

# **Response from Marden Parish Council: 17th March 2026**

## **Land North of Marden**

**Response to EIA scoping opinion for proposed construction of up to 1,100 homes together with land reserved for education, later living accommodation and local commercial/ community uses, access, landscaping and other works. MBC Application No: 26/500615/EIASCO**

### **Traffic and Transportation: Potential Significant Effects**

#### **Clause 4.2.6**

It is considered unreasonable to exclude construction traffic from the environmental impact assessment for the following reasons:

- 1) The routes taken by large goods vehicles during construction can be materially different from the operational traffic generation due to traffic regulation order constraints (such as weight, width or length limits).
- 2) The environmental impacts of construction traffic can be materially different to operational traffic due to physical constraints such as restricted junctions, narrow lanes and sharp bends.

### **Proposed assessment methodology**

#### **Clause 4.2.7**

The list of relevant guidance is considered variously incomplete and inaccurate as follows:

- The current version of Design Manual for Roads and Bridges (DMRB) document GG 119 'Road Safety Audit' is revision 2.0.1
- DMRB document GG 142 'Walking, cycling and horse-riding assessment and review' should be referenced, especially Section 4 'Walking, cycling and horse-riding assessment'
- Department for Transport (DfT) Local Transport Note (LTN) 1/20 'Cycle Infrastructure Design' should be referenced, especially Section 2 'Planning for Cycling'
- The Chartered Institution of Highways & Transportation's 'Manual for Streets 2' (2010) should be referenced, especially Section A 'Context and Process'
- The Kent Design Guide should be referenced, especially Section 4 'Transport assessment and travel plan guidance' (2025)

#### **Clause 4.2.9**

The vehicle routes most likely to be taken by Marden residents (both existing and from any future development) need to be assessed. In addition to the B2079 and A229 (already mentioned as in scope) to/from Maidstone, these include:

- Route to/from Tonbridge via Sheephurst Lane, B2162, Churn Lane, Pearsons Green Road, Mile Oak Road, Mascalls Court Road, B2017 and A26
- Route to/from Tunbridge Wells via Sheephurst Lane, B2162, Yew Tree Green Road, Crook Road, Blind Lane, Brenchley Road, B2160 and A21
- Route to/from the M25 via Pattenden Lane, Green Lane, B2162, B2015, A228, B2016, A20 and M20

#### **Clause 4.2.12**

The impacts on train services need to consider the route as a whole and not just the existing services currently calling at Marden. For example, there are already significant constraints on the main commuting route to/from London on the length between Tonbridge and Orpington and at the termini that effectively preclude additional or longer trains at the height of the AM and PM peaks. Cumulative effects also need to be considered (see below).

#### **Clauses 4.2.15 and 4.2.16**

In addition to motorised traffic, the effects on those walking, wheeling and cycling also need to be explicitly assessed.

#### **Cumulative effects**

##### **Clause 4.2.19**

As noted in clause 4.2.12, the cumulative effect of proposed developments on the main rail commuting route to/from London needs to be assessed. This should not be restricted to planning applications and allocated sites within 5 km of the site but needs to include those in the vicinity of all stations between Ashford and Tonbridge.

#### **Socio-Economic**

##### **Clause 4.5**

Marden has experienced housing growth in recent years:

The 2011 Census counted 1,542 households and a population of 3,724.

By the 2021 Census this had grown to 2,056 households and a population of 5,027.

The Maidstone Local Plan Review, adopted in 2024, included the site “Land East of Albion Road and North of Copper Lane” which has received outline planning consent for the erection of up to a further 117 dwellings.

Whilst MPC agrees that an assessment should be made of the impact on MBC’s housing supply and on increased demand on local facilities, we are of the view that the following additional areas also should be considered:

- Impact on quality of life of the existing community resulting from a substantial increase in the size of the community.
- An assessment of how the existing community absorbs the potential number of new residents into the community.
- Impact on the existing community of potentially moving existing services (eg. healthcare and education) to a site north of the railway line as it seems likely that

if said services are provided with additional facilities, then existing users may be redirected to specific services at the new locations.

- Impact on the proposed new community as a whole on living and working in a community that is effectively split by significant barriers. The Maidstone Road (B2162) will cut through the new northern “village quarter” and the railway divides the existing village and the proposed development. In both cases, a very limited number of crossing places seem to be practicable, and this will lead to limited access between the different resulting “zones” of the community.

### **Biodiversity and Climate Change**

The site poses a number of biodiversity risks that mean that careful consideration should be given to the scope of any assessment in order to avoid having a severe negative impact on the local ecosystem.

Clause 4.8.10 “The Proposed Development will seek to achieve 10% biodiversity on-site”.

We would note that Maidstone Borough Council’s LPR Policy LPRSP14(A)(a)– Natural Environment states “development, having regard to Biodiversity Opportunity Areas and/or Nature Recovery Networks. Biodiversity net gain should be calculated in accordance with the latest Natural England/DEFRA biodiversity metric or equivalent. Where 20% biodiversity net gain is demonstrated not to be financially viable, together with other policy costs, then the statutory minimum net gain provision will be secured”.

The site contains and adjoins Habitats of Principal Importance (HPI). The Scoping Opinion mentions both Bridgehurst Woods and the three SSSI’s including the Marden Meadows site. However, Bridgehurst Woods, which is a designated Ancient Woodland, is connected via a large matrix of high-grade habitats directly to Marden Meadows SSSI (less than 500m) and the River Beult (an SSSI) which lies less than 2000m from the site boundary. Both SSSI’s could be put at risk by changes to the water table and dust from construction. The River Beult’s chemical state is currently rated as ‘fail’ which indicates the river does not meet the required standards for water quality which is essential for supporting both people and wildlife. The proposed development could have a significant impact on the river’s ecosystem.

Additionally, air quality/pollution should be assessed during the construction and operational phases on ancient woodland, SSSI’s and LWS and the potential impacts of nitrogen deposition.

The habitats, which are all managed for nature include lowland mixed broadleaved woodland, lowland meadows, hedgerows, a network of ponds and an area of wet woodland and these habitats are Kent Biodiversity Action Plan habitats. They are inter-dependent and intersecting in terms of species that live there and recent monitoring has recorded many species that are nationally or locally rare and also species of principle importance in England.

The proposed site could have significant adverse impacts on the landscape and visual receptors. Marden Cemetery is of particular concern not only for its significant views, but its onsite biodiversity and the site is also vulnerable to groundwater.

Whilst swathes could mitigate some of these concerns, to protect the cemetery from the proposed nearby development, guidelines should be sought from the Environment Agency.

This site is almost entirely zoned by Natural England as “Network Enhancement Zone 1” and lies completely within the impact zones of both of Marden’s SSSIs. Natural England’s ‘Impact Risk Zones’ for SSSIs state that emissions from any type of development can cause air pollution and/dust affecting the habitat and the species on the SSSIs.

Hedgerows, single mature trees and shaws are predominant boundary features of the site, the majority of which have been present for more than 200 years, and many are likely to meet the important criteria of the Hedgerow Regulations 1997 and fail other biodiversity tests.

However, having considered all of the information about the proposed development site we note that the Scoping Opinion states that:

“...the majority of the site comprises arable land which has limited value in its potential provision of habitat to protected and notable species. The most important habitat features are the ponds, hedgerows and tree lines throughout the site as well as Bridgehurst Wood which is an area of ancient woodland. Most of these habitats have been provisionally assessed as being in Good or Moderate condition however some of the hedgerows, ponds and tree lines have been assessed as being in Poor condition.”

Therefore, the Scoping Opinion needs to take into account the previous four paragraphs and recognise that the site is important in respect of connectivity for protected species and other wildlife accessing SSSI sites and Ancient Woodlands

The Scoping Opinion does not appear to have taken into account KCC’s Kent & Medway Local Nature Recovery Strategy (updated in January 2026) and MBC’s Landscape Character Assessment 2025/26 (currently at consultation).

#### Clauses 4.3.1 and 4.3.4

The Institute of Environmental Management & Assessment (IEMA) guide to assessing Greenhouse Gas Emissions and Evaluating their Significance 2022 indicates there would be a significant adverse effect from the proposed development on greenhouse gas emissions and mitigation is therefore crucial. Climate Change impacts therefore also need to be taken into account.

Species of principal importance have been recorded within the site. The RSPB and the British Trust for Ornithology (BTO) highlight the existence of red listed birds’ species on the site, and surrounding farmland, including Turtle Doves, Yellow Hammers, Linnets and Skylarks. BTO ringing data indicates that the immediate area holds a significant proportion of these birds. The RSPB National and Area Team has advised that the Turtle Doves in particular could be significantly impacted by the proposed development and as they are a red listed species, this harm could be great and irreversible.

Whilst the Corylus Ecology Habitat Survey report undertaken in February 2026 provides a provisional baseline for the onsite habitats it does not provide information on the presence of protected species, although we understand these will be undertaken. The Habitat Classification Report is based on surveys undertaken in 2021 for the presence of Great Crested Newts, Reptiles, Dormouse, Bat, Badger and the breeding of protected birds and it is essential that up-to-date reports are undertaken.