Schedule of responses to the representations to the sites in Policy H3

Policy Number H3	General comments on Policy H3	
Summary of issues	Officer response	Proposed change
1: Too much reliance is placed on the three broad locations for future development. There are a number of uncertainties about the availability and delivery of these sites.	The sites will be subject to review when the Local plan is reviewed in 2021. There is currently no evidence that sites will not be available or unable to be delivered. The National Planning Policy Framework (NPPF) allows for the identification of broad locations for development.	No change
2: Given the shortfall in housing supply against the identified Objectively Assessed Need, these areas should be brought forward in the plan period to address that shortfall.	The Council has identified sufficient land	No change
3:The unused and empty offices in town should be converted to dwellings.	New permitted development rights have seen proposals for the conversion of some of the existing office blocks to residential use.	No change
4: Detling Aerodrome should also be considered as a broad location for development.	Detling Aerodrome is located entirely within the Kent Downs AONB, in an unsustainable location and is not considered appropriate for additional development	No change
5: The future locations for housing growth (e.g. Lenham and Maidstone Barracks	The development criteria set out in Appendix F require proposals to take into	No change

Invicta Park) defined by the plan need early consideration of landscape/habitat issues and opportunities	account ecological and habitat issues and opportunities.	
6: Highways Agency (Highways England): A robust transport evidence base has not been agreed that tests the quantum of development now proposed; nor sufficiently assesses the timing or location of any impacts or the form and funding of any necessary mitigation. The Plan is therefore not yet considered to be based on proportionate evidence.	A robust transport evidence base is being amassed and the quantum and location of proposed development tested. The results will be utilised in the preparation of the Regulation 19 consultation draft.	No change
7: If there are such sites available, why are they not detailed? Identifying general locations for future development is inherently an unsatisfactory position.	The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. There is no evidence to suggest otherwise in respect of the three broad locations that the Council has identified.	No change
8.The broad locations do not provide the necessary certainty needed to ensure that housing need during the Plan period is met.	The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. There is no evidence to suggest otherwise	No change

	in respect of the three broad locations that the Council has identified.	
Policy Number H3	Town Centre Broad Location	
Summary of issues	Officer response	Proposed change
1: Southern Water: No fundamental reasons why this development could not come forward but cannot assess proposals in more detail until the precise location of the development is known	Noted	No change
2: The existing underused office blocks should be developed now and incorporated as allocated sites under policy H1.	New permitted development rights have seen proposals for the conversion of some of the existing office blocks to residential use. Where sites have come forward through the 'call for sites' process they have been allocated. Not all redundant or under-used office blocks have been proposed for development. They cannot therefore be considered as available.	No change
3: Given the considerable site remediation and clearance costs, together with fluctuating and competing land use demands, including for commercial, retail and leisure makes it a highly unpredictable task to plan for housing growth in the town centre. It is submitted that any housing delivery within the town	The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.	No change

centre should be treated as a windfall and	There is no evidence to suggest otherwise	
should not be planned for or accounted	in respect of the Town Centre broad	
or within the emerging Local Plan	location.	
equirements, until such time as planning		
permission may be granted. I: The contribution from this location	New permitted development rights have	No change
seems to come entirely from poor quality	seen proposals for the conversion of	i i i i i i i i i i i i i i i i i i i
offices and given the statements made in	some of the existing office blocks to	
paragraph 6.15 (of the Draft Plan) it is	residential use.	
clear from the work that the Council has	Where sites have come forward through	
undertaken it is known where these poor	the 'call for sites' process they have been allocated.	
quality offices are. This being the case we can see no reason why the Plan cannot	Not all redundant or under-used office	
make specific allocations for these offices	blocks have been proposed for	
to be converted or redeveloped for	development. They cannot therefore be	
housing purposes. This will provide more	considered as available.	
clarity on their future use and the specific		
contribution that they will make to meeting future housing needs.		
dure nousing needs.		
Policy Number H3	Invicta Park Barracks Broad Location	
Summary of issues	Officer response	Proposed change
1: The MOD has not declared the	The MOD have stated that Invicta Park is	No change
barracks surplus to requirements. They	not a 'core' site and that it falls into the	
may not, and the site may not therefore	'retained site' category. The allocation of	
ever be available or deliverable.	the site as a broad location has occurred following discussions with the MOD.	
	Allocation does not mean that the site will	

	T	
	be vacated by the MOD, but it is prudent	
	nevertheless to plan for that eventuality.	
	The NPPF specifically allows for broad	
	locations to be identified beyond the first	
	five years of the Plan. To be considered	
	developable, sites should be in a suitable	
	location for housing development and	3
	there should be a reasonable prospect	
	that the site is available and could be	
	viably developed at the point envisaged.	
	There is no evidence to suggest otherwise	
	in respect of this identified broad location.	
2: As there is no certainty that the site will	The MOD have stated that Invicta Park is	No change
be available it should be deleted as it	not a 'core' site and that it falls into the	Two onange
would appear it is only included to enable	'retained site' category. The allocation of	
the housing target to be neared or	the site as a broad location has occurred	
reached.	following discussions with the MOD.	
	Allocation does not mean that the site will	
	be vacated by the MOD, but it is prudent	
	nevertheless to plan for that eventuality.	
	The state of the s	
	The NPPF specifically allows for broad	
	locations to be identified beyond the first	
	five years of the Plan. To be considered	
	developable, sites should be in a suitable	·
	location for housing development and	
	there should be a reasonable prospect	
	that the site is available and could be	
	viably developed at the point envisaged.	
	There is no evidence to suggest otherwise	
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The state of the s		
	in respect of this identified broad location	
3: Southern Water comments that there is	Noted and agreed add additional criterion	Add additional criterion 9 to Appendix F
insufficient capacity in the existing	and amend explanatory text to incorporate	
sewerage system to accommodate the	Southern Water's other advice that 'that	9 Development proposals must
development. Significant new or improved	due to the size of the development	demonstrate that the necessary sewerage
sewerage infrastructure would be required	significant sewerage infrastructure would	infrastructure is either available, or can be
to serve it.	be required.'	<u>delivered in parallel with the development.</u>
This is not a fundamental constraint to development, but the necessary infrastructure would need to be delivered in parallel with the development.		
Southern Water looks to the Local Plan to recognise the requirement for significant sewerage infrastructure in planning policies and ensure that this is taken into account in determining planning applications. To this end they seek additional development criteria;		
'Development proposals must demonstrate that the necessary sewerage infrastructure is either available, or can be delivered in parallel with the development. Southern Water has advised that due to the size of the development significant	·	
sewerage infrastructure would be required.'		
4: The development of the site along with	A robust transport evidence base is being	No change
other proposed sites in the area will lead	amassed and the quantum and location of	
to unacceptable increase in traffic and	proposed development tested. The results	

congestion on the already heavily congested roads in the area.	will be utilised in the preparation of the Regulation 19 consultation draft. The site criteria in Appendix F require the implementation of necessary off-site highway improvements to provide mitigation.	
5: Adverse impact on air quality and pollution.	The development criteria require enhanced pedestrian, cycling and public transport provision. Amend existing criterion 6 (renumbered as criterion 7) to ensure appropriate connection of pedestrian and cycle routes to the local area as well as the town centre. 7. Enhanced walking, cycling and public transport connections to the town centre and local area;	Amend existing criterion 6 (renumbered as criterion 7) in Appendix F to ensure appropriate connection of pedestrian and cycle routes to the local area as well as the town centre. 7. Enhanced walking, cycling and public transport connections to the town centre and local area;
6: Adverse impact on existing wildlife on the site	The development criteria set out in Appendix F require proposals to take into account ecological and habitat issues and opportunities The existing criteria can be strengthened to address concerns in this area Amend existing criterion 1 (renumbered to criterion 2) to read; 2. Integration of new development within the existing landscape structure of the site (supported by appropriate	Amend existing criterion 1 (renumbered to criterion 2) in Appendix F to read; 2. Integration of new development within the existing landscape structure of the site (supported by appropriate ecological, arboricultural and landscape and visual impact assessments together with the identification of detailed mitigation measures where appropriate); Amend existing criterion 5 (renumbered

	1 1 1 1 1	to mitarian (1) in Annondix E to read:
	ecological, arboricultural and	to criterion 6) in Appendix F to read;
	landscape and visual impact	O. D C
	assessments together with the	6. Preservation of features of ecological
	identification of appropriate detailed	importance including the retention
	<u>mitigation measures where</u>	and enhancement of wildlife corridors
	<u>appropriate);</u>	and ensuring that connection with
		ecological features and corridors
	Amend existing criterion 5 (renumbered	<u>outside the site is</u>
	to criterion 6 to read;	maintained/enhanced;
	,	
	6. Preservation of features of ecological	
	importance including the retention and	
	enhancement of wildlife corridors and	
	ensuring that connection with	
	ecological features and corridors	
	outside the site is	
	maintained/enhanced;	
	maintained/eimanced,	
7. Advance inspect on existing already	The site criteria in Appendix F require the	Add additional criterion 9 to Appendix F
7: Adverse impact on existing already	implementation of necessary off-site	9 Development proposals must
inadequate sewerage, transport and	ļ · ·	demonstrate that the necessary
community facility infrastructure in the	highway improvements to provide	
area, which would need to be expanded.	mitigation as well as the provision of	
	necessary community facilities. An	available, or can be delivered in
	additional criterion is proposed to address	parallel with the development.
	Southern water's comments regarding	
	sewerage infrastructure	
8: Adverse impact on the overall character	The proposed development criteria will	Add new criterion 1 to Appendix F and
and visual amenity of the area and the	ensure that any new development is	renumber existing criteria accordingly.
quality of life for existing residents.	integrated with its surroundings. The	
	protection of the amenities of nearby	1. Preparation and submission of a
	residents would be secured through	development brief and a masterplan
	detailed design at planning application	prepared in conjunction with and for
	The state of the s	

	stage	approval by the Council to guide
		development;
	Development should be guided by a	
	design brief and a masterplan prepared in	
	conjunction with the Council and	
	submitted for approval by the Council.	
	Add new criterion 1 and renumber existing	
	criteria accordingly.	
	1. Preparation and submission of a	
	development brief and a masterplan	
	prepared in conjunction with and for	
	approval by the Council to guide	
	development;	
	development,	
9: The landscape, cultural and biodiversity	The proposed development criteria will	Amend existing criterion 7 (renumbered
importance of this historic and sylvan	ensure that any new development is	as criterion 8) in Appendix F to read;
parkland are such that if development	integrated with its surroundings and that	·
takes place it should be only minor	the existing Grade II* Listed Building and	8.Preservation of Park House (Grade II*)
development restricted to the currently	its setting are preserved.	and its setting in particular the parkland to
developed footprint well away from the		the north and east of Park House to
Grade II* listed building.	The criterion regarding the existing	include removal of existing built
	parkland and the setting of Park House	development at 1-8 (consecutive) The
	should be strengthened to make this	Crescent to enhance/restore the parkland
	clear.	setting.
	Amend existing criterion 7 (renumbered to	
	criteria 8 to read;	
	7. Preservation of Park House (Grade II*)	
	and its setting in particular the	
	parkland to the north and east of Park	
	partially to the field and east of fair	

	House to include removal of existing built development at 1-8 (consecutive) The Crescent to enhance/restore the parkland setting.	
10: Working committees should be set up with the express purpose of keeping the military in the town not planning for withdrawal.	Noted. The decision about the future of Invicta Park Barracks does not rest with the Council. It is prudent to plan for the eventuality that the site may be declared surplus to requirements by the MOD.	No change
11: Any site access should be onto the A229 Royal Engineers Road only not onto other roads in the area	Appropriate access would be determined by Transport Assessments undertaken as part of any application and design considerations and any necessary off-site mitigation also secured as part of this process.	No change
12: Any development should be a campus-style mixed development and only on the footprint of existing development on the site	The proposed development criteria will ensure that any new development is of an appropriate mix and scale, integrated with its surroundings and that the existing Grade II* Listed Building and its setting are preserved. It is recommended that a development brief and masterplan are prepared in conjunction with the Council and submitted to and approved by the Council to guide future development. Add new criterion 1 and renumber existing criteria accordingly.	Preparation and submission of a development brief and a masterplan prepared in conjunction with and for approval by the Council to guide development;

approval by the Council to guide	
<u>development;</u>	
	No change
not a 'core' site and that it falls into the	
'retained site' category. The allocation of	
the site as a broad location has occurred	
following discussions with the MOD.	
	· ·
Allocation does not mean that the site will	
be vacated by the MOD, but it is prudent	
nevertheless to plan for that eventuality.	
The NPPF specifically allows for broad	
developable, sites should be in a suitable	
that the site is available and could be	
viably developed at the point envisaged.	
, ,	
1	
The MOD have stated that Invicta Park is	No change
not a 'core' site and that it falls into the	
'retained site' category. The allocation of	
the site as a broad location has occurred	
following discussions with the MOD.	
3	
	development brief and a masterplan prepared in conjunction with and for approval by the Council to guide development; The MOD have stated that Invicta Park is not a 'core' site and that it falls into the 'retained site' category. The allocation of the site as a broad location has occurred following discussions with the MOD. Allocation does not mean that the site will be vacated by the MOD, but it is prudent nevertheless to plan for that eventuality. The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. There is no evidence to suggest otherwise in respect of this identified broad location The MOD have stated that Invicta Park is not a 'core' site and that it falls into the 'retained site' category. The allocation of

a firm basis for the future planning of the site to ensure that any such contribution is forthcoming, it should be formally allocated in the Plan.	Allocation does not mean that the site will be vacated by the MOD, but it is prudent nevertheless to plan for that eventuality. The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. There is no evidence to suggest otherwise in respect of this identified broad location	
Policy Number H3	Lenham Broad Location	
Summary of issues	Officer response	Proposed change
1: This is a highly speculative allocation and expansion to the east may not be deliverable	The Council has received indications that land is potentially available through a 'call for sites' process. The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.	No change

2: Such a large expansion will be controversial and will raise many issues	There is no evidence to suggest otherwise in respect of this identified broad location The Council has received indications that land is potentially available through a 'call	No change
and may not be deliverable	for sites' process The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.	
	There is no evidence to suggest otherwise in respect of this identified broad location	
3: Lenham is a thriving and characterful medieval village with a strong community spirit, such a large development would completely alter/destroy its character as a place to live and also as a tourist attraction	The proposed development criteria will ensure that any new development is of an appropriate mix and scale and integrated with its surroundings. It would be appropriate tio ensure that	Insert new criterion 1 in Appendix F and renumber existing criterion accordingly; 1. Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;
	new development is guided by a masterplan prepared in conjunction with and submitted to the Council for approval.	
	Insert new criterion 1 and renumber existing criterion accordingly; 1. Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council	

	to guide development;	
4: Development on such a scale would harm The Square and make existing parking and traffic congestion problems much worse	The proposed development criteria will ensure that any new development is of an appropriate mix and scale and integrated with its surroundings. See the response to issue 3 above	No change
5: Existing community facilities can't cope now. How will they cope with such an expansion in the number of houses?	The site criteria in Appendix F require the provision of necessary community facilities.	No change
6: Lenham is capable of expansion and has a strong service and facilities infrastructure. It has good school provision across all years	Noted	No change
7: The proposed allocation would have an adverse impact on the setting of the adjacent Kent Downs AONB	The proposed development criteria will ensure that any new development is of an appropriate mix and scale and integrated with its surroundings including the setting of the adjacent Kent Downs AONB. Renumbered criterion 2 could be amended to reinforce this and changed to read; 2. Submission of necessary ecological, arboricultural and landscape and visual impact	Change re-numbered criterion 2 in Appendix F to read; 2.Submission of necessary ecological, arboricultural and landscape and visual impact surveys assessments with detailed mitigation schemes where appropriate;
	surveys assessments with detailed mitigation schemes where appropriate;	

8: Whilst the principle of additional development is supported, it is inappropriate to consider greenfield land around Lenham without first considering other available brownfield sites in and around the village	Noted. The broad location identified does not rule-out consideration of other appropriate sites previously developed land in an around the village. A masterplan as now required by criterion 1 (see issue 3 above) would address this.	Add criterion 1 to Appendix F Insert new criterion 1 and renumber existing criterion accordingly; 1. Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;
9: If you want to add that number of dwellings to Lenham a new village/town should be considered. The character of Lenham would be changed for ever.	Such an approach is contrary to the Council's preferred spatial development strategy. Even if such a development could be sited to be acceptable in environmental and visual impact terms would need to be of a sufficient scale to provide the necessary infrastructure and community facilities that would need to be wholly funded by new development. The proposed development criteria will ensure that any new development is of an appropriate mix and scale and integrated with its surroundings and with the proposed addition of criterion 1 be guided by a masterplan.	Add criterion 1 to Appendix F Insert new criterion 1 and renumber existing criterion accordingly; 1. Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;
10: Lenham would become a dormitory town with not enough employment to support the new dwellings	Lenham as a Rural Service centre has a range of employment uses.	No change
11: Southern Water: 'Significant sewerage infrastructure would be required to serve	Noted and agreed. Add additional criteria and amend explanatory text to incorporate	l K

this development. This is not a fundamental constraint to development as the necessary infrastructure could be provided in paralle I with the development, assisted by good forward planning. SW 'look to Maidstone's Local Plan to ensure that development in Lenham, as set out in policy H3, is coordinated with	Southern Water's other advice that 'that due to the size of the development significant sewerage infrastructure would be required to serve the overall level of development of 1500 homes in Lenham.'	A feasible solution shall be identified to provide wastewater treatment capacity so that water quality objectives set by the Environment Agency are not compromised, and the necessary wastewater treatment capacity can be delivered in parallel with the development. 9. Development proposals must
provision of necessary sewerage infrastructure and wastewater treatment capacity.' To this end they seek additional development criteria	The proposed development criteria will	demonstrate that the necessary sewerage infrastructure is either available, or can be delivered in parallel with the development.
12. The scale of the proposed development is entirely disproportionate to the size of the existing settlement	The proposed development criteria will ensure that any new development is of an appropriate mix and scale and integrated with its surroundings. The requirement for a masterplan to guide development will address this issue.	Insert new criterion 1 and renumber existing criterion accordingly; 1. Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;
13. Loss of productive agricultural land	Some loss of agricultural land is inevitable to enable necessary development but this is kept to a minimum by strategic and detailed policies which encourage the use of previously developed land wherever possible.	No change
14. Lenham is a distance from Maidstone and any expansion will thus generate	The proposed development criteria seek to provide inter-alia infrastructure	No change

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significant additional par journave on the	improvements to public transport	
significant additional car journeys on the	improvements to public transport	
15. There should be a new junction on the M20 Motorway adjacent to Lenham to not only accommodate the new development but also remove existing HGVs from Lenham Storage from the A20	The M20 Motorway is a considerable distance to the south of Lenham village. A motorway junction, even if one could be sited to the approval of Highways England and be acceptable in environmental and visual impact terms, would require considerable investment and would need to be wholly funded by new development.	No change
16. The possibility of a new village or village extension is worthy of consideration in the Lenham area due to its existing facilities including a railway station and relative ease of access to the major road network. This should be properly discussed now with appropriate partners rather than permitting piecemeal development which could provide the worst effects of development while accruing little in the way of definite benefits.	Such an approach is contrary to the Council's preferred spatial development strategy. Even if such a development could be sited so as to be acceptable in environmental and visual impact terms, it would need to be of a sufficient scale to ensure the necessary infrastructure and community facilities that would be needed could be wholly funded by new development.	No change
17. Arable prairie east of the village should be the focus of any development and significant semi-natural open space should be a core principle of any plan. Recent housing schemes at Swindon and Cambridge have delivered this aspiration.	Such an approach is contrary to the Council's preferred spatial development strategy. Even if such a development could be sited so as to be acceptable in environmental and visual impact terms, it would need to be of a sufficient scale to ensure the necessary infrastructure and community facilities that would be needed could be wholly funded by new development.	No change

18. If development is to take place it is vitally important that the required additional infrastructure is put in place	The site criteria in Appendix F require the implementation of improvements to physical and community infrastructure. An	Add additional criteria 8 and 9 to Appendix F
before the development takes place,	additional criterion is proposed to address	8 A feasible solution shall be
particularly in relation to transport and	Southern water's comments regarding	identified to provide wastewater treatment
utilities.	sewerage infrastructure	capacity so that water quality objectives
!		set by the Environment Agency are not
· ·		compromised, and the necessary
I		wastewater treatment capacity can be
		delivered in parallel with the development.
		9 Development proposals must
		demonstrate that the necessary sewerage
· ·		infrastructure is either available, or can be
·		delivered in parallel with the development.
19. The proposed level of development at		No change
Lenham is disproportionate and should be	development strategy that does seek to	
spread more fairly around the Borough	spread development around the Borough	
	as a whole.	N. I
20. Langley PC: The Local Plan should	Such an approach is contrary to the	No change
bring forward the early implementation for	Council's preferred spatial development	
the sustainable and well-planned	strategy. The Local Plan has a well-	
expansion of Lenham village. It is	defined spatial development strategy that does seek to spread development around	:
considered that Lenham has the capacity to deliver some 2500 to 5000 additional	the Borough as a whole.	
dwellings within the plan period within	the bolough as a whole.	
easy walking distance of the station and		
the village centre. Such a self-contained		
proposal would be far preferable to the		
perpetuation of urban sprawl along the		
Sutton Road.		
	The site criteria in Appendix F require the	Add additional criteria 8 and 9 to

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adequate infrastructure can be provided to allow delivery of land to the east and/or west of Lenham and it is submitted that Lenham should not be included within Policy H3 accordingly.

implementation of improvements to physical and community infrastructure. An additional criterion is proposed to address Southern water's comments regarding sewerage infrastructure

Appendix F

- A feasible solution shall be identified to provide wastewater treatment capacity so that water quality objectives set by the Environment Agency are not compromised, and the necessary wastewater treatment capacity can be delivered in parallel with the development.
- 9 Development proposals must demonstrate that the necessary sewerage infrastructure is either available, or can be delivered in parallel with the development

Add criterion 1 to Appendix F

22. Should be deleted from the Plan. The prospect of a further 1500 houses to the 245 allocated in the Plan is unjustified and would be contrary to the stated purpose of development at the rural service centres i.e. to maintain and enhance the service centre role of the village and meet the needs of the local community. No evidence has been presented this demonstrate whv scale development is needed to fulfil these stated intentions

The NPPF specifically allows for broad locations to be identified beyond the first five years of the Plan. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. There is no evidence to suggest otherwise in respect of the Lenham broad location.

The expansion of Lenham would be undertaken on a planned basis, scheduled to commence post 2026.

Development would not take place 'in one go' but would be phased to ensure appropriate facilities and infrastructure are

Insert new criterion 1 and renumber existing criterion accordingly;

1. Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;

	available.	
	The proposed requirement for a masterplan would guide future development.	
23. Whilst it is stated that the opportunities for development are at the eastern and western edges of the village and that they would be considered in detail when the Plan is reviewed, Appendix F defines the future growth location covering the whole village in a very general fashion. Furthermore, having so defined the 'growth location' it allows sites from anywhere in the location to be considered before the Plan is reviewed. This is a confused and inappropriate way to consider future growth and will potentially result in ad hoc and unplanned development coming forward contrary to the plan-led approach advocated in the NPPF. If there are genuine opportunities to expand the village they should be clearly presented so that people can clearly see what is being proposed. If that cannot be done now then the Plan should not seek to provide a mechanism for development to come forward through the 'back door'. This is an entirely unacceptable approach and should be deleted from the Plan.	The proposed development criteria will ensure that any new development is of an appropriate mix and scale and integrated with its surroundings. Development would also not take place 'in one go' but would be phased to ensure appropriate facilities and infrastructure are available. The proposed requirement for a masterplan would guide future development.	Insert new criterion 1 and renumber existing criterion accordingly; 1. Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;
24. Unlike the other "growth locations",	The expansion of Lenham would be	Add criterion 1 to Appendix F

the opportunities identified in Lenham involve extensive greenfield land. In accordance with NPPF, there should be a pre-disposition in favour of brownfield sites. In the projected time frame (2026 onwards) other land, and potentially brownfield sites, is likely to become available e.g. redundant office space or empty retail space in town centre locations, due to the growth of internet shopping.	scheduled to commence post 2026. The proposed allocation would be subject to review in 2021 to enable the delivery of other sites etc. that may have come forward to be taken into account The proposed requirement for a masterplan would guide future	Insert new criterion 1 and renumber existing criterion accordingly; 1. Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;
25. The suggestion to build 1500 new dwellings in Lenham would double its current size, which is contrary to good planning practice, as communities ought to be given time to absorb new development.	The expansion of Lenham would be undertaken on a planned basis. It is scheduled to commence post 2026. Development would not take place 'in one go' but would be phased to ensure appropriate facilities and infrastructure are available. The proposed requirement for a masterplan would guide future development.	Add criterion 1 to Appendix F Insert new criterion 1 and renumber existing criterion accordingly; 1. Preparation and submission of a masterplan prepared in conjunction with and for approval by the Council to guide development;
The land is agricultural land and privately owned. To our knowledge the landowner has not come forward and offered his land for development.	The Council has received indications that land is potentially available through a 'call for sites' process	No change
26. The retention of agricultural land is, in a time of climate change and growing world population, extremely important. In addition, the farmer earns his livelihood from that land. Would the Council, for example, tell any other kind of business	The Council is not advocating the use of Compulsory Purchase powers to bring forward development. The Council has received indications that land within the indicated area of the broad location is potentially available through a 'call for	No change

(such as Marley nearby) that it is	sites' process.	
considering compulsorily purchasing their	·	
land to put to another use against their		
wishes and interests?		
	The proposed development criteria seek	No change
from Maidstone within the Borough		
	improvements to public transport to	
	reduce reliance on the use of the private	
activities such as school, work, or	car as a mode of transport.	
shopping, a development such as this		
would bring at least 1000 more traffic	·	
movements onto the A20 daily.		NI. II.
	The proposed development criteria seek	No change
	to provide inter-alia infrastructure	
	improvements to public transport cycling	
1	and pedestrian movements to reduce	
same vagueness has the potential to		
create blight for residents.	mode of transport.	