

**MAIDSTONE BOROUGH LOCAL PLAN REVIEW**

**DRAFT PLAN FOR SUBMISSION (REGULATION 19)**

**OBJECTION TO SOUNDNESS ON BEHALF OF LENHAM PARISH COUNCIL**

**POLICY LPRSP4 (A) (7) (a)**

**POLICY LPRSPA4 (A) (5) (d)**

**HEATHLANDS GARDEN SETTLEMENT**

**DELIVERY OF WASTEWATER TREATMENT**

**LPC TEN**

1. The made Lenham Neighbourhood Plan (July 2021) which is part of the current development plan contains the following policy:

***SHDS General Planning Requirements***

- (6) ***The submitted Masterplan will show arrangements for foul sewerage connections to Lenham Wastewater Treatment Works (LWTW) and will demonstrate, to the satisfaction of Maidstone Borough Council as local planning authoring that adequate capacity will be provided at Lenham WTW to accept foul drainage flows arising from the development.”***
2. LWTW lies to the south of the railway within, but excluded from, the Garden Settlement notation in the Review. LPC objects to Heathlands proposals on the basis that:
  - (i) the proposals have not demonstrated how it will be possible to provide an enhanced wastewater treatment facility to serve the 1000 dwellings to be built under the provisions of Lenham Neighbourhood Plan in accordance with policy SHDS1 (6) of that Plan
  - (ii) The proposals have not demonstrated how it will be possible to provide wastewater treatment facilities to serve the proposed Heathlands Garden Community *in addition* to meeting the requirements of Lenham Neighbourhood Plan policy SHDS1 (6).
3. Under the heading ‘Environmental’ policy LPRSPA (4) (7) proposes a new country park around the Stour River to the south of the site. The country park is to include a wetlands area to ‘to assist’ with the filtration of nitrates and phosphates within the upper Stour catchment. The extent of that country park is not defined on the policies map.

4. Lenham Parish Council objects to policy LPRSP4 (A) on the basis that:
  - (i) the location and size of the proposed country park are not defined within the policy. Reference to a future masterplan or supplementary planning document is not sufficiently robust to demonstrate at this time that an adequate strategy to provide nutrient neutrality, as required by Natural England, can be achieved within the garden community proposals
  - (ii) there is no evidence that a workable and acceptable strategy can be developed to deal with wastewater treatment for all Lenham in combination with nutrient neutrality
  - (iii) it will be very expensive and difficult to secure and then maintain a combined wastewater treatment and nutrient neutrality facility making Heathlands an unwieldy, complex and expensive development option. This would be an unnecessary and expensive drain on funds generated through Community Infrastructure Levy (CIL) which should be available to provide infrastructure across the borough
  - (iv) there is no certainty that such an adequate combined facility can be designed, developed and installed within the plan period, to serve first occupation, causing uncertainty as to whether Heathlands can deliver ANY UNITS within the plan period
  - (v) other more sustainable development options exist within the Borough (such as at Maidstone urban areas and Marden) which do not drain into the Upper Stour and therefore avoid all the complexities outlined above
  - (vi) because it has not been possible to design a scheme to deal with wastewater and nutrient neutrality it will not have been possible to provide costings with any degree of certainty. It will not be possible, therefore, to ascertain whether Heathlands is a viable project
5. The failure to secure early engagement with infrastructure providers to identify what infrastructure is required and how it can be funded is contrary to the planning practice guidance on this matter. Lenham Parish Council concludes Heathlands should be deleted from the plan in its entirety.