development and it will be necessary for Southern Water to advise on the upsizing required”. This illustrates that Marden village does not really have the infrastructure capacity for the pressures being placed upon it.

However, the applicants has stated that - “*This proposed development site would be able to make connection with all utilities as part of a wider development proposal with land east of Albion Road*” (Utilities); and that – “*An existing 150mm diameter public foul sewer is located in Albion Road. This sewer is of sufficient size to accommodate the number of dwellings on the proposed development site*”.

MITIGATIONS

There are significant issues with connecting into sewage facilities to the north of the site. Mainly as these are uphill of the site and may require pumping. Thought should be given into the construction of, or linking in with, facilities to the south of the site as what is essentially being proposed is unsustainable in the long-term.

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DESIGN

The ‘MBC Local Plan Review: Regulation 18b Preferred Approach Consultation 2020’ stated that a condition for Land East of Albion Road (LPRSA314) to be considered before development is permitted would be that the “design of the site [would] need to ensure neighbouring resident’s amenity is protected.

The developer’s proposal also states that a ‘constraint’ is that the newly constructed Russet Grove development is “close to the final build out”.

MITIGATIONS

Ensuring that neighbouring resident’s amenity is protected should also apply to properties in the vicinity of site Land North of Copper Lane (LPRSA295). For example, the established properties along Thorn Road.

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HOUSING DENSITY

The draft MBC Local Plan allocates 113 new houses for the two combined sites. Whereas the proposal new increases this to 117.

The housing density on the former Cricket and Hockey Club site (‘Russet Grove’), is inappropriate for the edge of a rural settlement, given the sparsity of the existing environment and the (current) open countryside, and not one that should be repeated. A lower density should be adhered to.

MITIGATIONS

Due to the sparsity of the existing environment and the open countryside, the density of the proposed housing, at 117, is inappropriate and should be avoided on an edge of village location, and a reduced number per hectare/acre, should be considered.

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I am available to discuss any of the points mentioned in this note.

Yours faithfully,

Edward Thomas