

APPENDIX B – Balance of issues raised by respondents to the Maidstone Borough Local Plan 2014 consultation and officer responses

Policy No.	Policy title	No. in support	No. of objections	No. of observations	Key issues arising	Officer response	Officer recommendation
SS1	Spatial Strategy	14	239	23	1. The objectively assessed need figure of 19,600 dwellings:		
					The figure is too high. Objectors suggest various figures generally ranging from 11,000 to 15,500.	The housing requirement of 18,560 dwellings is derived from the Strategic Housing Market Assessment which has been undertaken in line with the guidance in the NPPG and using the latest ONS/CLG population and housing projections as its starting point. This work has been tested, including through the council's joint working with Ashford and Tonbridge & Malling Boroughs, and has been found to be a robust and credible assessment of future housing needs. The population and household projections take account of the need arising from London's growth. In June 2015 the Strategic Planning, Sustainability and Transport Committee specifically considered whether additional account should be taken for migration from London in the borough's objectively assessed need figure and concluded that such an approach was not merited. The housing trajectory in the Local Plan will illustrate how this number of homes will be delivered over the 20 year plan period.	No change
				The methodology behind the figure is flawed			
				The figure results from atypical recent trends			
				Population growth cannot be projected accurately			
				This number of homes is not needed			
				This number of homes is not deliverable			
				The figure should take account of the unmet requirement resulting from the Plan for London.			

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					2. Scale of housing proposed in the draft Local Plan:		
					Is too high. It will adversely impact on the character of the borough, on the quality of life of existing residents, on air pollution and on wildlife habitats. It will result in the loss of greenfield land and agricultural land. Traffic impacts have not been fully assessed.	The Regulation 19 version of the Local Plan will provide for the full objectively assessed (OAN) need for 18,560 new homes. The NPPF is clear that authorities should plan positively to meet OAN. A comprehensive search for suitable sites has been undertaken through the SHLAA and this has identified a number of brownfield sites for allocation but the scale of the housing need is such that some greenfield land is also needed. Sites have been assessed comprehensively and consistently through the SHLAA to ensure that those which are the most sustainable have been allocated in the Local Plan. Where necessary, the site allocation policies include appropriate measures to help mitigate the impacts of development, for example in terms of highway impacts, landscape impacts or impacts on heritage assets. The Regulation 19 version of the Local Plan will be accompanied by the Integrated Transport Strategy which will set out the strategy and the specific highway and transportation measures which will support the growth identified in the Local Plan.	No change
				Is too low. It does not meet the objectively assessed need. Overriding infrastructure and/or environmental constraints have not been sufficiently demonstrated.			
					Windfall developments have not been given sufficient allowance in the housing figures	The 20 year housing trajectory includes an allowance for windfall sites coming forward in the latter years of the Plan period. The proposed allowance of 114	No change

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						<p>dwelling/annum is based on analysis of past rates and takes account of there being fewer unidentified sites in the future as an outcome of the comprehensive site search process that has been undertaken as the Plan has been prepared.</p>	
					<p>Has been based on the availability of land rather than following a 'place-led' assessment of capacity.</p>	<p>The spatial distribution of development is in line with the NPPF which requires the Local Plan to identify key sites which are critical to the delivery of the housing strategy over the plan period, and to identify a supply of specific developable sites or broad locations for growth. In order for sites to be developable they must be available. The NPPF requires local authorities to aim positively to meet development needs. The capacity of infrastructure to serve additional development has been tested as the Plan has progressed and the accompanying Infrastructure Delivery Plan will set out in detail the infrastructure needed to support development. The Landscape Sensitivity work has also helped to identify the sites with higher or lower capacity for development.</p>	No change
					<p>Gypsy and Traveller pitch requirement is too high</p>	<p>The revised definition of Gypsies and Travellers issued on 31st August 2015 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. The 2012 Assessment identified a need for 187 pitches</p>	No change

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						(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.	
					3. Spatial distribution of housing:		
					Dispersed strategy will result in urban sprawl.	Support for the dispersed spatial strategy is welcomed.	No change
					Too much growth has been allocated to the rural areas. There should be more growth in Maidstone where the jobs are.	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 set out in the emerging Green and Blue Infrastructure Strategy. The overall provisions of the Local Plan help to avoid unplanned urban sprawl.	
					Development should be more evenly spread to include a wider range of smaller rural settlements		
					Development to the NW and SE of Maidstone will adversely impact on transport and local character.	The Sustainability Appraisal has assessed a number of options for the dispersal of development and takes account of various environmental, economic, and social factors. The Local Plan's dispersed strategy provides for the majority of future growth at the borough's main settlement of Maidstone but also recognises that the other identified settlements have the potential to accommodate some, more limited growth over the 20	
					More brownfield sites should be found in the town centre and in Maidstone urban area. Brownfield sites should be used before greenfield sites.		
					A new town should be proposed along A20 corridor.		

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					Support for the dispersed pattern of development	year plan period. This strategy has the key benefit of being inherently deliverable as it make best use of existing infrastructure and also provides some choice to the market. This is in contrast with a strategy which relies on a major urban extension or new town which requires significant new infrastructure and will therefore take longer to be delivered. The settlements suitable for new development have been identified through an assessment of facilities and services.	
					A systematic evaluation of alternative options is lacking	<p>The Regulation 19 version of the Local Plan will be supported by an Integrated Transport Strategy which will set out the transport measures needed to support the growth identified in the Local Plan.</p> <p>An extensive search for brownfield sites has taken place (through the SHLAA) and all the sites found to be suitable and deliverable/developable have been identified in the Local Plan. The OAN is such that some greenfield land also needs to be developed.</p>	
					Better protection for villages adjacent to the AONB and to areas of Local Landscape Value	Policy SP5 (Reg 19 Policy SP17) is considered to afford 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	No further change

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						<p>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 (Reg 19 DM3) Historic and Natural Environment and DM30 (Reg 19 DM34) Design Principles in the Countryside afford protection and enhancement of the countryside and should be given due consideration during the development management process.</p>	
					4. Infrastructure:		
					<p>Infrastructure provision is insufficient to match the scale of development. There will be adverse impacts on schools, health facilities, water supply and sewerage. Infrastructure should be provided before the new homes. There is a lack of clarity about infrastructure requirements.</p>	<p>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.</p> <p>The Integrated Transport Strategy sets out the specific transport measures which will support the growth planned for in the Local Plan.</p>	No change
				There is no Integrated Transport Strategy in support of the Local Plan	The Integrated Transport Strategy and the		

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						Infrastructure Delivery Plan will be available together with the Reg. 19 version of the Local Plan.	
					5. Employment/Retail		
					There is insufficient employment land identified to match the scale of proposed housing	Following the completion of the Qualitative Employment Sites assessment (2014), the updated employment land position was set out in a report to Planning, Transport and Development Overview and Scrutiny Committee on 21 st October 2014. The sites now identified in Policies EMP1 and RMX1 of the Regulation 19 version of the Local Plan address the need for additional B class floorspace (offices, industry, warehousing) in terms of both quantity and quality over the Plan period. The sites provide opportunities at Maidstone, including at Junctions 7 and 8 of M20, and at the Rural Service Centres. Retail needs will be met through the specific site allocations in the Local Plan and, in the longer term, the retail-led redevelopment of The Mall.	No further change.
				More employment land is needed in the Rural Service Centres			
				More employment land is needed at motorway junctions			
				The characteristics of the identified employment sites do not meet the full range of needs			
				Convenience and comparison retail needs should be met in full			
					Junction 7 is not an appropriate location for any development and/or	The spatial strategy (Policy SS1) sets out the settlement hierarchy for the distribution of development across the	No change

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					for retail	Borough. The principal focus for development is Maidstone urban area, which includes the strategic location identified at Junction 7 for additional business provision in association with a new medical campus. The medical campus development has outline planning consent. Newnham Court is an existing retail destination and the Local Plan allocation policy provides for the redevelopment and modest expansion of this shopping village.	
					The economic forecasting approach is flawed and results in a higher employment land requirement than is needed.	The Qualitative Employment Sites assessment (2014) has been undertaken by independent consultants, and forms part of the robust evidence base underpinning the Local Plan. The assessment considered a number of alternative economic scenarios in order to help identify the scale of economic growth which the Plan could appropriately provide for.	No change
					6. Countryside		
					The countryside should be protected for its own sake	The Plan as a whole limits what development is considered appropriate for the countryside, and therefore should be read as a whole. In particular Policies SP5 (Reg 19 SP17) Countryside, DM10 (Reg 19 DM3) Historic and Natural Environment and DM30 (Reg 19 DM34) Design Principles in the Countryside afford protection and enhancement of the countryside and	No change

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						will be applied during the development management process.	
					7. Joint working:		
					KCC and MBC need to have meaningful agreement on housing numbers and infrastructure requirements	KCC and MCB have had continuous dialogue through the Joint Transportation Board on matters relating to transport, and other infrastructure requirements through input sought from the County Council on the Infrastructure Delivery Plan (IDP).	No change
					There should be better co-operation with adjoining authorities to achieve a joined up approach to planning	The Council has undertaken a series of Duty to Cooperate meetings with neighbouring authorities to discuss cross boundary issues. The Duty to Cooperate Statement, which will be a record of these discussions and their outcomes, and the IDP will form part of the submission of the Local Plan for examination.	
					Better account should be taken of neighbourhood plans	Neighbourhood Plans are required to be prepared in accordance with national and adopted local planning policy. The Regulation 19 version of the Local Plan has been amended to set out more clearly the relationship between neighbourhood plans and the Local Plan.	Amend the Regulation 19 version of the Local Plan (key influences chapter) to strengthen reference to neighbourhood planning.
SP1 (Reg	Maidstone Town Centre	11	8	7	Retail offer needs strengthening to compete with out of town	Policy SS1 sets out the amount of retail floor space to be provided over the plan period, to provide for the	No change

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19 SP4)					developments.	need set out in the evidence base (Town Centre Study, Town centre Assessment, and Retail Capacity Study). Specific allocations for town centre retail development are included for the Maidstone East/Sorting Office site and the former King Street car park. For the longer term, The Mall is identified for major retail redevelopment.	
					Generalised support for the proposed redevelopment of The Mall and for leisure and cultural development in the town centre	Support welcomed.	No change
					Offices: conversion of offices to residential use should be streamlined; provision of additional good quality office stock should be encouraged, not just the retention of existing good quality stock;	Permitted development rights currently enable a change of use from office to residential. The specific site allocation at Mote Road provides for new office floorspace in the town centre and this can complement that which will be provided through the implementation of extant consents at Eclipse Park and at the Woodcut Farm site at Junction 8 of M20.	No change
					Objection to the exclusion of Springfield from the town centre boundary to facilitate high rise housing on the site. This cannot support the east station development concept due to access from Sandling Road / Stacey Street / Fairmeadow is not viable because of the levels and road pattern	The town centre boundary identifies the area covered by the Policy SP4 (Reg 19) and has resulted from a combined assessment of: <ul style="list-style-type: none"> - the extent of the area which contains, and is suitable for, the main focus of town centre uses; - the existing character and form of development; - the visual, physical and functional relationship between areas; and - the potential for appropriate development 	No change

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					<p>Exclude the Maidstone east from the town centre boundary and accept that it is unlikely to be developed for a town centre use – better to encourage development in its entirety for residential including affordable housing.</p>	<p>opportunities.</p> <ul style="list-style-type: none"> - In the 2012 draft Core Strategy the town centre boundary extended to include Springfield as the site was seen as having potential for a business campus form of development to potentially include university uses. The demand for these uses at this scale in this location has not transpired and, in response, it is considered that there is the opportunity to deliver significant additional housing. With this proposed pattern of development, the town centre boundary is more appropriately drawn to focus on the areas of main town centre uses to the south of this site. <p>Maidstone East/Sorting Office: this site is a key opportunity for additional, modern retail space, for which there is evidence of demand, in a location with very good, direct connections to the core of the town centre and sustainable transport links. In the absence of alternative suitable retail sites with these beneficial characteristics the allocation of this site for a mix of retail and residential and its inclusion within the town centre boundary continues to be appropriate.</p>	
					<p>Additional housing in and at the edge of the town centre should be identified</p>	<p>Throughout the preparation of the Local Plan there has been a thorough search for brownfield sites suitable for redevelopment, including in and at the edge of the town centre. Since the Regulation 18 version of the</p>	<p>No further change.</p>

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						Local Plan was published in March 2014, two further town centre sites have been included in the Plan (Wrens Cross and Dunning Hall) plus sites at Union Street, Foster Street and Tonbridge Road. The Plan also provides for additional housing to come forward within the town centre broad location.	
					Sufficient, affordable car parking needed.	Town centre parking arrangements are addressed in the Integrated Transport Strategy.	No change.
					The policy should be more explicit about how many additional houses and how much additional office and retail floorspace the town centre will deliver	Policy SS1 sets out the total amount of floorspace to be delivered during the plan period across the Borough. The policy also sets out the settlement hierarchy for the distribution of development.	No change
					High Street/Gabriels Hill should be part of the primary shopping area	The High Street / Gabriels Hill is not considered to fall within the primary shopping area, but does fall within the secondary area. The areas have been defined based on an analysis of unit sizes, occupants, rent levels and indicative footfall. In the secondary frontage areas, retail units are generally smaller than in the primary shopping area (under 500m2) and occupied by a mix of both national and local independent retailers. The latter have an important role in adding to the diversity and distinctiveness of the shopping 'offer' in Maidstone town centre. The approach of policy DM32 (Reg 19) is to enable a broader range of uses to include professional services (A2), cafés and restaurants (A3) and pubs and wine bars (A4) which contribute to the	No change

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						wider appeal of the town centre.	
					Specific allocations at Baltic Wharf for mixed use development and Lockmeadow as a priority leisure quarter are sought.	An amendment to the Plan has previously been agreed to make reference to the Baltic Wharf Site and the alternative uses which could be appropriate if the extant retail/mixed use consent is not implemented. Lockmeadow falls within the town centre boundary. Policy DM29 (Reg 19 policy DM33) - leisure and community uses in the town centre would support additional leisure uses at this site but, also, does not limit new leisure uses to this site alone. Additional leisure uses throughout the town centre would contribute to its on-going vitality.	No further change
					Concerns that congestion and pollution will be worsened by development proposals. Pedestrian access is constrained.	DM16 (Reg 19 DM5) Air Quality sets out the requirements on proposals for development that have an impact on air quality. DM4 (Reg 19 DM1) Principles of Good Design sets out in the first criterion the requirements of accessibility. In addition, the ITS sets out proposals for increasing levels of walking and cycling.	No change
					Better utilisation of the rivers, including their protection for wildlife.	Policy DM10 (Reg 19 DM3) sets out that development proposals will not be permitted where they lead to adverse impacts on natural assets. It also sets out that the Green and Blue Infrastructure should be taken into account. Policy SP1 (Reg 19 SP4) sets out the specific considerations for development by the riverside.	No change

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SP2	Maidstone urban area	7	12	4	Some unconditional support.	Support welcomed	No change
					Object to developments in NW/Barming area on infrastructure grounds i.e. transport grounds and water supply/sewerage; cumulative impacts in NW area – also TMBC developments.	The Regulation 19 version of the Local Plan will be supported by an Integrated Transport Strategy which will set out the transport measures needed to support the growth identified in the Local Plan. The Plan will also be accompanied by an Infrastructure Delivery Plan which will set out the infrastructure requirements generated by the new development.	No change
				Effect of development on North ward – traffic concerns.			
				Coalescence of developments with Leeds, Langley and Langley Heath – environmental damage not considered here – pollution. Bus lane no improvement – Wheatsheaf is a bottle neck.	The development proposals in the Plan provide for clear separation between the settlements of Leeds, Langley and Langley Heath.		
					Suggests implementation of a green belt style defendable edge to the urban area.	The Local Plan will redefine the boundary of the urban area to include the sites allocated at the urban edge. Beyond this boundary, development will be more strictly limited to that set out in Policy SP5 (Reg 19 SP17) Countryside.	No change
					Support for preference of sites at edge of urban area.	Support welcomed	No change
					Land at Orchard Spot should be included as a suitable urban extension	The SHLAA assessment of this site states that “development of this site in isolation would have a	No change

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					site.	harmful impact on the character and appearance of this area of countryside particularly in views from the north. Loss of woodland". This site is therefore deemed unsuitable for development and is not proposed to be allocated in the Local Plan.	
					Object to loss of parking spaces in town centre.	The Integrated Transport Strategy sets out the strategic management approach to car parking in the town centre.	No change.
					Question if enough is being done to regenerate urban area – there are more areas of deprivation that are not addressed in this policy.	Sustainable development is at the forefront of plan-making and decision-taking. The Plan includes policies to encourage regeneration, provide affordable housing, promote community facilities, and encourage employment opportunities within the Borough. More widely in the Council, the work of the Communities and Economic Development teams, amongst others, helps to support regeneration in different neighbourhoods in the town.	No change
SP3	Rural service centres	12	447	9	1. General Comments:		
	Plus petition (Harrietsham)		20		Unsustainable expansion of villages causing coalescence	By identifying specific sites for development, the Local Plan sets the limits to village expansion and so actually helps to secure against the coalescence of settlements. The majority of development is being focused in and at the edge of Maidstone with more limited development at the identified villages. The selection of villages is	No change
	Plus petition (Coxheath)		869		Dwellings numbers are not balanced between the rural service centres, in fact ALL villages should take a proportion of housing		

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					2. Harrietsham:		
					Harrietsham has less services/employment than the other villages therefore should be re-classified as a larger village	<p>An assessment of population and the services and facilities available in each settlement in the borough forms part of the basis for determining the villages that can be designated as a rural service centre.</p> <p>The Regulation 19 version of the Local Plan will be supported by an Integrated Transport Strategy which will set out the specific transport measures to support the growth in the Local plan and also an Infrastructure Delivery plan which will specify the wider infrastructure requirements (including for transport) and funding sources. It is not usually possible for infrastructure to be provided in advance of development as it is the development which helps generate the funding for the infrastructure, although the provision of the infrastructure in tandem with development will be sought where possible.</p> <p>With respect to the A20 scheme, this reference has been included in all the site allocation policies in Harrietsham.</p>	No further change
				Highway safety and capacity concerns; poor public transport links			
				Scale of proposed development is too large			
				Lack of infrastructure; Infrastructure should be improved prior to development commencing			
				A criterion for "appropriate contributions towards a highway improvement scheme for the section of the A20 Ashford Road that passes through Harrietsham" should apply to all site allocations in Harrietsham			
					3.Headcorn:		
					Headcorn should not be classified as a	An assessment of population and the services and	No change

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					rural service centre	<p>facilities available in each settlement in the borough forms part of the basis for determining the villages that can be designated as a rural service centre.</p> <p>The Regulation 19 version of the Local Plan will be supported by an Integrated Transport Strategy which will set out the specific transport measures to support the growth in the Local plan and also an Infrastructure Delivery plan which will specify the wider infrastructure requirements (including for transport) and funding sources. On-going work with the infrastructure providers, including Southern Water and the Environment Agency, has not identified a fundamental constraint to the development proposed at Headcorn.</p> <p>The sites at Headcorn have been identified following a comprehensive assessment of potential housing sites. The assessment has considered landscape and ecological impacts and potential agricultural land loss. Smaller sites would not demonstrably deliver sufficient new homes for the OAN for housing to be achieved.</p> <p>Viability assessments have been undertaken as part of the evidence base underpinning the Local Plan. These demonstrate that affordable housing located in rural areas is more viable than in urban locations. This requirement will help to boost the overall supply of</p>	
				Lack of infrastructure esp. sewerage; school places; Priorities conflict with those of PC			
				Sites are too large - development driven, not place driven; At odds with emerging Neighbourhood Plan;			
				Flooding issues; a strategic approach is required; no reference made to Water Cycle Study;			
				Loss of village character; impact on local landscapes and ecology; loss of agricultural land;			
				Increased traffic; poor public transport provision;			
				Lack of local employment opportunities to support growth;			
				Proposed percentage of affordable housing unsustainable			

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						much needed affordable units.	
					Proposed dwelling numbers are too high	The housing requirement is derived from the Strategic Housing Market Assessment which is a robust assessment of future housing requirements.	
					4.Lenham:		
					Support for Lenham as RSC	Support welcomed	No change
					Objection to Lenham taking any additional development;	An assessment of population and the services and facilities available in each settlement in the borough forms part of the basis for determining the villages that can be designated as a rural service centre.	No change
				Impact on highway capacity and safety;			
				Lack of infrastructure and services;			
					Loss of character of village; loss of green space, open space; lack of protection for built heritage;	The Regulation 19 version of the Local Plan will be supported by an Integrated Transport Strategy which will set out the specific transport measures to support the growth in the Local plan and also an Infrastructure Delivery plan which will specify the wider infrastructure requirements (including for transport) and funding sources. On-going work with the infrastructure providers has not identified a fundamental constraint to the development proposed at Lenham. In addition to the criteria in the site allocation policies, the development management policies in the Plan help to secure the protection of heritage and ecological assets. The master planning for the proposed Lenham Broad Location will help to clarify how best	

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						development can be delivered without undue impact on the character of the area, including on the landscape and on the built form.	
					5.Marden:		
					Proposed dwelling numbers are too high; phasing required- too much development too quickly; should not be classed as an RSC	An assessment of population and the services and facilities available in each settlement in the borough forms part of the basis for determining the villages that can be designated as a rural service centre.	
					Lack of infrastructure and facilities; need to manage increasing demand for parking at station and local shops / businesses.	The Regulation 19 version of the Local Plan will be supported by an Integrated Transport Strategy which will set out the specific transport measures to support the growth in the Local Plan and also an Infrastructure Delivery plan which will specify the wider infrastructure requirements (including for transport) and funding sources. On-going work with the infrastructure providers, including the Environment Agency has not identified a fundamental constraint to the development proposed at Marden.	
					Impact of traffic on neighbouring villages; increased pollution;	The sites at Marden have been identified following a comprehensive assessment of potential housing sites against a range of planning criteria. This included identifying brownfield sites but these alone are not sufficient to meet the future need for housing; greenfield sites are also needed.	
					Loss of village character; loss of green fields; impact on countryside;		
					Flooding concerns - a strategic approach required		

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					More consideration to be given to emerging Neighbourhood Plan	Neighbourhood Plans are required to be prepared in accordance with national and local planning policy. The Regulation 19 version of the Local Plan has been amended to set out more clearly the relationship between neighbourhood plans and the Local Plan	Amend the Regulation 19 version of the Local Plan (key influences chapter) to strengthen reference to neighbourhood planning.
					6.Staplehurst:		
					Proposed dwelling numbers are too high and disproportionate with other villages; should not be classed as an RSC	An assessment of population and the services and facilities available in each settlement in the borough forms part of the basis for determining the villages that can be designated as a rural service centre.	No change
					Development is allocated outside the village boundary;	The sites at Staplehurst have been identified following a comprehensive assessment of potential housing sites against a range of planning criteria including landscape impacts. This included identifying brownfield sites within the existing built up areas but these alone are not sufficient to meet the future need for housing; greenfield sites at the edge of the most sustainable settlements are also needed.	
					Lack of infrastructure; increased traffic; highway capacity and safety concerns; poor public transport; increased pollution;		
					loss of character of village;		
					Impact on Low Weald landscape character area and countryside generally;		
					Flooding issues; no reference to Water Cycle Study		
						The Regulation 19 version of the Local Plan will be supported by an Integrated Transport Strategy which will set out the specific transport measures to support the growth in the Local Plan and also an Infrastructure	

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						Delivery plan which will specify the wider infrastructure requirements (including for transport) and funding sources. On-going work with the infrastructure providers, including the Environment Agency has not identified a fundamental constraint to the development proposed at Staplehurst.	
SP4	Larger Villages	12	381	8	1. Boughton Monchelsea		
	Plus petition (Boughton Monchelsea)		197		Delete Boughton Monchelsea as a larger village or housing numbers are too high	An assessment of population and the services and facilities available in each settlement in the borough forms part of the basis for determining the villages that can be designated as a Larger Village. Whilst a Larger Village has fewer services and facilities than a Rural Services Centre, these are considered to be at a sufficient level to support limited, planned sustainable development. The sites at Boughton Monchelsea have been identified following a comprehensive assessment of potential housing sites against a range of planning criteria including landscape impacts and the prospect of coalescence. This included identifying brownfield sites within the existing built up areas but these alone are not sufficient to meet the future need for housing; greenfield sites at the edge of the most sustainable settlements are also needed.	No change
				Impact on local roads, increased traffic congestion, and impact on highway and pedestrian safety			
				Inadequate bus service and poor transport links to the town centre			
				Lack of infrastructure and facilities , including parking, dentist, doctors, shops, school and post office			
				Loss of landscape, impact on the countryside, and coalescence with surrounding villages			

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						The Regulation 19 version of the Local Plan will be supported by an Integrated Transport Strategy which will set out the specific transport measures to support the growth in the Local Plan and also an Infrastructure Delivery plan which will specify the wider infrastructure requirements (including for transport) and funding sources. On-going work with the infrastructure providers has not identified a fundamental constraint to the development proposed at Boughton Monchelsea.	
					Some support for Boughton Monchelsea as a larger village	Support welcomed	No change
					2. Coxheath		
					Delete Coxheath as a larger village or housing numbers are too high	Based on the assessment of services and facilities, it is considered that Coxheath fulfils the role of a Rural Service Centre and the Regulation 19 version of the Local plan is proposed to be amended to classify the village as a Rural Service Centre.	Designate Coxheath in the Reg 19 draft Plan as a Rural Service Centre
				Proposed development does not constitute "limited" development - needs to be quantified			
				Impact on quality of life, village character and coalescence with surrounding villages			
				Impact on the highway network, increased traffic congestion, impact on air quality, and impact on highway and pedestrian safety			
						The Regulation 19 version of the Local Plan will be supported by an Integrated Transport Strategy which will set out the specific transport measures to support the growth in the Local plan and also an Infrastructure Delivery plan which will specify the wider infrastructure requirements (including for transport) and funding	

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					Lack of infrastructure, including sewerage and water supply, and drainage/flooding problems	sources. On-going work with the infrastructure providers, including Southern Water and the Environment Agency has not identified a fundamental constraint to the development proposed at Coxheath. By identifying specific sites for development, the Local Plan sets the limits to village expansion and so actually helps to secure against the coalescence of settlements. The sites at Coxheath have been identified following a comprehensive assessment of potential housing sites. The assessment has considered landscape and ecological impacts and potential agricultural land loss. Whilst every effort has been made to identify brownfield sites, some greenfield sites are also required for the future need for housing to be met.	
				Lack of village facilities, including medical facilities, and impact on school			
				Loss of greenfield land and Grade 2 agricultural land, impact on wildlife and habitats			
					Reclassify Coxheath as a rural service centre	Based on the assessment of services and facilities, it is considered that Coxheath fulfils the role of a Rural Service Centre and the Regulation 19 version of the Local plan is proposed to be amended to classify the village as a Rural Service Centre.	Designate Coxheath in the Reg 19 draft Plan as a Rural Service Centre
					Some support for some growth in Coxheath with supporting infrastructure	Support welcomed	No change
					3. Eyhorne Street		

Policy No.	Policy title	No. in support	No. of objections	No. of observations	Key issues arising	Officer response	Officer recommendation
					Support for Eyhorne Street as a larger village	Support welcomed	No change
					4. Sutton Valence		
					Delete Sutton Valence as a larger village	An assessment of population and the services and facilities available in each settlement in the borough forms part of the basis for determining the villages that can be designated as a Larger Village. Whilst a Larger Village has fewer services and facilities than a Rural Services Centre, these are considered to be at a sufficient level to support limited, planned sustainable development.	No change.
				Lack of infrastructure and impact on highways			
				Lack of shops and the imminent relocation of the post office, impact on school			
				Impact on pedestrian safety			
					Village adjacent to Greensand Ridge where protective policies apply	The Regulation 19 version of the Local Plan will be supported by an Integrated Transport Strategy which will set out the specific transport measures to support the growth in the Local Plan and also an Infrastructure Delivery plan which will specify the wider infrastructure requirements (including for transport) and funding sources. On-going work with the infrastructure providers has not identified a fundamental constraint to the development proposed at Sutton Valence.	
					Some support for Sutton Valence as a larger village	Support welcomed	No change
					5. Yalding		

Policy No.	Policy title	No. in support	No. of objections	No. of observations	Key issues arising	Officer response	Officer recommendation
					Delete Yalding as a larger village	<p>An assessment of population and the services and facilities available in each settlement in the borough forms part of the basis for determining the villages that can be designated as a Larger Village. Whilst a Larger Village has fewer services and facilities than a Rural Services Centre, these are considered to be at a sufficient level to support limited, planned sustainable development.</p> <p>The sites at Yalding have been identified following a comprehensive assessment of potential housing sites against a range of planning criteria including landscape impacts. This included identifying brownfield sites (such as Syngenta) but these alone are not sufficient to meet the future need for housing; greenfield sites at the edge of the most sustainable settlements are also needed.</p> <p>The Regulation 19 version of the Local Plan will be supported by an Integrated Transport Strategy which will set out the specific transport measures to support the growth in the Local Plan and also an Infrastructure Delivery plan which will specify the wider infrastructure requirements (including for transport) and funding sources. On-going work with the infrastructure providers including the Environment Agency has not identified a fundamental constraint to the development proposed at Yalding.</p>	
				Lack of facilities and impact on local school which has no room for expansion			
				Increased traffic congestion and insufficient road structure, impact on highway safety, increased noise and air pollution, rail service is rural and remote, and bridges inadequate for growth			
				Impact on heritage, loss of countryside, and impact on village character			
				Increased flood risk			

Policy No.	Policy title	No. in support	No. of objections	No. of observations	Key issues arising	Officer response	Officer recommendation
					A new cycle route would benefit commuting to Maidstone and Tonbridge	A Cycling Strategy will be incorporated into the Integrated Transport Strategy produced to support the Local Plan.	No change
					Some support for Yalding as a larger village	Support welcomed	No change
					6. General		
					Some support for this tier in the settlement hierarchy	Support welcomed	No change
					Major housing expansion at the villages is out of scale and character with existing villages and represents unsympathetic excursion into the countryside	An assessment of population and the services and facilities available in each settlement in the borough forms part of the basis for determining the villages that can be designated as a Larger Village. Based on this assessment, the settlements listed are not considered to have sufficient services to support their designation as a Larger Village.	No change
					Include Hunton and other villages, or create a new tier of smaller settlements to address underprovision of housing land and rural decline, and to support local facilities.		
					East Farleigh should be identified as a larger village		
					Langley should be identified as a larger village		
					Chart Sutton should be identified as a larger village		
					Laddingford should be identified as a		

Policy No.	Policy title	No. in support	No. of objections	No. of observations	Key issues arising	Officer response	Officer recommendation
					larger village or smaller settlement		
					Re-direct development to villages closer to the motorway	Policy SS1 sets out the Council's spatial strategy and settlement hierarchy for the distribution of development. Proximity to the motorway is not considered to be a pre-determinant of the suitability of a settlement for additional development. An assessment of population and the services and facilities available in each settlement in the borough forms part of the basis for determining which settlements are the most sustainable. This assessment takes account of accessibility by public transport.	No change
					A reduction of allocations by around 20% should be made in each of the larger villages.	The evidence does not support the arbitrary reduction suggested. The identification of the Larger Villages is based on a comprehensive assessment of services and facilities which provides the evidence to support the selection of settlements included in the Plan's settlement hierarchy.	No change
				The larger villages concept is ill considered and based on out-of-date information			
					Lack of discussion and consent with villages involved prior to publication of draft plan	All planning related consultation must be 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. Since the Regulation 18 consultation was completed, there has been a specific series of meetings with parish councils to discuss local issues.	No change

Policy No.	Policy title	No. in support	No. of objections	No. of observations	Key issues arising	Officer response	Officer recommendation
NPPF1	Presumption in favour of sustainable development	8	5	3	Support for the policy	Support is welcomed. The Local Plan must comply with the policies of the NPPF, although Examination Inspectors no longer require a model policy for the presumption in favour of sustainable development. Policy NPPF1 is proposed to be deleted in the Reg 19 version of the Local Plan, although text references are retained.	Delete Policy NPPF1 as superfluous but retain text references to the NPPF as one of the key influences in the preparation of the Local Plan.
					Local Plan should demonstrably comply with this policy (and Council should apply this policy consistently to housing allocations.)	<p>The Local Plan is fundamentally concerned with delivering sustainable development objectives and the policy has been applied consistently to housing allocations. All sites (allocated and rejected) were subject to site visits, and the views of infrastructure providers and other bodies (for landscape, ecology, etc.) were sought. Pro forma were used to standardise the assessment of the merits and constraints of potential development sites. The pro forma were published with the Local Plan at consultation. Each site has been subject to independent sustainability appraisal.</p> <p>The Local Plan must comply with the policies of the NPPF, although Examination Inspectors no longer require a model policy for the presumption in favour of sustainable development. Policy NPPF1 is proposed to be deleted in the Reg 19 version of the Local Plan, although text references are retained.</p>	Delete Policy NPPF1 as superfluous but retain text references to the NPPF as one of the key influences in the preparation of the Local Plan.
					Policy should include a local	A robust evidence base supports the Local Plan and the	Delete Policy NPPF1 as

Policy No.	Policy title	No. in support	No. of objections	No. of observations	Key issues arising	Officer response	Officer recommendation
					perspective.	public has had the opportunity to shape the Plan at the local level through consultations. The Local Plan must comply with the policies of the NPPF, although Examination Inspectors no longer require a model policy for the presumption in favour of sustainable development. Policy NPPF1 is proposed to be deleted in the Reg 19 version of the Local Plan, although text references are retained.	superfluous but retain text references to the NPPF as one of the key influences in the preparation of the Local Plan.
					The inclusion of this policy is neither appropriate nor necessary.	The Local Plan must comply with the policies of the NPPF, although Examination Inspectors no longer require a model policy for the presumption in favour of sustainable development. Policy NPPF1 is proposed to be deleted in the Reg 19 version of the Local Plan, although text references are retained.	Delete Policy NPPF1 as superfluous but retain text references to the NPPF as one of the key influences in the preparation of the Local Plan.
H2 (Reg 19 DM12)	Density of Housing Development	1	14	9	A less prescriptive approach should be adopted to enable development to respond to site specific criteria and local aspiration.	The policy sets densities for residential development for a range of geographical areas, <u>provided</u> the achievement of good design and the distinctive character of the area are not compromised. The policy therefore provides flexibility. Further, the densities of allocated sites often vary where more detailed site information is available.	No change
					Proposed densities are too high.	The policy provides for flexibility depending on site conditions and/or constraints.	No change

Policy No.	Policy title	No. in support	No. of objections	No. of observations	Key issues arising	Officer response	Officer recommendation
					Housing density should be higher.	The policy provides for flexibility depending on site conditions and/or constraints.	No change
					Development density in the rural areas should not exceed 30 dwellings per hectare.	The policy provides for flexibility depending on site conditions and/or constraints.	No change
					Policy H2 is in need of amendment/clarification.	The policy sets densities for residential development for a range of geographical areas, <u>provided</u> the achievement of good design and the distinctive character of the area are not compromised. The densities of allocated sites often vary where more detailed site information is available. The same will be true for planning applications. There is no conflict because the policy provides flexibility.	No change
					Adequate play areas, community facilities and parking spaces need to be provided.	The policies of the Local Plan set the requirements for publicly accessible open space and parking (Reg 19 Policies DM22, DM23 and DM27).	No change