

APPENDIX A:

Schedule of issues and responses

Introduction and General Comments						
Key Issues	No. in support	No. of objections	No. of observations	Details	Officer response	Officer Recommendation
Length of the consultation period.		7		The consultation period was too short. It should have been at least 6 weeks. The consultation does not equate with early and effective community engagement (NPPF para. 155). It contravenes the parish charter.	The Regulations do not specify a minimum consultation during preparation of the Local Plan at Regulation 18 stage. The breadth and length of the consultation should be proportionate to the size and complexity of the document. The 4 week timeframe was agreed as part of the wider programme for the delivery of the Local Plan by Councillors given it was a partial update to the comprehensive consultation at Regulation 18 undertaken in the spring of 2014 on the whole plan. The proportionately shorter timescale ensured expediency in progressing the plan to the next stage. All planning related consultation must be	No change.

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				<p>undertaken with regard to and in compliance with the Council's adopted Statement of Community Involvement, a legal requirement, which this Regulation 18 consultation was.</p> <p>Finally in regard to the Parish Charter, this is clear that planning consultations are exempted from the six-week requirement, and that parishes should 'respond to all consultations in relation to the Local Plan within the Borough Council's deadlines in accordance with the adopted Statement of Community Involvement and Constitution.' This understood, comments received after the consultation close owing to the timing of parish council meetings have been considered with those received on time.</p>	
Amendments to allocation policies		1	Allocation policies should be worded 'may be permitted' rather than 'will be permitted'.	Expressing policies in terms of what will be permitted (subject to compliance with specific criteria), gives certainty to all users of the Plan and is consistent with the NPPF which requires authorities to plan positively.	No change.
		1	Lighting at every site (not solely 'rural' areas) should be addressed as it is best practice to encourage its reduction through all developments.	This matter is specifically covered by Local Plan Policy DM6 – External lighting.	No change.

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		1	<p>Policies should identify opportunities for high quality and appropriate mitigation and enhancement measures, both from landscape and ecological viewpoints. This would help to avoid ad hoc solutions at planning application stage. Landscape and ecology should be dealt with separately in policies to avoid confusion. Proposed mitigation must be landscape appropriate. Policies should be encouraging an integrated approach that requires understanding the site, its heritage and ecology and how these contribute to character.</p>	<p>The site allocation policies require habitat surveys (where appropriate) at detailed planning application stage and that the outcomes of such surveys be used to devise the most suitable mitigation and enhancement measures to be delivered in association with the development. Policy DM10 promotes the comprehensive analysis of biodiversity, heritage and landscape impacts in the planning of development.</p>	<p>No change.</p>
Sustainability Appraisal		1	<p>The SA finds the majority of the sites included in the consultation to have sustainability constraints; cumulative impacts on infrastructure are not considered by the SA; the majority of proposed allocated sites fail the sustainability criterion.</p>	<p>The SA provides a framework for considering the implications of development against key sustainability criteria. The SA provides a consistent assessment of these implications using specific criteria (many based on a distance measurement) but is not the role of the SA to determine conclusively which sites should or should not be allocated. The SA serves to highlight where a particular site scores well or less well against a specific consideration and invites consideration of whether and how a negative effect can be mitigated. A SA of the whole plan, which</p>	<p>No change</p>

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					will include assessment of the overall implications of the Plan in its entirety will accompany the Regulation 19 version of the Local Plan.	
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Policy SP5 – The Countryside						
Key Issues	No. in support	No. of objections	No. of observations	Details	Officer response	Officer Recommendation
Support for LLVs	4			General support for creation of LLVs	Support welcomed	No change
	1			Support specific for inclusion of Len Valley as an LLV	Support welcomed	No change
	14			Support for designation of Low Weald as LLV	Support welcomed	No change
	1			Support for Greensand Ridge LLV	Support welcomed	No change
	3			Support for Loose Valley LLV	Support welcomed	No change
Support for safeguarding AONB	4			Support for safeguarding AONB	Support welcomed	No change
Omission of areas of equal environmental importance and additional areas of landscapes of local value			3	No mention of River Beult SSSI	Para. 2.19 of the supporting text for policy SP5 states that “The Kent Downs AONB and High Weald AONB and their settings and other sites of European and national importance are considered to be covered by appropriate existing policy protection in the National Planning Policy Framework, National Planning Practice Guidance and other legislation”. Sites of Special Scientific Interest are afforded specific protection within the NPPF and other legislation for their ecological value, and as such are	No change

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				considered sufficiently protected without the requirement of being named within this policy.	
	4		LLVs should not stop at edge of urban areas; extend River Len LLV westward as far as Wat Tyler Way fly-over; extend River Medway LLV northward to Allington Lock	<p>The evidence base underpinning this policy with regard to Landscapes of Local Value focuses upon the countryside landscape as opposed to townscape.</p> <p>Policy DM4 Principles of Good Design ensures that development proposals respond positively to and where possible enhance the local, natural, and historic character of the area. Therefore affording a degree of protection to townscapes.</p>	No change
	1		Widen Medway Valley LLV to provide further protection for Barming	<p>The Maidstone Landscape Capacity Study: Sensitivity Assessment (Jan 2015) was produced by consultants (Jacobs) to assess the comparative sensitivity of the Borough's landscapes to development. The methodology used to undertake this study is derived from the Landscape Character Assessment Guidance for England and Scotland: Topic Paper 6 Techniques and Criteria for Judging Capacity and Sensitivity.</p> <p>This study, alongside the Landscape Character Area Assessment, comprises a detailed analysis of local landscape character and sensitivity in the light of central government guidance, primarily</p>	No change
	4		<p>Objections to Low Weald LLV: Should link with designated area around Staplehurst;</p> <p>Include area between Laddingford, Yalding and Beltring; Yalding Farmlands; Linton Park and Farmlands; Ulcombe Mixed Farmlands; Headcorn Pasturelands; Staplehurst Low Weald; Sherenden Wooded Hills; Knoxbridge Arable Lowlands; Teise Valley (Lesser Teise); and Beult Valley</p>		

			Low Weald not defined enough.	<p>through the National Planning Policy Framework (NPPF), which requires a criterion based approach to any local landscape designation. The methodology and criteria for LLV designation were set out in the report to the Strategic Planning, Sustainability and Transport Committee on 14th July 2015.</p> <p>Some of the areas raised by respondents as potential LLVs – in particular the areas around Walderslade and the areas around Chart Sutton - were previously considered by the SPS&T Committee in response to the 2014 Reg 18 consultation (see 14th July 2015 report). It was previously determined that many of these areas are too small to be designated landscapes of local value, which is a strategic designation of landscape protection for the borough and that the criteria for designation were not met.</p> <p>The committee also determined that a LLV covering the settings of the AONBs were not required as this is sufficiently protected through other national legislation and guidance.</p> <p>With respect to areas around Barming, to the east of Staplehurst, around Langley,</p>
		1	Include area between Bearsted and Leeds Castle as LLV.	
	1		Countryside around Lidsing; Beechen Bank; Walderslade Woodlands; Cowbeck and Reeds Croft Woods, Lordswood; and Cuckoo Woods and surrounding area, Sandling should be included in LLVs	
	10		Object to omission of Langley parish from LLV Designations – include areas 30-1 to 30-9 from Landscape Character area assessment; include ‘Langley Fruit Plateau’.	
	1		Banky Meadow Valley should be designated LLV	
		4	Extend Greensand Ridge LLV	
		2	Object to exclusion of former KIG site from Len Valley LLV	
		1	Include area east of Loose Valley LLV – Farleigh Greensand Fruit Belt; include Forstal lane	
		2	Extend the Len Valley area of Landscape of Local Value to include Len Valley, Gore Court Farm, Otham Open Land, Caring Fruit Slopes, Stoneacre Spring, Upper Len, Milgate Park, Langley Grasslands, and Leeds Farmland.	

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		3	Include setting of Kent Downs AONB as LLV	<p>Banky Meadow, west of the Loose valley and around Otham and Ulcombe, these areas were not found to fully accord with the criteria set out in the 14th July report or to relate to very discernible topographical features such as river valleys or ridges.</p> <p>The Local Plan as a whole sets out where significant development is acceptable with consideration given to conserving and enhancing the natural, historic, and local landscapes. A thorough assessment of character areas, sensitivity, and capacity for change has been undertaken. Those further areas suggested are subject to a significant degree of control over the scale and nature of development through the Local Plan as whole and specifically through Policy SP5 – Countryside.</p> <p>Planning permission has been granted for land north of Cripple Street and land at Brandys Bay (H1(73)). The LLV designation does not preclude development but helps ensure that landscape considerations are given particular consideration in the planning and design of development. In this respect the retention of the designation is valid.</p>
	1		Land north of Cripple Street should be deleted from Loose Valley LLV	
	1		Remove Land at Brandy's Bay (H1 (73)) from Low Weald LLV	

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Amendments to policy wording and clearer definitions		4	<p>More appropriate definition of setting set out in para 2.16 rather than 2.13 as it is not limited to open countryside</p> <p>Define areas that constitute the setting of the AONB and areas to be protected</p>	<p>The Council recognises that the setting of the AONB is not defined or indicated on a map due to its broadness depending on the location, as stated in Para 2.16.</p> <p>On review, the supporting text should be revised to clarify that the setting of the AONB is largely felt to be the countryside to the immediate south of the Kent Downs AONB, it is however not limited to this area. This will ensure consistency with the definition set out in the Kent Downs AONB management Plan, as stated in para 2.16.</p>	<p>Amend Para 2.13 to read:</p> <p>Open countryside to the immediate south of the AONB forms <i>a large extent of</i> the setting for this designation.</p>
		1	<p>Para 2.17 – change ‘Preservation and enhancement’ to ‘Conservation and enhancement’ In line with NPPF wording</p>	<p>On review of the wording of the NPPF (Chapter 12 – conserving and enhancing the historic environment) and of the Kent Downs AONB Management Plan, the supporting text should be consistent with these statutory and adopted documents.</p>	<p>Amend Para 2.17 to read:</p> <p>Preservation <i>Conservation</i> and enhancement of this area is also part of the Council’s statutory duty and is covered under the guidance set out in national policy (national Planning Policy Framework and National Planning Practice Guidance).</p>
		1	<p>Sub-section 5 – change ‘protected’ to ‘conserved’ to reflect CROW Act requirements</p>	<p>On review of the wording of section 85 of the CROW Act 2000 which states that ‘a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the AONB’, criterion 5 should be worded to ensure consistency with this statutory legislation.</p>	<p>Amend Criterion 5 to read:</p> <p>The distinctive character of the Kent Downs Area of Outstanding Natural Beauty and its setting, the setting of the High Weald Area of Outstanding Natural Beauty and the extent and openness of the Metropolitan Green Belt will be rigorously protected <i>conserved</i>, maintained and enhanced where appropriate</p>

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		6	Objection to words “where appropriate”	Para 152 of the NPPF sets out how LPAs should consider each of the economic, social and environmental dimensions of sustainable development, including how to address adverse impacts on any of these dimensions. The wording ‘where appropriate’ therefore enables the net gains across all three of these dimensions to be considered on balance, in accordance with para 152. Furthermore, para 19 places emphasis on encouraging, not impeding, sustainable growth, with para. 186 reaffirming this message stating that the delivery of sustainable development should be fostered in a positive manner.	No change
		1	Para 2.17 Suggests more appropriate wording: “nature, scale and design” of proposals instead of “Matters such as the size of proposals”	The choice of wording has been taken from the Kent Downs AONB Management Plan and therefore, whilst matters of the nature, scale and design of proposals are considerations when determining a planning application, for consistency the wording should remain that of the Management Plan.	No change.
		1	Para 2.19 Seems appropriate in all areas (when dealing with more than minor development) that consideration is given to the LCA and use of LVIA in line with NPPF para 17	Policy DM10 criterion 3 iii) requires a landscape and visual impact assessment where appropriate to accompany a planning application. In any case, account should be taken of the Landscape Character Guidelines. It is considered that sufficient consideration is afforded to landscape character throughout the Borough, to be	No change

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				dealt with through the development management process. It is the purpose of SP5 to take a strategic approach to defining landscapes of local value in line with the NPPF.	
	1		Add wording "Proposals for development of essential infrastructure will be supported where the benefit development outweighs any harm or loss"	As a result of issues that arose during the wider 2014 Reg 18 consultation on the draft Local Plan, the proposed Policy DM10 has now been revised to include the statements "proposals for development of essential utility infrastructure will be supported where the benefit of the development outweighs any harm". It is considered more appropriate that this wording be included in DM10 as opposed to SP5.	No change
	2	1	SP5 1.i.a – remove 'except in isolated cases'	<p>Development in isolated locations is not generally considered to be sustainable. However, to remain consistent with Policy DM37 Expansion of Existing Businesses in Rural Areas, which does not preclude isolated locations, it is recommended this wording be removed.</p> <p>This is also consistent with national legislation that allows agricultural buildings to change to a flexible commercial use (under 500sq m) comprising A1, A2, A3, B1, B8, C1 or D2 uses, under the General Permitted Development Order, implying isolated locations are not precluded.</p>	<p>Amend Criterion 1,i,a to read:</p> <p>The reuse or extension of existing buildings except in isolated locations;</p>
		3	SP5 1.i.b – add 'appropriate' in front of expansion or 'reasonable'	Policy SP5 criterion 1 refers to small-scale economic development. It is therefore	No change.

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				implied that the expansion of existing businesses (1.b) relates to proportionate development as appropriate to this scale.	
		4	SP5 1.ii.c – expand and clarify ‘local housing needs’	Local needs housing is defined and addressed specifically under policy DM25 Local Needs Housing and its supporting text.	No change.
		2	SP5 8 – remove ‘with any unavoidable impacts mitigated’	The wording ‘with any unavoidable impacts mitigated’ is in line with paragraph 115 of the NPPF, which allows for mitigation of unavoidable significant harm resulting from a development.	No change
		4	Add “high quality soils”.	Criterion 4 affords for the efficient use of soil resources. The protection and enhancement of soils is given due consideration in para 109 of the NPPF.	No change
	1	2 1	Add “heritage assets” after “natural” and also in Para. 2.14	<p>The NPPF affords protection of the historic environment from any substantial harm to or total loss of significance of a designated heritage asset unless the harm or loss is outweighed by significant public benefit of the development or fulfils set criteria (para 133).</p> <p>Policy SP5 specifically deals with development in the countryside, conserving and enhancing landscape character. Historic assets are not limited to the urban / defined settlements and do contribute to the landscape character, as emphasised within the AONB Management Plan. In this respect it is appropriate to amend Policy SP5 accordingly.</p>	<p>Amend Criterion 8 to read:</p> <p>Natural <i>and historic</i> assets, including characteristic landscape features, wildlife and water resources, will be protected from damage with any unavoidable impacts mitigated.</p>

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			Role of LVIAs needs clearer definition and reference to visual impacts/amenities required.	It is not the remit of the Local plan to set out the exact requirements of a Landscape Visual Impact Assessment. Detailed points of design will be agreed as part of the development management process.	No change
			Statement should be included to ensure developments are only permitted if they do not cause a deterioration of controlled waters including groundwater by ensuring appropriate pollution prevention measures and suitable waste disposal where needed is carried out.	Policy DM10 1-iii ensures for the control of pollution to protect ground and surface waters where necessary. It is considered more appropriate that this be dealt with on a case by case basis through the development management process as opposed to being considered necessary for a strategic borough wide policy.	No change
		1	SP5. 5 - Add “which is not only confined to the countryside but also the distinctive character of the built environment” after High Weald AONB	The Management Plans for both the High Weald and the Kent Downs AONBs set out the features of these areas that contribute to their setting. The Kent Downs AONB Management Plan has been formally adopted by the Council and is therefore given due regard as a material consideration in any development proposal impacting the AONB or its setting. The wording of the policy is considered to be sufficient to ensure appropriate consideration is given to these designations when determining development proposals.	No change
Lack of reference to specific guidance		2	Account should be taken of the Kent Downs AONB Management Plan and associated design guidance and publications and the Maidstone Borough	Policy SP5 takes account of the Kent Downs AONB Management Plan which has been adopted by the Council. Whilst the associated supporting publications and guidance should be given a degree of	No change.

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			Landscape Character Guidelines SPD	regard as material considerations, these are not statutorily required documents and as such have not been adopted individually by the Council. Sufficient regard is given to these by the inclusion of the reference to the Management Plan in which they are associated with. The conservation of the AONB is given great weight in the NPPF, which Policy SP5 supports.	
		1	Policy should refer to Water Framework Directive or Thames River Basin Management Plan	Paragraphs 11.42 and 11.43 support Policy DM10, and make specific reference to the Council continuing to work in partnership with the EA to achieve the goals of the Water Framework Directive and actions of the Thames River Basin Management Plan. These material considerations are more appropriately considered as part of the development management process and therefore supporting DM10 is deemed more appropriate.	No change
Lack of clear evidence base		1	Need a clear evidence base of the character of settlements and their sensitivity to coalescence before deciding where this is desirable / resisted because coalescence aids connectivity and shared use of services.	The overall strategy approach to development across the Borough has been to generally develop at the edge of discreet settlements as opposed to infilling between settlements producing coalescence. Individual site assessments in the SHLAA considered the implications of coalescence where appropriate on the overall local character. In terms of landscape character, the	No change

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				<p>Maidstone Landscape Character Assessment includes a summary analysis for each landscape character area giving an indication of an area's ability to accommodate change without the loss of its overall landscape integrity. The Maidstone Landscape Capacity Study: Sensitivity Assessment provides a combined assessment of landscape character sensitivity and visual sensitivity to identify each area's capacity to tolerate change. These evidence base documents do not preclude development, and are used to aid decisions about the appropriateness of a development in a particular location, in particular in making site allocations in the Local Plan. Policy SP5 takes account of this study and ensures its consideration when determining planning proposals.</p>	
	4		<p>Landscape designation criteria lacks published evidence base and particularly object to basing Low Weald LLV on former Low Weald SLA. Boundaries should be revised</p>	<p>The Maidstone Landscape Capacity Study: Sensitivity Assessment (Jan 2015) was produced by consultants (Jacobs) to assess the comparative sensitivity of the borough's landscapes to development. The methodology used to undertake this study is derived from the Landscape Character Assessment Guidance for England and Scotland: Topic Paper 6 Techniques and Criteria for Judging Capacity and Sensitivity.</p> <p>The minutes of the SPST Meeting of 18th</p>	<p>No change</p>

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				<p>August set out the Chairman’s response to a query regarding the analysis of local landscape quality informing the selection of suitable development sites. The response given sets out the evidence base underpinning the landscape designation criteria stating:</p> <p>“Analyses of local landscape quality have preceded every stage of Local Plan preparation, including early work with Kent County Council and others to identify Special Landscape Areas (SLA) in the original Maidstone Borough Wide Local Plan 2000. For the 2014 consultation draft of the emerging Maidstone Local Plan, a comprehensive Landscape Character Assessment study was carried out by consultants Jacobs for the Council which reported in March 2012, and subsequently a Landscape Capacity Study by the same consultants was published in January 2015.”</p> <p>These studies comprised a detailed analysis of local landscape character and sensitivity in the light of central government guidance, primarily through the National Planning Policy Framework (NPPF), which requires a criterion based approach to any local landscape designation. As a result of the application of criteria, as discussed in the SPST Committee report on 14th July,</p>	
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				<p>Landscapes of Local Value (LLV) are recommended to form part of Policy SP5.</p> <p>The significance of the Low Weald landscape was weighed in balance with the evidence presented at the Policy and Resources Committee on 23rd Sept and the Committee decided to designate the Low Weald as a LLV.</p>	
	1		Should include a test to determine whether any adverse impact of renewable energy developments would be so damaging it cannot be offset by the benefits of the project in line with NPPF (98)	Renewable and low carbon energy schemes are considered specifically by Policy DM3. Development must have regard to landscape and visual impact (criterion 2)	No change
Policy not consistent with NPPF		2	Delete policy as NPPF does not suggest blanket protection for the countryside	Para 113 of the NPPF states that LPAs should set criteria based policies against which proposals for development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. It is therefore appropriate to include Policy SP5 in the Local Plan.	No change
	1		Policy is too stringent and inconsistent with both the supporting text and national policy. Policy should make reference to the specific features (as mentioned in the supporting text) that require protection, maintenance and / or enhancement rather than a 'catch all policy' protecting all landscape	Policy SP5 should be read together with the supporting text, as this provides further explanation and justification for the policy itself. The supporting text sets out the characteristic features of each identified LLV. The policy wording does not preclude development within the LLV and it will be for the development management process to ensure that all relevant policies are weighed in balance	No change

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			aspects within the LLV designations.	most appropriate to the perceived impacts the proposal may have on the LLV and countryside.	
General objection to Policy SP5		7	2	<p>Policy too in favour of development in the countryside and should define development in terms of what it will be confined to rather than what is permissible.</p> <p>The wording of the policy is in line with the NPPFs presumption in favour of sustainable development, where all plans should be based upon and reflects this presumption, containing clear policies that will guide how the presumption should be applied.</p> <p>Policy SP5 provides affords sufficient protection and enhancement to national landscape designations, as well as the borough's own identified landscapes of local value. Development is not precluded from the countryside, but this policy ensures due consideration is given to the impacts development may have upon the character, setting, and natural assets contained within the Borough's areas of countryside.</p> <p>The Plan as a whole limits what development is considered appropriate for the countryside, and therefore should be read as a whole. In particular Policy DM10 Historic and Natural Environment and DM30 Design Principles in the Countryside afford protection and enhancement of the countryside and should be given due</p>	No change

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					consideration during the development management process.	
			1	Agricultural land other than grades 1-3a should be protected	The NPPF affords appropriate protection for the best and most versatile agricultural land (Land in grades 1, 2 and 3a of the Agricultural land Classification). Para 112 of the NPPF makes allowance for development of poorer quality agricultural land where necessary.	No change

Responses to representations made on Policy SP5 during the Regulation 18 Consultation 2014

POLICY SP5 THE COUNTRYSIDE						
Key Issues	No. in support	No. of objections	No. of observations	Details	Officer response	Officer Recommendation
Overview	8	29	15			

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Landscape				Specific additional areas proposed as Landscapes of Local Value and the enhanced protection of them is sought, including areas currently identified as ALLI/SLAs in the adopted Local Plan.	The Strategic Planning Sustainability and Transport Committee agreed the Officer recommendations regarding LLVs that result from the 2014 Reg 18 consultation at the meeting on 14 th July 2015.	No change
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<p>Policy SP5 – The Countryside</p>				<p>Detailed landscape assessment is needed to underpin the Plan</p>	<p>The Maidstone Landscape Capacity Study: Sensitivity Assessment (Jan 2015) was produced by consultants (Jacobs) to assess the comparative sensitivity of the borough’s landscapes to development. The methodology used to undertake this study is derived from the Landscape Character Assessment Guidance for England and Scotland: Topic Paper 6 Techniques and Criteria for Judging Capacity and Sensitivity.</p> <p>The minutes of the SPST Meeting of 18th August set out the Chairman’s response to a query regarding the analysis of local landscape quality informing the selection of suitable development sites. The response given sets out the evidence base underpinning the landscape designation criteria stating:</p> <p>“Analyses of local landscape quality have preceded every stage of Local Plan preparation, including early work with Kent County Council and others to identify Special Landscape Areas (SLA) in the original Maidstone Borough Wide Local Plan 2000. For the 2014 consultation draft of the emerging Maidstone Local Plan, a comprehensive Landscape Character Assessment study was carried out by consultants Jacobs for the Council which reported in March 2012, and subsequently a Landscape Capacity Study by the same consultants was published in January 2015.</p> <p>These studies comprised a detailed analysis of local landscape character and sensitivity in the light of central government guidance, primarily through the National</p>	<p>No change</p>
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					<p>Planning Policy Framework (NPPF), which requires a criterion based approach to any local landscape designation. As a result of the application of criteria, as discussed in the SPST Committee report on 14th July, Landscapes of Local Value (LLV) are recommended to form part of Policy SP5 The Countryside, which seeks to protect the countryside generally, and the areas delineated in particular. Specific development management policies will then inform the determination of any subsequent applications for these areas, in addition to the general and specific protection afforded by Policy SP5.”</p>	
				<p>Concern that landscape character guidelines will not be completed until after the Local Plan is adopted.</p>	<p>The Maidstone Landscape Character Assessment Supplement 2012 accompanies the Maidstone Landscape Character Assessment 2012. It reflects both the typical planting lists set out in the previous 2000 guidelines and those identified in the 2012 assessment. For the interim, it is therefore considered sufficient to make reference to this document until such time as the Local Plan is adopted and a Landscape Character Guidelines Supplementary Planning Document SPD is produced.</p>	<p>No change</p>

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<p>Development in the Countryside</p>				<p>Smaller villages and the rural areas have capacity for some residential development, including 'green' homes</p>	<p>Policy SS1 sets out the spatial strategy and settlement hierarchy for development across the Borough. This is based on an assessment of the facilities and services within respective settlements. The settlements included in the settlement hierarchy are those which are considered to be the most sustainable and thereby appropriate for planned growth over the timeframe of the Plan. Outside these areas, it is appropriate to more strictly restrict development. By this means more sustainable patterns of growth are perpetuated and the inherent character of the countryside is better preserved.</p>	<p>No change</p>
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				<p>Redevelopment of previously developed land in the countryside should be allowed for</p>	<p>The spatial strategy (Policy SS1) sets out the settlement hierarchy for where development should be focused across the Borough. Policy DM1 - Development on Brownfield Land sets out the Council's policy on the redevelopment of brownfield sites, but does not make reference to where across the borough this is deemed to be most appropriate, and conversely least appropriate.</p> <p>It is therefore necessary to address the omission in the plan of the approach to the redevelopment of brownfield sites in the countryside. It is proposed that an additional section be added to Policy DM1 to specify the parameters for the redevelopment of such sites.</p>	<p>Amend Policy DM1 - Development on brownfield land as follows:</p> <p>Proposals for development on previously developed land (brownfield land) <u>in Maidstone urban area, Rural Service Centres and Larger Villages</u> that makes effective and efficient use of land and which meet the following criteria will be permitted:</p> <p>1 – The site is not of a high environmental value; and 2 – If the proposal is for the residential development, the density of new housing proposals reflects the character and appearance of individual localities and is consistent with Policy H2 unless there are justifiable planning reasons for lower density development.</p> <p><u>Exceptionally, the residential redevelopment of brownfield sites which meet the above criteria and which are in close proximity to Maidstone urban area, a Rural Service Centres or Larger Village will be permitted provided the redevelopment will also result in a significant environmental improvement and the site is, or will be made, demonstrably accessible by sustainable modes to Maidstone urban area, a Rural Service Centre or Larger Village.</u></p>
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			Re 'small scale economic development': it is argued that 'small scale' should be defined and conversely that 'small scale' is an unnecessary caveat	<p>Policy SP5 criterion 1 refers to small-scale economic development. It is therefore implied that the expansion of existing businesses (1.b) relates to proportionate development as appropriate to this scale.</p> <p>Policy DM37 permits new buildings to be developed providing they are small in scale.</p>	No change
			Clearer definition of local housing needs and criteria for Gypsy and Traveller development sought. Question consistency with 'Planning for Traveller Sites' guidance.	<p>Policy DM26 details the criteria for Gypsy & Traveller development and Policy DM25 relates to local needs housing. The criteria in Policy DM26 and the Local Plan's overall approach to the identification and allocation of Gypsy sites has had to balance appropriate protection of the countryside and the guidance in Planning for Traveller Sites (PTS) that Gypsy development in open countryside should be strictly limited, with the requirement to demonstrate a supply of deliverable sites which is also part of the PTS.</p>	No change.

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

<p>Countryside protection</p>				<p>The policy should be more prescriptive about how the countryside will be protected, akin to adopted Policy ENV28, and limit the loss of greenfield land</p>	<p>The wording of the policy is in line with the NPPFs presumption in favour of sustainable development, where all plans should be based upon and reflects this presumption, containing clear policies that will guide how the presumption should be applied.</p> <p>Policy SP5 provides affords sufficient protection and enhancement to national landscape designations, as well as the borough's own identified landscapes of local value. Development is not precluded from the countryside, but this policy ensures due consideration is given to the impacts development may have upon the character, setting, and natural assets contained within the Borough's areas of countryside. Policy SP5 takes account of the saved policy ENV28, and builds upon it in a manner that aligns with national policy.</p> <p>The Plan as a whole limits what development is considered appropriate for the countryside, and therefore should be read as a whole. In particular Policy DM10 Historic and Natural Environment and DM30 Design Principles in the Countryside afford protection and enhancement of the countryside and should be given due consideration during the development management process.</p>	<p>No change</p>
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MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

				<p>Countryside should be protected for its intrinsic value; protection of public rights of way, land and soil and the greater protection of agricultural land is sought</p>	<p>The NPPF makes reference in para 17 to the recognition of ‘intrinsic character and beauty of the countryside’.</p> <p>In order to be consistent with national policy, the Local plan wording should reflect this.</p> <p>Public Rights of way are afforded protection under national legislation and policy (NPPF para 75 and CROW Act 2000).</p> <p>Criterion 4 affords for the efficient use of soil resources. The protection and enhancement of soils is given due consideration in para 109 of the NPPF.</p> <p>The NPPF affords appropriate protection for the best and most versatile agricultural land (Land in grades 1, 2 and 3a of the Agricultural land Classification). Para 112 of the NPPF makes allowance for development of poorer quality agricultural land where necessary and on higher quality land where wider considerations direct that this is the most sustainable option.</p>	<p>Amend para 2.2 of the SP5 supporting text to read:</p> <p>...The countryside has intrinsic value <u>character and beauty</u> that should be conserved and protected for its own sake.’</p>
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MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

			Criteria for Green Wedges should seek to reduce cumulative impacts	The Green Corridor is part of the overall strategy for how growth has occurred and developed across Maidstone borough, as set out in para 4.14 of the 2014 Reg 18 Consultation Draft Local Plan. Scope for further enhancement of these areas will be given in the emerging Green and Blue Infrastructure Strategy.	
			There should be objective criteria for assessing development on land adjacent to the AONB.	<p>Criterion 5 of Policy SP5 affords protection of the setting of the AONB, which is considered to provide sufficient protection in line with the NPPF and requirement to give account to the AONB Management Plan.</p> <p>Landscape Visual Impact Assessments would be required in support of any planning application that could impact the AONB and / or its setting, providing an objective assessment.</p>	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

Policy H1(51) – Bridge Bridge Industrial Centre, Wharf Road, Tovil						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Proposed amendments to the policy			1	Policy should refer to the inclusion of on-site green infrastructure from early stage plans	Policy already includes “Provision of publicly accessible open space as proven necessary and/or contributions towards such provision off-site”. The Local Plan will also include a policy which specifies quantity, quality and accessibility standards for public open space.	No change
		1		Insert additional development criterion: Utility infrastructure – existing underground sewers on site are protected, or appropriate arrangements are made for their diversion	Noted - however this is a detailed matter which is appropriately dealt with at the planning application stage and does not necessitate a specific addition to the policy.	No change.
		1		Amend the Design and Layout section to highlight the opportunity for river enhancement work	Criterion 2 already required provision of a visual and functional relationship between the development and the river.	No change
			1	Wharf Road is a private road owned by residents.	Noted. There is existing development on this site which is accessed via Wharf Road. There is no evidence that future development cannot be accessed in the same manner.	No change.

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

		1		To ensure the sewage network can meet demand new or improved infrastructure should be provided in parallel with the development	Noted and welcomed.	No change
Assessment of the local sewerage network capacity		1		Capacity of the local sewage network is insufficient in the immediate vicinity of the site (however not a fundamental constraint)	Noted. Developers will be required to work with Southern Water at planning application stage to identify and implement any required infrastructure upgrade.	No change
Lack of reference to specific guidance and policies		1		Reference should be made to Sport England's Land Use Planning Policy Statement 'Planning for Sport Aims and Objectives' and its policy 'A Sporting Future for Playing Fields of England (1997)'	Reference to the amount and type of open space that will be sought with each relevant application is addressed in policy DM11.	No change
Lack of relevant assessments		1		Reference is made to a Flood Risk Assessment (FRA) but EA has no record of consultation on this. Therefore may object to proposed development at planning application stage	Noted. Criterion 6 of the policy specifies that a comprehensive FRA is required undertaken to a methodology to be approved by the Environment Agency.	No change
General support for the policy and site allocation	1			Overall support for Policy H1(51)	Support welcomed	No change
	2			Support the choice of brownfield site	Support welcomed	No change
	1			Site and adjacent area considered to have low level archaeology and does not have any designated heritage assets. The site also does not contain non-designated heritage assets.	Noted. Archaeological potential of the site would be dealt with at the planning application stage.	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

				But the archaeological potential of the site is unknown		
General objection to the policy and site allocation			1	Proposal appears to be overdeveloped	Yield of approximately 15 units is based on net density of 30 dwellings/ha which is significantly lower than expected densities of between 45 and 170/ha in such an urban location which reflects both the size and configuration of the site.	No change
		1		Site is located within Flood Zone 3 of Environment Agency Flood Map and therefore at high risk of flooding. Should only be considered if no other suitable sites are available and encourage contributions from the developer towards Flood Management Improvements in the Medway catchment	Noted. Criterion 6 of the policy specifies that a comprehensive FRA is required undertaken to a methodology to be approved by the Environment Agency which will test the actual susceptibility to flood. The site slopes significantly from south to north. The site yield of 15 dwellings reflects the fact that an element of the site may not be suitable for development following the detailed FRA.	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

Policy H1(52) – Dunning Hall (Off Fremlin Walk)						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Allocation of the site	1			General support for the allocation of this site	Support welcomed	No change
	1			Support the use of brownfield land in the town centre	Support welcomed	No change
			1	Site and adjacent land considered to have low level archaeology and does not contain any designated heritage assets. The site also does not contain non-designated heritage assets. Site may have been affected by historic groundwork, although some potential for archaeology	Noted. Any requirement for archaeological work will be dealt with by a planning condition attached to any approval.	No change

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Policy H1(53) – 18-21 Foster Street						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Allocation of the site	1			Use of previously developed brownfield land	Support welcomed	No change
			1	Site and adjacent land has low level archaeology and does not contain any designated heritage assets. Does not contain any non-designated heritage assets. The site has probably been affected by historic groundwork	Noted.	No change
	1			General support for the allocation of the site	Support welcomed	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

Policy H1(54)- Slencrest House, 3 Tonbridge Road						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Proposed amendments to the policy		1		Insert additional development criterion: "Utility infrastructure – existing underground sewers on site are protected, or appropriate arrangements are made for their diversion"	Noted - however this is a detailed matter which is appropriately dealt with at the planning application stage and does not necessitate a specific addition to the policy	No change.
		1		To ensure the sewage network can meet demand new or improved infrastructure should be provided in parallel with the development	Noted and welcomed. The developer will be expected to liaise with Southern Water at planning application stage to identify and deliver any required additional infrastructure.	No change
Assessment of the local sewerage network capacity		1		Capacity of the local sewage network is insufficient in the immediate vicinity of the site (however not a fundamental constraint)	Noted and welcomed. The developer will be expected to liaise with Southern Water at planning application stage to identify and deliver any required additional infrastructure.	No change
General support for the policy and site allocation	1			Overall support for site allocation	Support welcomed	No change
	1			Use of a brownfield site close to the town centre	Support welcomed	No change
	1			Support the proposal to encourage joint development with adjacent businesses for	Support welcomed	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

				urban regeneration		
			1	Proposed site and adjacent land has low level archaeology and does not contain any designated heritage assets. The site also does not contain non-designated heritage assets. Historic groundworks could impact the site	Noted	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

Policy H1(55) – The Russell Hotel, Boxley Road						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
General support for the allocation of this site	1			Support as there is existing planning permission for 14 dwellings on the site	Support welcomed. This site has planning permission and the development is approaching completion.	Delete this site from Policy H1 as it was granted planning permission before the housing supply base date of 1st April 2015.
			1	Assessment has shown that the site is of low level archaeology. The site and adjacent land does not have any designated or non-designated heritage assets. Considered that the site has probably been affected by historic groundworks	Noted. This site has planning permission and the development is approaching completion.	Delete this site from Policy H1 as it was granted planning permission before the housing supply base date of 1st April 2015.

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

Policy H1(56) – Land at 180-188 Union Street						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Proposed amendments to the policy			1	Summarise the constraints associated with all of the proposed site allocations	The site proformas contained within the Strategic Housing Land Availability Assessment sets out the planning constraints information relating to each site.	No change
			1	Point 5 within Policy H1(56) repeats point 3	Agreed. Criteria 3 and 5 should be combined to avoid unnecessary duplication.	Amend criterion 5 to read “The development proposals are designed to take account the results of a detailed arboricultural survey, tree constraints plans and tree retention/protection plans. <i>Existing prominent trees should be retained as part of the development scheme where they have an appropriate safe useful life expectancy. Otherwise they should be removed and their loss mitigated with appropriate semi-mature feature trees</i> ” Delete criterion 3
			2	Consideration should be made for the inclusion of hedgerows at Union Street and Queen Anne	The land at the Junction of Queen Anne Road and Union Street is outside the site. There is no reason to suggest that the	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

				Road to reflect local character	existing shrubs, trees and hedges on this boundary will be removed.	
		1		Inclusion of how the loss of parking spaces will be resolved and improvements to bus services	Only 22 spaces would be lost, 26 would remain as they are outside the allocated site. The Council is working through the ITS to secure improved bus frequency on the Sittingbourne Road corridor. New development is expected to comply with adopted parking standard, which do take into account the sites sustainable Town Centre location.	No change
General objection to the policy and site allocation		2		Removal of 40 car park spaces due to this allocation in addition to the closure of the Park and Ride at Sittingbourne Road creates a problem of parking for potential new residents	Only 22 spaces would be lost, 26 would remain as they are outside the allocated site. The Council is working through the ITS to secure improved bus frequency on the Sittingbourne Road corridor. New development is expected to comply with adopted parking standard, which do take into account the sites sustainable Town Centre location.	No change
		1		Influence of more housing on the congested road network	This is an urban, brownfield site which is a type of site which gives the best opportunity for access by sustainable modes. Further, Policy DM 13 states:- "Working in partnership with Kent County Council (the local transport authority), the Highways Agency, infrastructure providers and public transport operators, the borough council will facilitate the delivery of transport improvements to support the growth proposed by the local plan. An Integrated Transport Strategy, prepared by the council and its partners, will have the	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

					aim of facilitating economic prosperity and improving accessibility across the borough and to Maidstone town centre, in order to promote the town as a regionally important transport hub.”	
		1		Details of allocation do not reflect the potential site yield (44 units vs 30 units proposed)	Yield of approximately 30 is based on net density of 55 dwellings/ha which is within the expected densities of between 45 and 170/ha in such an urban location. Yields are indicative and reflect both the size and configuration of the site but could increase subject to an acceptable design.	No change
General support for the policy and site allocation	2			Overall support for the inclusion of the site allocation	Support welcomed	No change
	1			Allocated site is a brownfield site close to the town centre	Support welcomed	No change
			1	Considered that the site has low level archaeology, with no designated heritage assets on the site or adjacent to the site. There are also no non-designated heritage assets. But the site has probably been affected by historic groundworks	Noted	No change
	1			Support retaining the ragstone wall to Tufton Street and Union Street	Support welcomed	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

Policy H1(58) – Tovil Working Men’s Club, Tovil Hill						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Proposed amendments to the policy		1		Policy should consider a new access road	Kent County Council, as the highway authority, has commented that there is no apparent serious problem regarding the highway access.	No change
		1		Point 14 (re-provision of the Bowling Green/Petanque Courts) is considered unnecessary	Criterion 14 of the policy requires the re-provision of the petanque and/or bowling green if proven necessary. An application will need to be accompanied with an appropriate sports facilities assessment to demonstrate compliance with this requirement.	No change
		1		Policy DM2 is out of date because it is based on the now withdrawn ‘Code for Sustainable Homes’.	Noted. Policy DM2 will be reviewed as part of the preparation of the Regulation 19 version of the Local Plan. Subject to this review, the policy cross-reference in Policy H1(58) is appropriate.	No change to Policy H1(58)
Lack of reference to specific guidance and policies		1		The allocation will result in a loss of playing fields therefore consideration should be given to Sport England’s Playing Fields Policy	Criterion 14 of the policy requires the re-provision of the petanque and/or bowling green if proven necessary. An application will need to be accompanied with an appropriate sports facilities assessment to demonstrate compliance with this requirement.	No change

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General support for the policy and site allocation	2			Overall support for the allocation	Support welcomed	No change
	1			Support point 8 (reference to habitat and species survey and appropriate mitigation/ enhancement)	Support welcomed	No change
	1			Assertion that the sports facilities are not well used	Criterion 14 of the policy requires the re-provision of the petanque and/or bowling green if proven necessary. An application will need to be accompanied with an appropriate sports facilities assessment to demonstrate compliance with this requirement.	No change
	1			Allocation is a brownfield location	Support welcomed	No change
			1	Assessment shows that the site is of low level archaeology. The site and adjacent land do not contain any designated heritage or non-designated heritage assets. Across the road is a Grade II fountain	Noted	No change
General objection to the policy and site allocation		2		Loss of leisure facilities as a result of this allocation	Criterion 14 of the policy requires the re-provision of the petanque and/or bowling green if proven necessary. An application will need to be accompanied with an appropriate sports facilities assessment to demonstrate compliance with this requirement.	No change

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Policy H1 (59) – Bearsted Station Goods Yard, Bearsted						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
General support for the policy and site allocation	1			Support Point 6 (reference to ecological survey and subsequent mitigation/enhancement)	Support welcomed	No change
	3			Regeneration and redevelopment of the Goods Shed and Weighbridge house is supported.	Support welcomed	No change
General objection to the policy and site allocation		2		Objections regarding the provision of car parking, cycle-parking, taxis and drop-off/pick-up. The proposed 10 car parking spaces is not enough and the existing facilities at the station are inadequate.	This claim of inadequate provision is not substantiated by any evidence or support from Network Rail. The proposed addition of 10 parking spaces minimum represents a significant increase on the current situation.	No change
		2		Overall objection – not environmentally appropriate	This is a brownfield site located with the urban area. Based on a comprehensive assessment, the site is considered inherently suitable for development. The assessment of the most significant environmental to be the listed buildings. Criterion 1 requires that they are retained, restored and that the development	No change

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					provides an appropriate setting. A noise survey is also required as part of any planning application to identify appropriate noise attenuation measures.	
Considerations for any development and the policy			1	Policy H1(59) should include an additional point to emphasis importance of green infrastructure on the site	This matter is considered to be adequately dealt with by criteria 5 and 6 which relate to Landscape/Ecology in combination with Policy DM10 which addresses the Historic and natural environment.	No change
		2		Improvements should be made to the infrastructure network to accommodate proposed new dwellings	Any necessary improvements to the community infrastructure generated by the development will be funded by financial contributions as referred to in criterion 11.	No change
	1	1	1	Particular attention should be made to improving access to the train station and increase car park provision.	Kent County Council, as the highway authority, have no particular concerns regarding access to the site. The policy provides for an increase of a minimum of 10 station car parking spaces.	No change
			1	Consideration for the impact of the development on Network Rail's ability to service the track	As the landowners, Network Rail can be expected to ensure adequate continued access to the track through planning condition and/or legal agreement associated with the grant of any planning permission.	No change
	2		1	Prior to any development tests should be carried out to assess the risk of subsidence	Criterion 3 specifically requires demonstration that the development will not impact on land stability	No change
	1		2	To ensure high quality design a height restriction should be imposed on any development as not to exceed the apex of the	The listed goods shed and weighbridge house are significant constraints to development. Criterion 1 requires the setting of the listed properties to be	No change

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			roof line of the current goods shed	secured. Any proposed scheme would need to be in accordance with Policy DM10 which looks to ensure that the qualities and local distinctiveness of the historic environment are recognised and protected. It is considered that the policies of the Plan provide appropriate safeguards for these heritage assets.		
		5	Site is of low level archaeology. However the Goods Yard Building, Weighbridge House and Bearsted Station building are listed buildings. Development should therefore respect historic character and setting of these buildings. As a result a potential historic building assessment will be needed. Also consider the conservation area and historic Bearsted Green	Criterion 1 requires that the listed buildings are not only retained and restored but that the development also provides an appropriate setting for them. Any development proposal will also be assessed in the context of Policy DM10 which seeks to ensure that the qualities and local distinctiveness of the historic environment are recognised and protected. . It is considered that the policies of the Plan provide appropriate safeguards for these heritage assets with the addition of reference to the Bearsted Conservation Area.	Amend criterion 7 with the addition of the following to the end of the sentence: “... <u>and Bearsted Conservation Area</u> ”.	
	1		1	The policy should address the provision of additional community facilities such as schools, health services and use of the land as a community hall	Any necessary improvements to the community infrastructure generated by the development will be funded by financial contributions as referred to in criterion 11.	No change

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Policy H1 (62) – Land at Boughton Lane, Loose and Boughton Monchelsea						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Residents' reasons for objecting		17		No support in emerging Loose Neighbourhood Plan	The site lies outside the North Loose Neighbourhood Plan Area. As yet a neighbourhood plan for Loose Parish has not been submitted. In any event, this site is considered suitable for additional housing as part of the Local Plan's overall strategy to meet the need for additional housing.	No change
				Traffic congestion (at the Swan junction with the Loose Road, on the Loose Road and at the Wheatsheaf junction); risk of accidents (where the access meets Boughton Lane); threat to pedestrian and cyclist safety; access road will be at a higher level than existing garden which would be dangerous should any vehicles go off the road.	Highways: KCC Highways has not objected to this proposed allocation on highways grounds, including highway safety. Criterion 14 and 15 also requires appropriate highways improvements in association with development. A planning application will require the submission of a transport assessment	No change

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				Adversely impact on the amenity value of the adjacent Loose Valley	This site is sufficiently separated from the Loose Valley to have no direct impact. Criterion 9 requires a landscape and visual impact assessment to be undertaken which will input into the design process.	No change
				Loose is a “small village” and, as such, 75 units is a major development which is not appropriate; threat that existing communities will be engulfed and lost; development of this scale and density will not meld with the setting and character of neighbouring buildings	Impact on character: The site directly adjoins existing development at the edge of the built up area of the town. The site assessment concludes that “the development would have no more of an urbanising influence than that of the existing development. That is because it is set back considerably from Boughton Lane and would be read with the Leonard Gould development. The open space to be secured would considerably mitigate the impact of the development”.	No change
				Air quality	Air quality: Any development proposal would need to comply with Policy DM16 – Air quality. Depending upon the location, it requires proposals that have an impact on air quality to provide an Air Quality Impact Assessment and/or Emissions Statement and/or incorporate mitigation measures. The site is not within a declared Air Quality Management Area.	No change

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			Local schools, medical and social facilities will be over stretched; absence of commitment to necessary infrastructure improvements	Infrastructure: criteria 13, 14 and 15 specify that infrastructure improvements and/or contributions will be sought. The Infrastructure Delivery Plan will set out the infrastructure requirements resulting from the development proposed in the Plan and the funding mechanisms to secure them which will include section 106 legal agreements for individual developments and CIL.	No change
			Loss of a well-used green space; unnecessary public open space	Open space: the developer has proposed 7.1 ha of land to the east and north east of the development site would be provided as public open space. Policy DM11 of the plan seeks to ensure the delivery of publicly accessible open space, in accordance with requisite standards, in association with new housing sites. The proposal will result in a net increase the amount of publically accessible green space.	No change
			Loss of residents' privacy; loss of view; loss of light; property blight	Residential amenity: Any prospect of loss of light or overlooking to neighbouring properties and their gardens is a detailed matter to be addressed in the design of the development at planning application stage. Any reduction in the value of property is not an issue that can be considered in the planning process.	No change
			Impact on listed building (Slade House)	Slade House: Criterion 8 of the policy addresses the impact of the development on the setting of Slade House. Form of	No change

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					development will be subject to appropriate standard of design and layout as dealt with in policy and Policies DM4 'Principles of good design' and DM10 'Historic and natural environment.'	
Suggested policy amendment		1	2	Include a reference to requirement for full evaluation of habitats, no loss of high quality hedgerow and long-term management plan for management and enhancement of retained hedgerows.	These matters are already the subject of criterion 3, which looks to retain and reinforce existing boundary hedges where necessary, and criteria 9, 10 and 11 under the heading 'Landscape/Ecology'. Any further specific requirements to emerge in association with a particular development proposal will be dealt with by planning condition in association with the grant of any planning permission.	No change.
				Ensure a brief for the proposed open space for providing accessible natural green space, delivering links in the local habitat network and securing long term management.	The provision of accessible natural green space, links to the local habitat network and its long term management are the subject of criteria 2, 3, 10 and 11. Any further specific requirements to emerge in association with a particular development proposal will be dealt with by planning condition in association with the grant of any planning permission.	No change
				Ensure proper waste water management near River Loose	Noted. Criterion 12 specifically requires a surface water drainage strategy.	No change

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				Assessment of local sewerage network capacity is insufficient in the immediate vicinity of this site to meet the anticipated demand but this is not a fundamental constraint to development. Proposed amendment: insert additional development criterion: "Utility infrastructure - A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider."	Noted that this is not a fundamental constraint to development. The detailed connection requirements will be subject to specific consideration at planning application stage and, will need to be agreed between the developer and Southern Water.	No change
General observation			1	Pedestrian access to nearest public transport on the A229 needs to be direct and attractive to users, i.e. lit and hard surface.	Noted	No change

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Policy H1(63) – Land at Boughton Mount, Boughton Lane, Boughton Monchelsea						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Reasons for objecting		9	2	Number of proposed houses on sites H1(62); H1(63); H1(70); H1(71); H1(76) and H1(75) in Coxheath is far too high.	Number of dwellings: Sites are put forward as development proposals which individually and collectively would contribute to the plan’s objective of meeting the borough’s development needs by delivering sustainable growth which includes focusing limited new development at the 5 larger villages where appropriate. The allocated part of this site is previously developed and is considered suitable for a limited quantum of housing	No change

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				<p>Traffic congestion (at the Swan junction with the Loose Road, on the Loose Road itself, Boughton Lane/Loose Road traffic lights and at the Wheatsheaf junction which are already at capacity; require the highway improvements to be made before the housing is built; no mention of an Integrated Transport Strategy; no certainty that appropriate transport infrastructure can be delivered and fully funded</p>	<p>Highways: KCC Highways has not objected to this proposed allocation. Criteria 17 and 18 specify the highways improvements that will be required subject to more the more detailed assessment provided with a Traffic Assessment submitted with a planning application. The Integrated Transport Strategy and the Infrastructure Delivery Plan will be available together with the Reg. 19 version of the Local Plan.</p>	<p>No change</p>
				<p>Grade 2 agricultural land</p>	<p>Agricultural land: development is restricted to the previously developed part of the site and so will not lead to the loss of high quality agricultural land.</p>	<p>No change</p>
				<p>Air quality</p>	<p>Air quality: Any development proposal would need to comply with Policy DM16 – Air quality. Depending upon the location, it requires proposals that have an impact on air quality to provide an Air Quality Impact Assessment and/or Emissions Statement and/or incorporate mitigation measures. The site is not in a declared Air Quality Management Area.</p>	<p>No change</p>
				<p>Doubt regarding sustainability as site is a great distance from any services (no bus services so residents will need to rely on private transport)</p>	<p>Access to services: The site is reasonably related to the urban area. The SHLAA assessment notes that 'there is a footway link between Boughton Lane and Eddington Close which provides onward</p>	<p>No change</p>

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				connectivity to the bus stops on Loose Road. Many of the local services within Loose are within walking and/or cycling distance of the site and the bus stops on Loose Road are served by Bus Routes 5 and 89 which provide a combined 15-minute frequency to Maidstone Town Centre on weekdays.' On this basis, the site is considered suitable for allocation in sustainability terms.	
			Part greenfield site	Loss of greenfield (in part): development is restricted to the previously developed part of the site.	No change
			Impact on the rural / countryside character; within the Loose Landscape of Local Value	Impact on character: the SHLAA identifies that 'visually, the site is well contained with dwellings to the north and east (as well as PROW KM99 to the east, which is a metalled driveway for much of its length) and Boughton Lane to the west and south.' There is an established tree screen to all boundaries.'. It is acknowledged in the SHLAA that if improvements are required to Boughton Lane, these could have a visual impact on its rural character. A LVIA is required to be submitted with any application (criterion 10) by which any detailed landscape impacts, and appropriate mitigation measures, can be identified in an objective manner. The proposed policy for Landscapes of Local Value does not preclude development;	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

					rather, it signals that landscape considerations must be given significance in terms of the design and scale of development proposals. As development will be focused on the brownfield element of this site, it is considered that development may be able to secure an overall enhancement to the landscape in this location, subject to the safeguards in the policy being followed.	
				Site lies within the Southern Anti-Coalescence Belt in adopted local plan	Anti-coalescence: redevelopment on the existing footprint will not result in coalescence with other development in the area.	No change
Reasons for supporting	3			Low density appropriate for this rural location; development is confined to the brownfield part of site; development protects historical and ecological features of the remainder of site; enabling development of a brownfield site to maintain the Grade II listed building; provision of open space in southern parcel	Support welcomed	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

Suggested policy amendment		1	1	Assessment of local sewerage network capacity is insufficient in the immediate vicinity of this site to meet the anticipated demand but this is not a fundamental constraint to development. Proposed amendment: insert additional development criterion: "Utility infrastructure - A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider."	Sewerage capacity: Noted that this is not a fundamental constraint to development. The detailed connection requirements will be subject to specific consideration at planning application stage and, will need to be agreed between the developer and Southern Water.	No change
				Ensure a brief for the proposed open space for providing accessible natural green space, delivering links in the local habitat network and securing long term management.	Open space: The provision of accessible natural green space, links to the local habitat network and its long term management are the subject of criteria 6, 11 and 12. Any further specific requirements to emerge in association with a particular development proposal will be dealt with by planning condition in association with the grant of any planning permission.	No change
				Ensure proper waste water management near River Loose	Waste water management: Noted. Criterion 14 specifically requires a surface water drainage strategy.	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

General observations			4	Pedestrian access to the nearest public transport on the A229 needs to be of good quality i.e. hard surface and lit.	Noted	No change
				If this site is developed, there should be no development on H1(62)	Policies H1(62) and H1(63) are each put forward as development proposals which individually and collectively would contribute to the plan's objective of meeting the borough's development needs.	No change
				Any development would require formal archaeological works	Noted. Criterion 9 requires a detailed heritage and archaeological assessment.	No change
				Reconsider boundaries of open space in southern parcel of site (with a view to including land immediately north of the ha-ha as 'private open space' to	If there are sound heritage reasons why access should be restricted to part of the site, this should be evidenced through the heritage impact assessment which is required as part of a planning application.	No change
				Provide greater flexibility in design process and improve scope to preserve/enhance its setting).	Defining an area of private open space is considered to reduce the flexibility of the policy prior to this detailed work being undertaken, rather than increase it at this stage.	No change

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Policy H1(66) – Land south of The Parsonage, Goudhurst Road, Marden						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Objections	1	5	2	Highways impacts; required improvements not specified; highway improvements should be implemented before housing is built	Any necessary highway mitigation works will emerge from the transport assessment necessary for planning application. Mitigation, if required, will either be secured directly with the County Council through a s278 agreement or if appropriate through s106 planning obligations both methods should include trigger points as to when provision is required.	No change
				Ensure appropriate infrastructure (road and rail links) are in place or planned; provide details of community infrastructure; cumulative impact of new developments on residents/ infrastructure	Infrastructure: the Infrastructure Delivery plan to be published with the Regulation 19 version of the Local Plan will set out the infrastructure required to service the development proposals in the Local Plan. The term 'community infrastructure' in criterion 9 would encompass contributions to health facilities, schools, libraries, village hall etc. The Infrastructure Delivery Plan which will be published with the Regulation 19 version of the Local Plan will help to more precisely identify the services/facilities for which contributions will be sought.	No change

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				Grade 2 agricultural land	This site is a mixture of Grade 3a and 3b agricultural land. The National Planning Policy Framework requires that, where development of agricultural land is required, a sequential approach is adopted whereby lower quality land is utilised in preference to that of higher quality. As revealed by the SHLAA, an overall assessment of the candidate sites supports the development of this site if the overall borough requirement for additional housing land is to be met. Based on this overall assessment, the loss of a proportion of higher quality agricultural land is not considered to override the factors in support of the proposed development.	No change
				Area of high landscape value; would have a harmful effect on landscape character of Staplehurst Low Weald Landscape Character Area (for which the Sensitivity Assessment is High)	Landscape impact: the Council's Landscape Capacity Study Site Assessment (2015) found that site to have 'moderate' capacity to accommodate new housing development. To address landscape impacts, criterion 4 requires development proposals to be explicitly designed to take account of a landscape appraisal. Criteria 1 and 2 also require landscaped buffers to help screen development and provide a buffer to the open countryside to the south.	No change
				Extension of an already large development site	Scale of development: the SHLAA assessment of this site concludes that it is a logical extension to the development approved at The Parsonage immediately to the north.	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

			Have regard to emerging Marden Neighbourhood Plan	Neighbourhood Plan: It is important to minimise any conflicts between policies in the draft plans wherever possible. Any conflicts that do exist are required to be resolved in favour of the last document to become part of the development plan.	No change
			Inappropriate location	Inappropriate location: The overall strategy of the Local Plan is to focus development at the most sustainable settlements in the borough, namely Maidstone, the Rural Services Centres, of which Marden is one, and the Larger Villages. These are the settlements which have been identified on the basis of an assessment of their available services and facilities. On this basis, and through the comprehensive individual sites assessment undertaken through the SHLAA, this site is considered to be an appropriate location for additional housing, subject to the criteria in Policy H1(66).	No change
			Greenfield site	Greenfield site: in the OAN for additional housing is to be met, some greenfield development is required. This being the case, the comprehensive assessment through the SHLAA identifies the most suitable greenfield sites in planning terms for allocation.	No change
			Backland development; impact on the setting of buildings to the south of the site	Form of development: the term backland development generally refers to development of garden sites immediately to the rear of properties which is not the case for this proposal. Criterion 2 requires a 30m landscape buffer to help mitigate the visual impact of development from the south.	No change
Suggested policy		1	Assessment of local sewerage	Noted that this is not a fundamental	No change

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amendments				network capacity is insufficient in the immediate vicinity of this site to meet the anticipated demand but this is not a fundamental constraint to development. Proposed amendment: insert additional development criterion: "Utility infrastructure - A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider."	constraint to development. The detailed connection requirements will be subject to specific consideration at planning application stage and, will need to be agreed between the developer and Southern Water.	
General observations	1		2	Requirement for a buffer to provide habitat connectivity should be linked with any on-site green infrastructure and its long-term management plan.	Noted. Any specific requirements to emerge in association with a particular development proposal will be dealt with by planning condition in association with the grant of any planning permission.	No change
				Site has significant archaeology (to be dealt with by conditions)	Noted	No change
				Logical extension to the adjacent Parsonage site	Noted and welcomed	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

Policy H1(68) – Land north of Henhurst Farm, Staplehurst						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Reasons for objecting		17		Vehicular access inadequate; traffic generation; inadequate road network; detail 'improvements to the junction of Headcorn and Marden roads with the A229'; require highway improvements before the housing is built; no access is shown for the site; potential impact on village roads	Highways: Kent County Council, as the highway authority, has not objected to the principle of development on this site. Any scheme will be subject to a detailed transport assessment that will examine the impact of this site and other committed or proposed development on the local network including the existing Marden Road/A229 Junction. Any mitigation identified as necessary would be provided at an appropriate trigger point – the development. Criterion 10 confirms that access will be from Oliver Road.	No change
				Insufficient infrastructure capacity (particularly sewerage); insufficient existing local amenities; consider cumulative impact of current proposals on village.	Infrastructure: the Infrastructure Delivery Plan (IDP) which will be published with the Regulation 19 version of the Local plan will give greater detail about the infrastructure required to service the development proposed in the Local Plan. The IDP is being prepared with the input of the key infrastructure providers.	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

				Loss of agricultural land	Agricultural land: The site is identified as Grade 3b agricultural land. The National Planning Policy Framework requires that, where the development of agricultural land is required, a sequential approach is adopted whereby lower quality land is utilised in preference to that of higher quality. The higher grades are denoted as grades 1, 2 and 3a. Based on this guidance, the loss of some grade 3b agricultural land is not considered to override the factors in support of the proposed development.	No change
				Backland development	Backland development: the term backland development generally refers to development of garden sites immediately to the rear of properties which is not the case for this proposal.	No change

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				Not in line with draft Neighbourhood Plan	Neighbourhood plan: It is important to minimise any conflicts between policies in the draft plans wherever possible. Any conflicts that do exist are required to be resolved in favour of the last document to become part of the development plan. The development of this site will contribute to the overall borough need for additional housing evidenced in the Strategic Housing Market Assessment and the suitability in planning terms of this site, and other candidate sites, has also been tested comprehensively through the Strategic Housing Land Availability Assessment.	No change
				Within the AONB; Green Belt	Green Belt/AONB: this site does not fall within either designation.	No change
				Historic and archaeological value	Heritage: In the SHLAA it was noted that the development of this site would not affect heritage assets or any known archaeological potential.	No change
				Flood risk	Flood risk: as the site falls within Flood zone 1, flood risk is not a constraint to development. However, as the site is larger than 1 ha a flood risk assessment will need to be undertaken and submitted with any application.	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

				<p>Site lies within, and would have a harmful effect on, landscape character of Staplehurst Low Weald Landscape Character Area (for which the Sensitivity Assessment is High); destruction of ancient field boundaries.</p>	<p>Landscape impact: The Council's 'Landscape Capacity Study : Site Assessments (2015)' finds that the site has a moderate capacity to accommodate housing development. Criterion 7 specifically requires the design of development to respond to a Landscape and Visual Impact Assessment Development, recognising that development is likely to result in the loss of the existing boundaries crossing the site. The site does not fall within the Low Weald Landscape of Local Value as it is proposed in the emerging Local Plan.</p>	<p>No change</p>
				<p>Greenfield site</p>	<p>Greenfield site: some development on greenfield sites will be necessary if the OAN for housing is to be met. This being the case, the comprehensive assessment of candidate sites through the SHLAA has found this site to be suitable in planning terms for development, subject to the criteria in the Policy. The land itself is classified as Grade 3b agricultural land, not among the best and most versatile grades (1, 2 and 3a)</p>	<p>No change</p>

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

				Precedent for further future development on greenfield land to the north and west	Precedent: a key purpose of the Local Plan is to positively allocate sufficient land to meet identified needs, in this case for housing. By doing this, it enables greater policy protection against inappropriate development on sites which have not been allocated. The development proposals on land to the west would be considered under the terms of Policy SP5-Countryside which places clear limits on the type and scale of development which would be appropriate.	No change
Suggested policy amendments	2	2	2	The area to be developed for residential purposes should be increased. Some of eastern parcels of the remainder of Henhurst Farm also have potential for a residential development scheme	The landscape capacity study 2015 is clear in its advice regarding this site – that “minor residential development contained within the northern most part of the site could perhaps be accommodated”. Development over a larger area further southwards as suggested would result in greater harm to the landscape.	No change
				Allocating southern part of site for Strategic Open Space would hinder the comprehensive masterplanning of the wider site.	The landscape capacity study 2015 is clear in its advice regarding this site – that “minor residential development contained within the northern most part of the site could perhaps be accommodated”. Development over a larger area further southwards as suggested would result in greater harm to the landscape.	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

				<p>Premature to seek contributions for something as specific as the enhancement of parking at the railway station.</p>	<p>The IDP identifies the need for improved cycle and public transport provision at the railway station. Staplehurst Railway station and its car parking are a key component of the settlements sustainability. Criterion 16 seeks to ensure this remains the case</p>	<p>No change</p>
				<p>Include a policy for ecological mitigation/compensation for cumulative loss of farming land.</p>	<p>Criterion 9 requires development to be subject to ecological assessment and for appropriate mitigation and enhancement measures to be implemented. The land is valued is grade 3b which is not the best and most versatile</p>	<p>No change.</p>
				<p>Ensure a brief for the proposed open space for providing accessible natural green space, delivering links in the local habitat network and securing long term management.</p>	<p>It is considered that this matter is already dealt with adequately by criterion 2 which states: "The southern area will be retained undeveloped to provide open space and ecological mitigation areas". The provision of accessible natural green space, links to the local habitat network and its long term management are the subject of criteria 2, 4, 9 and 14. Any further specific requirements to emerge in association with a particular development proposal will be dealt with by planning condition in association with the grant of any planning permission.</p>	<p>No change.</p>

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				Ensure proper waste water management near River Beult	Criterion 12 addresses this issue.	No change.
				Assessment of local sewerage	Noted and welcomed that this is not a fundamental constraint. Developers will be expected to liaise with Southern Water to confirm connection arrangements at the time of a planning consent.	No change.
				Network capacity is insufficient in the immediate vicinity of this site to meet the anticipated demand but this is not a fundamental constraint to development. Proposed amendment: insert additional development criterion: "Utility infrastructure - A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider."	Sewage capacity: noted that this is not a fundamental constraint to development. The detailed connection requirements will be subject to specific consideration at planning application stage and, will need to be agreed between the developer and Southern Water.	No change
General observations	1	2	3	Site considered to have low-level archaeology.	Noted	No change
				Site does not contain any designated heritage assets nor are any adjacent.	Noted	No change

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			No known non-designated heritage assets on site.	Noted	No change
			Not clear what the "ecological mitigation areas" refer to	"Ecological mitigation areas" refer to those areas of the undeveloped part of the site which may warrant specific protection given that the site has a mixture of woodland adjacent, field boundaries marked by hedging and trees as well as ponds within and adjacent although the fields themselves are intensively cultivated.	No change
			Possible need for a new bus stop	Noted	No change
			Consider transferring areas proposed for conservation, allotments and open space to a public body.	Noted. This will be a matter to be dealt with in the context of a planning application through associated planning condition and/or legal agreement.	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

Policy HI (70) – Land at junction of Church Street and Heath Road						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
General objections to the policy and site allocation		2		Loss of agricultural land and has concerns at putting extra traffic on Heath Road	Agricultural land: There is insufficient previously-developed land in the borough to accommodate all of the development required. Hence the development of agricultural land is inevitable. The National Planning Policy Framework requires that where development of agricultural land is required, a sequential approach is adopted whereby lower quality land is utilised in preference to that of higher quality. As revealed by the SHLAA, an overall assessment of the candidate sites supports the development of this site if the overall borough requirement for additional housing land is to be met. Based on this overall assessment, the loss of higher quality agricultural is not considered to override the factors in support of the proposed development. Financial contributions will be made towards improving the junction of the B2163 Heath Road with the A229 Linton	No change
				Site would not meet an objective of the Landscape Character Area No 29 to “improve the sense of place between swathes of development”		

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

				Road/Linton Hill.	
	1		Detail into the required improvements to the highways is not specified	Detail of required improvements will be drawn up as and when necessary.	No change
	1		Impact on safety of Boughton Monchelsea Primary School	Kent County Council, as the highway authority, requires access to only be from Church Street but acknowledges that it is currently heavily parked both sides at school drop-off and pick-up times. This is a highway management/enforcement issue that KCC as the highway and education authority should seek to resolve if necessary.	No change
	1		Concentration of development in Boughton Monchelsea has a detrimental impact on local character and identity	Sites are put forward as development proposals which individually and collectively would contribute to the plan's objective of meeting the borough's development needs by delivering sustainable growth which includes focusing limited new development at the 5 larger villages where appropriate.	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

General support for the policy and site allocation			1	Site is of low level archaeology. Assessment has shown that the site and adjacent land does not contain any designated heritage assets or non-designated assets	Noted	No change
Amendments/considerations to the policy			1	To reduce the impact a strong buffer at the edges of any development will be required as well as green infrastructure	Criterion 2 requires the retention of the existing hedgerow to Heath Road and an appropriate buffer to the existing woodland. Criterion 10 requires open space provision but offers scope for this being off-site. It is considered that these criteria are sufficient to result in adequate landscape buffers and appropriate green infrastructure.	No change
		1		Insert additional development criterion: "Utility infrastructure – existing underground sewers on site are protected, or appropriate arrangements are made for their diversion"	Noted - however this is a detailed matter which is appropriately dealt with at the planning application stage and does not necessitate a specific addition to the policy.	No change
	1	2		Criterion 4 – amend as follows: "Vehicular access shall only be taken from Heath Road"	Kent County Council, as the highway authority, requires access to only be from Church Street.	No change
		2		Consideration – provision should be made for open space and additional parking	Criterion 10 of the policy requires the provision of publicly accessible open space, as proven necessary. This is a highway management/enforcement issue that KCC as the highway and education authority should seek to resolve if necessary.	No change
		1		Capacity of the local sewage network is insufficient in the immediate vicinity of the site	Noted that this is not a fundamental constraint to development. The detailed connection requirements will be subject	No change

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			<p>(however not a fundamental constraint). To ensure the sewerage network can meet demand new or improved infrastructure should be provided in parallel with the development. Recommend additional development criteria: "Utility infrastructure – A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider."</p>	<p>to specific consideration at planning application and, will need to be agreed between the developer and Southern Water.</p>	
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MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

Policy H1(71) - Lyewood Farm, Green Lane, Boughton Monchelsea						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Housing density, scale, distribution and location		3	1	Site has greater capacity than proposed 25 dwellings	The consultation document points out that the village comprises, and is characterised by, a number of distinct groups/clusters of dwellings. Development on this site would result in the creation of a further such group of dwellings, provided it was limited to the 1.25ha area of the current built development (i.e. the chicken sheds which are large utilitarian structures that are out of character with and visibly prominent in the landscape). The appropriateness of a low to medium density development, to ensure that it fits into the landscape, results in the proposed yield.	No change
				Yield of site should be 70 dwellings		
		1		Site is in isolated location and will set precedent for future	An amendment to Policy DM1 – Development on Brownfield L and is proposed to clarify the specific, exceptional circumstances when the redevelopment of a brownfield site in the countryside would be acceptable	No change to Policy H1(71) (but please refer to the change proposed to Policy DM1 which has resulted from the consideration of representations to Policy SP5 – Countryside)

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		2		Proposed housing numbers too high and no allowance has been made for windfall sites	The housing requirement is derived from the Strategic Housing Market Assessment which is meant to assess authorities' full housing needs. An appropriate, substantiated windfall allowance has been included in the 20 year housing land supply. Sites are put forward as development proposals which individually and collectively would contribute to the plan's objective of meeting the borough's development needs by delivering sustainable growth which includes focusing limited new development at the 5 larger villages where appropriate.	No change
				Cumulative effect of nearby developments		
Impact on countryside		2		Object to loss of agricultural land	This proposal is restricted to the area of the current chicken sheds.	No change
				Proposal contradicts policy SP5	The proposed development will result in the removal of chicken sheds which are visibly prominent in the landscape. A small, low density development with appropriate landscaping is considered to be likely to be beneficial to the landscape in this location.	No change to Policy H1(71) (but please refer to the change proposed to Policy DM1 which has resulted from the consideration of representations to Policy SP5 – Countryside)
				Object to development on greenfield site	An amendment to Policy DM1 – Development on Brownfield L and is proposed to clarify the specific, exceptional circumstances when the redevelopment of a brownfield site in the countryside would be acceptable.	
Impact on highway safety, road network and traffic flow		4		Development requires notable improvements to road network. Requirement for Integrated	The ITS is in course of preparation and will be available together with the Reg. 19 consultation document.	No change

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			Transport Strategy		
	3		Increased traffic flow on narrow roads	Kent County Council, as the highway authority, expressed concern about the impact of 12.97ha development proposal on local junctions. Now that the site area has been reduced considerably, traffic should not be such an issue. Removal of the sheds should also result in a reduction in HGV movements into the area.	No change
	2		Object to requirement for development to contribute to Linton crossroads improvements as site is not in close enough proximity	This requirement stems from cumulative impact of various development proposals upon this junction. Development proposals would be subject to a Transport assessment.	No change
	1		Impact on safety of non-road users	The probable need to upgrade pedestrian footways into the village is recognised. Hence criterion 9 requires a footpath/cycle path to be provided along the frontage to Green Lane on land within the landowner's control to the north of the existing hedgerow.	No change
Impact on sewerage and drainage infrastructure	1		Additional criterion required: "Utility infrastructure A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider. Existing underground sewers on site are protected, or appropriate arrangements are made for their diversion."	This is a matter which will be dealt with at/after the point of a planning application. The developer will be expected to liaise directly with Southern water to confirm the connection arrangements.	No change.

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

General support for site	1			Low level archaeology and no heritage assets on site or adjacent	Noted	No change
Impacts on privacy for existing residents		1		Loss of privacy will occur due to overlooking of new development	Any prospect of overlooking of neighbouring properties and their gardens will be dealt with in the design of the development at planning application stage.	No change

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Policy H1(72) – Land adjacent to The Windmill PH, Eyhorne Street, Hollingbourne						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Enhance ecology and biodiversity			1	Development requires attention to detail of hedgerow management and enhancement	Criterion 8 requires an appropriate ecological survey and the implementation of resulting mitigation measures which could encompass hedgerow management measures. Further specific requirements with regard to the hedgerow will be dealt with by planning condition in association with the grant of any planning permission.	No change
Impact on character and setting of countryside and surrounds			1	Reference in policy should be made to the fact the site lies within setting of the AONB	It is a requirement of criterion 6 that a visual impact assessment is undertaken. Viewpoints for this would need to be agreed with the council.	No change
		2		Object to this site as it is greenfield and outside of village envelope	There is insufficient previously-developed land in the borough to accommodate all of the development required. The Local Plan strategy is to allocate sufficient greenfield land at the edge of the most sustainable settlements including Eyhorne Street in order deliver sufficient housing over the 20 year plan period.	No change
		1		Loss of Grade 2 and 3 agricultural land	This site is Grade 2 agricultural land. There is insufficient previously-developed land in the borough to accommodate all of the	No change

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					development required. The National Planning Policy Framework requires that where development of agricultural land is required, a sequential approach is adopted whereby lower quality land is utilised in preference to that of higher quality. As revealed by the SHLAA, an overall assessment of the candidate sites supports the development of this site if the overall borough requirement for additional housing land is to be met. Based on this overall assessment, the loss of higher quality agricultural land is not considered to override the factors in support of the proposed development.	
		1		Site has high potential for archaeological remains, although does not contain any designated heritage assets on site.	Noted. This will be addressed at the planning application stage and dealt with by an appropriate planning condition. Criterion 4 requires an archaeological assessment to accompany a planning application.	No change
		2		Impact on historic character of area needs consideration	Noted. Any planning application will be required to comply with Policy DM10 which, amongst other things, will ensure that the qualities and local distinctiveness of the historic environment are recognised and protected. Criterion 4 of the policy also specifically requires the findings of a heritage impact assessment to be taken into account in the design of development.	No change
Impacts on highway safety, road network,		4		Unsuitable access from Eyhorne Street and inadequate road	Noted. Kent County Council, as the highway authority, has expressed concern	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

and traffic flow				infrastructure	about access, as it lies along a narrow track next to the pub and is particularly difficult for pedestrians. However, KCC have not objected to this proposal. Track also serves as access to the pub, pub car park, car park of Hollingbourne Village Hall and to Grove Mill House further to the SE. This would be subject to detailed assessment at application stage.	
Inadequate Sewerage / drainage infrastructure		1		Additional criterion should be added: "Utility infrastructure - Existing underground sewers on site are protected, or appropriate arrangements are made for their diversion"	Noted - however this is a detailed matter which is appropriately dealt with at the planning application stage and does not necessitate a specific addition to the policy.	No change
		1		Inadequate sewerage capacity	Southern Water has not identified this as a fundamental constraint to development	No change
Impact on recreational facilities		1		Object to loss of playing field for development	The site is not a playing field; it comprises a paddock used for horse grazing.	No change

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN 2015 CONSULTATION: ISSUES AND RESPONSES

Policy H1(73) – Brandy’s Bay, South Lane, Sutton Valence						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Biodiversity, ecology, and green infrastructure preservation			1	General support for para 1, 2, and 10 but more details required	Noted. More detailed information will be submitted as part of a planning application. Indeed this site now has a full planning consent (14/504556)	No change
Highways safety and access		2	1	Pedestrian access to public transport on A274 needs further consideration	This issue has been addressed by the developers and is the subject of a proposed amendment to criterion 4.	Amend criterion 4 as shown below.
Impact on environment quality		3		Pollution Flood risk	The SHLAA indicates that:- <ul style="list-style-type: none"> • the site is not in a declared AQMA • noise very unlikely to be a problem • the site is not in Flood Zone 2 or 3 • there may be land contamination in the area of the existing stables/yard and waste bedding material pile. This would be addressed at the planning application stage – indeed this site now has detailed consent 	No change
Impact on countryside		2		Site is located on Greensand Ridge	The SHLAA concludes that “The site is suitable for development and will not extend development unacceptably into the countryside.”	No change

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		4		Object as site is greenfield outside of the village envelope and would adversely impact character and setting.	There is insufficient previously-developed land in the borough to accommodate all of the development required. The councils SHLAA concludes that "The site is suitable for development and will not extend development unacceptably into the countryside." The acceptability of development on the site has been tested and confirmed through the granting of a detailed consent (14/504556).	No change
Inadequate social infrastructure / local amenities		2		Lack of social infrastructure and village facilities	Sites are put forward as development proposals which individually and collectively would contribute to the plan's objective of meeting the borough's development needs by delivering sustainable growth which includes focusing limited new development at the 5 larger villages where appropriate. Sutton Valance has been assessed as one of the locations in the borough with sufficient services/facilities to sustain limited additional development.	No change
Inadequate sewerage / drainage infrastructure		1		History of serious sewerage and drainage issues	Mitigation can only be required where proposed development exceeds existing capacity. It is not appropriate to use development to solve existing issues.	No change
Local amenity		1		Loss of light and privacy for those in close proximity	Any prospect of loss of light and overlooking of neighbouring properties and their gardens will be dealt with in the context of the assessment of any planning application which will need to comply with Policy DM4 'Principles of good design' criterion v.	No change

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Amendments to specific wording		1	Para 3 – remove the words ‘an avenue of’	Noted that this is due to impracticalities of planting trees adjacent to the street due to differing levels.	Amend criterion 3 as follows:- “The layout shall provide for a centrally positioned access road off South Lane with landscaping to the site boundaries and an avenue of trees along the new access road.”
		1	Para 4 – suggest wording: “The development shall provide a footpath link from the site’s entrance on South Lane, through the site to link into PROW KH505 at an appropriate access point on the southern boundary to improve pedestrian connectivity with the existing settlement, the adjacent bus stops in Headcorn Road, and the countryside to the east”	Noted that the suggested wording specifies the intention more clearly.	Amend criterion 4 as follows:- “The scheme shall provide for a footpath link from <u>the site’s entrance on</u> South Lane to PROW KH505 at an appropriate access point on the southern site boundary to improve <u>pedestrian</u> connectivity <u>with the existing settlement, the adjacent bus stops in Headcorn Road,</u> and to the countryside <u>to the east beyond.</u> ”
		1	Para 8 – not necessary for additional landscape information for this site due to self-contained and well screened	Notwithstanding that this site has a detailed consent, this criterion provides important safeguard to ensure landscape impact is fully considered as part of the design of developments retain	No change
		1	Para 11 – not relevant as no historic evidence of contamination	SHLAA indicates the possibility of contamination in the area of the existing stables/yard and waste bedding material pile.	No change
		1	Para 13 – Too vague and require more details	Given that planning permission has been approved, subject to a legal agreement, then the subject matter of this criterion is already being dealt with in that context. The wording of this and equivalent	No change at this stage

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					<p>criterion in other allocation policies will be revised comprehensively in the course of preparing the Regulation 19 version of the Local Plan.</p>	
		1		<p>Insert additional criterion - "Utility infrastructure - Existing underground sewers on site are protected, or appropriate arrangements are made for their diversion."</p>	<p>Noted - however this is a detailed matter which is appropriately dealt with at the planning application stage and does not necessitate a specific addition to the policy.</p>	No change
General support for policy			1	<p>Low level archaeology and no heritage assets on the site or adjacent</p>	<p>Noted</p>	No change
Loss of recreational facility			1	<p>Object to loss of playing field</p>	<p>Site is a paddock, house and garden, as such, not be subject to Sport England's policy.</p>	No change
Overdevelopment of the site		2		<p>40 dwellings will overdevelop the site</p>	<p>Development density is 26.7 dwellings/ha which is less than the 30/ha 'expected' in 'larger villages' specified in Policy H2. This site now has a detailed consent for 40 dwellings.</p>	No change

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Policy H1(74) – Wren’s Cross, Upper Stone Street, Maidstone						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Impact on road infrastructure, traffic flow, and highways safety			1	More appropriate use would be care home as it wouldn’t exacerbate traffic flow as housing would	It is imperative to accommodate the objectively assessed housing need. Should the site not be developed for housing then it may accommodate a care home if any such development proposal complies with Policy DM42.	No change
			1	Require joined up strategy for pedestrian and cycle routes	Maidstone’s Integrated Transport Strategy is in course of preparation and will be available together with the Reg. 19 version of the Local Plan.	No change
General support for policy	2			Support proposal to improve air quality and creating pedestrian and cycle track	Support noted and welcomed	No change
	3			Support policy for site redevelopment	Support noted and welcomed	No change
	3			Support site development to enable restoration and protection of heritage assets	Support noted and welcomed	No change
Impact on environment quality			1	Poor air quality at this location – concerns for increased residents	The SHLAA identifies the site as being a suitable one for development in a sustainable Town Centre location but notes that it is constrained by air quality and	No change

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					noise issues which may have some impact on the potential design of the development. Criteria 13 and 14 deal with air quality and noise respectively such that necessary/appropriate mitigation/attenuation measures are implemented and criterion 8 requires the development to be set back from Upper Stone Street.	
Historic value of site			1	Site redevelopment needs to be informed by an Archaeological Desk-based assessment due to having high potential for archaeological remains	Noted. Criterion 10 specifies the need for a Heritage and Archaeological Impact Assessment. Any other specific requirements to emerge in association with this development proposal will be dealt with by planning condition in association with the grant of any planning permission.	No change

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Policy H1(75) – Land north of Heath Road (Older’s Field), Coxheath						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Impact on ecology, and biodiversity		1		Site comprises broadleaf woodland with significant biodiverse habitats	Criteria 6 & 7 relate to tree retention/protection and habitat/species surveys. Adherence to criteria is expected to address these issues adequately.	No change
		1		Loss of ancient woodland	According to ' a revision of the Ancient Woodland Inventory for Maidstone borough, August 2012') there are no designated Ancient Woodlands on site.	No change
		2		Site includes area of BAP woodland Contrary to Maidstone Biodiversity Action Plan	Mitigation will be secured through any application as required . Criterion 7 specifies that this will be the case. An arboricultural survey is also required (criterion 6).	No change
Issues regarding green infrastructure / open space		5		Site provides vital semi-natural green amenity space for residents and anti-coalescence buffer	It is considered that the application of criteria 6, 7 and 10 will ensure that not only is adequate public open space made available but that part or all will also serve as a wildlife habitat.	No change
		1		Object to site as contrary to Policy SP5	Not accepted. Policy SP5 applies to the countryside which will comprise the area outside of the towns, villages and associated sites allocated for development.	No change
	1			Support in principle – add	The need for a management plan will be a	No change

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			requirement for management plan	matter to be addressed in the context of determining a planning application.	
	1		Support in principle - do not understand provision for open space as amount in excess of that required under Policy DM11 is already proposed	An overall review of open space requirements is detailed in the responses to Policy DM11 and OS1 and in the covering report for the Strategic Planning Sustainability and Transport Committee on 14 th December 2015. In addition to public open space requirements, a function of the undeveloped land/open space proposed with this development is to secure the separation of the development from Dean Street to the west. In this basis the location and amount of land safeguarded is justified.	No change (but please additionally refer to the issues/responses/ proposed amendments for Policies DM11 and OS1).
		1	Include the adjacent land south of Pleasant Valley Lane in the open space for this site as forms part of Coxheath Neighbourhood Plan	This area has permission as an area of public open space under application 13/1999.	No change
		1	Policy should refer to PROW as per easy access circular route proposed in Coxheath Neighbourhood Plan	This will not be necessary because, once adopted, the emerging neighbourhood plan will constitute part of the development plan.	No change
Object due to coalescence		1	Site will coalesce Coxheath and Linton	Noted. SHLAA concludes that development of the site would result in the coalescence of development in Coxheath to the east and the settlement in Dean Street to the west. A function of the undeveloped land/open space proposed with this development is to secure the separation of the development from Dean Street to the west.	No change

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Inadequate social infrastructure / local amenities		2		Inadequate social infrastructure / local amenities	Sites are put forward as development proposals which individually and collectively would contribute to the plan's objective of meeting the borough's development needs by delivering sustainable growth which includes focusing limited new development at larger villages consistent with their range of services and role. Criterion 9 of the policy also requires contributions to community infrastructure to mitigate the impact of development.	No change
Inadequate sewerage and drainage supply, and water infrastructure		1		Object to site due to pressure on already inadequate sewerage / drainage and water supply	Sewerage capacity has not been identified by Southern Water as a constraint to development.	No change
		1		Insert additional development criteria: "Utility infrastructure - A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider."	This is a detailed matter which will be addressed at/after planning application stage. Developers will be expected to liaise directly with Southern Water to put the necessary connection arrangements in place.	No change.
Inadequate road infrastructure, impact on traffic flow and highways safety		4		Site will cause increased congestion and impact on existing road network Need an Integrated Transport Strategy	There is no highway objections to the site being delivered. Proposals would (and have been as part of the current application) subject to a transport assessment that will identify significant mitigation.	No change
		1		No consideration to parking provision	The council's adopted parking standards will be applied to any development proposal.	No change
		1		Inadequate public transport service	Not agreed. Coxheath is served by a regular bus service (89). The nearest	No change

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				existing bus stop is located approximately 150m east of the site.	
		1	Object to site access	Kent County Council, as the highway authority, has not objected to the proposed access but commented that, whilst there is no apparent serious problem, there would be a need to extend the speed limit and possibly traffic calming.	No change
		1	Para 13 – include requirement for the provision of gateway facilities to the village	Such provision would be subject to detailed negotiation as part of the planning application and section 278 processes with Kent Highways.	No change
Impact on environment quality		1	Site will cause an increase in pollution	This site is not in the AQMA or a noise hotspot.	No change
Object to housing scale, density, distribution		1	Housing numbers too high for this area, and no allowance made for windfall sites	The housing requirement is derived from the Strategic Housing Market Assessment which is meant to assess authorities' full housing needs. An appropriate windfall allowance has been included in the 20 year housing supply.	No change
General support for policy	2		Support policy H1 (75)	Support welcomed.	No change
			Site has low level archaeology and does not have designated heritage assets on site or adjacent		
	1		Support but delete H1(45)	Support welcomed. Policy H1(45) is not included in the current Regulation 18 consultation	No change

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Policy H1(76) – Hubbards Lane, Boughton Monchelsea						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
General support for Policy	1			Support for policy	Support welcomed	No change
	1			Low level archaeology and no designated heritage assets on site or adjacent	Noted	No change
Road infrastructure and highways safety concerns			1	Carefully design site to ensure no conflict between all road users and residents	Noted	No change
		1		Will create increased traffic	Kent County Council, as the highway authority, has not objected on this basis.	No change
		1		Requirement for an Integrated Transport Strategy for the Plan	The ITS is in course of preparation and will be available together with the Reg. 19 Local Plan.	No change
Object due to greenfield site			3	Site is greenfield and high quality agricultural land	There is insufficient previously-developed land in the borough to accommodate all of the development required. The National Planning Policy Framework requires that, where development of agricultural land is required, a sequential approach is adopted whereby lower quality land is utilised in preference to that of higher quality. Given that, the loss of higher quality agricultural is not considered to override the factors in support of the proposed development if	No change

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					the overall borough requirement for additional housing land is to be met.	
Object to scale, density, distribution, and cumulative impacts of housing in area/on site		2		Housing number is too high with no allowance for windfall sites	The housing requirement is derived from the Strategic Housing Market Assessment which is meant to assess authorities' full housing needs. Local planning authorities may make an allowance for windfall if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. A windfall allowance is included within 20 year land supply	No change
		2		Object to ribbon development	Given the apparent conflict between criteria 1 and 3, it would be appropriate to replace both with a new criterion. To read; development proposals should seek to retain as much of the existing hedgerows or the western boundary as possible, to help retain the existing natural character of the site.	Delete criteria 1 and 3. Replace with a new criterion to read; <i><u>“development proposals should seek to retain as much of the existing hedgerows on the western boundary as possible, to help retain the existing natural character of the site.”</u></i>
Support but delete criterion 1	1			Support but delete criterion 1 in order to maximise potential of site and retain the hedgerow.	Given the apparent conflict between criteria 1 and 3, it would be appropriate to replace both with a new criterion. To read; development proposals should seek to retain as much of the existing hedgerows or the western boundary as possible, to help retain the existing natural character of the site.	Delete criteria 1 and 3. Replace with a new criterion to read; <i><u>“development proposals should seek to retain as much of the existing hedgerows or the western boundary as possible, to help retain the existing natural character of the site.”</u></i>

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Policy H1(77) – Bentletts Yard, Laddingford						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Viability of housing number proposed		1		Proposed yield is unviable – minimum 25 dwellings required. Amend policy to provide indicative yield of 25 – 31 dwellings.	Criterion 11 requires the submission of a viability assessment. This will demonstrate the minimum level of development necessary to remediate the site.	No change
	1			Support site and allocate for more than 10 units.	Criterion 11 requires the submission of a viability assessment. This will demonstrate the minimum level of development necessary to remediate the site.	No change
	1			Support site and consider viability.	Criterion 11 requires the submission of a viability assessment. This will demonstrate the minimum level of development necessary to remediate the site.	No change
Further protection of ecology and biodiversity required	1			Support in principle subject to ecological survey and protected species mitigation	Noted. This issue is addressed by criteria 8 and 9.	No change
Amendments to specific wording			1	Para. 7 – insert word ‘existing’ before trees	Accepted	Amend criterion 7 as follows:- “Retention, enhancement and reinforcement of <i>existing</i> trees and hedgerows.....”
Support for Policy	1			Support as brownfield site despite location	Support welcomed	No change

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	1			Low level archaeology and no designated heritage assets on site or adjacent	Noted	No change
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Housing site allocations proposed for deletion						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Deletion of Haynes, Ashford Road H1(12)	4	1		Support this policy and the deletion of Haynes, Ashford Road H1(12)	Support welcomed	No change
		1		Like to see renewed discussion on the re-inclusion of this site	The landowner has indicated that the site is no longer available for residential development. See response below.	No change
			1	Concerned that previous comments have not been considered; site should be allocated for retail/mixed use	The proposed allocation of the Haynes site as a mixed use site to include retail floorspace was considered in the covering report to the Strategic Planning, Sustainability and Transportation Committee to the 18 th /19 th August 2015 and in the schedule of responses which was agreed by the Committee. For clarity, the mixed use retail allocation of the site is not recommended. The Maidstone East/Sorting Office site is the priority location to meet retail needs over the Plan period and the redevelopment of The Mall provides for longer term needs. Both these locations are sequentially preferable to the Haynes site which is 'out of centre' in retail planning terms.	No change

Housing site allocations proposed for deletion

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			2	Allocated site is an urban brownfield site and should be used	Noted. The landowners have confirmed that the site is not available for residential development.	No change
Deletion of Tong's Meadow H1(25)	51	3		Support this policy and the deletion of Tong's Meadow H1(25)	Support welcomed	No change
		3		Safeguard land for educational purposes within the emerging Plan to enable Harrietsham Primary School to expand	As the site is no longer proposed for housing development, a proportion of land is no longer demonstrably available for a primary school extension and such an allocation for this use is not 'deliverable'. Such development could nonetheless come forward through a planning application should the landowner and education authority reach an agreement about the transfer of appropriate land.	No change.
		2		Site should be not be deleted as it is in a good location and would help to ease traffic in West Street; Need to retain allocation to ensure overall housing delivery is met. Site should be allocated on a reduced site area that does not include the receptor site	The site is not considered suitable for residential development in the light of Natural England's advice that it would be unlikely to issue a European Protected Species development license give that the site was a receptor site for a previous development.	No change
Deletion of Ham Lane H1(31)	4			Support this policy and the deletion of Ham Lane H1(31)	Support welcomed	No change
		1		Object to the deletion of Ham Lane.	Cabinet on 2/4 February 2015, following consideration of the Reg. 18 representations, recommended that it should not be allocated and should be subject to a further Regulation 18	No change

Housing site allocations proposed for deletion

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					<p>consultation for its deletion on the grounds 'of (the) unacceptably adverse impact on the AONB and on the character of the village because it is peripheral to the settlement and beyond the open space occupied by Swadlands School playing field.'</p> <p>The site was again considered by SPS&T Committee on 14/23 July 2015 who re-affirmed the earlier decision of Cabinet that the site should not be allocated for the same reasons.</p> <p>Application 14/502973/FULL for 82 units has been REFUSED and is currently subject to an appeal.</p> <p>It is considered that there has been no change in circumstances relating to the site to warrant Councillors previous decision being reversed.</p>	
Deletion of Heath Road H1 (48)	5			Support this policy and the deletion of Heath Road H1 (48)	Support welcomed	No change
Allocation of Tong's Meadow as an allocation for open space (Policy OS1 (8))	11			Support the allocation of Tong's Meadow as an allocation for open space (Policy OS1 (8)); Important community facility for dog walkers and creates a sense of community; Guarantee open space for future generations	Noted. This issue is considered in detail under Policy OS1.	[Please refer to the responses to Policy OS1]

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Policy H1(10) – South of Sutton Road, Langley						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Inadequate social infrastructure / local amenities		38		Inadequate social infrastructure / lack of existing capacity of local amenities to facilitate more development in area i.e. doctors surgeries, hospitals, shops, schools, broadband internet, mobile signal	The Infrastructure Delivery plan to be published with the Regulation 19 version of the Local Plan will set out the infrastructure required to service the development proposals in the Local Plan. The term 'community infrastructure' in criterion 17 would encompass contributions to health facilities, schools, libraries, village hall etc. The Infrastructure Delivery Plan, which will be published with the Regulation 19 version of the Local Plan, will help to more precisely identify the services/facilities for which contributions will be sought.	No change
Insufficient employment to sustain development		4		Insufficient employment in the area	The Economic Sensitivity Testing and Employment Land Forecast, and the Final Qualitative Employment Site Assessment Report have been produced for the Council by consultants GVA and form part of the evidence base underpinning the Local	No change

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				No understanding of severe impact on the town's economy	Plan. These documents together provide the Council of a robust assessment of current employment land and forecast of the potential of future demand. Policy EMP1 sets out the Council's proposed employment allocations to deliver the employment needs across the Borough during the plan period. The NPPF is clear that providing sufficient housing is an important element in supporting wider economic growth.	
Inadequate sewerage/drainage/water/electricity infrastructure		26		Lack of sewerage system, adequate drainage, and water supply	Noted. The developer will be expected to liaise with Southern Water at the planning application stage to identify and deliver any required additional infrastructure.	No change
Inadequate road infrastructure, and impact on traffic flow		84		Will cause increased levels of traffic (including HGVs) in an already congested area Object to the site due to cumulative impacts on highway to the southern approaches to Maidstone and severe impact on local highway network Present road network including narrow lanes cannot support further	The policy requires the provision of bus priority measures along Sutton road in conjunction with the other development sites in the area. The Council is working on the production of an Integrated Transport Strategy not only for junction improvements but also to seek to encourage a shift towards the use of public transport and a reduction on the reliance of the use of the private car. It is noted that planning approvals have either been permitted or	No change

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				development to the south of Maidstone	resolutions to grant provided for applications on other proposed allocation sites in the area – H1(6), H1(5), H1(21), and H1(22). These applications all included detailed transport assessments and have had mitigation measures agreed with Kent Highways for improvements to Sutton Road, providing substantial financial contributions.	
Highways safety issues		33		Development will cause safety issues for other non-vehicle road users. Lack of pavements and street lighting Inappropriate access to site	Issues regarding highways safety, lighting, and appropriate provisions for non-road users such as pavements will be dealt with in the detailed design stage of the development management process.	No change
Inadequate public transport		23		Bus lane is not a solution. No planned Park and Ride. Unsustainable location - not close to railway station	Whilst there is no planned new park and ride facility, the Plan does sets out under Policy DM15 the criteria to which new or replacement park and ride facilities will be assessed. The policy requires the provision of bus priority measures along Sutton road in conjunction with the other development sites in the area. They aim to encourage a shift towards the use of public transport and a reduction on the reliance of the use of the private car which will also be	No change

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					supported by the wider objectives of the emerging Integrated Transport Strategy.	
Object on grounds of creating coalescence / urban sprawl		17		The development will create coalescence with neighbouring /urban areas and extend urban sprawl.	<p>The SHLAA recognises the impacts that development on this site may have on the character of this area, and the fact that it would extend the built up area of Maidstone significantly to the east.</p> <p>However, it is considered that the need to provide sites suitable for housing holds significant weight which outweighs this visual harm.</p> <p>The rural character of the Borough is afforded protection throughout the Plan, and emphasized in the spatial strategy Policy SS1, SP5, and DM10. Any proposal for development on this site will be subject to the requirements of these policies.</p>	No change
Object to scale and density of development proposed in this area		19		<p>Scale and density of development of this site is inappropriate in this rural area. Should be smaller than existing residential scale of Langley.</p> <p>Too many homes allocated for this area</p>	<p>As revealed by the SHLAA, an overall assessment of this site supports its development if the overall borough requirement for additional housing land is to be met.</p> <p>The rural character of the Borough is afforded protection throughout the Plan, and emphasized in the spatial</p>	No change

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				<p>strategy Policy SS1. Therefore any proposal for development on this site will be required to take account of landscape and visual impact, as set out in Criterion 3 of Policy H1(10).</p> <p>The form of development will be subject to appropriate standard of design and layout as dealt with in policy and Policies DM4 'Principles of good design' and DM10 'Historic and natural environment, which will be given due consideration in the development management process.</p>	
Impact on rural and historic character of the area		13	Impact on character and identity of villages	<p>As revealed by the SHLAA, an overall assessment of this site supports its development if the overall Borough requirement for additional housing land is to be met.</p> <p>The rural character of the Borough is afforded protection throughout the Plan, and emphasized in the spatial strategy Policy SS1. Any proposal for development on this site will be required to take account of landscape and visual impact, as set out in Criterion 3 of Policy H1(10).</p> <p>The form of development will be subject to appropriate standard of design and layout as dealt with in policy and Policies DM4 'Principles of</p>	No change

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				good design' and DM10 'Historic and natural environment, which will be given due consideration in the development management process.	
	4		Development will result in loss of ancient woodland	The site is not located within any areas of Ancient Woodland	No change
	10		Development will cause detrimental effect on listed buildings and conservation area	Criterion 5 of H1(10) affords preservation or enhancement of the setting of the listed buildings surrounding the site. The form of development will be subject to appropriate standard of design and layout as dealt with in policy and Policies DM4 'Principles of good design' and DM10 'Historic and Natural Environment, which will be given due consideration in the development management process.	No change
	5		Loss of agricultural land	The site is identified as largely Grade 3b agricultural land with small pockets of Grade 3a. The National Planning Policy Framework requires that where development of agricultural land is required, a sequential approach is adopted whereby lower quality land is utilised in preference to that of higher quality. The higher grades are denoted as grades 1, 2 and 3a. As revealed by the SHLAA, an overall assessment of this site supports its development if the overall borough requirement for additional housing	No change

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					land is to be met. Based on this overall assessment, the loss of some grade 3a agricultural land is not considered to override the factors in support of the proposed development.	
Object to proposed strategic transport requirements		26		Object to proposed junction improvement at Gore Court Road as it will divert traffic through Otham and Downswood to avoid congestion Not acceptable or appropriate solution	This measure is listed as one of a suite of improvements being sought in connection with development on a number of sites at south east Maidstone. This specific improvement to Gore Court Road will be delivered in association with development at sites H1 (6) – North of Sutton Road and H1(7) – North of Bicknor Wood. The Regulation 19 version of the Local Plan will refine the presentation of these requirements so they are more specific to each site. A Transport Plan has been approved as part of the permission granted for the development of H1(6).	The Regulation 19 version of the Local Plan will refine the presentation of these requirements so they are more specific to each site.
		1		Objection to a number of the proposed strategic transport requirements due to not being directly related to the site, have already been completed, or would not be CIL compliant as contributions have already	Noted. The Regulation 19 version of the Local Plan will refine the presentation of these requirements so they are more specific to each site.	The Regulation 19 version of the Local Plan will refine the presentation of these requirements so they are more specific to each site.

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			been received		
Provision of a Leeds/Langley bypass is required		7	Risk of further increased traffic and articulated lorries using local roads so bypass should be provided.	This scheme does not have an identified alignment, has not been fully assessed and funding sources have not been confirmed. At present there is no evidence to justify such a requirement as part of this policy.	No change
Impacts on ecology, open space and Green Infrastructure		2	Stronger protection required for ecological features, open space, and green infrastructure.	<p>Ecological features: Criterion 1 sets out the requirements for development proposals to provide open space at this site.</p> <p>Open space: Criterion 11 sets out the requirement for development proposals to produce a phase one ecological survey.</p> <p>Green infrastructure: NPPF para 99 sets out that where new development is brought forward in vulnerable areas, care should be taken to ensure that risks can be managed through suitable adaption measures including the planning of green infrastructure. Scope for further enhancement of this requirement will be given in the emerging Green and Blue Infrastructure Strategy. Policy SS1 also sets out that green and blue network will be generally maintained.</p> <p>Consideration and more detailed</p>	No change

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				discussions of these aspects with appropriate stakeholders will be made during the development management process to ensure appropriate design of any proposal.	
	1		Concern that upgrade of PROWs sought (criterion 6 and 18) will require improvements to land outside of owner control with no formal plans/agreement in place.	Noted. An amendment is proposed to the Policy to detail the alignment of the proposed cycle path across the site which will link Sutton Road to Brishing Road via the Langley Park development immediately to the west of Site H1(10). As a result of this amendment it is also proposed that the existing criterion 18 be deleted.	Delete Criterion 18 and amend Criterion 6 to read: <i><u>A new PROW with a cycle route will be provided running east-west from Sutton Road to Brishing Road connecting with the planned route through the adjacent site at Langley Park Farm</u></i>
	8		Object to general loss of countryside /green space.	The NPPF clearly sets out the requirement for local authorities to meet their objectively assessed needs unless specific policies in the framework indicate development should be restricted. The NPPF does not preclude development which would result in the general loss of the countryside or green space. It does however emphasis the need to contribute to and enhance the natural and local environment. The Local Plan as a whole provides significant protection and enhancement in line with the NPPF for natural and historic	No change

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				<p>environments. This also includes a specific policy (SP5) identifying areas of Landscapes of Local Value across the Borough. The rural character of the Borough is afforded protection throughout the Plan, and emphasized in the spatial strategy Policy SS1.</p> <p>Therefore these considerations will be given due weight during the development management process for any proposal that comes forward for this site.</p>	
	22		<p>Object to adverse impact on wildlife and biodiversity</p>	<p>Criterion 11 sets out the requirement for development to be subject to the results and recommendations of a phase one ecological survey. Policy DM10 also sets out further criteria which any development proposals for this site will be subject to for matters of ecology and biodiversity.</p>	No change
	4		<p>Impacts on rural activities / recreation</p> <p>This site constitutes all, or part of, a playing field. It therefore objects to this policy allocation unless any application is considered in the light of Sport England's Playing Fields Policy.</p>	<p>Development proposals for this site are required to retain and enhance PROWs associates with the site, as specified within Criterion 6. An area of public open space is also to be retained as per Criterion 1.</p> <p>The site does not contain any formal playing fields. The developable area of the site does encompass a golf driving range however in addition the</p>	No change

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					policy provides for a substantial element of publically accessible open space (14ha) to the east of the proposed development area.	
Impact on environmental quality		22		Development will cause noise, air and light pollution, and increased litter	<p>Any development proposals for this site will be subject to a noise survey to determine attenuation measures, and appropriate air quality mitigation measures will be required.</p> <p>The design of any development proposal will be required to take account of policy DM4 Principles of Good Design and will be dealt with during the development management process.</p>	No change
		6		Increased flood risk	<p>The SHLAA notes for this site that the southernmost edge of the site is in flood zone 2 & 3, and flooding of the remainder of the site is highly unlikely. The EA have not objected to the principal of development at this site, and will be consulted on any development proposal that comes forward to determine suitable flood mitigation measures. This is also inferred in the Policy criterion 2 which states that the area set aside for natural/semi natural open space shall incorporate SuDs. As the site is greater than 1ha in area, a Flood Risk Assessment will be required at planning application stage.</p>	No change

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		1	<p>Objections to Criterion 15 drainage:</p> <ul style="list-style-type: none"> - drainage is not achievable here and the reservoir is not suitable as a flood management asset - not necessary to include this as SUDs proposed on site will manage the run-off to a greater degree and improve water quality 	<p>Noted.</p> <p>The EA have undertaken a site specific assessment of flood mitigation measures which the Council are awaiting response of to inform the Infrastructure Delivery Plan.</p> <p>Appropriate contributions will be required for this site due to the location partially within the flood zone 2&3. Further discussion with the EA will be required as part of the development of any planning proposal on this site. Therefore, in light of their response, it is necessary to remove reference specifically to the reservoir at Brishing Lane, and allow a more flexible approach to contributions.</p>	<p>Amend criterion 15 to read:</p> <p>The provision of appropriate contributions as proven necessary towards the long term maintenance and improvement of the flood mitigation reservoir at Brishing Lane <u>will be sought for the improvement of flood mitigation impacting this site.</u></p>
			<p>Element of flexibility over boundary for area set aside as open space is sought due to the allowance for better connection with existing village. The developable area proposed would have a significant impact on the provision of a school and the quality of the landscaping proposed. It also fails to</p>	<p>The eastern portion of the site is especially open in character with the exception of the small scale development at Langley village. Rumwood Nurseries are located to the north of the site, and the new development of Langley Park is immediately adjacent to the west of the site.</p> <p>It is therefore considered more appropriate in terms of reducing the</p>	<p>Amend Policy H1(10) with the inclusion of an additional criterion as follows:</p> <p><u>"The development will provide for a primary school within the developable area of the site, the details of which shall be agreed with the local education authority.</u></p> <p>"</p> <p>-</p>

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				recognise the need for tow accesses into the site and the landscape topography.	<p>impact of coalescence and character of the open countryside in this area to direct higher density development to the western and northern portion of the site, keeping the eastern portion for open space.</p> <p>KCC in its response to the Local Plan has indicated that, with the other existing and planned housing development at south east Maidstone, there is limited surplus primary school place capacity. This being the case, an additional primary school (2 form entry) can expect to be required.</p> <p>At 29ha, the developable area of the site is, prima facia, sufficient to deliver 800 dwellings together with a range of community facilities (primary school, community centre) and to achieve this at an overall site density range of 30-35 dwellings/hectare which accords with Local Plan Policy H2. An amendment to Policy H1(10) is proposed to clarify the primary school requirement.</p>	
Impact on privacy for existing local residents		3		Cause impact on privacy for existing residents	The exact design details will be determined during the development management process in accordance with Policy DM4 Principles of Good Design.	No change
Designate site for Open Space / Green buffer and not housing		3		Delete housing allocation and designate under OS1	There is no robust evidence to suggest that this site should be	No change

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					designated purely for open space. As revealed by the SHLAA, an overall assessment of this site supports its development if the overall borough requirement for additional housing land is to be met	
Increase windfall allowance		4		If increased windfall allowance to 500 dpa this site would not be required to be allocated	A windfall allowance of 114 dpa is included in the 20 year housing land supply. This allowance is both robust and justified.	No change
General support for policy	3			Will provide opportunity to enhance bus service. Support inclusion of this site for housing – viable site to create new community with good access to A274	Support for allocation is welcomed	No change

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Policy EMP1(5) – Land at Woodcut Farm						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Nature of the jobs created		4		Warehousing creates few, low paid jobs. Cannot guarantee the site will deliver high quality jobs.	Jobs will be created in a range of sectors in the period up to 2031. Demand for this range of jobs is evidenced through the 'Economic Sensitivity Testing and Employment Land Forecast report' prepared by GVA (2014). The Local Plan identifies land for office, industrial and retail uses as well as warehousing/ distribution uses. Further jobs will be created in other sectors such as service sectors, health and education. Warehousing jobs are therefore an element of the range of employment that will be created.	No change.
Transport		1		Development should include a connection to HS1.	There are no current proposals to add further stations/stops to the HS1 line.	No change.
		20		Poor public transport connections. Employees will use cars and add to congestion on local roads, particularly when Operation Stack is in place.	KCC has not objected to the proposed allocation of Woodcut Farm on highways grounds. Policy EMP1(5) specifically requires a significant package of transport measures to significantly improve sustainable access to the site.	No change.
Appeals dismissed for		24		There have been 2 dismissed	There has been careful consideration of	No change.

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KIG and at Waterside Park			appeals for KIG and at Waterside Park. The value of the land has not changed since these appeals. The Inspectors weighted the attractive, rural character of the countryside and failure to protect the setting of the AONB highly. The Waterside Park Inspector identified that the significant environmental harm was not outweighed by the economic benefits.	the implications of the latest Waterside Park appeal decision on the case for allocating a site at Junction 8 in the Local Plan (see report to the Strategic Planning, Sustainability & Transport Committee 18/19 th August 2015). The findings of the KIG Inspector have also been explicitly considered through the assessment of potential sites at Junction 8 in the Strategic Housing and Employment Development Land Availability Assessment. Having regards to the appeal Inspectors' findings, it is considered that there is a strong economic case, supported by evidence, to allocate the Woodcut Farm site and that the criteria in the Policy EMP1(5) provide appropriate safeguards to help mitigate the adverse impacts of development.	
Object to the allocation of Woodcut Farm		30	<p>Object, including objections on the following grounds</p> <ul style="list-style-type: none"> • Loss of agricultural land (Grade 2) • Air pollution from motorway for workers on site • Impact of local residents' amenity • Impact on highway safety • Hazardous materials • Removed from the built up area • Impact on Leeds Castle and other listed buildings (Old 	Agricultural land: The Agricultural Land Classification Study (November 2014) reveals the site to comprise a mixture of Grades 2 and 3a. The National Planning Policy Framework requires that where development of agricultural land is required, a sequential approach is adopted whereby lower quality land is utilised in preference to that of higher quality. As revealed by the Strategic Housing Economic Development Land Availability Assessment, an overall assessment of the candidate sites supports the development of the Woodcut Farm site. Based on this	No change.

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				<p>England cottage, Woodcut Farmhouse). Archaeological assessment is required</p> <ul style="list-style-type: none"> • Site contributes to a green gateway to Maidstone; loss of greenfield land/ countryside; development would be detrimental to the rural character of the area; loss of visual amenity 	<p>overall assessment, the loss of higher quality agricultural is not considered to override the factors in support of the proposed development.</p> <p>Air quality: Junction 8 is outside the Maidstone Air Quality Management Area. Criterion (3) requires substantial landscape buffers along the M20 boundary which will distance development (and hence the workers) from the moving vehicles along M20.</p> <p>Residential amenity: criterion (3) requires landscape buffers to help secure the amenity of the adjoining residential properties.</p> <p>Highway safety: KCC Highways and Highways England have not objected to the proposed allocation.</p> <p>Hazardous materials: Businesses occupying the site will need to comply with relevant environmental management legislation.</p> <p>Location removed from the built up area: Policy EMP1(5) specifically requires a significant package of transport measures to significantly improve sustainable access to the site.</p> <p>Heritage impacts:</p>	
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					<p>At the KIG Inquiry, objectors raised concerns about the impact of that development on visitors to the area, in particular Leeds Castle. The KIG Inspector did not support this view however and the current proposal, which is of a much smaller scale than KIG, should not be rejected on this basis. The Council's Conservation Officer identifies the likelihood of an adverse impact on the setting of the listed Woodcut Farmhouse, which the policy criteria seeks to help mitigate, but this is not considered to outweigh the overall economic case in favour of the allocation. The Conservation Officer did not identify an adverse heritage impact on Old England Cottages from the proposal.</p> <p>KCC Archaeologist identified that targeted archaeological fieldwork may be needed to inform further consideration of this site. Criterion (9) of Policy EMP1(5) specifically requires that an archaeological survey is undertaken and the development designed to take account of the findings.</p> <p>Impact on rural character: Development would significantly alter the immediate rural character of the site and the inherent attractiveness that these fields have as an area of undeveloped countryside located on key routes into, and past, Maidstone. The adverse impacts are proposed to be</p>	
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				mitigated through the detailed and specific requirements of the policy.	
	23		Landscape impact: Impact on AONB setting. Will result in damage in views to AONB (with scarp slope as a backdrop) and views from public vantage points within the AONB (in particular the North Downs Way). Notwithstanding the policy criteria, there will be unacceptable landscape change and harm to the AONB setting. Council's Landscape capacity evidence shows that the site has low development capacity for economic development. The SA shows sustainability concerns.	<p>Development of the Woodcut Farm site will have an adverse impact on the setting of the AONB and on the wider landscape.</p> <p>It is considered that there is a strong economic case, supported by evidence, to allocate a site for B class employment uses at Junction 8. Site assessment through the Strategic Housing and Economic Development Land Availability Assessment concludes that the Woodcut Farm site is the most appropriate site to allocate. This site gives the best opportunity for mitigation measures to help ameliorate the adverse impact of development. The criteria in the Policy EMP1(5) are considered to provide appropriate safeguards through landscaping, building coverage, building heights and building orientation to help mitigate the adverse environmental impacts of development. Policy EMP1(5) also specifically requires a significant package of transport measures to significantly improve sustainable access to the site.</p>	No change
	5		Proposed floorspace is not needed, especially warehousing. It is speculative development.	The Council's evidence in the Economic Sensitivity Testing and Employment Land Forecast (2014) and the Qualitative Employment Site Assessment (2014) indicates that there is a need for the	No change.

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					additional employment land in the period to 2031, including for warehousing, and that there is a gap in the Council's portfolio of employment land which can be best met by an allocation at junction 8.	
Support the allocation of Woodcut Farm	7			Support Policy EMP1(5)	Support welcomed	No change.
Alternative sites		16		There are vacant industrial sites elsewhere such as J6, J7 and Detling Aerodrome. Office blocks in the town centre are being redeveloped for residential so there is no need to develop this site. A more strategic approach needs to be taken to employment land needs in the borough. The council should engage in Duty to Co-operate as sites are available in adjacent boroughs (Medway, Swale, Ashford, Tonbridge & Malling)	<p>Alternative, available employment sites have been assessed through the Strategic Housing and Economic Development Land Availability Assessment. This assessment, in conjunction with the evidence about the nature and scale of demand for additional employment land, is considered to support the allocation of a site at junction 8 and specifically the Woodcut Farm site. Expansion of the Detling Aerodrome site to for mixed employment/residential development has been considered and has been rejected on the grounds of unacceptable harm to the AONB and its relatively unsustainable location.</p> <p>There is recognition in the Council's evidence (Qualitative Employment Site Assessment (2014)) that there is an oversupply of poorer quality office stock in the town centre and that some of this stock could and should be redeveloped to other uses as part of an overall stock rationalisation process. It is estimated in the Assessment that some 25,000sqm of poorer quality stock can be lost and not</p>	No change.

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				<p>directly replaced without detriment to the local economy. This rationalisation process is not, however, an indicator of a lack of demand for any additional floorspace. Rather, what is required is additional, modern business floorspace in appropriate locations to meet the needs of a growing economy to 2031 which is what the Local Plan aims to deliver through the allocations in Policies EMP1 and RMX1.</p> <p>The National Planning Policy Framework states that local planning authorities should aim to meet the needs of the economy in their Local Plans (paragraph 21) and that they should plan positively for the development required in the area (paragraph 157). The clear expectation is that authorities should aim to meet needs within their own area first. Policy EMP1(5) provides the appropriate criteria to deliver an acceptable form of development in this sensitive location and thereby help ensure that the forecast economic growth can be delivered in the borough.</p>	
	1		Should aim to create high quality employment (not warehousing) along Ashford-Tonbridge railway line.	<p>The sites at Marden and Headcorn for employment development which were identified as suitable, available through the Strategic Housing and Economic Development Land Availability Assessment have been allocated in the Local Plan. Staplehurst benefits from extant consents</p>	No change.

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				at Lodge Road. The qualitative and quantitative assessments of future employment land needs prepared for the Local Plan have not revealed a specific demand for any particular type of 'high quality' employment along the alignment of the railway. Should this demand arise during the timeframe of the Plan, Policy SP3 (Rural Service Centres) gives explicit support new employment opportunities in these villages.		
		1		There has been no comparative evaluation of all potential sites.	All the available potential employment sites have been assessed through the Strategic Housing and Economic Development Land Availability Assessment to identify the most appropriate sites for allocation in the Local Plan.	No change
Object to the omission of Waterside Park		6		<p>Object to the omission of Waterside Park from the Plan on the following grounds:</p> <ul style="list-style-type: none"> • Need for additional employment land has been underestimated in the Council's evidence meaning Woodcut Farm is not sufficient to meet needs • EMP1(5) does not meet the known needs of local businesses (Scarab) in terms of building footprint or sufficiently of new/expanding business/inward 	<p>Evidence underestimates employment land requirements: It is considered that the forecast scenarios, density assumptions and frictional vacancy rates applied in the council's employment land evidence are reasonable and defensible and that the resulting employment land requirement is soundly based and an increase is not justified by the evidence.</p> <p>Known business needs: the Council's evidence provides an appropriate strategic view of employment land needs. Evidence of future employment requirements indicates that the prevailing demand is expected to be for small – medium sized</p>	<p>No specific change to Policy EMP1(5).</p> <p>The introductory sections of the Local Plan will be updated to take account of changed circumstances since the Regulation 18 draft of the Local Plan was published in March 2014.</p>

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			<p>investment.</p> <ul style="list-style-type: none"> • Mismatch in planned job growth relative to housing growth which will lead to increased commuting • Office floorspace is being converted to residential under permitted development rights. Employment floorspace must be provided elsewhere. • Allocate Waterside Park with a smaller development footprint/lower building heights than the appeal schemes. Development on 5.8ha at the north east part of the site would require less site excavation and reduced height retaining walls. Development on the Waterside Park site would be the least visible of all the sites at J8. <p>Also, the economic vision/strategy of the Local Plan need updating in the light of the updated economic evidence and the decision to allocate a site at J8.</p>	<p>units (up to 5,000sqm) which is at a scale which could be accommodated within the criteria of the allocation policy. Indeed the requirements of Scarab and ADL are exceptional in scale when put in the context. There have been only 4 land deals exceeding 2,000sqm in the borough since 2007, the largest of which was 6,344sqm.</p> <p>Alignment between employment needs and housing needs: the employment land requirements used in the Local Plan are based on nationally recognised Experian economic forecasts. These forecasts have been further refined to take account of the specific strengths and potential of the local economy. The forecast, and the resulting employment land requirements, are considered to represent a robust assessment of the actual capacity of the local economy for growth. Based on this evidence, if further employment sites over and above this requirement were allocated with the aim of aligning housing and employment targets, the outcome would be unused or underused employment site allocations.</p> <p>Lost town centre office floorspace: There is recognition in the Council's evidence (Qualitative Employment Site Assessment (2014)) that there is an oversupply of poorer quality office stock in the town</p>	
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				<p>centre and that some of this stock could and should be redeveloped to other uses as part of an overall stock rationalisation process. It is estimated in the Assessment that some 25,000sqm of poorer quality stock can be lost and not directly replaced without detriment to the local economy.</p> <p>Waterside Park: development of this site, even at a reduced scale, would necessitate significant alteration to the landform, and the introduction of features such as bunding and retaining walls which the appeal Inspector considered to be alien features. The Woodcut Farm site is considered to provide better opportunities for mitigation.</p> <p>The introductory sections of the Local Plan will be updated to take account of changed circumstances since the Regulation 18 draft of the Local Plan was published in March 2014.</p>	
Pressure for further sites to be developed		7	The allocation will result in pressure for further sites to be developed at J8 and/or ribbon development along A20.	<p>A key purpose of the Local Plan is to identify suitable locations for development to give certainty about where development is acceptable and, as a corollary, where it is not. Woodcut Farm is considered to be the most appropriate site for B class employment uses at Junction 8. The Local Plan Policy SP5 – Countryside would apply Other areas in the vicinity which puts clear limitations on the scale and type of</p>	No change.

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					development which would be acceptable.	
Specific criteria/policy amendments		1		Criterion (4): the undeveloped area should be established and maintained as 'wood pasture' to restore the historic land use and to secure landscape and biodiversity benefits.	Agree that amendments to the wording of the policy and the supporting text would help to clarify appropriate management arrangements for this area of land.	Amend criterion 4 to read "An area of 9ha to the north and north west of Woodcut Farm is secured as an undeveloped landscape area <u>in the form of open woodland</u> including the addition of a landscape buffer of at least 30m along the eastern boundary. Future management of this area will be secured by means of legal agreement and maintained in perpetuity. " Amend the supporting text at paragraph 6.10 to add the following sentence to the end of the paragraph: " <u>This area should be managed and structured as open woodland with associated biodiversity benefits and the potential to establish woodland pasture in the future</u> "
		1		Amend ridge heights on building to the west of the stream to 10m (from 8m). 8m is below the requirement for light industrial occupiers.	In view of the landscape sensitivity of this location, control over the building heights is necessary and justified. Development is required to be designed in accordance with a detailed Landscape and Visual Impact Assessment (criterion 7) by which impact on the landscape will be evidenced and tested. It is through this detailed LVIA that any case for an element of buildings of greater height would need to be made and justified.	No change.
		1		Extend the range of uses to include B1(b) to give the policy	The evidence of employment land requirements does not identify a specific	Add an additional paragraph to Policy EMP1(5) after the first paragraph in

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			greater flexibility.	requirement for additional hi-tec/research & development floorspace (class B1(b)) in the borough to 2031. Such uses, however, could be appropriately included on the site as part of a mixed employment development, subject to compliance with the criteria the policy. To recognise this, and to provide appropriate clarity in the event of such a demand arising, it is agreed that the text of the policy should be amended.	the policy to read: <u><i>In the event of a demand arising, an element of hi-tec and/or research and development (B1(b)) would be appropriate as part of the overall mix of B class uses on the site.</i></u>
	1		Amend criterion (7) to refer to financial contributions to wider enhancements. It should not be the intention to seek off site enhancements on land outside the control of the landowner/developer.	Agreed	Amend the last sentence of criterion (7) as follows: This will include environmental enhancements of the wider landscape beyond the allocation boundaries <u><i>through financial contributions</i></u> using the mechanism of a s106 agreement.
		1	Policy criterion re public transport is welcomed.	Comment welcomed.	No change.
	1		Proposed limits to building size (<10,000sqm) do not meet the needs of specific local firms (ADL; Scarab) who are/were looking to relocate to J8	The site is in a sensitive location, situated within the setting of the AONB, and it contributes to the attractive rural character of the wider area. In this context it is considered vital that appropriate safeguards are included in the allocation policy to help mitigate the adverse impacts on development on these features. Evidence of future employment requirements indicates that the prevailing demand is expected to be for small – medium sized units (up to 5,000sqm)	No change.

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				which is at a scale which could be accommodated within the criteria of the allocation policy. Indeed the requirements of Scarab and ADL are exceptional in scale when put in the context. There have been only 4 land deals exceeding 2,000sqm in the borough since 2007, the largest of which was 6,344sqm.	
	1		TPO references need amendment	Agreed.	Amend the supporting text at paragraph 6.9 to read "... including those subject to <u>T</u> ree <u>P</u> reservation <u>O</u> rders <u>no.</u> 19 of 2007 and <u>no.</u> 17 of 2007..."
	1		The Economic Development Strategy should be quoted in the supporting text.	Agreed. The introductory sections of the Local Plan will be updated to take account of changed circumstances since the Regulation 18 draft of the Local Plan was published in March 2014.	The introductory sections of the Local Plan will be updated to take account of changed circumstances since the Regulation 18 draft of the Local Plan was published in March 2014.
	1		Plan does not set out the required floorspace for the plan period. It should confirm that only B class uses contribute to the required floorspace figure.	Agreed. Development requirements (housing, employment, retail) are included in the text of the full draft Local Plan.	No change.
	1		The sequential approach to the identification of office sites has not been followed.	Policy EMP1(1) allocates land at Mote Road, within the town centre, for offices. The employment land evidence additionally identifies distinct office markets whereby the demand for town centre floorspace is separate from that for office accommodation in business park style developments, generally with good connections to the highway network. The extant consents at Eclipse Park and the	No change.

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					allocation at Woodcut farm aim to cater for the latter demand.	
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Policy GT1 – Gypsy & Traveller allocations						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
National guidance in Planning for Traveller Sites (PTS)		4		Should not allocate additional sites until the implications for overall needs of the changed definition of Gypsies and Travellers is known.	<p>The revised definition is likely to have the effect of reducing the overall number of households that are ‘gypsies and travellers’ for the purposes of planning but, as the 2012 Assessment did account for travelling habits, the reduction is likely to be relatively modest.</p> <p>The 2012 Assessment identified a need for 187 pitches (2011-31) and this is the best evidence of needs available at this point in time, recognising that actual needs may be a degree lower. Any individual applicant’s compliance with the definition will be tested at planning application stage.</p>	No change.
		1		There has not been effective and early engagement with the settled community.	The Local Plan, and the Gypsy and Traveller policies and site allocations contained within it, have been subject to public consultation in 2011, 2014 and 2015. A sequence of 20 dedicated meetings with Parish Councils were held during October/November 2014 at which Gypsy	No change.

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					and Traveller matters and potential gypsy site allocations were raised and discussed.	
		1		The allocated sites are in open countryside but the revised PTS states that sites in open countryside should be strictly limited. The guidance points to finding sites in/edge of settlements.	A comprehensive and extensive site identification process has been followed to identify available, suitable sites for allocation in the Local Plan. Sites in or at the edge of settlements were not discounted unless there were sound planning grounds for doing so. These grounds included the landowner confirmation that a site was not available for Gypsy and Traveller accommodation and hence not deliverable as a site allocation for this use.	No change.
Allocation of sites – overall points		1		Need to explain why Gypsy & Traveller sites are not being allocated as part of housing sites; should have been exploration of the removal of sites from the Green Belt	Taking account of completions to date, proposed allocations, turnover on public sites and an appropriate windfall allowance, it is expected that the overall requirement for pitches can be met and in these circumstances the options suggested in this representation are not necessary. The government has very recently further strengthened Green Belt policy in ‘Planning for Traveller Sites’ by indicating that Gypsy and Traveller development should only be permitted in <u>very</u> special circumstances. Green Belt boundaries should be altered only in exceptional circumstances. Existing sites within the Green Belt have been assessed through the evidence base and found not to be suitable for allocation	No change
		1		Allocated sites do not offer a choice of tenure. There is no	The Gypsy and Traveller and Travelling Showpeople Accommodation Assessment	No change.

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			additional social provision. There is no exploration of the need for transit sites in the light of the revised guidance.	found no clear evidence of demand for transit provision in the borough. This is consistent with previous KCC analysis for the South East Plan (2007/8) which similarly found that there was no case for transit site provision in the borough. Maidstone has historically had a relatively low incidence of unauthorised encampments which are an indicator for transit site need. Historically, travelling routes in Kent have focused on links along the north Kent coast It is, at this stage, too early to determine conclusively whether the revised definition will alter this pattern of low/nil demand and/or the pattern of travelling movements. MBC in conjunction with KCC and other Kent authorities is keeping this matter under review and it may be a matter for a future review of the Gypsy & Traveller needs.	
	1		Policies should support minor extension/infilling of existing sites.	Policy DM26 - Gypsy, Traveller and Travelling Showpeople Accommodation provides the criteria by which such applications would be determined.	No change.
	1		Support principle of increasing density on existing sites.	Support welcomed	No change.
Omission sites	1		The Coster/Coates site at Yalding should be allocated	Symonds Lane: Pear Paddock and Pear View were granted personal temporary consent at appeal (09/0732 & 09/0731). Subsequent applications (13/0103 & 13/0104) were submitted seeking	No change.

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				permanent consents for 2 mobiles & 2 tourers on each site. The assessment of these applications concluded that the development would be harmful to the character and appearance of the countryside and that mitigation has not been achieved and is unlikely to be so. On this recent analysis, these sites are considered unsuitable for allocation in the Local Plan.	
		1	Sites which are subject to current applications should have been considered	The suitability of such sites will be determined through the development management process.	No change.
		1	Land at Congelow Farm, Benover Road, Yalding	This site has been previously assessed and rejected as a potential Gypsy and Traveller site allocation (Site GT-1) on the grounds of flood risk, landscape harm and potential harmful impact on setting of listed buildings.	No change.
General issues		2	Account should be taken of temporary consents when assessing whether Gypsy and Traveller site targets have been met	Sites in the borough with temporary consent have been assessed for their suitability as permanent sites as part of the site identification process. Those which have not been identified as suitable for allocation cannot appropriately be counted towards the Gypsy pitch requirement because the consents are time limited and they do not add the overall supply of permanent sites.	No change.
		3	Concerns about retrospective applications being accepted for consideration and insufficient	The Council is not able to refuse to determine retrospective applications. The recent ministerial statement does confirm	No change.

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			enforcement/enforcement of conditions.	that unintentional unauthorised development is a factor which can be weighed in the determination of any subsequent planning application. With respect to enforcement, all enforcement complaints are investigated and where appropriate and proportionate, enforcement action taken.	
	1		With the allocation of sites in Staplehurst, expansion of sites elsewhere in the parish should be resisted.	With the allocation of the proposed sites in the Local Plan there will still be a shortfall against the identified need for pitches, estimated to be some 45 pitches. This will mean the granting of further consents on sites not yet identified (windfall sites). Policy DM26 provides the criteria for assessing planning applications for such sites.	No change.
Policy GT1(8) – Kilnwood Farm, Old Ham Lane, Lenham.	1		Object pending further details of Local Wildlife Site impacts	KCC Ecology was consulted on this site and responded that development should not impact on the designated Ancient Woodland and the LWS. The criteria in Policy GT1(8) require a 15m buffer to the ancient woodland which is consistent with that required for the approved application 12/1276 for the same site. The policy criteria also require an ecological assessment, by which impacts and mitigation will be identified, and an approved ecological enhancement and wildlife management plan.	No change.
	2	1	The BAP woodland to the north and east, the ancient woodland	The criteria in Policy GT1(8) require a 15m buffer to the ancient woodland which is	No change

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				and the habitat associated with the remained for the site should be managed and protected; a 15m buffer to the ancient woodland is insufficient; risk of domestic encroachment into the ancient woodland.	consistent with that required for the approved application 12/1276 for the same site. The policy criteria also require an ecological assessment, by which impacts and mitigation will be identified, and an approved ecological enhancement and wildlife management plan.	
		2		Object; there are too many Gypsy and Traveller sites in this area;	Government guidance in 'Planning for Traveller Sites' directs that councils should identify suitable sites in their Local Plans where there is an identified need for additional pitches. A comprehensive planning assessment of this site has found this site to be suitable for additional Gypsy and Traveller pitches.	No change.
			1	Occupants must comply with the new definition.	Noted. This is a matter for the planning application stage when a specific individual's compliance with the revised definition can be tested.	No change.
Policy GT1(9) – The Kays, near Boughton Monchelsea (Linton parish)			1	The site is in Linton parish, not Boughton Monchelsea.	Noted.	Amend the site address in Policy GT1(9) to refer to Linton, not Boughton Monchelsea
			1	The BAP woodland to the south and east should be managed	Comment noted. This area is outside the allocated site and is not known to be in the same ownership or control as the allocated site so cannot be a requirement of the policy.	No change
	1			Support	Support welcomed	No change.
		1		Object	Objection noted.	No change.
GT1(10) – Greenacre,		1		Object	Objection noted.	No change.

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(Plot 5), Church Hill, Boughton Monchelsea						
GT1(11) – Chart View, Chart Hill Road, Chart Sutton		1		Object	Objection noted.	No change.
GT1(12) – Neverend Farm, Pye Corner, Ulcombe.			1	Give consideration to the potential use of the pond by protected species.	Comment noted. There is a condition on the current consent for the site requiring a biodiversity enhancement strategy for the site. This should be incorporated as a requirement in the policy	Amend Policy GT1(12) to include an additional criterion as follows: <u>5 – A biodiversity enhancement strategy for the site is approved.</u>
		2		Object; object even to the expansion of existing sites as there are already too many sites in this area	Government guidance in ‘Planning for Traveller Sites’ directs that councils should identify suitable sites in their Local Plans where there is an identified need for additional pitches. A comprehensive planning assessment of this site has found this site to be suitable for additional Gypsy and Traveller pitches.	No change.
GT1(13) – The Paddocks, George Street, Staplehurst	1			Support	Support welcomed.	No change.
		6		Object due to access issues, surface water flooding, this is an unsustainable location with poor pedestrian links to village as highlighted in the recent appeal decision for affordable housing off George Street, site is in the open countryside contrary to national guidance.	KCC Highways and the Environment Agency have not objected to this allocation. In April 2012, after the Planning for Traveller sites national guidance had been published, the appeal Inspector for this and the adjacent site (APP/U2235/A/11/2166525) determined that the location was suitable for permanent Gypsy sites. This included its suitability in terms of its proximity to services and transport links as the sites are within walking distance of local facilities.	No change.

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		5		There are too many Gypsy & Traveller sites. The existing community is being overwhelmed.	Government guidance in 'Planning for Traveller Sites' directs that councils should identify suitable sites in their Local Plans where there is an identified need for additional pitches. A comprehensive planning assessment of this site has found this site to be suitable for additional Gypsy and Traveller pitches. National planning policy in Planning for Traveller Sites does refer to councils ensuring 'sites in rural areas respect the scale of, and do not dominate, the nearest settled community'. Whilst some local residents strongly believe that the threshold of 'domination' has already been met in some parts of the borough, in practice Inspectors frequently test this against the capacity of local infrastructure (schools, medical facilities, for example) and are not supporting it as an argument at appeal, particularly when they must also give weight to the overall shortfall in the supply of Gypsy sites. The achievement of some alternative distribution of Gypsy sites is crucially dependant on there being alternative suitable sites which are demonstrably available for Traveller accommodation. Despite concerted efforts, a choice of such sites has not come forward.	No change.
		1		There is a risk of sites GT1(13) and (14) merging.	The site boundaries for these two allocations as defined in the Local Plan	No change.

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GT1(14) – Bluebell Farm, George Street, Staplehurst		6		Object due to access issues, surface water flooding, this is an unsustainable location with poor pedestrian links to village as highlighted in the recent appeal decision for affordable housing off George Street, site is in the open countryside contrary to national guidance.	shows clear separation between the sites. KCC Highways and the Environment Agency have not objected to this allocation. In April 2012, after the Planning for Traveller sites national guidance had been published, the appeal Inspector for this and the adjacent site (APP/U2235/A/11/2166525) determined that the location was suitable for permanent Gypsy sites. This included its suitability in terms of its proximity to services and transport links as the sites are within walking distance of local facilities.	No change.
		5		There are too many Gypsy & Traveller sites. The existing community is being overwhelmed.	Government guidance in ‘Planning for Traveller Sites’ directs that councils should identify suitable sites in their Local Plans where there is an identified need for additional pitches. A comprehensive planning assessment of this site has found this site to be suitable for additional Gypsy and Traveller pitches. National planning policy in Planning for Traveller Sites does refer to councils ensuring ‘sites in rural areas respect the scale of, and do not dominate, the nearest settled community’. Whilst some local residents strongly believe that the threshold of ‘domination’ has already been met in some parts of the borough, in practice Inspectors frequently test this against the capacity of local infrastructure (schools, medical facilities,	No change.

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				for example) and are not supporting it as an argument at appeal, particularly when they must also give weight to the overall shortfall in the supply of Gypsy sites. The achievement of some alternative distribution of Gypsy sites is crucially dependant on there being alternative suitable sites which are demonstrably available for Traveller accommodation. Despite concerted efforts, a choice of such sites has not come forward.	
		1	There is a risk of sites GT1(13) and (14) merging.	The site boundaries for these two allocations as defined in the Local Plan shows clear separation between the sites.	No change.
GT1(15) – Land rear of Granada, Lenham Road, Headcorn		2	Object. Too many sites in the area.	Government guidance in ‘Planning for Traveller Sites’ directs that councils should identify suitable sites in their Local Plans where there is an identified need for additional pitches. A comprehensive planning assessment of this site has found this site to be suitable for additional Gypsy and Traveller pitches. The achievement of some alternative distribution of Gypsy sites is crucially dependant on there being alternative suitable sites which are demonstrably available for Traveller accommodation. Despite concerted efforts, a choice of such sites has not come forward.	No change.
		1	The site should only be approved if it is part of the framework for Gypsy & Traveller sites in the Headcorn Neighbourhood Plan.	The emerging Headcorn Neighbourhood Plan (Regulation 14 version) proposes to set a limit on the number of permanent pitch consents to be granted in Headcorn	No change.

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					up to 2031 parish at 5 pitches. This approach applies an overall proportional approach to the distribution of future Gypsy pitches in the borough and does not appear to be based on an analysis of actual planning constraints in the parish and/or a search for available and suitable sites. It is not agreed that the neighbourhood plan's proposed limit is soundly based on planning grounds.	
GT1(16) – Blossom Lodge, Stockett Lane, Coxheath		1		Concern about the traffic implications for B2163 and Linton Crossroads	KCC Highways has raised no objection on highways grounds to this proposed allocation.	No change
		1		Criterion (2) should state 'existing' not 'exiting'; criterion (4) should refer to all the site boundaries; there should be strong protection of the public right of way and enforced implementation of the landscaping requirements.	<p>Agree that criteria (2) and (4) need amendment.</p> <p>It is a legal requirement for public rights of way to be kept open by landowners through the CROW Act. KCC Public Rights of Way team has responsibility for enforcement.</p> <p>Where non-compliance with conditions is identified, applicants are contacted to undertake the necessary action. If appropriate and proportionate, enforcement action may be taken.</p>	<p>Amend criteria (2) and (4) as follows:</p> <p>(2) Access to the site is via the existing <u>existing</u> access of Stockett Lane</p> <p>(4) A landscaping scheme for the site is approved which provides for the retention and future maintenance of the hedgerows and tree planting along the site's northern, southern, western and eastern boundaries and the native hedgerow bordering the public footpath which crosses the site.</p>

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Policy OS1 – Proposed new open space allocations						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Suggested amendments to policy wording	1	6	5	Policy should include blue spaces and improvements. As well as creating for new wet habitat, much could be done to improve the existing blue spaces adjacent or near to proposed developments.	Noted. The Council is currently progressing with a Green and Blue Infrastructure Strategy which once adopted will form the basis for a Supplementary Planning Document which will include qualitative standards for different types of green and blue space and provide detailed guidance to developers, partners and decision makers on future provision for both green and blue infrastructure.	No change.
				Policy is unjustified. Need to explain the rationale behind the open space allocations and how the figures have been arrived at. Some of the policies conflict with the parameters of approved planning consents whilst others will prejudice the proper delivery of sites before more detailed appraisal and master planning work has been undertaken.	It is acknowledged that the evidence base which justifies the approach was not made available alongside the Regulation 18 consultation document and this will be rectified for publication of the Regulation 19 Local Plan. A comprehensive review of the policy and supporting evidence has been undertaken in order to establish a more accurate and justified set of open space requirements. This has included a review of open space provision already secured through existing	Relevant OS1 and H1 policies to be amended to incorporate minimum or approximate quantum and, where possible, location and typology of open space where justified.

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				<p>planning consents.</p> <p>OS1 allocations have been taken forward and/or amended where justified, with corresponding amendments to H1 policies.</p> <p>Where there is an identified need for open space and capacity within the site to accommodate it but the precise location is to be determined later in the planning process, amendments to the relevant H1 policies are recommended.</p>	
			Consider providing a design brief for each open space recognising the benefits.	Supporting text for policy DM11 states the benefits of open space in terms of social interaction, inclusion, sports facilities and the positive impact upon the quality of the built environment and its benefits in terms of ecological value.	No change.
			Specify that amenity trusts for long-term management of open spaces are supported.	The council will expect future management and maintenance of new open spaces to be appropriately secured to the satisfaction of the council, which can include amenity trusts.	No change.
			Include the allocation of buffer zones to mitigate impacts of development.	The primary purpose of open space provision through OS1 is to provide public access to open space infrastructure. In some cases provision may also provide an element of landscape screening however issues of landscaping are covered, where necessary, in other policy criteria within	No change.

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					relevant H1 policies.	
				Question how the areas will be managed and whether they will be protected in perpetuity.	The council will expect future management and maintenance of new open spaces to be appropriately secured to the satisfaction of the council.	No change.
	3		1	All sites	Support is noted.	No change.
	3			1 East of Hermitage Lane (Bluebell Wood)	Support is noted. Since publication of the Regulation 18 consultation document this site has been granted planning permission on appeal. The inspector and Secretary of State have approved the principle of some residential development within this area and therefore the policy has been reviewed.	<p>Policy to be deleted with an amendment to Policy H1 (2) "Open Space": <u>Provision of 12.95ha of open space within the site comprising 6.62ha woodland/landscape buffers, 5.41ha amenity greenspace, 0.77ha of allotments (community orchard), 0.15ha of provision for children and young people and contributions towards outdoor sports facilities at Giddyhorn Lane. Development should maximise the use of the southern part of the site including Bluebell Wood and the "hospital field" for the provision of open space, making best use of existing features within the site.</u></p> <p>Corresponding amendment to Policy H1 (2) "Community Infrastructure": <u>The use of the north western part of the site (land to the north of the restricted byway and south of the borough boundary) for the siting of</u></p>

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						community infrastructure is strongly encouraged.
	3			2 Oakapple Lane, Barming	Support is noted.	Policy to be carried forward to Regulation 19 Local Plan with the following amendment: <u>“1.5ha of natural /semi natural open space.”</u> Corresponding amendment to Policy H1 (4) “Open Space”: <u>Provision of open space in accordance with Policy OS1 (1) together with any additional on-site provision and/or contributions towards off-site provision/improvements as required in accordance with Policy DM11.</u>
	3			4 Bicknor Farm, Otham	Support is noted. However representations received from landowners/developers of the site have identified that the site will not be made available for public open space unless an element of housing development is incorporated. The site is therefore not deliverable and cannot be allocated for public open space.	Policy to be deleted with an amendment to Policy H1 (9) “Open Space”: <u>Provision of a minimum of 2.3ha of open space provision within the site together with contributions towards off-site provision/improvements as required in accordance with Policy DM11. Open space should be sited to maximise accessibility to new and existing residents.</u>
	2			5 south of Sutton Road, Langley	Support is noted.	Policy to be carried forward to Regulation 19 Local Plan with the following amendment: <u>14.00ha of natural/semi-natural open space.</u>

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						Corresponding amendment to Policy H1 (10) "Open Space": <u>Provision of open space in accordance with Policy OS1 (3) together with any additional on-site provision and/or contributions towards off-site provision/improvements as required in accordance with Policy DM11.</u>
	3			6 S of Ashford Rd., Harrietsham	Support is noted.	<p>Policy to be carried forward to Regulation 19 Local Plan with the following amendment: <u>1.37ha of natural/semi-natural open space and 0.5ha of allotments.</u></p> <p>Corresponding amendment to Policy H1 (26) "Open Space": <u>Provision of open space in accordance with Policy OS1 (4) together with contributions towards outdoor sports facilities and provision for children and young people at Glebe Fields.</u></p>
	3			7 Church Road, Harrietsham	Support is noted.	<p>Policy to be carried forward to Regulation 19 Local Plan with the following amendment: <u>"1.22 0.91ha of natural/semi natural open space.</u></p> <p>Corresponding amendment to Policy H1 (28) "Open Space": <u>Provision of open space in accordance with Policy OS1 (5) together with contributions towards outdoor sports facilities and equipped areas at Booth Field and</u></p>

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					<u>Glebe Field. Additional on-site provision and/or contributions towards off-site provision/improvements as required in accordance with Policy DM11.</u>	
	44			8 Tongs Meadow, Harrietsham	Support is noted. However comments received from landowners/developers of the site have identified that the site will not be made available for public open space unless an element of housing development is incorporated. The site is therefore not deliverable and cannot be allocated for public open space.	No direct change.
	1			10 Hen & Duckhurst Farm	Support is noted.	Policy to be deleted with an amendment to Policy H1 (36) "Open Space": <u>Provision of a minimum of 4.66ha of formal/semi-natural/allotment open space provision within the site together with contributions towards Lime Trees Playing Fields.</u>
	1			11 Fishers Farm, Staplehurst	Support is noted.	Policy to be deleted with an amendment to Policy H1 (37) "Open Space": <u>Provision of a minimum of 4.47ha of natural/semi natural open space provision within the site together with contributions towards off-site provision/improvements required in accordance with Policy DM11. Should the site be sub-divided through the development management process proportionate</u>

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						<p><u>provision/contributions will be required. Open space should be sited to maximise accessibility to new and existing residents.</u></p>
	1			12 N of Henhurst Farm.	Support is noted.	<p>Policy to be carried forward to Regulation 19 Local Plan with the following amendment: "5.78ha <u>1.22 of natural/semi natural open space.</u></p> <p>Corresponding amendment to Policy H1 (68) "Open Space": <u>Provision of open space in accordance with Policy OS1 (10) together with additional on/off-site provision and/or contributions towards off-site provision/improvements as required in accordance with Policy DM11. Open space should be sited to maximise accessibility to new and existing residents.</u></p>
	1			16 Former Syngenta Works	Support is noted.	<p>Policy to be carried forward to Regulation 19 Local Plan with the following amendment: "26.20ha <u>4.4ha of natural /semi natural open space."</u></p> <p>Corresponding amendment to Policy RMX1 (5) "Open Space": <u>Provision of open space in accordance with Policy OS1 (14) together with additional on/off-site provision and/or contributions towards off-site provision/improvements as required</u></p>

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						<p><u>in accordance with Policy DM11. Open space should be sited to maximise accessibility to new and existing residents.</u></p>
<p>Suggested amendments to size/boundary of area of proposed open space.</p>		11	5	<p>Sites 1, 7 & 9 - Open space allocations should reflect planning permission.</p>	<p>A full review of the policy and supporting evidence has been undertaken in order to establish a more accurate picture of open space provision secured through existing planning consents. Where necessary amendments to OS1 and/or H1 policies have been recommended.</p>	<p>Site 1: Policy to be deleted with an amendment to Policy H1 (2) "Open Space": <u>Provision of 12.95ha of open space within the site comprising 6.62ha woodland/landscape buffers, 5.41ha amenity greenspace, 0.77ha of allotments (community orchard), 0.15ha of provision for children and young people and contributions towards outdoor sports facilities at Giddyhorn Lane. Development should maximise the use of the southern part of the site including Bluebell Wood and the "hospital field" for the provision of open space, making best use of existing features within the site.</u></p> <p>Corresponding amendment to Policy H1 (2) "Community Infrastructure": <u>The use of the north western part of the site (land to the north of the restricted byway and south of the borough boundary) for the siting of community infrastructure is strongly encouraged.</u></p> <p>Site 7: Policy to be carried forward to Regulation 19 Local Plan with the following amendment: "1.22 <u>0.91ha of</u></p>

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					<p><u>natural/semi natural open space.</u></p> <p>Corresponding amendment to Policy H1 (28) "Open Space": <u>Provision of open space in accordance with Policy OS1 (5) together with contributions towards outdoor sports facilities and equipped areas at Booth Field and Glebe Field. Additional on-site provision and/or contributions towards off-site provision/improvements as required in accordance with Policy DM11.</u></p> <p>Site 9: Policy to be carried forward to Regulation 19 Local Plan with the following amendment: "3.20 <u>2.16ha of natural/semi natural open space.</u></p> <p>Corresponding amendment to Policy H1 (34) "Open Space": <u>Provision of open space in accordance with Policy OS1 (7) together with a minimum of 0.85ha of allotments/amenity green space/provision for children and young people and contributions towards Marden Playfield Fields.</u></p>
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				<p>Sites 10, 11 & 13 - exact location of the open space to be determined in later stages.</p>	<p>Noted and agreed. There is an identified need for open space and capacity to accommodate provision within each of these sites. Amendments to relevant H1 policies are therefore recommended to stipulate the minimum or approximate quantitative requirements for open space provision within each site.</p>	<p>Site 10: Policy to be deleted with an amendment to Policy H1 (36) "Open Space": <u>Provision of a minimum of 4.66ha of formal/semi-natural/allotment open space provision within the site together with contributions towards Lime Trees Playing Fields.</u></p> <p>Site 11: Policy to be deleted with an amendment to Policy H1 (37) "Open Space": <u>Provision of a minimum of 4.47ha of natural/semi natural open space provision within the site together with contributions towards off-site provision/improvements required in accordance with Policy DM11. Should the site be sub-divided through the development management process proportionate provision/contributions will be required. Open space should be sited to maximise accessibility to new and existing residents.</u></p> <p>Site 13: Policy to be deleted with an amendment to Policy H1 (39) "Open Space": <u>Provision of a minimum of 1.50ha of natural/semi-natural open space within the site together with contributions towards Hoggs Bridge Green Play Area. Open space should be sited to maximise accessibility to</u></p>
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						<u>new and existing residents.</u>
				Site 12 (north of Henhurst Farm, Staplehurst) - Open space allocation should include a residential element. – representation by agents	There is sufficient justification for the identification of this area of land for allocation as open space/undeveloped land/ecological mitigation however it is recognised that the need for publically accessible open space generated by this development is lower than previously identified.	<p>Policy to be carried forward to Regulation 19 Local Plan with the following amendment: <u>“5.78ha 1.22 of natural/semi natural open space.</u></p> <p>Corresponding amendment to Policy H1 (68) “Open Space”: <u>Provision of open space in accordance with Policy OS1 (10) together with additional on/off-site provision and/or contributions towards off-site provision/improvements as required in accordance with Policy DM11. Open space should be sited to maximise accessibility to new and existing residents.</u></p>

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				<p>Site 14 (south of Grigg Lane, Headcorn) - Enlarge open space allocation & shift south towards River Sherway</p>	<p>There is sufficient justification for the identification of this area of land for allocation as open space/undeveloped land however it is recognised that the need for publically accessible open space generated by this development is lower than previously identified.</p>	<p>Policy to be carried forward to Regulation 19 Local Plan with the following amendment: <u>"2.40ha 1.18 of natural/semi natural open space.</u></p> <p>Corresponding amendment to Policy H1 (41) "Open Space": <u>Provision of open space in accordance with Policy OS1 (12) together with additional on/off-site provision and/or contributions towards off-site provision/improvements as required in accordance with Policy DM11.</u></p>
				<p>Site 15 (north of Heath Road, Coxheath) - Open space provision, in excess of the requirements of draft policy DM11, already proposed (H1(75))</p>	<p>There is sufficient justification for the identification of this area of land for allocation as open space/undeveloped land/ecological mitigation however it is recognised that the need for publically accessible open space generated by this development is lower than previously identified.</p>	<p>Policy to be carried forward to Regulation 19 Local Plan with the following amendment: <u>"2.34ha 1.12 of natural /semi natural open space."</u></p> <p>Corresponding amendment to Policy H1 (75) "Open Space": <u>Provision of open space in accordance with Policy OS1 (13) together with additional on/off-site provision and/or contributions towards off-site provision/improvements as required in accordance with Policy DM11. Open space should be sited to maximise accessibility to new and existing residents and should provide for connectivity to existing open spaces.</u></p>

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			<p>Site 5 (south of Sutton Road, Langley) - Expand to include whole site proposed for housing. - all the land to the east of the golf driving range should be shown as open space.</p> <p>Objection to arbitrary line forming western part of allocation.</p>	<p>The site is proposed for allocation to deliver some 800 units and therefore restricting the developable area as proposed would result in an unacceptable development density.</p> <p>The western boundary of the OS1 allocation follows an existing field boundary.</p>	<p>Policy to be carried forward to Regulation 19 Local Plan with the following amendment: <u>14.00ha of natural/semi-natural open space.</u></p> <p>Corresponding amendment to Policy H1 (10) "Open Space": <u>Provision of open space in accordance with Policy OS1 (3) together with any additional on-site provision and/or contributions towards off-site provision/improvements as required in accordance with Policy DM11.</u></p>
			<p>Site 10 (Hen & Duckhurst Farm) - Eastern section 'green wedge' should extend further south.</p> <p>Western section should provide a boundary to future expansion to the west, (in line with emerging Neighbourhood Plan).</p>	<p>Noted. There is an identified need for open space and capacity to accommodate provision within this site. Amendments to the relevant H1 policy are therefore recommended to stipulate the minimum requirements for open space provision within the site. The primary purpose of open space requirements in the Local Plan is to provide public access to open space infrastructure.</p>	<p>Policy to be deleted with an amendment to Policy H1 (36) "Open Space": <u>Provision of a minimum of 4.66ha of formal/semi-natural/allotment open space provision within the site together with contributions towards Lime Trees Playing Fields.</u></p>
			<p>Site 4 (Bicknor Farm, Otham) - Boundary drawn out of alignment through a private garden.</p>	<p>Noted.</p>	<p>Policy to be deleted with an amendment to Policy H1 (9) "Open Space": <u>Provision of a minimum of 2.3ha of open space provision within the site together with contributions towards off-site provision/improvements as required in accordance with Policy DM11. Open</u></p>

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					<u>space should be sited to maximise accessibility to new and existing residents.</u>
Suggested deletions	1		Site 8 (Tongs Meadow, Harrietsham) - Unclear how the extent of allocated open space is justified or which growth the allocation is related to. The policy is contrary to NPPF. The site should be allocated for housing development.	Noted and partially agree. It is accepted that the draft allocation did not relate to any specific development sites in the Local Plan. The developer has confirmed that the land will not be made available for public open space unless an element of housing is included – which is not proposed. The draft open space allocation is therefore not deliverable and should not be allocated for public open space.	Policy to be deleted.
			Site 11 (Fishers Farm, Staplehurst) Do not believe that the site can accommodate 6.24 ha. of open space. Any requirement for open space should take account of the fact that two developers are pursuing applications on separate parts of the site.	Noted and agreed. There is an identified need for open space and capacity to accommodate provision within this site. Amendments to the relevant H1 policy are therefore recommended to stipulate the minimum requirements for open space provision at 4.47ha. A further amendment to the policy requires proportionate contributions should the site be sub-divided.	Policy to be deleted with an amendment to Policy H1 (37) “Open Space”: <u>Provision of a minimum of 4.47ha of natural/semi natural open space provision within the site together with contributions towards off-site provision/improvements required in accordance with Policy DM11. Should the site be sub-divided through the development management process proportionate provision/contributions will be required. Open space should be sited to maximise accessibility to new and existing residents.</u>

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		1		Site 12 (north of Henhurst Farm) - should not be allocated for housing so the open space is not required.	Not accepted. The site is proposed for allocation for some 60 units and has capacity to deliver open space.	<p>Policy to be carried forward to Regulation 19 Local Plan with the following amendment: <u>“5.78ha 1.22 of natural/semi natural open space.”</u></p> <p>Corresponding amendment to Policy H1 (68) “Open Space”: <u>Provision of open space in accordance with Policy OS1 (10) together with additional on/off-site provision and/or contributions towards off-site provision/improvements as required in accordance with Policy DM11. Open space should be sited to maximise accessibility to new and existing residents.</u></p>
		1		Site 15 (North of Heath Road, Coxheath) - Need for this open space is not demonstrated; the local community should not have to meet the costs of the open space; the developer/landowner should meet the costs.	<p>It is acknowledged that the evidence base which justifies the approach was not made available alongside the Regulation 18 consultation document and this will be rectified for publication of the Regulation 19 Local Plan.</p> <p>The revised open space requirement represents a justifiable level of provision.</p>	<p>Policy to be carried forward to Regulation 19 Local Plan with the following amendment: <u>“2.34ha 1.12 of natural /semi natural open space.”</u></p> <p>Corresponding amendment to Policy H1 (75) “Open Space”: <u>Provision of open space in accordance with Policy OS1 (13) together with additional on/off-site provision and/or contributions towards off-site provision/improvements as required in accordance with Policy DM11. Open</u></p>

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						<p><u>space should be sited to maximise accessibility to new and existing residents and should provide for connectivity to existing open spaces.</u></p>
		1		<p>Sites 13 & 14 (Ulcombe Road+ south of Grigg Lane, Headcorn) – opposed to allocations unless sites are accessible from village and provide benefit to residents.</p>	<p>Noted. Policy to be amended to state that open space should be sited to maximise accessibility to new and existing residents.</p>	<p>Site 13: Policy to be deleted with an amendment to Policy H1 (39) “Open Space”: <u>Provision of a minimum of 1.50ha of natural/semi-natural open space within the site together with contributions towards Hoggs Bridge Green Play Area. Open space should be sited to maximise accessibility to new and existing residents.</u></p> <p>Site 14: Policy to be carried forward to Regulation 19 Local Plan with the following amendment: “2.40ha <u>1.18 of natural/semi natural open space.</u></p> <p>Corresponding amendment to Policy H1 (41) “Open Space”: <u>Provision of open space in accordance with Policy OS1 (12) together with additional on/off-site provision and/or contributions towards off-site provision/improvements as required in accordance with Policy DM11.</u></p>
Suggested additions		1		<p>Include land south of Pleasant Valley Lane, East Farleigh, (adjacent to land north of Heath Road (Olders Field), Coxheath).</p>	<p>The site was not submitted in response to the open space Call for Sites.</p>	<p>No change.</p>

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Policy DM11 – Open space and recreation						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Principle of policy	5	2		Support for policy.	Noted and welcomed.	No change.
				<p>Policy is unjustified and not based on robust evidence. Standards should be applied on a case-by-case basis with an understanding of viability as well as in the context of local needs.</p>	<p>It is acknowledged that the evidence base which justifies the approach was not made available alongside the Regulation 18 consultation document and this will be rectified for publication of the Regulation 19 Local Plan.</p> <p>The draft policy already establishes that the council will take account of existing provision in accordance with the quantitative and accessibility standards and where this may wholly or partially mitigate the impacts of development, the council may seek a reduced contribution.</p> <p>It is accepted that modifications would provide greater clarity and therefore amendments are recommended.</p>	<p>Where it can be demonstrated that existing open space provision can either wholly or partially mitigate the impacts of development in accordance with the above standards, the Council may seek a reduced <u>level of provision or financial contribution</u>. <u>Developers should take full account of open space requirements at an early stage of the development management process and are encouraged to engage with the council's Parks and Open Space team to determine the most appropriate quantum, type and location of open space provision.</u></p> <p><u>The council will operate the policy flexibly to secure the provision of the typologies of open space which are most needed in the relevant area, taking account of the above standards</u></p>

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						and the suitability of the site to accommodate the identified needs.
				Policy needs reappraisal unless most provision will be off-site.	A full review of the policy and supporting evidence has been undertaken in order to establish where open space can be located with development sites in accordance with DM11. Off-site provision is likely to be most appropriate in some cases.	No change.
Technical considerations		1	5	Delete the outdoor sports standards from Point 1 as they are not based on a robust and up-to-date evidence base. Indoor sports facilities should be specifically stated in point 1.	1.6ha / 1000 people is an interim standard pending further work. This is in accordance with the Fields in Trust standard of 1.6ha/ 1000 population. Indoor sports facilities requirements will be reviewed as part of the updated evidence base. However, Indoor sports will not form part of an outdoor open space policy, but will be part of an community infrastructure policy.	No change to policy. Further evidence work will be undertaken in respect of outdoor and indoor sports provision.
				Residential development must be accompanied by the provision of public open space. This must not be seen as land for future residential development.	Noted and agreed. Where there is a need for addition open space as a result from development, and capacity to deliver provision within the site, the council has identified suitable sites to secure the provision of open space through Policy OS1 allocations and H1 policies.	No change.
				Remove "seek to" to give more positive approach to this policy.	Noted.	No change.

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			<p>Include a statement as to where any financial contribution towards off-site provision is spent. Any such contribution should be used to improve/upgrade local facilities rather than any further afield.</p>	<p>Noted and partially agreed. It is important to retain some flexibility in the operation of the policy and this is particularly appropriate for off-site contributions where the condition of facilities can change over time. The policy requires that financial contributions should be used towards provision/improvement of facilities within the relevant accessibility standards.</p>	<p>In such cases the council will seek to secure high quality, significant structural landscaping to compensate for the non-provision of open space and ensure a high quality environment is secured for future residents. <u>Financial contributions will be used towards the provision, improvement, maintenance and/or refurbishment of open space within the appropriate accessibility standard(s).</u></p>
			<p>Unclear how the draft standard (ha/1000 population) will be implemented. How will residential developments be translated into population and will people employed in mixed use development schemes count towards the population figure.</p>	<p>It is acknowledged that the evidence base which justifies the approach was not made available alongside the Regulation 18 consultation document and this will be rectified for publication of the Regulation 19 Local Plan. Further detail will also be set out within the Open Space SPD.</p> <p>Policy DM11 sets out the draft standard per 1000 population for residential developments and also mixed use developments. The policy does not take account of the number of people employed within an area.</p>	<p>No direct change but further information will be made available through the evidence base and Open Space SPD.</p>
			<p>It is important that children's play space is provided on-site.</p>	<p>Noted and partially agreed. Where justified and there is sufficient capacity within a site, provision of on-site play space can be appropriate. Some sites do not generate sufficient need to meet the minimum size of facility threshold however whilst for other sites it may be more appropriate to improve existing facilities in the locality.</p>	<p>No change as DM11 facilities on site provision of play space where appropriate.</p>

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Policy DM42 – Nursing and care homes						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Principles underlying policy	6	3	6	The policy should also apply to brownfield sites/existing care homes outside the urban area, rural service centres or larger villages. Could result in reduced parking requirements and fewer trips as a result of fewer visitors and lower staff numbers; Nursing and care homes should be an “exception site” and allow construction/purchase outside of the village boundary.	<p>The wording of the current draft policy sets out the approach to nursing and residential care homes in the main settlements. It is justified on the basis that the identified main settlements have the best levels of accessibility by public transport.</p> <p>It is, however, acknowledged that:-</p> <ol style="list-style-type: none"> 1. there may be existing nursing/care homes in the rural area which can be suitably extended ; and 2. there may well be existing buildings in rural locations which readily lend themselves to conversion to such a use. <p>Policy DM32 ‘Conversion of rural buildings’ enables changes of use of buildings in rural areas (subject to compliance with certain criteria) to uses which may include nursing and care homes. Whilst the scope for the use of sustainable transport may be reduced in such locations, the NPPF</p>	Amend para. 10.3 as follows for clarity:- “Nursing and care homes fall within the C2 use class (residential institutions). The identified need for additional nursing and care home places will be addressed through the granting of planning consents. Planning applications for nursing and care homes <i>in the identified settlements</i> will be assessed using the following policy. Such homes are places of work as well as residences and proposals for <i>new build and redevelopment</i> should be located within the borough’s identified main settlements which have the best levels of accessibility by public transport. <i>Proposals for the conversion of rural buildings to nursing and care homes will be assessed using Policy DM32 whilst an extension to an existing care home located in the rural area will be</i>

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				recognises that “.....opportunities to maximise sustainable transport solutions will vary from urban to rural areas” and specifies that “To promote a strong rural economy, local ...plans should: <ul style="list-style-type: none"> • support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings” 	<i>considered under Policy DM37.</i> Commensurate on-site parking will be required for both staff and visitors.”
			Difficult to implement criterion 2 (re. sufficient parking and in a manner that does not diminish the character of the street scene.)	This criterion will be applied through the operation of the development management process in the determination of a planning application in conjunction with the application of the parking standards.	No change
			Include a requirement that developments should be in a location that can be properly supported by the local ambulance service.	This is not a matter which can reasonably be the subject of a criterion in the policy. The ambulance service is obligated to serve these – and all other – uses irrespective of their scale, location	No change
Proposed allocation		1	Allocate land to the south east of the junction of New Cut Road and Bearsted Road for a nursing/ care home. Site is in close proximity to the Kent Institute of Medical Science and the proposed medical campus at Newnham Park (ref. 13/1163.)	In May 2015, a Planning Inspector dismissed the subsequent appeal (decision ref. APP/U2235/W/15/3002874) following MDC’s refusal of planning permission for “8 houses with garage and front and rear gardens”. The Inspector concluded that “.....the proposal would be harmful in terms of its	No change

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					<p>impact on the landscape arising from both the proposed dwellings and the required acoustic boundary fencing. Significant weights can be given to those harms on the basis of the quality of the landscape setting. The significant weights arising from the harms identified outweigh the limited weight in favour of the proposal.”</p> <p>It should be noted that this conclusion was reached despite MBC being unable to demonstrate the existence of a 5 year housing land supply which is why the Inspector undertook the planning balance approach in his assessment.</p> <p>It is considered that the same factors would apply to the prospect of a nursing home on the site such that it would be unacceptable in principle.</p>	
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Policy PKR1 (1) & (2) – deletion of park & ride						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
PKR1 (1) Linton Crossroads	11	3	3	<p>Deleting this site will not enable any relief for access to Maidstone from the south.</p> <p>Give urgent consideration to alternative layouts, such as a roundabout.</p>	<p>With respect to access from the south, a package of highway capacity improvements on A274/A229 has been developed to mitigate the impacts of increased traffic flows. To complement these capacity improvements for general traffic, bus priority proposals have also been developed which will protect buses from residual queues and delays. .</p>	No change
PKR1 (2) Old Sittingbourne Road	1	11	6	<p>Need a replacement service.</p> <p>State that “removal should only be permitted subject to a suitable alternative facility of at least equivalent capacity.”</p>	<p>The County Council’s comment is noted. The apparent contradiction to its response to Policy DM15, which provides no support for the provision of bus measures, is also noted.</p> <p>The merit in only losing a facility once a replacement is provided is acknowledged. However, the Sittingbourne Road site is being deleted because the landowner states the land is no longer available and there is a lack of potentially suitable sites available.</p>	No change

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					Increases in the quality and frequency of bus services are proposed as part of the comprehensive measures, including on the A249 corridor currently served by the Sittingbourne Road Park & Ride service.	
General	1		1	Should not be removed due to improving traffic congestion and air quality.	Noted. The importance of park and ride facilities is acknowledged. Policy DM15 looks to identify sites and identify criteria that they are required to meet. The draft Integrated Transport Study will set out the overall framework for transport planning in the borough. It will provide a programme of specific schemes to support the growth proposed in the Local Plan. The aim is to deliver a package of highway improvements throughout the Borough which will add capacity at key junctions to the benefit of both public transport and car users.	No change

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Policy DM15 – Park and Ride						
Key Issue	No. in support	No. of objections	No. of observations	Detail	Officer Response	Officer Recommendation
Overall response	4	2	5	<p>Opportunities need to be taken to create new sites wherever practical, particularly on strategic corridors such as Sutton Road, where land is earmarked for other developments.</p> <p>Improved bus services to the town centre and railway stations of Bearsted, Maidstone East and Maidstone West will be imperative should all the proposed development be approved or Willington Street will be full.</p> <p>Should be more pro-active in finding sites in south and west.</p> <p>Need to replace the closed Armstrong Road site to relieve problems from Langley</p>	<p>Policy DM15 sets the criteria against which proposals for new or replacement Park & ride sites will be considered.</p> <p>KCC states that there is no support for the provision of bus measures, including bus lanes, as the benefits they achieve do not represent good value when compared with highway capacity schemes that will deliver overall improvements in traffic flow. The draft Integrated Transport Study is the document which will set out the overall framework for transport planning in the borough. It will provide a programme of specific schemes to support the growth proposed in the Local Plan. The aim is to deliver a package of highway improvements throughout the Borough which will add capacity at key junctions to the benefit of both public transport and car users.</p> <p>A draft of the strategy was brought to 1st</p>	No change to Policy DM15.

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			<p>westwards.</p> <p>Policy conflicts with Local Highway Authority and Joint Transportation Board who have consistently demonstrated no support for the provision of bus measures, including bus lanes, as the benefits they achieve do not represent good value when compared with highway capacity schemes that will deliver overall improvements in traffic flow.</p> <p>New park and ride facilities should only be provided where existing public transport services cannot be improved (in order to prevent users of existing public transport driving to park and ride facilities thus reducing the viability of rural bus services).</p>	<p>December meeting of the Strategic Planning Sustainability and Transport Committee. With respect to access from the south, a package of highway capacity improvements on A274/A229 has been developed to mitigate the impacts of increased traffic flows. To complement these capacity improvements for general traffic, bus priority proposals have been developed which will protect buses from residual queues and delays, contributing to quick and reliable bus services toward Maidstone town centre, with largely continuous bus priority between Wallis Avenue and Armstrong Road. Increases in the quality and frequency of bus services are also proposed as part of the comprehensive measures, including on the A249 corridor currently served by the Sittingbourne Road Park & Ride service.</p>	
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