

## **Maidstone Borough Local Plan Examination Session 3B: Alternative Strategic Development – Response by Headcorn Parish Council, September 2016**

- 1) Headcorn Parish Council is the elected body that represents the residents of Headcorn Parish. Headcorn Parish is a designated Neighbourhood Plan Area, and Maidstone Borough Council has assigned it Rural Service Centre status. The views expressed in this consultation response have been informed by the evidence gathered to underpin Headcorn's Neighbourhood Plan. Headcorn's Neighbourhood Plan is at an advanced stage, having completed its Regulation 16 Consultation on February 26, 2016 and is now at examination. Completion of the examination has been delayed, as the original examiner for Headcorn's Neighbourhood Plan was forced to withdraw, having lost her accreditation. Therefore, Headcorn's Neighbourhood Plan had to be sent to a second examiner, and the examination expected to be completed by the end of October 2016. Headcorn's Neighbourhood Plan enjoys considerable local support, with 93.9% of respondents for the Regulation 14 consultation supporting the draft Plan and similar support expressed at Regulation 16 Consultation. Therefore the views expressed in this consultation response about Headcorn's development should be seen as representative of the overall needs and priorities of the people and businesses within Headcorn Parish.

### **I. Overview**

- 2) For the reasons set out in its Regulation 19 Consultation response, Headcorn Parish Council does not consider that Maidstone Borough Council's spatial strategy and the resulting dispersal strategy meets the definition of soundness set out in the NPPF. In particular, it considers that the spatial strategy, which results in almost 30% of the proposed housing being allocated to the five rural service centres, fails to meet the definition of sustainability set out within the NPPF. This is because the strategy fails to consider the impact of distance, both to Maidstone's primary labour market and to key social infrastructure, such as schools and hospitals.
- 3) Headcorn Parish Council notes that there is an incomplete mapping between the Sustainability Appraisal conducted for Maidstone Borough Council and the definition of sustainability set out in the NPPF. The partly relates to *a priori* assumptions in the Appraisal itself (for example that development in a designated rural service centre is judged as equivalent in sustainability terms to development in the urban area) and partly because of the different legislative requirements underpinning the two tests.
- 4) Headcorn Parish Council notes that even allowing for these differences, sites in Headcorn perform very badly compared to other locations when judged against the criteria used in the site assessment for the Sustainability Appraisal.
- 5) Dr Driver, Director of Analytically Driven Ltd has undertaken an assessment of the site rankings for 313 sites considered as part of Maidstone's Sustainability Appraisal. This assessment uses the results of the Sustainability Appraisal to rank

the sustainability of individual sites, by firstly ranking depending on how many red flags are associated with the site (red flags are associated with serious concerns about the site, so fewer red flags indicate that the site is more sustainable) and then, for a given number of red flags, ranking sites on the difference between the number of green flags and the number of red and amber flags combined (with a higher proportion of green flags in the total indicating the site is more sustainable). This site ranking is then used to allocate sites to different quartiles, depending on where they fall in the ranking. Details of Dr Driver's approach can be found in Appendix 1 of this response.

- 6) Headcorn Parish Council notes that if the findings of the Sustainability Appraisal have played an important role in informing the Local Plan, then only sites in the top two quartiles, which are associated with the fewest identified problems, should be allocated. In practice this is not the case. In total 35.9% of the houses from the sites allocated in Policy H1 of the Local Plan fall in the bottom half of the sustainability ranking, with 12.8% falling in the bottom quartile.
- 7) This does not reflect the lack of alternative, more sustainable sites. Headcorn Parish Council notes that all but one of the available sites in Maidstone itself, fall in the top half of the sustainability ranking, but only 54.5% of these sites are allocated in the Local Plan. The allocated policy yield in Maidstone itself only accounts for 41.8% of the potential yield of houses in sites in Maidstone in the top two quartiles of sustainability, a difference of over 1,650 houses. Headcorn Parish Council notes that when judged by the results of the site assessment exercise, the most sustainable site in the entire Borough (site HO3-214) has not been allocated. This is despite the fact that it has just one red flag and only 4 amber flags, compared to 24 green flags.
- 8) In the case of Headcorn itself, a weighted average of the sustainability rankings for sites considered as part of Maidstone's Local Plan shows that of the 26 main locations where potential housing sites were submitted, Headcorn ranked as 22, where 1 is the most sustainable.<sup>1</sup> In total 72.7% of the sites submitted in Headcorn ranked in the bottom half of the sustainability rankings, with 40.9% ranking in the bottom quartile of the sustainability rankings. This ranking is not a reflection of the smaller out-of-settlement sites in Headcorn Parish, as the number of out-of-settlement sites submitted in Headcorn was limited, meaning the vast majority of submitted sites (and all the larger sites) were located in the immediate vicinity of Headcorn village. Headcorn Parish Council notes that when potential housing numbers in Headcorn are considered, 94.3% of the potential housing yield within the Parish falls in the bottom half of the sustainability rankings, with 70.3% of the potential yield being in the bottom quartile.

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<sup>1</sup> The 26 locations were: Maidstone, Headcorn, Harrietshan, Marden, Lenham, Staplehurst, Thurnham, Coxheath, Yalding, Bearsted, Barming, Boxley, Loose, East Farleigh, Tovil, Boughton Monchelsea, Detling, Hollingbourne, Sutton Valence, Chart Sutton, Langley, Otham, Bredhurst, Leeds, Kingswood and Ulcombe. In addition to these 26 locations a small number of sites in tiny settlements were grouped together in the analysis as a single group of "other". The 11 sites in this group accounted for just 688 houses (out of a potential yield across all sites of over 35,800 houses) and were all located in the bottom two quartiles. On average these sites were less sustainable than the sites in Headcorn, therefore including them in the ranking would mean that Headcorn ranked 22 out of 27 locations. In both cases this means that there are 21 locations that have a better sustainability ranking than Headcorn, where the sustainability ranking for each location represents a weighted average, where the ranking of individual sites is weighted depending on the potential yield of the site.

- 9) It is unsurprising therefore that of the 423 houses allocated in sites in Headcorn through the Local Plan, 85.3% of the potential housing yield ranked in the bottom half of the sustainability ranking, with 49.6% being in the bottom quartile.
- 10) Headcorn Parish Council considers that these findings demonstrate a fundamental mismatch between the supposed sustainability of housing development in Headcorn discussed both in the Local Plan itself and the background papers (including the Sustainability Appraisal) and the actual results of the site assessment supposedly underpinning the Sustainability Appraisal.
- 11) Headcorn Parish Council does not consider that the approach to assessing sustainability within the Local Plan is fully compatible with the definition of sustainability within the NPPF. It considers that a better mapping to the NPPF's definition of sustainability would recognise the evidence showing the negative impact of distance from urban areas on sustainability.
- 12) However, even if addressing this concern is not considered necessary to judge whether the Local Plan meets the definition of sound within the NPPF, Headcorn Parish Council considers that the results of Maidstone's Sustainability Appraisal are definitely relevant.
- 13) As set out above, there is a fundamental mismatch between the actual results and how the results have been interpreted. The site allocation policy that has been implemented by Maidstone Borough Council clearly systematically diverges from the results of the Sustainability Appraisal. In the view of Headcorn Parish Council this clearly demonstrates that the existing Local Plan does not meet the definition of sound set out within the NPPF.

**Qn.3.1. Should it be concluded that there would be a shortfall of supply against the OAHN, what alternative means would be available for making up a shortfall if that is measured in: (a) hundreds or (b) thousands?**

- 14) As set out above, Headcorn Parish Council notes that all but one of the available sites in Maidstone itself fall in the top half of the sustainability ranking, but only 54.5% of these sites are allocated in the Local Plan. The allocated policy yield in Maidstone itself therefore only accounts for 41.8% of the potential yield of houses in sites in Maidstone in the top two quartiles of sustainability, a difference of over 1,650 houses.
- 15) Headcorn Parish Council considers that prioritising sites in Maidstone itself to meet any shortfall, therefore represents the most sustainable approach housing allocation, as Maidstone ranked second in the sustainability rankings.
- 16) Headcorn Parish Council considers that even Maidstone itself cannot provide all the additional sites in the event of any shortfall, priority should be given to sites that are located in more sustainable locations. As Headcorn is ranked 22 out of the 26 main locations for housing development analysed, Headcorn Parish Council considers that no additional housing sites should be allocated in Headcorn.

**Qn.3.2. What scope may exist for addressing any shortfall by provision outside the Borough boundary and how might that be accommodated having regard in particular to the timescales of the preparation of other Local Plans?**

- 17) Headcorn Parish Council does not wish to make any specific comments on this issue.

**Qn.3.3. What is the updated position in respect of the availability of the Invicta Park Barracks site?**

- 18) Headcorn Parish Council does not wish to make any specific comments on this issue.

**Qn.3.4. Should the Ministry of Defence determine (before the Examination is completed and the Report submitted) that the Invicta Park Barracks will not be surplus to requirements during the Plan period, how should the consequential loss of 1,300 dwellings in the later period of the plan be addressed?**

- 19) Headcorn Parish Council does not wish to make any specific comments on this issue over and above the comments provided in answer to Qn 3.1, above.

**Qn.3.5. Can Golding Homes show examples of the claimed housing supply shortfall?**

- 20) Headcorn Parish Council does not wish to make any specific comments on this issue.

**Qn.3.6. What is the Council's response to the Golding allegations in relation to housing supply?**

- 21) Headcorn Parish Council does not wish to make any specific comments on this issue.

**Qn.3.7. The estimated cost of a Leeds-Langley Relief Road has been put at £50-£80m. Can Golding estimate what 'significant contribution' could be made to that road by their proposed development and what other sources of funding would be needed?**

- 22) Headcorn Parish Council does not wish to make any specific comments on this issue.

**Qn.3.8. When might such a road be available for use?**

- 23) Headcorn Parish Council does not wish to make any specific comments on this issue.

**Qn.3.9. The Local Plan period runs to 2031. When would the first delivery of housing in a new settlement occur and how much housing could be delivered by 2031?**

- 24) Headcorn Parish Council does not wish to make any specific comments on this issue.

**Qn.3.10. What areas of land do the Representors propose for which land use?**

- 25) Headcorn Parish Council does not wish to make any specific comments on this issue.

**Qn.3.11. How does the 177.5ha site in the SA relate to the 70.44ha site referred to in the R19419 representations and where do they overlap?**

- 26) Headcorn Parish Council does not wish to make any specific comments on this issue.

**Qn.3.12. How much employment floorspace could be provided?**

- 27) Headcorn Parish Council does not wish to make any specific comments on this issue.

**Qn.3.13. Why did the SA addendum consider a wholly residential development rather than the mixed development sought by the Representors?**

- 28) Headcorn Parish Council does not wish to make any specific comments on this issue.

**Qn.3.14. The submitted Local Plan seeks to meet the assessed needs for housing and employment outside the designated AONB. How do the Representors address Framework criteria for major development in the AONB and especially the second bullet point of paragraph 116?**

- 29) Headcorn Parish Council does not wish to make any specific comments on this issue.

**Qn.3.15. How would the Council assess the major mixed development proposal against the Framework tests?**

- 30) Headcorn Parish Council does not wish to make any specific comments on this issue.

**Qn.3.16. Detling Airfield is included in Policy DM21 as an employment site to be retained. What scope would there be under that policy to redevelop or intensify that site for business use?**

- 31) Headcorn Parish Council does not wish to make any specific comments on this issue.

**Qn.3.17. What are the implications of this decision for the Local Plan allocation?**

- 32) Headcorn Parish Council does not wish to make any specific comments on this issue over and above the observation on this employment allocation in its Regulation 19 response.

**Qn.3.18. How does the Council propose to address those implications and would this involve any alternative proposals?**

- 33) Headcorn Parish Council does not wish to make any specific comments on this issue.

**Contact details**

All queries on this consultation response should be addressed either to:

- A. Caroline Carmichael, Headcorn Parish Clerk, Parish Office, Headcorn Village Hall, Headcorn (Email: [headcornparishclerk@gmail.com](mailto:headcornparishclerk@gmail.com)) ; or
- B. Dr Rebecca Driver, Analytically Driven Ltd, Great Love Farm, Love Lane, Headcorn (Email: [rebecca.driver@analytically-driven.com](mailto:rebecca.driver@analytically-driven.com)).

Dr Driver is a member of the Headcorn Matters Neighbourhood Plan team and prepared this consultation response on behalf of Headcorn Parish Council, with support from the wider Headcorn Matters Neighbourhood Plan team.

## **Appendix 1: Methodology for comparing the sustainability of alternative sites**

Data from Maidstone's Sustainability Appraisal for the sites have been used to analyse how sites compare based on the outcomes of the appraisal. In order to undertake this assessment, data for the specific questions assessed were captured, based on the red/amber/green coding used in the sustainability report. In addition data on the site number and location were also captured, as well as information on site size, dwelling numbers, agent and (where needed) owner.

The Sustainability Appraisal provides the responses for individual sites. However, these responses can also be used to assess how alternative sites compare. In order to do this systematically, two measures of the overall sustainability of each site have been used:

- The first measure is the number of red flags associated with the site as a percentage of the total number of questions answered. The higher the score, then the less sustainable the site is.
- The second measure recognises that while red flags indicate a significant problem, amber flags also indicate concerns about the site. Therefore this measure of sustainability is based on the balance between the number of green flags and the total number of red and amber flags. A higher number indicates that the site is more sustainable, because fewer concerns have been raised out of the total.

The first measure captures the extent to which there are serious concerns about a site, while the second simply captures where there may be problems, but does not differentiate between the severity of potential concerns.

In order to compare sites, the sites are then ranked: by first ranking sites according to how well they perform against the share of red flags; and then (for a given share of red flags) according to how well they perform against the total number of potential problems compared to green flags.

In other words, sites with a 15% share of red flags are more sustainable than sites with a 20% share of red flags, because fewer significant concerns have been raised. However, a site with a 20% share of red flags out of the total, with a balance of ten green flags relative to red and amber flags would be ranked as more sustainable than a site with a 20% share of red flags out of the total, with a balance of five green flags relative to red and amber flags. While both sites have the same number of serious concerns, fewer potential problems (ie red and amber flags) were raised against the first site.

Combining the two measures in this way therefore creates a ranking from the most to the least sustainable sites, which can be used to assess how well individual sites perform, relative to other sites. In total this approach allocated sites to one of 91 different site rankings (with the number of site rankings being determined by the sustainability outcomes in the data itself). In the analysis, sites were also allocated to four quartiles, based on where they came in the sustainability ranking of sites, with the most sustainable sites being allocated to the top quartile.

The fact that additional or alternative questions have been asked in more recent iterations of the Sustainability Appraisal raises the issue of ensuring results are comparable. Therefore, while all the data were captured, the site comparisons were

conducted using results which excluded the question on the proximity to the Local Centre to ensure consistency.

### **Data on sustainability**

The majority of the data on sustainability were taken from the summary of the 2016 Sustainability Assessment Report, which can be found here: [http://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0019/105157/Sustainability-Appraisal-Appendices-2016.pdf](http://www.maidstone.gov.uk/_data/assets/pdf_file/0019/105157/Sustainability-Appraisal-Appendices-2016.pdf). This covered the three separate ratings exercises, relating to different calls for sites. Where data were missing from the summary, it was taken on a site-by-site basis from the full site assessments published in the 2014 and 2016 Sustainability Reports, where available. An additional question was added in both the 2015 and 2016 assessments (over and above the 2014 report), but the remaining questions remained broadly identical. In the case of the 2015 addition, which related to landscape character, it was provided as an alternative to the original question on landscape, but covered a broadly similar issue. Therefore in the approach to assessing sustainability, the results were taken from whichever question was used. In the case of the 2016 addition, this split the question on proximity to employment sites to include an additional question on proximity to local centre. To capture the results on a consistent basis, the results were analysed both with and without this addition and the data presented in this submission covered the data excluding the additional question.<sup>2</sup>

The sites identified from the SA report were also checked against the site index provided for the SHEDLAA report to ensure the full set of sites were captured ([http://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0007/106963/Site-Index-2016.pdf](http://www.maidstone.gov.uk/_data/assets/pdf_file/0007/106963/Site-Index-2016.pdf)).

In order to identify which sites were allocated in the Local Plan, three sources of information were used:

- the individual site maps for allocated sites provided Appendix F of the Local Plan (<http://services.maidstone.gov.uk/docs/February%202016%20Regulation%2019%20Draft%20Local%20Plan.pdf>);
- the housing allocations map ([http://www.maidstone.gov.uk/\\_data/assets/image/0004/120856/Appendix-C-Updated-Sites-Map-2016.jpg](http://www.maidstone.gov.uk/_data/assets/image/0004/120856/Appendix-C-Updated-Sites-Map-2016.jpg)); and
- Maidstone Borough Council's assessment of individual sites provided as part of the SHEDLAA report ([http://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0008/106964/Appendix-A.1-Housing-Site-Assessments-2016.pdf](http://www.maidstone.gov.uk/_data/assets/pdf_file/0008/106964/Appendix-A.1-Housing-Site-Assessments-2016.pdf) and [http://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0009/106965/Appendix-A.2-Housing-Site-Assessments-2016.pdf](http://www.maidstone.gov.uk/_data/assets/pdf_file/0009/106965/Appendix-A.2-Housing-Site-Assessments-2016.pdf)).

MBC's assessment for the SHEDLAA was also used to identify: the size of the site; the potential number of dwellings (where this data was not specified it was calculated based on 30 dwellings per hectare)<sup>3</sup>; whether the site was allocated; the expected yield of the site (if allocation was proposed by MBC); the agent; and the owner (where no agent was specified, or the owner was a company or institution).

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<sup>2</sup> The additional question may have influenced allocations, so it is important not simply to drop it all together.

<sup>3</sup> Note 30 dwellings a hectare is the density proposed for rural developments under Policy DM 12 of Maidstone's Local Plan, with higher densities envisaged in urban and edge of urban developments. As such it is likely to understate potential yields and therefore represents a conservative approach to assessing potential housing supply.

Not all the sites shown as allocated in SHEDLAA report and on the housing allocations map are explicitly allocated in the Local Plan itself. In addition, in some cases there are differences between the policy yield anticipated in the SHEDLAA report and the Policy yield within the Local Plan. Therefore two measure of whether a site has been allocated have been used, one that encompasses all allocated sites and one that specifically relates to sites allocated in the Local Plan. Similarly two measure of the potential yield for allocated sites have been capture, one based on the SHEDLAA report and one based on the policy yield within the Local Plan itself.

In total 313 records were created.

### **Gaps identified**

Although the data sources used for the analysis all related to Maidstone's Local Plan and were all published by Maidstone Borough Council, a number of gaps as well as contradictions between the different data sources were identified that needed to be resolved. Specifically:

1. Site HO3-310 (land at Boughton Mount Farm, Cliff Hill) did not appear in either the 2016 or 2014 Sustainability Assessment (or the 2015 version), but was shown both on the site map and in MBC's index of sites and MBC's assessment of sites. The site was shown as rejected. The site was dropped from the analysis because the sustainability data were not available. However, it is worth noting that it is located next to site HO-99, which was accepted for inclusion in the Local Plan (and allocated as H1(54)).
2. Site HO2-189 (Springfield Square, Royal Engineers Road) was shown in the Sustainability Appraisal summary and was allocated as site H1(11). However, the site was missing from the site index, the site map and MBC's site assessment. As the site has been allocated it was included in the analysis. MBC's site appraisal had no data for the site size, therefore the expected yield was taken from Policy H1(11) and the site size and dwelling numbers given by the developer were taken from the Sustainability Appraisal.
3. Site HO2-186 (Ware Street, Thurnham) was missing from the summary of the Sustainability Appraisal, but data were available from the proformas for the 2014 sustainability appraisal. It was listed in the site index and MBC site assessment with a recommendation to accept and shown as accepted on the site map. However, there is no site allocation policy for this site within the Local Plan.
4. Site HO3-186 (Haynes Brothers Limited, Ashford Road) is shown in the summary of the Sustainability Appraisal, but is missing from the site index and MBC's site assessment. It is shown as rejected as an employment allocation on the site map, but as agreed subject to an s106 on the housing allocations map. However, there are no data on expected yield for this site and MBC background papers indicate that the site has been withdrawn, but might come forward in future, if circumstances were to change. On that basis it is not flagged as an allocated site in the assessment.
5. Site HO3-248 (Herts Farm, Coxheath) is missing from the site index, and the site map, but is included in MBC's site appraisal and the Sustainability Appraisal.

It is linked to site HO-56, which was a proposal for a smaller development on the same site. The sustainability appraisal for site HO-56 was significantly more negative than that for site HO-248, but neither proposal was accepted for allocation. Both sites were included in the analysis as the sustainability proposals differ.

6. Site HO3-294 (land at Tanyards Farm, Lenham) was included in the site index and shown as rejected on the site map. MBC's site appraisal states that the site was deleted because it was a replication of mixed use site MX-11. It is not included in the sustainability appraisal. Therefore this site was dropped from the analysis.
7. Site HO3-213 (Slencrest House, Tonbridge Road) the site size was given as 10Ha and yield as 0.15 in MBC's site assessment. 0.15 of a dwelling does not make sense. Therefore, in analysis these were flipped so the site yield was set to 10 dwellings. This accords with the site size in policy H1(16), which the site was allocated under.
8. Site HO3-301 (Kilnwood Land East of Old Ham, Lenham) was assessed twice in the Sustainability Appraisal. The second assessment (which was less favourable) was used for the analysis as the SA Report indicated it should replace the first assessment.
9. Site HO-123 (Land north of Sutton Road and East of Church Lane Otham) was rejected as a whole, but two parts of the site were allocated as policies H1(7) and H1(8) for 190 and 440 dwellings respectively. No separate Sustainability Appraisal was provided for the two subsections. Therefore the site was analysed as accepted, but with an allocation of 630 houses.
10. Site HO-95 (Land at Farleigh Lane and Gatland Lane, Maidstone) was assessed twice within the Sustainability Appraisal (the second time as part of Half Yoke Land). The first appraisal was for 12.51Ha and 240 dwellings and the second for 2.2Ha and 66 dwellings. MBC's site assessment for HO-95 had the site covering 14Ha (for 240 dwellings). As MBC's site assessment was used to provide the data for site area and yields in the analysis, the larger site area of 14Ha was set for the first site assessment for consistency, with the area recorded in the second sustainability appraisal used for the second assessment of the site (as MBC only assessed it once). Site HO-95 also overlaps partly with the larger site HO-74, which MBC's site appraisal recommends for acceptance. Site HO-74 is ranked as less sustainable than either of the rankings for site HO-95. Although site HO-74 is marked as allocated on the policies map, it is not allocated under policy H1. As the size of each site differs, they were all included in the analysis for completeness.
11. Housing allocation H1(62) for 72 houses is not included in the analysis, because it was not assessed as part of the housing site Sustainability Appraisal. (It was assessed as a mixed use site MX2-16).
12. Housing allocation H1(68) is shown as rejected on the site map and in MBC's site appraisal. This allocation is site HO3-270 (Bentletts Scrap Yard, Laddingford). As it is an allocated site, the site is marked as allocated for the analysis, even though the two main sources of information on site allocations

indicated that it had been refused. The expected yield is set to 10, in line with policy H1(68), not 0 as in MBC's site assessment.

13. Site HO-113 (Land west of North Street Barming) was allocated as site H1(23). The allocation H1(23) was for 35 houses, the same number as given in the Sustainability Appraisal, which records the site size as 10.24Ha and 35 dwellings. MBC's site appraisal records the site as 1Ha and 225 dwellings. As the housing allocation H1(23) was for 35 houses and on the site map the site looks like a large site, the figures from the Sustainability Appraisal (of 10.24Ha and 35 dwellings) were used.
14. Site HO-74 (land at Fant Farm, Maidstone) on the site map is roughly four times the size of the nearby site HO-113. In the Sustainability Appraisal the size of site HO-74 was recorded as 47.7Ha (and 358 dwellings), but in MBC's site appraisal it is recorded as 10.2Ha and 350 dwellings with 36.6Ha of country park. Therefore the lower figure of 10.2Ha was used. Site HO-24 is shown as accepted on the site map and in MBC's Site Assessment, but is not allocated within the Local Plan.
15. Site HO3-220 (Hubbards Lane, Loose) is allocated as H1(57) for 8 dwellings. It is shown as recommended for rejection in MBC's Site Assessment and not marked on the site map. Geographically it is part of the larger (rejected) site HO-120. Both sites were included in the Sustainability Appraisal and site HO3-220 was marked as accepted, even though the official proposal was rejection.
16. Site HO2-171 (land at George Street, Staplehurst) has no recorded data for site size or number of dwellings in MBC's site appraisal. Therefore details were taken from the Sustainability Appraisal.
17. Site HO3-256 (north of Heath Street, Coxheath) is recommended for rejection in MBC's site assessment, although it is shown as accepted on the site map. It is allocated under policy H1(61). As MBC's site appraisal set the expected yield at zero (reflecting recommended rejection), the expected yield was set at 55, in line with the policy.
18. Site HO-112 (land at Boughton Lane, Loose) is allocated as site H1(53). MBC's site assessment recommended rejection and therefore set the anticipated yield as zero. The expected yield is set to 75 in line with the policy recommendation. The site is shown as accepted on the site map.
19. Site HO-99 (land at Boughton Mount, Boughton Lane, Loose) was recommended for rejection in MBC's site assessment, but was allocated under policy H1(54). The expected yield is set to 25, in line with the policy, significantly below the 75 dwellings anticipated in the proposal from the landowner.
20. Site HO-66 (land east of Hermitage Lane, Maidstone) does not match the allocated site under policy H1(2). The site that was assessed for the Sustainability Appraisal was for 20 houses, while H1(2) allocates 500 houses. The site map for allocation H1(2) appears to indicate that Site HO-66 has been excluded from this allocation and that the allocation makes up the area surrounding this site. As H1(2) is an important allocation, in order to provide an

indicative assessment, the Sustainability Appraisal of Site-66 has been used twice: once for HO-66 itself, which is shown as not allocated, and once for the allocation H1(2), which is shown allocated. While this approach is not ideal, the fact that the allocation H1(2) surrounds site HO-66 should mean that the sustainability results will be broadly comparable.