

Heathlands Garden Community, Lenham Heath:
Unsustainable, undeliverable and unviable

Contents

3 Introduction

- 4 Location
- 5 Policy Context

6 Unsustainable

- 7 Employment & Economic Need
- 8 Biodiversity & Environment
- 9 Water

10 Undeliverable

- 11 Transport
 - 13 Land Ownership & Assembly
-

14 Unviable

- 15 Viability Assessment

16 In Summary

- 17 Community Engagement
 - 18 Garden Community principles
 - 19 What your experts say
-



Introduction

Lenham is not the right place for a garden community

Save Our Heath Lands (SOHL) is an independent volunteer-led campaign group made up of concerned residents of Lenham and the surrounding villages, under threat by Maidstone Borough Council (MBC)'s Garden Community proposal to build a new town of over 5,000 homes on beautiful, green heath lands at the foot of the Kent Downs Area of Outstanding Natural Beauty.

Our work over the last twelve months since MBC announced their intentions to investigate Lenham Heath as a prospective development site has explored the constraints and opportunities of this location.

Our findings are conclusive. The council-led Heathlands development is unsustainable, undeliverable and unviable.

This document sets out evidence-based, factual information that must be considered by MBC's planners and those politicians responsible for making strategic planning decisions.

MBC's role as scheme promoter has created significant mistrust in the community it seeks to serve.

It is time for our local council to start listening to local residents.

Location

Lenham's rural setting and distance from existing major settlements makes it an unsuitable location for new major development.

Lenham is located at the centre of Kent, the heart of the garden of England.

The parish largely comprises high quality rural landscape, being roughly equidistant between Faversham, Ashford, Headcorn and Maidstone, approximately 15km from each of these locations.

Lenham is the source of two of the county's most important rivers; the Stour and the Len.

Lenham village has the only working medieval village square in Kent, which has remained without significant change to the enclosing buildings since the 16th century.

Lenham has historically benefited from east-west routes including from London to the continent and the Pilgrims Way (North Downs Way).

This pattern continues to this day, and the Parish is now

crossed east-west by the A20, the M20, the Kent mainline railway and the High Speed 1 line which run approximately parallel to, and south of, the Kent Downs AONB.

The area to the north of the A20 forms part of the Kent Downs AONB, while the area immediately south of the A20, to the east of Lenham village, provides the setting of the AONB and is a very attractive area of open countryside.

The area to the south of the mainline railway, to the east of Lenham village, lies in an area of more intricate but still very attractive scenery, including areas of woodland, agricultural fields and the hamlets of Lenham Heath, Sandway and Platts Heath.

Lenham Heath is where Maidstone Council propose siting the Heathlands Garden Community.



Policy Context

The Heathlands Garden Community proposal is not in conformity with national, borough or local neighbourhood policy. It will place new residential development in an isolated location with heavy reliance on the private car and with insufficient mixed use to reduce the need to travel.

National Planning Policy Framework (NPPF)

The NPPF is focused upon achieving sustainable development and promoting travel by sustainable modes.

The NPPF sets out a range of objectives for achieving sustainable development including the potential impact on the transport network and opportunities for sustainable travel. It also states in paragraph 17 and 21 that new developments must:

“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development on locations which can be made sustainable.” and “set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth.”.

Selecting Heathlands as a future development site as part of the emerging review of the Maidstone Local Plan would be deliberately selecting a pattern of development and land use which is heavily unsustainable.

Maidstone Local Plan (MLP)

The Maidstone Local Plan recognises Lenham as a Rural Service Centre.

The 2017 Local Plan focused new development *‘principally within the Maidstone urban area and at the strategic development locations at the edge of town and to a lesser extent at the five rural service centres of Harrietsham, Headcorn, Lenham, Marden and Staplehurst consistent with their range of services and role.’*

Lenham has an allocation of approximately 1,000 new homes in the current plan period which along with the 364 new units already committed nearly doubles the size of the village. No other rural service centre has committed such relative growth.

The Heathlands proposition would swell the parish to nearly seven times the existing number of households. This is clearly unacceptable and a divergence from existing borough policy, even with Lenham as an identified broad area of growth.

Lenham Neighbourhood Plan (LNP)

The Neighbourhood Plan demonstrates how the Parish can deliver a notable amount of development with supporting infrastructure while at the same time protecting the countryside, by ensuring growth is in appropriate locations.

In particular, the LNP makes provision of Policy CP1 (Countryside Protection). This states that *“development proposals should seek to protect the rural environment of the Parish, such that there are no adverse impacts upon the character of the countryside. Proposals which fail to demonstrate that any such impacts can be mitigated will not be supported.”*

The Heathlands proposition is beyond the Lenham parish settlement boundary and consumes the hamlet of Lenham Heath, one of which this specific policy seeks to protect.

Heathlands is not policy compliant at a neighbourhood planning level.



Unsustainable

*Lenham is an inherently
unsustainable location*

Employment & Economic Need

There is no evidence to support the proposition that the market would be able to provide close to 5,000 jobs, or indeed any significant employment, at such an isolated location. Lenham Heath is not the right location for a sustainable employment settlement.

Heathlands' promoter currently propose around 850 new jobs for the site. This is made up of 420 jobs in the B1c/B2 and B8 use classes, a further 230 non-B class jobs and provision in the form of managed workspace that will provide space for 200 workers, providing space for the self-employed, those spending some time working from home.

Arguably the development is only proposing to create 650 jobs. This is well below the TCPA guide of 1:1 jobs to houses ratio.

For the aspirations set out in the masterplan to be realised, considerably more employment would need to be delivered. Recent research found that garden communities on average deliver 35m² of employment space per dwelling². For Heathlands, this would equate to 35 acres of space required compared to the current proposed 27 acres.

Such few jobs will lead to the true vision and purpose of a garden community not to be realised. Government guidance requires garden communities to facilitate residents living, working and playing in the development to reduce external trips.

Even if thousands of jobs could be provided at Heathlands the majority of those are likely to be low-wage positions. This would require workers travelling long distances, mainly by private motor car, from their homes in Maidstone, the Medway towns, Ashford or further afield to reach employment at Heathlands. Meanwhile, residents of Heathlands, inevitably in higher earning brackets and able to afford the "executive homes" that would no doubt feature heavily, would be travelling away from the area to higher paid employment. This would create a dormitory town.

The Council's Sustainability Appraisal notes that the strategic location to the motorway network of Heathlands and Lenham Heath could make it a suitable site for warehouse/distribution however this would go against the principles of creating a low carbon integrated transport

system and the promoter is yet to make any case as to how the scheme could cope with the residential motor car trips before even considering heavy good vehicle movements on an existing unsuitable road network.



Biodiversity & Environment

The rural setting and rich biodiversity at the foot of the Kent Downs AONB are to be robustly protected. The use of over 700 acres of predominantly green space is not an acceptable location for a new settlement like Heathlands. The loss of biodiversity, farming land, and wildlife is intellectually and morally bankrupt.

The proposed site for Heathlands garden community is extremely complex from a landscape, ecology, and biodiversity perspective.

Parts of the site have high landscape sensitivity with other parts benefiting from rich arable farming (grade 3 and above).

A number of designations for areas within the proposed site are omitted from the Council's own designations map and include parts of the National Habitat Network and Countryside Stewardship Agreement Management Areas as well as ancient protected woodland.

The Council's own Sustainability Appraisal of Spatial Options highlights the considerable concern on sustainability grounds of the Heathlands proposal not least it's locality to the Area of Outstanding Natural Beauty (AONB).

The Sustainability Appraisal therefore determines Heathlands as performing least well of all garden community proposals across the range of sustainability objectives.

A significant area on the western half of the proposed scheme will be visible from the AONB and that the topography and natural vegetation will be unable to mask the full extent of the scheme. The eastern part of the scheme has a restricted view and its impact on the AONB from a visual perspective is at this stage less.

The site is also home to a number of native wildlife including the verified presence of slow worm, common lizard and bats which would be contrary to Planning Policy Statement 9: Biodiversity and Geological Conservation.



Water

Water is one of the most significant constraints for this site. This includes the protection of the River Stour which is under protection order for nutrient neutrality as well as the siting of the Lenham Water Treatment Works which is at the centre of the proposed development and not planned to be relocated.

The water environment within the Stour catchment, which the Heathland site entirely falls within is one of the most important for water dependant wildlife in the UK.

Natural England have raised concern with the potential impact new growth is having on further deterioration of the designated sites. This uncertainty is one reason that the wastewater treatment works, such as the one at Lenham, discharging into the River Stour and surrounds are subject to an investigation of their impacts and connection with Stodmarsh designated sites under the Environment Agency Water Industry National Environment Programme (WINEP) that will report in 2022.

This causes potentially a significant constraint on the Heathlands site and the promoter is required to

demonstrate how they will ensure nutrient neutrality and remove or offset the impact of new development.

The promoter is currently reviewing what intervention is required and a report is expected 'imminently'. Whatever mitigation is proposed, it is going to be at considerable cost and not factored into the existing precarious financial appraisal.

Sewage Treatment Works

Heathlands has a Sewage Treatment Works (STW) located within a substantial part of the proposed site. There is little detail in the promoters' submissions which explains how they intend to mitigate the risks/issues associated with the proximity of the STW with the planned residential dwellings and other uses associated with the proposed housing area.

The masterplan makes little provision for the "cordon sanitaire" policy water companies comply with.

The recommended buffer zone between a wastewater treatment site and any housing is 400 metres. At present, all wastewater treatment sites in Kent conform to this requirement.

We would expect the Heathlands development to meet this requirement which would result in a considerable acreage of what is now presumed to be building land having to be set aside. This reduces the viability and deliverability of the scheme, particularly the second and third build phases.



Undeliverable

Significant constraints make Heathlands an undeliverable proposition



Transport

SOHL commissioned an independent transport assessment of the Heathlands proposal. **It concludes that the development is undeliverable** as the removal of the motorway access results in a significant and unacceptable increase in local traffic impact which cannot be mitigated by sustainable travel alternatives.

The first masterplan for Heathlands promised a new motorway junction at Lenham Heath as well as a connection to the High Speed Rail line with a new station.

The second stage masterplan indicates that the above proposed infrastructure improvements are no longer being considered as part of the development. This significantly impacts the deliverability potential of the project.

Despite numerous requests, MBC have failed to make available the full Transport Assessment that has been produced for Heathlands. For this reason, SOHL has chosen to commission independent consultants to undertake an objective assessment with publicly available information.

Highways impact

The A20 Ashford Road is the main connector for local traffic between

key centres of Maidstone, Ashford and Canterbury.

Information submitted thus far for Heathlands has lacked any indication of anticipated traffic generation. Our consultants have assumed a conservative estimated peak trip generation for the development. This concludes two-way traffic flows in excess of 3,400-3,600 vehicles from the development on the A20 during the highway peak hours without accounting for existing planned residential growth in Lenham and more modest growth in other villages along the corridor including Harrietsham and Charing.

To put this level of traffic into context, the theoretical maximum capacity of the A20 corridor is between 2,400 and 3,000 vehicles two-way. Traffic flows in the order of those conservatively estimated above could simply not be accommodated on the A20.

In the absence of a new motorway junction the traffic impacts of the development on the A20 corridor and surrounding rural lanes would be severe and appropriate mitigation such as dualling the A20 is considered to be undeliverable and financially unviable.

New rail station

The second stage masterplan refers to a 'potential' new rail station within the proposed development. No engagement has taken place with the promoter and Network Rail with regard to feasibility and deliverability.

It is not evident that a new station would be acceptable given the proximity to existing stations at Lenham and Charing and if so would potentially act as a replacement to these existing and important facilities which serve existing communities.

Stantec's assessment states that a dedicated rail station would be

15km

of carriageway requiring dualling to cope with traffic generated by Heathlands



2,400

number of additional car trips generated by Heathlands in the morning rush hour

17 years

it took for M20 Junction 10a to go from submission to government to being built and completed at a cost of £105m



70 minutes

time it would take to cycle from Heathlands to Maidstone Town Centre



fundamental to the development and that this should be in place from the outset to encourage and ingrain sustainable travel behaviour. This would require a new station to be in place by 2030. Based on previous recent examples of new stations on the national rail network, at least a 15 year delivery timetable is more realistic. MBC are yet to speak to Network Rail to find out if a new station is deliverable.

Sustainable Travel Strategy

The Heathlands Masterplan sets out an ambitious strategy for walking, cycling and public transport use. These forms of travel are limited by the distance the development would be from key employment centres and services.

Walking and cycling would, for the majority of residents, not be a suitable mode of travel for trips other than those within the development and to local centres namely Lenham and Charing. Destinations beyond these

villages would rely on public transport or private car use.

The masterplan proposes a potential bus rapid transit (BRT) scheme between Maidstone & Ashford as well as enhanced feeder electric bus services to surrounding rural areas. It is unlikely that the Maidstone to Ashford BRT scheme would generate a satisfactory transport business case given it would replicate an existing rail line.

Internalisation

The limited employment opportunities created in the proposal site along with the absence of secondary/higher education facilities reduces the ability to maximise internalisation potential for walking, cycling and public transport trips. This results in the continuing dominance of the private car to reach services outside of the development and limits any potential sustainable transport strategy.

The site is located in an inherently unsustainable location with regards to access to necessary employment, goods, services, and sustainable modes of transport. The proposed sustainable transport strategy is considered inadequate to overcome these deficiencies.

Land Ownership & Assembly

Heathlands has the most complicated land ownership arrangements of any other proposed garden community nationally. Principal landowners have not agreed any terms and the volume of small landowners will make it almost impossible to assemble phases 1 and 2 without compulsory purchase.

The proposed site's current landownership is extreme complex.

Eight principal landowners have been in discussion with MBC for some time although progress of an agreement has stalled in the last 12 months. No principal landowner has signed heads of terms at this stage.

Whilst the principal landowners do own a significant proportion of the overall site, there are a large number of small landowners, particularly in phase 1, which are vital to unlock the site's opportunity for development.

The vast majority of the 30+ small landowners are not in support of the scheme. Small landowners shaded in orange on the map to the right have requested removal of their landholdings from the masterplan with immediate effect.

Assembling such a multitude of ownerships and land types is an insurmountable task in SOHL's opinion and also affects the viability of the scheme.

The site also has the M20 motorway to the south as well as the High Speed Rail line running parallel. Each provide significant severance issues and construction constraints.



An aerial photograph of a residential development. The left side shows completed houses with red roofs and grey walls, arranged in a curved street pattern. The right side shows a large, undeveloped area with brown earth, construction equipment, and the foundations of new buildings. A large green semi-transparent overlay is positioned on the right side of the image, containing white text.

Unviable

“The greatest risk of Heathlands is the marginal viability” – Stantec

Viability Assessment

Heathlands is unviable. The proposal is wildly ambitious in its expectations and fails to acknowledge fully the challenges of the development and the inevitable financial costs. The estimated costs versus the likely revenue from the proposal quickly turns it into a loss-making scenario with insufficient risk accounted for.

We have asked for greater transparency from the promoter on its financial appraisal of the project but regrettably to no avail despite the project being funded by the taxpayer.

In the absence of a project financial appraisal, SOHL have built their own financial model for the scheme using publicly available information along with estimates and assumptions typically used in the industry.

The promoter has publicised an ambitious build and sale programme. They assume a 15 year build period starting in 2027 and with the final house sale in 2042. This is wildly optimistic given the biggest parcel of land (the western parcel in phase 3) will not become available until all minerals have been extracted, estimated to be in the 2050s.

Land values

Land around in the Maidstone area already has significant “hope” value for residential use, which would yield values of £500k-£1,000,000. Principal landowners will accept a discount for the certainty of a clear route through the planning system: but if they get too little they have the option of waiting for the next opportunity.

£140,000 per acre is the maximum the promoter is able to offer on land purchase however this is assuming the full cost of the infrastructure required has been factored in. We believe this has been grossly underestimated.

Infrastructure Costs

For transport, costs for significant infrastructure improvements have not been accounted for. The cost of a new railway station at c£12m is conservative given more recent built examples nationally.

No cost has been accounted for in order to upgrade or relocate the Water Treatment Works which is inevitable.

Risk/Contingency

Contingency of 5% is assumed for the project with no material contingencies in individual items.

It is public sector best practice for early stage projects to require big contingencies which should reduce as project definition increases. In this instance, the HM Treasury Green Book recommends 40% contingency and this is qualified by major infrastructure providers.

Making the sensible assumption on risk/contingency would make the Heathlands proposition completely unviable. Council officers have therefore chosen to keep contingency low to provide the most optimistic of business cases.

Development quantum

The promoter currently assumes 5,000 homes are built and sold by 2042. Factoring in a number of constraints such as the required buffer zone for the Water Treatment Works and the loss of a large proportion of development land in phase 1 from landowners who do not wish to sell their land, the number of homes is anticipated to significantly reduce.

We estimate the removal of land in phase 1 would result in the loss of 990 houses which would equate to c£255m in sales and which when compared to the total scheme revenue of £1.1bn is equivalent to a loss of 23%.

Our overall assessment confirms an overall loss on the proposal if a realistic appraisal is completed with suitable infrastructure costs for the investment required to make Heathlands a garden village.

An aerial photograph of a suburban town during the golden hour of sunset. The scene shows a mix of residential buildings, including terraced houses and larger detached homes, interspersed with trees showing autumn foliage. In the foreground, there are large, open fields, some of which appear to be agricultural. A road winds through the town. The sky is filled with soft, orange and yellow light, with some clouds. A large, semi-transparent green shape is overlaid on the right side of the image, containing white text.

In summary

*Heathlands is not
the solution*

Community Engagement

The Lenham community have rallied against such an audacious assault on their village. They do not and will not ever support Heathlands.

Genuine consultation is at the core of the NPPF, which is intended to allow “people and communities back into planning.”

A key requirement of the Government’s garden communities initiative is that proposals are locally supported and locally led, and the Council has failed to engage with the local community on this proposal right from the beginning.

The Council have made no attempt to meaningfully engage with the local community. In fact, it is SOHL’s view that they have actively attempted to avoid any engagement until the site has been secured in the Council’s emerging Spatial Strategy where it will be harder to argue against it.

The opposition in Lenham and surrounding villages is strong. Over 300 people turned up to a community event in January organised by SOHL to get some

Initial answers from the Council’s leadership.

Helen Whatley MP has been outspoken against the development saying it is too big and in the wrong place. Her survey of over 1,000 residents in her constituency concluded with 96% against the garden village.

Heathlands is not supported by the local community.

4,500 

people signed our petition calling for a re-think on garden communities

96% 

of 1,091 respondents said that Lenham Heath was the wrong place to build 5,000 new homes

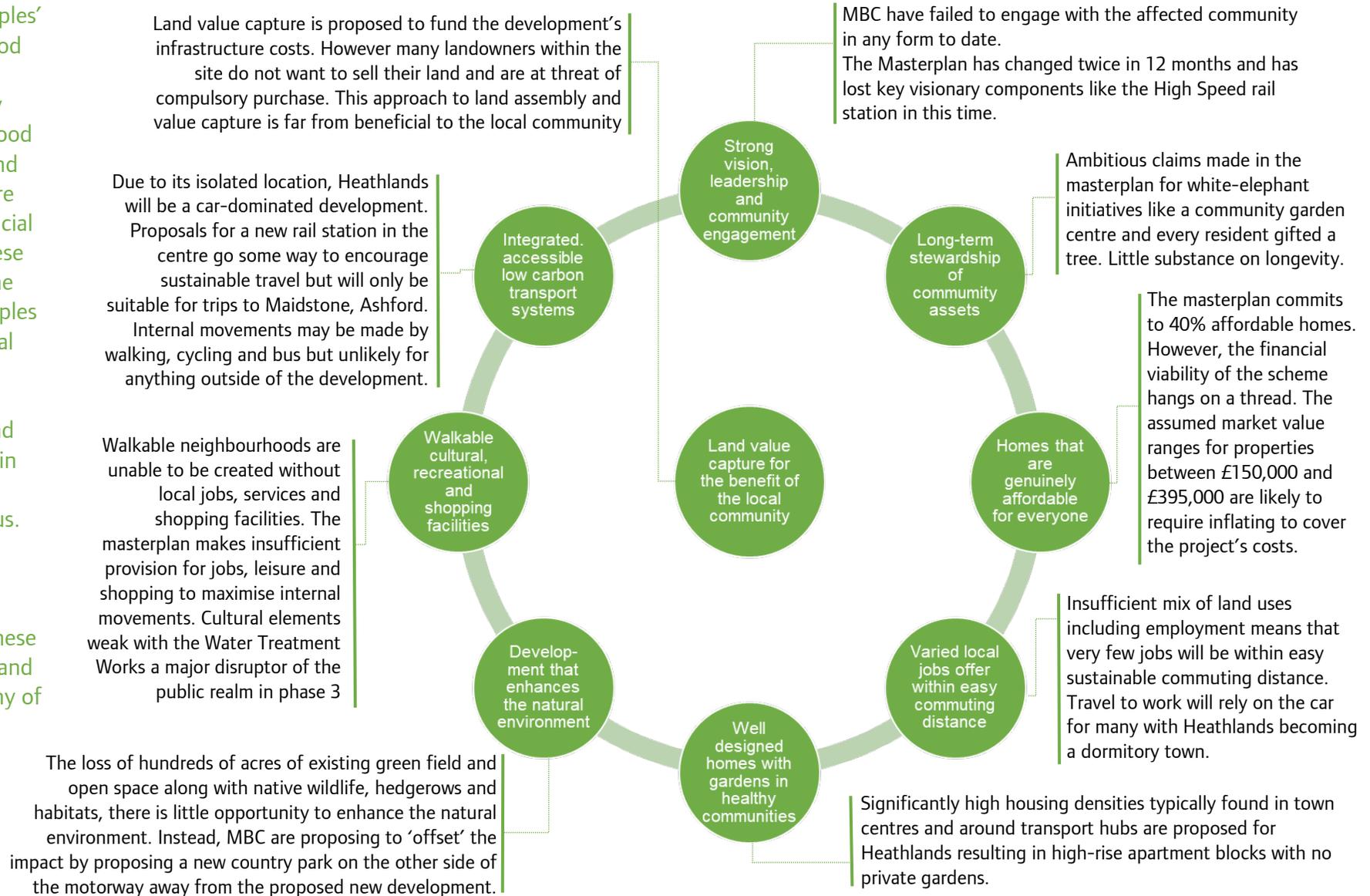


Garden Community Principles

The Government is clear that new Garden Communities should not be about creating dormitory towns, or places which just use 'garden' as a convenient label. This is exactly what is proposed in Heathlands. Away from major urban centres with an insufficient mix of land uses to ensure people can live, work, and play in the development. **Heathlands does not meet garden city principles**, a requirement of new communities.

The 'Garden City principles' are a framework for good place-making and the delivery of high-quality places which provide good outcomes for people and the environment and are underpinned by a financial model that pays for these positive outcomes in the long term. These principles are advocated by central Government as requirements for new garden communities and are supported by MBC in their New Garden Communities Prospectus.

Our assessment of the proposed Heathlands development against these principles is presented and shows weakness in many of the key principles.



What your experts say

Maidstone Borough Council commissioned a garden community assessment as well as a Sustainability Appraisal of the Local Plan Spatial Strategy options. Both expert opinions raise considerable concern with the deliverability and suitability of Heathlands and confirm that it performed least well against objectives.

Stantec Garden Communities Assessment

Paragraph 7.5.8: **The greatest risk for this scheme is the marginal viability due to unknown costs and significant abnormalities**, this will need to be properly monitored and actively managed if it was taken forward.

Paragraph 4.3.2: The 850 job total is below the TCPA guide 1:1 jobs to houses ratio and represents a lost opportunity to make a much larger contribution to the Council's employment land needs.

Paragraph 4.4.8: It is more than certain that without the [new rail] station, offsite vehicle impacts could be double those outlined by RSK, and that would lead to car reliance and ingrained unsustainable travel patterns, contrary to the Garden Communities Prospectus and government guidance. Even in a best case some 1,000 trips in each direction on the A20 to Ashford and Maidstone would lead to significant traffic problems and impacts.

Paragraph 7.2.14: For the purposes of the draft plan we would suggest that the Council caveats the deliverability of the current masterplan proposal on the successful delivery of the station.

Paragraph 4.6.10: There are still a considerable number of land parcels that are not included within the ownership or control of the promoter and which are fundamental to achieving the design and masterplan proposed [...] Uncertainty about the inclusion of all the land within the red line remains a key issue going forward and risk to the delivery of the scheme.

Sustainability Appraisal (SA) Options for Spatial Strategy, Site Allocations & Garden Settlements

Paragraph 8.9: The SA found that the garden settlement option that performed most strongly in sustainability terms was Lidsing, followed by North of Marden; **Heathlands performed least well across the range of sustainability objectives.**

Paragraph 4.58: Heathlands [...] could take a long time to deliver, which means that additional sustainable transport infrastructure would not be provided for in the early years of the plan period. Furthermore, research of practical experience elsewhere⁸⁵ has concluded that garden settlements can become car dependent and create more traffic on local roads.

Paragraph 4.67: Heathlands would have a negative effect on the 'conserve borough mineral reserves' objective as the location is located within a Mineral Safeguarding Area and also contains a safeguarded mineral and waste site.

Paragraph 4.74: Heathlands location lies within Grade 3 agricultural land [...] there is the potential for new development to harm the Borough's best and most versatile soils in both locations.

Paragraph 4.108: The Heathlands garden settlement location overlaps several Local Wildlife Sites and areas of Ancient Woodland. Therefore, significant negative effects are identified for this option.

Paragraph 5.83: [...] approximately a third of the Heathlands site is at high risk of groundwater flooding. As such, significant negative effects are anticipated. *{more than all other garden community sites}*