

Whilst TMBC have lodged a baffling array of new evidence, they have not properly addressed the underlying flaws in their original Borough Green Garden City proposals, and so our concerns remain unchanged from those set out in our Reg 19 response.

1. The most glaring anomaly is that the development both depends on the building of the Relief Rd, and uses the Relief Rd as the single justification for that development. A circular argument
2. It is quite clear that the Relief Rd cannot be delivered within the timeframe of this Local Plan for a variety of reasons, most importantly the sterilisation of Strategic Mineral Reserves. It is estimated that there is a further 3million tonnes of sand to be extracted in the area, and a similar amount of inert landfill material to be imported. Despite illegal operating hours and HGV numbers, it is unlikely that this can be achieved.
3. Whilst the bulk of the sites have been landfilled using modern engineered landfill practices, parts of BGSP and Borough Green Landfill are old sites, which will contain contamination and voids, needing re-engineering. Ightham Sandpit is known to have some 250,000 tonnes of contaminated and toxic waste, which must be remediated as a priority.
4. TMBC plan 400 houses before construction the Relief Rd, but it cannot provide the promised "relief" unless it is wholly in place prior to any development commencing. Otherwise you are condemning Borough Green & Platt to years of unacceptable levels of HGV traffic, from sandpits, landfill and construction.
5. TMBC's promise that the Relief Rd will reduce Traffic Pollution and congestion in Borough Green and Platt may be true in the very short term, between completion of the Relief Rd and the completion of the Housing. But 3000 houses will generate so much traffic any benefit will swiftly be lost, and that takes no account of the extra traffic caused by the mass housing across the South East in various Local Plans
6. The moment this Plan is approved, the Greenbelt has gone, and TMBC will have lost all control of the development. The proposal cannot be allowed to proceed piecemeal.
7. TMBC state that the population increase will be a benefit to the Borough Green "Rural Service Centre" retail area. At present we have a fine balance with Borough Green acting as the "hub village" for Platt, Wrotham, Plaxtol, Shipbourne and Ightham. Whilst initial benefits from increased trade might be welcomed, this will swiftly grow to the point where our parking, already difficult, will fail, and will slowly drive a local recession.
8. TMBC's only defence of their use of Greenbelt is based on their "Housing Market Areas". These are a completely arbitrary artifice, and bear no relationship to the actual housing market, but on a hypothetical market where local people move locally. The simple fact is that ALL these new build houses will be purchased by "internal Immigrants", probably from London, whose decisions will be based on transport and proximity to their City jobs, with no assessment as to whether the proposed house purchase is a few miles north, south, east or west of their favoured destination.
9. TMBC have still not addressed their failure to use hundreds of sites that are achievable, available and not in Greenbelt. It almost seems that they are "saving" these sites for future Plans when Greenbelt starts to be re-appreciated and protected, instead of being regarded as a disposable and replaceable asset.
10. TMBC's Traffic assessments fail to take account of the recently adopted Maidstone Integrated Transport Plan, which will provide new roundabouts at Coldharbour and Quarrywood, which will resolve the serious A20 traffic problems that prevented large scale development in Aylesford and Ditton.
11. This area has suffered Mineral Extraction for decades on the premise that permissions were essentially temporary, and that our land would be reinstated and returned to Greenbelt. We have done our bit for the Common Good over the past century.

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TMBC notes the justifications for using Greenbelt referencing a Nottingham Case identifying "Exceptional Circumstances". None of TMBC's reasons meet the criteria set out in this judgement:

1. Whilst the OAN (Govt Housing Targets) is high, it is neither acute or intense, and can be met without use of Greenbelt
2. There are no constraints on the supply or availability of suitable development land in TMBC
3. There is ample opportunity to build in TMBC without impinging or encroaching on Greenbelt.
4. It is clear that BGGC will cause harm to the Greenbelt, and harm the setting of remaining greenbelt and the North Downs AONB
5. Because of the topography of our valley there is no way the impact on our Greenbelt/AONB can be mitigated or ameliorated, and earmarking a few fields at West Malling, whilst a laudable aim, does not suffice.

Extract ED10 Greenbelt Exceptional Circumstance Topic Paper "New Evidence"

1.2.3. The Council is mindful of the High Court case Calverton Parish Council v Nottingham City Council, Case Number: CO/4846/2014, which sets out factors that ideally would be considered in identifying exceptional circumstances. The factors are (in order):

- i. the acuteness/intensity of the objectively assessed need*
- ii. the inherent constraints on supply/availability of land prima facie suitable for sustainable development*
- iii. the consequent difficulties in achieving sustainable development without impinging on the Green Belt*
- iv. the nature and extent of the harm to this Green Belt*
- v. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent*