The following pages contain all

of the letters

submitted by Tony Harwood,

with the latest first.

From: Richard Timms
Sent: Mon, 28 Jan 2019 09:04:15 +0000
To: Planning Comments
Subject: FW: 18/506656/FULL Census data pertinent to identified catchment of new schools proposal at Bearsted Road and Popes Wood, Weavering

Please log and upload 'Cllr Comments'

Thanks

Richard Timms MRTPI
Principal Planning Officer
Development Management
Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent, ME15 6JQ
t: 01622 602325 **w**: www.maidstone.gov.uk

From: Tony Harwood (Cllr)
Sent: 27 January 2019 14:47
To: Richard Timms; James Bailey
Subject: 18/506656/FULL Census data pertinent to identified catchment of new schools proposal at Bearsted Road and Popes Wood, Weavering

Dear Richard / James,

Having read the justification and need narrative accompanying this application I am struck that it is the North Maidstone catchment area which is referred to again and again in relation to the primary school proposal. This is not a surprise because North Ward is an already densely populated urban area which is absorbing the most significant residential growth in the Borough (including ongoing major development at Springfield Mill and the former KCC campus).

The following 2011 census data underlines a number of key demographic challenges in relation to the location and accessibility of the Newnham Court Farm site from North Maidstone. I hope this provides helpful context.

- According to the 2011 census, the population of North Ward was 10,210, with a high proportion of males at 53.8% compared to borough average 49.4%, average age of 36.7 is significantly lower than borough average 40.5%. 1,930 0-15 year olds and 1,230 over 65s

- Much higher than borough average BME (non-white) population 13.2% compared with 5.9% - largest non-white ethnic group is Asian/Asian British at 8.7% compared with borough average 3.2%. In addition, there is a higher rate of recent arrivals to UK than borough average: 11.8% arrived in previous 10 years compared with 5.0% for the borough as a whole. Significantly lower than borough average of residents have English as a first language at 87.2% compared with 95.1% for the borough as a whole.

- Parts of North Ward fall in the national top 20% of most deprived wards in relation to Health and Disability, Barriers to Housing and Services, Crime and Living Environment.

- 295 residents receive income support, 155 receive attendance allowance and 370 receive disability living allowance. There are 445 Out of work benefits claimants which is in line with borough average at 6.3% of the 16-64 population.

  Dominant housing types are terraced, semi-detached and flats, all above borough averages. Significantly lower than borough average of owner occupied households (59.6% compared with 70.5%). High rates of rented households at 37.9% compare with borough average 27.3% of which private rented are the most prevalent (20.6% of all households compared with 13.0% borough average)

- A very high number of residents walk to their place of employment 24.1% compared to 11.6% for the borough; there is a commensurate lower use of cars/vans at 53.3% compared to 64.2% for the borough. Cycling is almost double that of the borough average. 27.1% of residents travel less than 2km to work compared to 16.0% for the borough reflecting the ward's proximity to the town centre.

Yours sincerely,
Tony Harwood

From: Richard Timms
Sent: Mon, 14 Jan 2019 09:01:32 +0000
To: Planning Comments
Subject:FW: 18/506656/FULL Transport Assessment proposed schools site adjacent to Bearsted Road and Popes Wood, Weavering

Please log and upload 'Cllr comments'

Thanks

Richard Timms MRTPI

Principal Planning Officer

Development Management

Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent, ME15 6JQ

t: 01622 602325 **w**: www.maidstone.gov.uk

From: Tony Harwood (Cllr)
Sent: 13 January 2019 20:44
To: Richard Timms; James Bailey
Cc: Clive English (Cllr); Rob Jarman
Subject: 18/506656/FULL Transport Assessment proposed schools site adjacent to Bearsted Road and Popes Wood, Weavering

Dear Richard and James,

18/506656/FULL Transport Assessment proposed schools site adjacent to Bearsted Road and Popes Wood, Weavering

Having read the transport assessment accompanying application 18/506656/FULL it is clear that Maidstone Borough Council should seek impartial independent technical advice is required to determine whether the impact upon already congested Bearsted

Road arising from these proposals is in fact Severe and therefore contrary to Paragraph 109 of the NPPF.

The rationale for this view being that access to the proposed new schools by foot or bicycle cannot realistically be safely achieved from surrounding communities (except perhaps, Grove Green with significant impacts upon the local environment and residential quality of life) the scheme will be entirely dependent upon motor vehicles thus creating a worse congestion situation than that experienced around local school. Experience at nearby Roseacre Primary, Thurnham Infants, Madginford Junior, Sandling Junior, Eastborough County Primary, Northborough Primary and St. Paul's Infants all experience near or actual gridlock in surrounding roads at the start and finish of the school day with routine hazardous parking in adjacent streets completely ignoring parking restrictions, pinch-points and private drives. As a result of traffic problems experienced around local junior schools an 'arms race' has developed in which parents/carers arrive in their cars earlier and earlier in the afternoon to get the plum parking spaces. The hundreds of school run vehicles which would inevitably congregate in Bearsted Road, Shepherdsgate Drive, Weavering Street and Hockers Lane will inevitably clog the already extremely busy Bearsted Road link and bring hazardous congestion to nearby residential streets.

I will not focus upon pedestrian/cyclist access as it is clear that this cannot be safely achieved by parents and carers with young children at the start or end of the school day. Children from the north Maidstone, Penenden Heath, Vinters Park, Thurnham, Detling and Bearsted will simply physically not be able to safely cross the series of frequently alternating footways because of the sheer volume and speed of traffic. The walking environment in the Bearsted Road / Ware Street corridor is currently grim for pedestrians because of the pollution and noise (and driver behaviour / antagonism against pedestrians seeking to cross from footway to footway).

SPECIFIC ISSUES

Proposed Weavering Heath PROW Upgrade: The proposal to upgrade KH46 at Weavering Heath is particularly problematic. Because it will link to the only controlled and thus safe new pedestrian crossing point on Bearsted Road it will inevitably lead to Shepherdsgate Drive becoming the unofficial parking and waiting area for the school. Because of the obscured sightlines resulting from the curve in the northern section of Shepherdsgate Drive and the number of drives it contains the potential for traffic danger and conflict with residents is significant. Shepherdsgate Drive is an internal estate road

not designed for heavy use and the route back onto Grovewood Drive North is circuitous and narrow.

A formal path across the seasonally water-logged Weavering Heath would require significant engineering works, regrading and vegetation removal and would bisect and fragment this important semi-natural open space. A number of legally protected species (especially reptiles and uncommon heathland plants) inhabit the Heath and direct habitat damage, fragmentation, littering and disturbance would inevitably result from any formalisation of KH46. Weavering Heath has been utilised recently as a receptor site for protected species displaced from a development site in Harrietsham and this raises and ethical question. There is reference within the transport assessment to a crushed-stone surfacing for the proposed footway, but how realistic this is on such a waterlogged site remains to be seen.

Gidds Pond Cottages: The proposal to remove on-street car parking from outside Gidds Pond Cottages is vague. The creation of an off-street car park would not of itself remove vehicles from Bearsted Road. Indeed, some off-street parking already exists but residents of the cottages prefer to park on-street because of the traffic calming function it performs and the distance and screening it affords from fast and noisy traffic. The living rooms and bedrooms of the cottages are very close to the road and the traffic on the Bearsted Road is very fast and noisy. Indeed, when a fatal car crash involving a local man took place adjacent to the cottages fragments of the vehicle involved were thrown over the cottages and into back gardens. Another key issue in relation to the practicality of off-street parking is security, indeed, when I was a resident in the cottages my own car was vandalised and broken into when parked off-street. If parking restrictions are proposed outside the cottages this is likely to be far from popular as it would impact visitors, deliveries, carers etc. If the footway build-out were such that it precluded on-street parking there is a strong likelihood of conflict with delivery vehicles, dustcarts and general parking. As a post-script another issue is relation to encouraging heavier pedestrian use of the footway outside the cottages is the fact that wheelie bins almost completely block the footway because gaining access to the rear of the terrace properties is virtually impossible with a wheeled bin. The ecological implications arising from the construction of a larger car park are also significant.

As a post-script the only time currently that crossing is possible on Bearsted Road is when vehicles are held back at the unofficial traffic calming outside Gidds Pond Cottages, without this natural break in traffic flows they would be continuous and crossing would be impossible. Any attempt to remove this traffic calming feature would therefore make crossing the road much more difficult.

Proposed 30 MPH Speed Limit: The alternating footway configuration and their positioning on the brow of hills and on bends means that a safe and enforceable speed limit is vital if pedestrians are to safely cross during any breaks in traffic flows. 30 MPH as proposed is very fast in light of the positions of the uncontrolled alternating crossings and 20 MPH would be more appropriate (even if only at the start and end of the school day) and reflect a trend outside other schools in Kent and beyond. That said, any reduced speed limit would require enforcement and continuous speed camera technology is essential and probably draconian traffic calming features as well to tame the 'motorway vision' of much of the traffic using this busy commuter route to and from the M20.

Loss of Trees at south east extent of application site for footway configuration changes: The oak and other trees proposed to be removed are the only decent trees on the application site and form an important screen for residents on the other side of the Bearsted Road. The choice of the only small sylvan area to create footway configuration changes which will eat into the verge is extremely unfortunate and an alternative location where no trees would be lost would be more appropriate. Ironically, the native trees lost are proposed to be replaced with non-native conifers.

Street Lighting: The negative ecological impacts upon the relatively dark corridor adjoining wildlife rich ancient woodlands and Weavering Heath of street lighting will be profound, as will the resultant change in local landscape character. Such urbanisation and the negative impacts upon nocturnal wildlife (including protected species) are a significant planning issue and must form a part of the balancing exercise alongside all of the other significant considerations involved in this decision.

Environmental sustainability, Social Responsibility, Socio-economic, Health, BREEAM and Safe Pedestrian Access: There are very fundamental issues raised by a proposal for a new school with such profound barriers to access and egress being achieved by any other means than the motor car. Case law and a range of national and local planning guidance will need to be interrogated and ethical as well as practical considerations will need to be taken into account, especially in relation to those local children who will be excluded from the future rolls of these schools should they go ahead as a result of the socio-economic, physical health or other circumstances of their parents / carers i.e. not having access to a car. The BREEAM scoring for the schools will be significantly affected by their remote and inaccessible situation for those without access to a car.

If you require any further information or wish to discuss this matter further please do not hesitate to contact me.

Yours sincerely,

Tony Harwood

From: Richard Timms
Sent: Mon, 14 Jan 2019 09:01:13 +0000
To: Planning Comments
Subject:FW: 18/506656/FULL Location and Design Observations proposed schools site adjacent to Bearsted Road and Popes Wood, Weavering

Please log and upload 'Cllr comment'

Thanks

Richard Timms MRTPI

Principal Planning Officer

Development Management

Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent, ME15 6JQ

t: 01622 602325 **w**: www.maidstone.gov.uk

From: Tony Harwood (Cllr)
Sent: 13 January 2019 13:16
To: Richard Timms; James Bailey
Cc: Clive English (Cllr); Deanne Cunningham; Rob Jarman
Subject: 18/506656/FULL Location and Design Observations proposed schools site adjacent to Bearsted Road and Popes Wood, Weavering

Dear Richard and James,

18/506656/FULL Location and Design Observations proposed schools site adjacent to Bearsted Road and Popes Wood, Weavering

I write with the following observations on Location and Design in relation to application 18/506656/FULL.

Location: Location raises significant challenges in terms of achieving sustainable development in terms of transport and encouraging other means of movement than the motor vehicle. In both social responsibility and practical terms building schools in a location where only families with access to a private motor car can access the site raises ethical and planning questions. The north Maidstone catchment indicated covers North Ward with its comparatively low car ownership levels and high walk to work/school rates. Adjacent populous East Ward is also out of safe practical reach of the application site. The sustainability of the inevitable significant car trip generation arising from this proposal also significantly impacts BREEAM compliance.

Design: The scale and mass of the proposed utilitarian flat-roofed structure proposed to be built in open countryside forming the foreground of the AONB bounded on two sides by an ancient woodland Local Wildlife Site does not evidence good design. An exceptional scheme in terms of design and environmental sustainability is required within such a high quality setting. Further, the intensity of development proposed on the site does not afford the space for the structural landscaping required to accommodate such a large utilitarian structure into the landscape. The extent of proposed hardstanding, artificial pitch, fenestration, flank wall and flat roof will all significant detract from the landscape setting. Materials proposed indicate no congruity with local character and do not comply with the adopted Landscape Character Assessment i.e. inner urban design approach has been pursued within a sensitive rural landscape. Design was a key consideration for all the permitted schemes on the adjoining Newnham Park campus and stimulated meaningful negotiation and evolution. The application site is more visible and high profile than the rest of Newnham Court Farm (hence its Local Plan designation and planning permission for a ‘woodland nature reserve’) and it is therefore puzzling that design considerations appear not to have been subject to the same level of scrutiny and refinement.

Key Observation: In light of the profound sensitivity of this rural site in the open countryside and foreground of the AONB and the clear transport/access sustainability deficit it is suggested that this proposal is subject to early Design South East - South East *Panel scrutiny.*

If you require any further information please do not hesitate to contact me.

Yours sincerely,

Tony Harwood

From: Richard Timms
Sent: Mon, 14 Jan 2019 08:49:12 +0000
To: Planning Comments
Subject:FW: URGENT: 18/506656/FULL Energy Strategy proposed schools site adjacent to Bearsted Road and Popes Wood, Weavering

Please log and upload 'Cllr comments'

Thanks

Richard Timms MRTPI

Principal Planning Officer

Development Management

Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent, ME15 6JQ

t: 01622 602325 **w**: www.maidstone.gov.uk

From: Tony Harwood (Cllr)
Sent: 13 January 2019 12:40
To: Richard Timms; James Bailey
Cc: Rob Jarman; Clive English (Cllr); Martin Round (Cllr); Steve Munford (Cllr)
Subject: URGENT: 18/506656/FULL Energy Strategy proposed schools site adjacent to Bearsted Road and Popes Wood, Weavering

Dear Richard and James,

18/506656/FULL Energy Strategy proposed schools site adjacent to Bearsted Road and Popes Wood, Weavering

I have now had the opportunity to read in detail the Energy Strategy submitted as part of this application. It is clear that the narrative within the document is generic and similar to consultancy documentation increasingly submitted by other developers seeking to avoid investment in clean energy. However, the forecast data on energy use which does exist

within the strategy document indicate a comparatively significant comparative energy use forecast when compared with available data for larger buildings such as the new STEM school in New Cut Road and new local residential and commercial flat roofed blocks (which all incorporate solar pv arrays).

The Energy Strategy fails to address resilience considerations encompassing power outage risk (specific to north east Maidstone and Weavering supply infrastructure), energy security, rising energy costs, UK commitments on clean energy and greenhouse gases. All of these issues have been given extra urgency by the latest IPCC report and UK Met Office climate change impacts forecast. Indeed, existing older schools are widely retro-fitting solar pv and other clean and decentralised energy generation. It is more technically appropriate and cost effective to design in clean energy generation - the situation of the proposed school and expanse of flat roof makes it suitable for a substantial solar pv array, while the playing field and soil type are suitable for ground-source heat pump technology which is an effective means of heating such institutional buildings.

Initiatives such as Solar for Schools https://www.solarforschools.co.uk/schools-funding evidence significant financial benefits, alongside sustainability, public health and educational benefits.

From a regulatory perspective compliance with BREEAM Schools Very Good remains enforceable as Government proposals to remove this requirement have yet to be acted upon. Just as in the case of other commercial developments BREEAM compliance remains current for schools. Indeed, the Government review of the cost of BREEAM compliance in schools concluded: "*The study demonstrates that achieving a 'Very Good' rating is not likely to create significant extra costs, provided that satisfaction of the BREEAM credits is given due consideration early in the design process."*

In conclusion, it is very unusual for an application for a large and publicly funded institutional educational development to be progressed in the UK in 2019 without clean or decentralised energy generation technology included. The simple block structure, expansive flat roof area available and situation within open land in the sunny south east makes designing-in clean energy generation such as solar pv cost effective and technically straightforward and would therefore bring immediate benefits in terms of energy costs and pollution reduction.

Maidstone Borough Council officers should therefore urgently negotiate inclusion of clean / decentralised energy generation as a pre-requisite of achieving resilience, sustainable development and good design as required by the NPPF. This issue should have been addressed at the pre-application stage and it is extremely unfortunate that such an untenable situation has arisen. A very recent example promoted by KCC in relation to renewable energy installation funded through Salix Finance: https://kccmediahub.net/northfleet-school-girls-soaks-solar-power745 underlines the significant holistic benefits from such technology.

Yours sincerely,

Tony Harwood

From: Richard Timms
Sent: Mon, 14 Jan 2019 08:47:45 +0000
To: Planning Comments
Subject:FW: 18/506656/FULL Biodiversity observations in relation to proposed schools site adjacent to Bearsted Road and Popes Wood, Weavering

Please log and upload 'Cllr comments'

Thanks

Richard Timms MRTPI

Principal Planning Officer

Development Management

Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent, ME15 6JQ

t: 01622 602325 **w**: www.maidstone.gov.uk

From: Tony Harwood (Cllr)
Sent: 12 January 2019 22:35
To: Deanne Cunningham; Richard Timms; James Bailey
Cc: Rob Jarman; Clive English (Cllr)
Subject: 18/506656/FULL Biodiversity observations in relation to proposed schools site adjacent to Bearsted Road and Popes Wood, Weavering

Dear Deanne, Richard and James,

18/506656/FULL Biodiversity observations in relation to proposed schools site adjacent to Bearsted Road and Popes Wood, Weavering

I write with the following observations on biodiversity considerations in relation to application 18/506656/FULL on open countryside adjoining the part semi-natural ancient Popes Wood at Weavering.

Context: the application site is located within the Mid Kent Greensand and Gault Biodiversity Opportunity Area and is fringed on two sides by the (part) semi-natural ancient Popes Wood (a Kent Wildlife Trust Local Wildlife Site).

Agricultural Landscape: The application site (despite the long-term presence of slightly ramshackle reptile fencing) is an important 'grazing lawn' for European rabbit because of the field of vision it affords. The local European rabbit population is a keystone species in this area, enhancing local vegetation structure along the woodland edge through its grazing of grass, herbs and woody vegetation and providing a prey species for larger predators including stoat, red fox, badger and common buzzard. The loss of the last 'protected' large open field at Newnham Court Farm would inevitably result in a collapse of the rabbit population with a resultant negative impact upon local biodiversity as vegetation structure become simplified and a key prey species (especially in spring when rabbits are the single most important protein source for the young of a range of predatory species). The European rabbit is undergoing a significant population decline in the British Isles of some 60% in the last 20 years as a result of disease and habitat loss, which is contributing to the wider decline in biodiversity.

A range of farmland birds utilise the field subject to this application including starling, a Red Listed species of High Conservation Concern, with flocks routinely seen foraging the sward for invertebrates and seeds. The pasture land which once characterised Weavering, Vinters Park, Boxley and Detling is now all but lost to agricultural change and urbanisation and as a result bird species such as the starling have largely vanished. Other bird species observed utilising the application site include raptors such as barn owl sparrow hawk, kestrel and common buzzard.

The prevailing MBC Local Plan (2017) policy criteria and extant planning permission on the application site (and detailed landscape management plan therein) were carefully crafted to deliver 'open woodland' along the lines of wood pasture to ensure that local biodiversity is maintained and enhanced. The current application will result in the loss of open grassland and consequently the loss of all the farmland birds currently associated with the site – with no compensation provided or indeed possible with such an intensive form of development.

Woodland Edge: Alongside the total loss of open grassland and the species which rely upon it the significant negative impact upon the extensive sunlit woodland edge ecotone (through shading, disturbance, noise, light pollution, air pollution and polluted run-off i.e. herbicide, road salt etc.) will inevitably have a negative offsite impact upon the part

ancient Popes Wood Local Wildlife Site. The interrelationship between Popes Wood and the adjoining open farmland subject to this application is significant. The sunlit south-facing woodland edge ecotone is both the most biodiverse and vulnerable to disturbance sector of the whole wood. Legally protected species associated with this 'edge habitat' include dormice, viviparous lizard, slow worm, grass snake, great crested newt and a number of bat species (there also historic records for adder from Popes Wood). This is almost a full sweep of all the animal species protected under the Wildlife and Countryside Act 1981 resident in Maidstone Borough.

Landscaping proposals (which are incomplete as currently submitted) and the Biodiversity Enhancement and Landscape Management Plan do not mitigate the inevitable negative impacts upon the woodland edge ecotone. The proposed site layout results in more than a quarter of the (currently open and sunlit) south-facing woodland edge being perpetually shaded by the tall northern flank wall of the primary school block, while the intrusive hard-standing car park/internal road area and MUGA will disturb and effectively 'sterilise' an equal length with only the woodland adjoining the senior football pitch retaining any semblance of openness. The boundary treatments to protect the buffer are currently unspecified but should not further shade the buffer zone, be visually intrusive or prevent movement of wildlife (including larger species such as badger, red fox or roe deer).

Management prescriptions set out in the Biodiversity Enhancement and Landscape Management Plan at 3.3.4 in relation to management of 'wildflower meadows' within the proposed woodland buffer pay no regard to the vulnerability, lifecycles and behaviour of the fauna associated with the woodland edge ecotone and instead prescribe 'gardening' for wildflowers. If the following proposed management prescriptions are carried out along the entire buffer zone it will inevitably result in the attrition of all small fauna:

"In the first year, wildflower meadows sown in autumn are to be cut in late March/ early April when the sward has reached 100-150 mm, and reduced to 50-70 mm. Those sown in spring are to be cut to 50-70 mm, six weeks after sowing, with further cuts if the sward reaches 100-150 mm. A final cut is to be made in September. All arisings are to be removed. After the first year, wildflower grassland is to be cut to 50-70 mm in March/April and again in September/October with a scythe or petrol strimmer. Arisings are to be left in-situ to dry and shed seed for 3-7 days then raked."

The mowing regime quoted would directly kill invertebrates, amphibians, reptiles and small mammals and also remove the tussocks, dry stems, seed heads and other habitat

niches essential to the overwintering stages of many organisms. Traditional meadows do not support a rich fauna and is an inappropriate habitat aspiration for a narrow woodland edge ecotone. Instead, the Biodiversity Enhancement and Landscape Management Plan should instead seek to optimise the structure of the woodland edge habitat to offset the harm arising from shading, disturbance, artificial lighting and other consequences of urbanisation. This could best be achieved through:

- *Allowing a more natural, undulating and organic woodland edge to form – including a transition from tall trees, to shrubs, to rank herbs and scrambling vegetation such as bramble, through to a shorter herb rich sward (the meagre 15m width available will mean that rotational management interventions will be required to achieve this structural diversity).*

- *Natural regeneration with 'management' from rabbit grazing is optimal to achieve this desired optimal vegetation structure – rather than planting and mechanical interventions – with only a framework of structural planting necessary such as common hawthorn and common gorse (which will benefit the adult stages of saproxylic invertebrates and provide cover for the all-important rabbit population).*

- *Scattered cordwood and cordwood piles should be introduced into the buffer zone including, however, the approach indicated within the management plan using old pallets, bamboo etc. is inappropriate in such a semi-natural habitat adjacent to ancient woodland and in the foreground of the Kent Downs AONB and could profitably be utilised within the school site as an education aid.*

- *The excavation of banks, depressions and sections of ditch within the buffer zone would enhance topographical interest and benefit invertebrates, amphibians, reptiles and small mammals through creating basking and burrowing opportunities and ephemeral wetlands.*

Landscaping / Planting: As mentioned in my earlier observations on the proposed planting plan (dated 11/01/2019) the inclusion of exotics and cultivar clones is unacceptable in this location adjacent to an ancient woodland Local Wildlife Site. Planting within such a sensitive landscape must be 100% native and local provenance for biosecurity and landscape reasons.

Ponds: Though the inclusion of wet and ephemeral ponds is welcomed, their situation on the site frontage subject to significant disturbance and divorced from Popes Wood and other adjacent semi-natural habitat is unacceptable. It is inevitable that great crested newt and other resident amphibians will seek to reach the new ponds and will

be vulnerable to dessication by hardstanding, tissue damage by road salt, entrapment by drainage infrastructure, roadkill, predation and disturbance. The new ponds should therefore be relocated closer to Popes Wood. It is vital that the ponds are sustainable in the long-term and their location and linkage to nearby semi-natural habitats

Local ponds support uncommon aquatic and marginal plants including fan-leaved water crowfoot, blunt-fruited water starwort and stoneworts and it is recommended that natural colonisation by aquatic and marginal plants is optimal to planting, which brings biosecurity and long term management risks. It is vital that the ponds are sustainable in the long-term and their location and linkage to nearby semi-natural habitats.

Site Frontage: The ivy-heavy mixed species native hedge which formerly created the boundary between this field and the Bearsted Road sheltered a significant population of viviparous lizard at its base and audibly hummed with pollinators in the autumn when the ivy was flowering. It is recommended that a broad mixed native species hedge is replanted along the site frontage interspersed with native hedgerow trees. As well as recreating a lost wildlife habitat such a boundary is more appropriate in landscape terms than the more formal landscape approach currently proposed. The Management Plan should stipulate an eventual height and width and cutting regime for the new hedge to ensure it delivers for both wildlife and landscape.

Integral niches for wildlife: There is a plan to incorporate a small number of swift bricks, which is welcomes, but integral bat nesting/roosting spaces for bats should also be delivered as part of this development should it be progressed. All drainage infrastructure must also be wildlife friendly to prevent entrapment.

Lighting: The field subject to this application and Popes Wood remain remarkably dark as a result of local landform, woodland screening and the absence of lighting on Bearsted Road. This benefits invertebrates, bats and much other wildlife and it is vital that a ‘dark skies’ approach is utilised here, perhaps using motion sensors on safety lighting and with all lighting switched-off onsite in the early evening.

Bird-strike: The proximity of fenestration to woodland is a recipe for disaster for birdlife which can quickly be decimated by bird-strike in such situations when they fly towards reflected vegetation and smash into windows. There is evidence from sites in Maidstone of almost complete extirpation of woodland birds when highly reflective large buildings

have been introduced nearby. It is therefore vital that glass stippling or tinting and/or overhangs are utilised and that fenestration is removed or reduced where it reflects adjacent woodland.

Chemical Use: Insensitive site maintenance and management interventions such as profligate use of road salt, introduction of pesticides such as slug pellets or rodenticides can wipe out local wildlife populations almost overnight. It is therefore vital that maintenance contracts are sensitive to the setting of this proposed development and explicitly forbid the use of toxic chemicals on the site. Unfortunately, contract landscape maintenance can be 'brutal' and insensitive to wildlife and landscape and therefore the management plan must be explicit in making this site wildlife friendly.

Offsite Safeguards: Bearsted Road is flanked by ancient woodlands, mature hedgerows and other beautiful and biodiverse habitats and it is vital that these are not damaged in any way as a result of this proposal. Further, nearby Weavering Heath supports one of the few areas of surviving European dwarf shrub heath in Maidstone Borough and even a small area of lichen heath. Another feature of the Heath is its reptile fauna, which includes adder, grass snake, slow worm and a very large viviparous lizard population. Indeed, Weavering Heath has also been used as a receptor site for reptiles displaced by residential development at Hook Lane, Harrietsham, The proposal to create a regraded and surfaced path across Weavering Heath (which is water-logged in the winter months) would directly damage habitat and fragment this important semi-natural landscape inflicting inevitable harm on legally protected wildlife. Indeed, the sensitivity of Weavering Heath in ecological terms is such that its bisection by a formal surfaced path and regrading should be ruled out. In landscape terms the MBC Landscape Character Area Assessment is explicit in regard to this site: "• Improve and reinforce relict heathland at Weavering Heath".

Built design: The absence of living roof technology or renewable or decentralised energy generation despite an expansive extent of flat roof does not deliver sustainable development as demanded by the NPPF in terms of either the local or global environment. The intensive nature of the proposed development and extent of hardstanding and artificial surfacing will create an urban heat trap without the space to introduce the level of structural landscaping required to cool and screen the development. This will result is mechanical cooling being necessary which will further increase carbon footprint. In landscape terms the intensive nature of the proposed development on a site with little space will have a significant landscape impact in the open countryside and foreground of the Kent Downs AONB.

If you require any further information or wish to discuss this matter further please do not hesitate to contact me.

Yours sincerely,

Tony Harwood

From: Richard Timms
Sent: Mon, 14 Jan 2019 08:39:32 +0000
To: Planning Comments
Subject:FW: 18/506656/FULL Observations on planting plans for proposed schools site adjacent to Bearsted Road and Popes Wood, Weavering

Please log and upload 'Cllr comments'

Thanks

Richard Timms MRTPI

Principal Planning Officer

Development Management

Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent, ME15 6JQ

t: 01622 602325 **w**: www.maidstone.gov.uk

From: Tony Harwood (Cllr)
Sent: 11 January 2019 22:36
To: Richard Timms; Deanne Cunningham; James Bailey
Cc: Rob Jarman; Clive English (Cllr)
Subject: 18/506656/FULL Observations on planting plans for proposed schools site adjacent to Bearsted Road and Popes Wood, Weavering

Dear Deanne, Richard and James,

18/506656/FULL Observations on planting plans for proposed schools site adjacent to Bearsted Road and Popes Wood, Weavering

I write with the following observations on the planting proposals accompanying application 18/506656/FULL on open countryside adjoining the part semi-natural ancient Popes Wood at Weavering.

Context: the application site is located within the Mid Kent Greensand and Gault Biodiversity Opportunity Area and MBC Landscape Character Area Assessment 14.1 'Weavering Fringes' landscape area and is fringed on two sides by the (part) semi-natural ancient Popes Wood.

The MBC Landscape Character Area Assessment promotes the following principles within this landscape area:

• Consider the generic guidelines for Gault Clay Vale

• Improve and reinforce the more distinctive and characteristic elements, e.g. ancient woodland, streams, traditional buildings and open

landscape at Newnham Court Farm, which strengthen the setting of the Kent Downs AONB

• Improve and reinforce relict heathland at Weavering Heath

• Avoid significant encroachment of the urban edge where it would detract from the open landscape

The application site also forms a key component of the foreground of the Kent Downs AONB in north Maidstone. Maidstone Borough Council is a signatory to the Kent Downs AONB Management Plan where policies: **LLC1** (The protection, conservation and enhancement of special characteristics and qualities, natural beauty and landscape character of the Kent Downs AONB will be supported and pursued); and **SD11** (Where it is decided that development will take place that will have a negative impact on landscape character, characteristics and qualities of the Kent Downs AONB or its setting, mitigation measures appropriate to the national importance of the Kent Downs landscape will be identified, pursed, implemented and maintained. The removal or mitigation of identified landscape detractors will be pursued) apply.

All of these designations set a high bar for any planting plan scheme. The proposed planting schedule includes a number of non-native trees and cultivars which are inappropriate within such a sensitive landscape setting where biosecurity and biodiversity are fundamental considerations.

KEY OBSERVATIONS

Proposed tree planting includes a number of incongruous exotics:

North American river birch (Betula nigra) – substitution with local provenance native silver birch (Betula pendula) or downy bitch (Betula pubescens) would seem a sensible way forward.

Tibetan cherry (Prunus serrula) – substitution with local provenance native wild cherry (Prunus avium) or bird cherry (Prunus padus) would perhaps be appropriate.

Cultivar small-leaved lime (Tilia cordata) 'Greenspire' – substitution of this ubiquitous clone for true native small-leaved lime (Tilia cordata) would be sensible from a biosecurity perspective

North/Central American Liquidambar styraciflua is shown on the planting plan but not the schedule – substitution with the similar in appearance but native wild service tree (Sorbus torminalis)

Mountain ash (Sorbus aucuparia) is only doubtfully native to mid Kent and is inappropriate to this local landscape character area, however, it is proposed in significant numbers along the prominent site frontage – substitution with crab apple (Malus sylvestris) would be more locally appropriate.

Scots Pine (Pinus sylvestris) is proposed immediately adjacent to Popes Wood but is not native to England – substitution with locally appropriate sessile oak (Quercus petraea) and small-leaved lime (Tilia cordata) should be considered.

15 METRE BUFFER TREATMENT ABUTTING POPES WOOD

The proposed buffer zone is compromised:

The planting plan illustrates a ‘Mix B’ within the woodland buffer, however, the planting plan does not provide a species schedule for a Mix B. It is vital that the composition of Mix B is understood.

However, there is a reference to under-planting of Mix B with cultivar bulbs (i.e. Narcissus 'Thalia' and Narcissus 'Silver Chimes') which is inappropriate in immediate proximity to semi-natural ancient woodland for biosecurity and biodiversity reasons. If the landscape approach proposed is pursued substitution with native wild daffodil (Narcissus pseudonarcissus) should be sought.

It is unclear from the planting plan but the area of woodland buffer immediately to the north of the ‘natural play area’ appears to be subject to some form of access or demarcation from the rest of the surrounding area.

Mix H ‘naturalistic woodland edge planting’ is indicated close to part ancient Popes Wood. This proposed planting comprises non-native and cultivar species and therefore threaten invasion of the wood and/or hybridisation with native ground flora. Any woodland edge planting MUST comprise only local provenance native species.

A more ecologically appropriate treatment of the woodland buffer would be to retain it as rough grass with frequent woodpiles and occasional small ephemeral ponds. A more natural woodland edge should be allowed to develop with subsequent low key maintenance interventions undertaken to maintain a natural undulating woodland edge and transition from woodland through to scrub, tall herbs and grassland. If the local rabbit population can be safeguarded they will provide optimum management through their grazing activity. If tree or shrub planting is required within the woodland buffer the occasional common hawthorn (Crataegus monogyna) and common gorse (Ulex europaeus) would suffice to benefit local invertebrates and rabbits.

SITE FRONTAGE

The recently grubbed traditional hedgerow boundary is not restored under current proposal:

It is unclear what the treatment of the site frontage is because no species schedule for ‘Mix A’ is provided. However, prior to its historic grubbing alongside the treatment and re-seeding of the formerly species rich field a mixed native hedge with occasional hedgerow trees demarcated the Bearsted Road frontage.

A more ecologically and culturally appropriate site frontage would be achieved through the introduction of a broad mixed native hedge with occasional native hedgerow trees.

PONDS

The immediate vicinity supports a number of ponds important for great crested newts and other wildlife:

The ponds within nearby Horish Wood host uncommon aquatic plants including fan-leaved water crowfoot (Ranunculus circinatus) and blunt-fruited water starwort (Callitriche obtusangula) as well as great crested newt. Further, stoneworts have recently been recorded in a nearby newly excavated pond. The planting schedule for the two proposed ponds are shown to be planted with a range of aquatic and marginal plants including non-native golden variegated sweet flag (Acornus gramineus 'Ogon'). Natural colonisation is favourable over planting in biosecurity and biodiversity terms.

The location of the two proposed ponds adjacent to the traffic choked, noisy and polluted Bearsted Road and the access into the proposed school campus poses a significant risk to amphibians and other wildlife. A location closer to the woodland edge for the two ponds would reduce the risk to wildlife from traffic, pollution and disturbance.

TREES PROPOSED TO BE REMOVED

There is no indication that the cordwood from the trees earmarked to be felled will be retained onsite

The loss of the small trees on the Bearsted Road frontage at the south east extent of the site is unfortunate for a number of reasons, however, all resultant cordwood must be maintained as habitat piles within the woodland buffer.

Living Roof?

Significant area of flat roof in the foreground of the AONB

A development on this scale in such a sensitive location must (alongside solar pv) incorporate a significant extent of living roof to achieve good design and sustainable development.

If you require any further information or wish to discuss this matter further please do not hesitate to contact me.

Yours sincerely,

Tony Harwood

From: Richard Timms
Sent: Thu, 10 Jan 2019 08:02:18 +0000
To: Planning Comments
Subject:FW: 18/506656/FULL | Erection of a new two-storey primary school and special educational needs secondary school - call-in to Planning Committee
Importance: High

Please log and upload Cllr Comments

Thanks

Richard Timms MRTPI

Principal Planning Officer

Development Management

Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent, ME15 6JQ

t: 01622 602325 **w**: www.maidstone.gov.uk

From: Tony Harwood (Cllr)
Sent: 09 January 2019 20:59
To: Richard Timms; James Bailey
Cc: Rob Jarman; Deanne Cunningham; Clive English (Cllr)
Subject: 18/506656/FULL | Erection of a new two-storey primary school and special educational needs secondary school - call-in to Planning Committee
Importance: High

Dear Richard / James,

18/506656/FULL | Erection of a new two-storey primary school and special educational needs secondary school with formation of new access onto Bearsted Road, together with associated car parking and drop off area, pedestrian access, drainage, areas for formal and informal outdoor play and landscaping works. | Popesfield Bearsted Road Weavering Kent.

I write to request that this significant expansion of built development into open countryside in the foreground of the Kent Downs AONB is reported to Planning Committee to enable this application to be determined democratically and in public.

The justification for this request being the very significant public interest (and concern) in relation to the status of the recently confirmed Local Plan policy protection for the application site (2017), implications of the existing planning permission for a ‘woodland nature reserve’ and the implication for the ‘balance’ of the wider Newnham Park campus development, justification and selection of such a remote and inaccessible application site, landscape impact by day and night, sustainability of such a car dependent site, issues surrounding accessibility on foot and by road, profound pedestrian/cyclist safety challenges, impact upon already SEVERE local traffic congestion, impacts upon biodiversity (including offsite fragmentation of Weavering Heath receptor site for protected reptiles), scale/massing and design (including the absence of renewable and de-centralised energy generation and integral niches for wildlife - while existing schools are retrofitting this technology), non-policy compliant landscaping (including use of exotic and cultivar trees, shrubs and bulbs close to semi-natural ancient woodland and within a designated Biodiversity Opportunity Area) and geographically confused proposed development names.

I will write with detailed observations on this application in the next few days.

Yours sincerely,

Tony Harwood

Group Planning Committee Spokesperson