
HEARING STATEMENT

SESSION 14B – ALTERNATIVE SITES TO BE HEARD AT SESSION R2 18 NOVEMBER 2016 – AM

MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION

EXAMINATION HEARING SESSIONS

Prepared on Behalf of

Gleeson Developments Ltd (Representor ID REF 19261)

October 2016

**HEARING STATEMENT
MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION
EXAMINATION HEARING SESSIONS OCTOBER 2016**

SESSION R2 – ALTERNATIVE SITES

Prepared on behalf of Gleeson Developments Ltd

Project Ref:	24690/A5
Status:	FINAL
Issue/Rev:	03
Date:	27 October 2016
Prepared by:	Emma Wreathall
Checked by:	Andrew Wilford
Authorised by:	Andrew Wilford

Barton Willmore LLP
The Observatory
Southfleet Road
Swanscombe
Kent
DA10 0DF

Tel: 01322 374660
Email: andrew.wilford@bartonwillmore.co.uk

Ref: 24690/A5/EW/kf
Date: 27 October 2016

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

CONTENTS

	PAGE NO.
1.0 INTRODUCTION	01
2.0 RESPONSE TO SESSION R2 – ALTERNATIVE SITES	01

APPENDICES

Appendix 1: Extract of SHLAA (May 2009)

Appendix 2: Extract of Strategic Sites Assessment (November 2009)

Appendix 3: Extract of Sustainability Appraisal (February 2016) [SUB 002]

Appendix 4: BW Commentary on SA [SUB002]

Word Count: 2,049 words (excluding Inspector's Questions and title pages)

1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of Gleeson Development Ltd in respect of Session 14B of the Inspector's Matters, Issues and Questions for the Maidstone Borough Local Plan (MBLP) Examination.
- 1.2 Gleeson Developments Ltd has land interests in the south-west of Maidstone, namely 'Land at Fant Farm, Maidstone' (hereafter referred to as the Site).

2.0 RESPONSE TO SESSION R2 – ALTERNATIVE SITES

Issue (i) – Whether the alternative site would be suitable, sustainable and deliverable

Qn14.12 Does the site have any relevant planning history? (applications, permissions, appeals, previous allocations)

- 2.1 The Regulation 19 representations (ID Ref: 19261), paragraphs 1.6 – 1.7 and associated Appendix B and C, detail the desire by Professional Officers of Maidstone Borough Council (MBC) to propose Fant Farm as an allocated site. However, this was rejected by Members for reasons which we consider not to be based on robust or credible evidence. A summary of these reasons are set out in Section 4 of our Regulation 18 representations, which are contained within Appendix B of our Regulation 19 representations.
- 2.2 In December 2015, an Outline planning application (Ref: 15/509962/OUT) was submitted to MBC for up to 225 residential dwellings with access from Gatland Lane.
- 2.3 The Outline application was refused by MBC Planning Committee on 17 March 2016, with 3no. Reasons for Refusal relating to landscape impact, lack of a legal mechanism and the level of proposed affordable housing provision.
- 2.4 A Section 78 Appeal (Ref: APP/U2235/W/16/3148213) is due to be heard by way of a Public Inquiry on 17th – 20th January 2017.
- 2.5 The Site Boundary Plan (Dwg No. M-01 Rev B) and Illustrative Masterplan (Dwg No. M-13 Rev B) subject to the Appeal can be found in Appendix A of the Regulation 19 representations.

Qn14.13 What is the site's policy status in the submitted Local Plan? (e.g. whether in defined settlement/countryside/AONB/conservation area/Landscape of Local Value etc.)

- 2.6 The Site is located to the south-west of Maidstone. It lies outside, but directly adjacent to, the boundary of Maidstone urban area, and therefore in the 'countryside' in planning terms.
- 2.7 The Site is designated within the 'Landscapes of Local Value' (LoLV) relating to the Medway Valley in the submitted Local Plan [SUB 001]. As set out in detail in our Regulation 19 representations (ID Ref: 19261), it is considered that the LoLV designation should be amended to incorporate the buildings of Fant Farm with an appropriate landscape surround (i.e. between Fant Farm and Shelley Farm) as existing legible features, and not include the Site itself.
- 2.8 The Site is not located within any other designation for its biodiversity or landscape value.

Qn14.14 What is the site's policy status in any made or emerging neighbourhood plan?

- 2.9 The Site is not located within a Parish boundary. It is located in the Ward of Fant.
- 2.10 No Neighbourhood Plan status has been requested that covers the Site.

Qn14.15 Is the site greenfield or previously developed (brownfield) land according to the definition in the glossary of the National Planning Policy Framework?

- 2.11 The Site is greenfield.

Qn14.16 What previous consideration by the Council has been given to the site's development (e.g. inclusion in a Strategic Housing and Economic Development Land Availability Assessment (SHEDLAA)) and does the Representor have any comments on its conclusions?

- 2.12 The Site was submitted in 2no. parts in the 2007 Call for Sites: a 1.45ha north eastern section for approximately 40no. dwellings; and a 9.53ha area for approximately 300 dwellings. The subsequent Strategic Housing Land Availability Assessment (May 2009) (not submitted to the Local Plan Examination) concluded that the Site was 'Suitable' for development due to its location and characteristics, and 8.5ha of the Site should provide strategic landscaping (**Appendix 1**).
- 2.13 The Strategic Sites Assessment (November 2009) (not submitted to the Local Plan Examination) concluded that the Site has low development potential due to landscape impact and that only the small part of the Site in the eastern corner would be 'Suitable' for development (**Appendix 2**).

- 2.14 Subsequently, the Site was again assessed in the Strategic Housing and Economic Development Land Availability Assessment (SHEDLAA) (January 2014) (not submitted to the Local Plan Examination), which concluded:

Whilst the site is visually prominent due to its location within the Medway Valley and there is likely to be some visual harm as a result, I consider the site is in a sustainable location and relates well to the existing urban area and would represent a logical expansion of the urban area westwards. In addition to this, the need to provide sites suitable for housing holds significant weight which outweighs this visual harm. In addition to this, the NPPF attaches less to the protection of locally designated landscapes such as the area of local landscape importance which is applicable in this case. It is noted that 36ha of the site¹ would be used to create a country park style area of open space, which would ensure protection of this landscape.

- 2.15 Overall the SHEDLAA (2014) considered that due to the urban location of the Site and link to Gatland Lane, the Site is suitable and recommended as acceptable for development.
- 2.16 Throughout 2014 and 2015, MBC Officers progressed the draft Local Plan and reported a number of key stages/updates to various MBC Committees. During this time, sites were recommended by Officers for allocation in the Local Plan. The Site itself was recommended for allocation by Officers on three occasions (February 2014, January/February 2015 and June 2015), but was rejected as an allocation by Members in all instances.
- 2.17 The conclusions from the Site's assessment in the SHEDLAA (January 2014), as set out above, remained the same in the updated SHEDLAA (January 2016) [HOU 007] (Appendix J of Regulation 19 representations) in that it is suitable and acceptable for development. However, an 'Addendum' is added to the SHEDLAA (2016) that highlights the Site's consideration at various MBC Committee meetings in that it was recommended by MBC Officers and rejected by Members.

Qn14.17 What is the site area and has a site plan been submitted which identifies the site?

- 2.18 The Site extends to 14.47 hectares (ha), of which 7.24ha is proposed for net residential development under the Outline planning application.
- 2.19 The Site Boundary Plan (Dwg No. M-01 Rev B) and Illustrative Masterplan (Dwg No. M-13 Rev B) are enclosed at Appendix A of our Regulation 19 representations (ID Ref: 19261).

¹ Country Park is no longer proposed and not contained in the refused Outline application.

Qn14.18 What type and amount of development could be expected and at what density?

- 2.20 The Outline planning application, subject to a S78 Appeal, proposes up to 225 residential dwellings, including 30% affordable housing. Due to the Outline nature of the application, the specific housing mix and exact densities are not yet fixed.
- 2.21 The average net density across the Site is 30 dwellings per hectare (dph), albeit the proposed residential dwellings will be built at a range of densities that reflect the surrounding area, as well as current best practice design principles.
- 2.22 The Appeal scheme is landscape led and proposes a layout that responds to a number of key landscape and visual sensitivities including the following:
- PROW KB17 retained and enhanced, placing the existing Green infrastructure at the centre of the layout, with the alignment of built form and new open spaces relating to this;
 - Open spaces incorporated within the layout to separate the mass of the built form, and enable new planting across the Site to soften and screen new built form;
 - The layout incorporate viewing corridors from PROW KB17 towards the North Downs;
 - The layout of the built form should reflect the linear and staggered alignment of the existing settlement pattern;
 - The siting of the built form reflect the existing settlement pattern, being located between 40-60m AOD;
 - The scale of the built form reflect that of the surrounding built form, being 2 storeys in height;
 - The built form set within a robust landscape framework, with structural tree planting on the southern edge of the Site to filter and screen views of the built form;
 - To reflect the existing landscape character of mature trees adjacent to Gatland Lane, new built form should be set back from this road to enable new planting, and reinforcing the well wooded skyline when viewed from locations to the south of the Site;
 - To retain the character of views from Gatland Lane across to the southern aspect of the valley, open space is located in the central part of the Site; and
 - To reflect the published landscape character guidance the layout include for the reintroduction of orchards and views from PROW KB17.

Qn14.19 When could development be delivered and at what rate?

- 2.23 On the basis that the development is allowed at Appeal in 2017, it is anticipated that delivery would commence on Site in 2019/20 at a rate of 30-50 dwellings per annum.

Qn14.20 What evidence is there of the viability of the proposed development?

- 2.24 Gleeson confirms the proposed development of the Site for up to 225 dwellings is viable.
- 2.25 A Section 106 Heads of Terms was contained in the Outline application and, as part of the Appeal proceedings, a S106/UU is to be progressed with MBC and Kent County Council (KCC) for submission prior to the Inquiry's opening.

Qn14.21 Has the site been the subject of sustainability appraisal and does the Representor have any comments on its conclusions?

- 2.26 The Site (SA Ref: HO-74) was tested as part of the Sustainability Appraisal (SA) (February 2016) [SUB 002], supporting MBC's Local Plan (**Appendix 3**). No overriding 'showstoppers' to development were identified in respect of the Site, indeed only 4no. 'red' categories (significant constraint) were identified, along with 9no. 'amber' (potentially significant constraints) and 16no. 'green' (no constraint).
- 2.27 Table A within **Appendix 4** sets out the conclusions of the SA in respect of the Site and provides Barton Wilmore comments against any necessary items. Areas where we consider the colour coding should be amended are identified and reasons given.
- 2.28 As set out in our Regulation 19 representations (ID Ref: 19261), there is not a clear difference in analysis between the Site's assessment within the SA [SUB 002] and the assessment of allocated sites within the submitted Local Plan [SUB 001]. Indeed, some allocated sites are assessed to have a greater level of constraints than 'Fant Farm' (HO-74).
- 2.29 This conclusion in part supports MBC Officer's views to allocate the Site and does not substantiate Members views who chose not to allocate the Site.

Qn14.22 What constraints are there on the site's development and how could any adverse impacts be mitigated?

- 2.30 There are no overriding constraints to the Site's development.

- 2.31 The Outline application was refused on 3no. grounds, relating to landscape impact, lack of a legal mechanism and the level of affordable housing provision, and which is to be tested at a Public Inquiry. Notwithstanding the current Appeal, it should be noted that the 3no. Reasons for Refusal relate to the content of the development proposals (i.e. affordable housing provision and legal mechanism) and do not preclude the Site's allocation in the draft Local Plan. If allocated, the Site would be applicable to 30% provision Affordable Housing in any event.
- 2.32 In addition, it is noted that paragraph 5.84 of the submitted Local Plan [SUB 001] does not preclude development within LoLV, provided that its siting, scale, mass, materials and design seek to contribute positively to the conservation and enhancement of the protected landscape. MBC's proposed amendments² to Draft Policy SP17 (presented at Hearing Session 4) require that:

6. The distinctive landscape character of the Greensand Ridge, Medway Valley, Len Valley, Loose Valley, and Low Weald as defined on the policies map, will be conserved and enhanced where appropriate as landscapes of local value.

- 2.33 On this basis, whilst we note the Outline application was refused due to the impact of the proposed development on an area within a LoLV and notwithstanding our objections to the Site's inclusion in the designation, it is possible that a development scheme could come forward on the Site which is acceptable to MBC in line with the content of the submitted Local Plan [SUB 001].

² It is acknowledged that the Inspector must conclude the submitted Local Plan is unsound before Policy amendments are progressed.

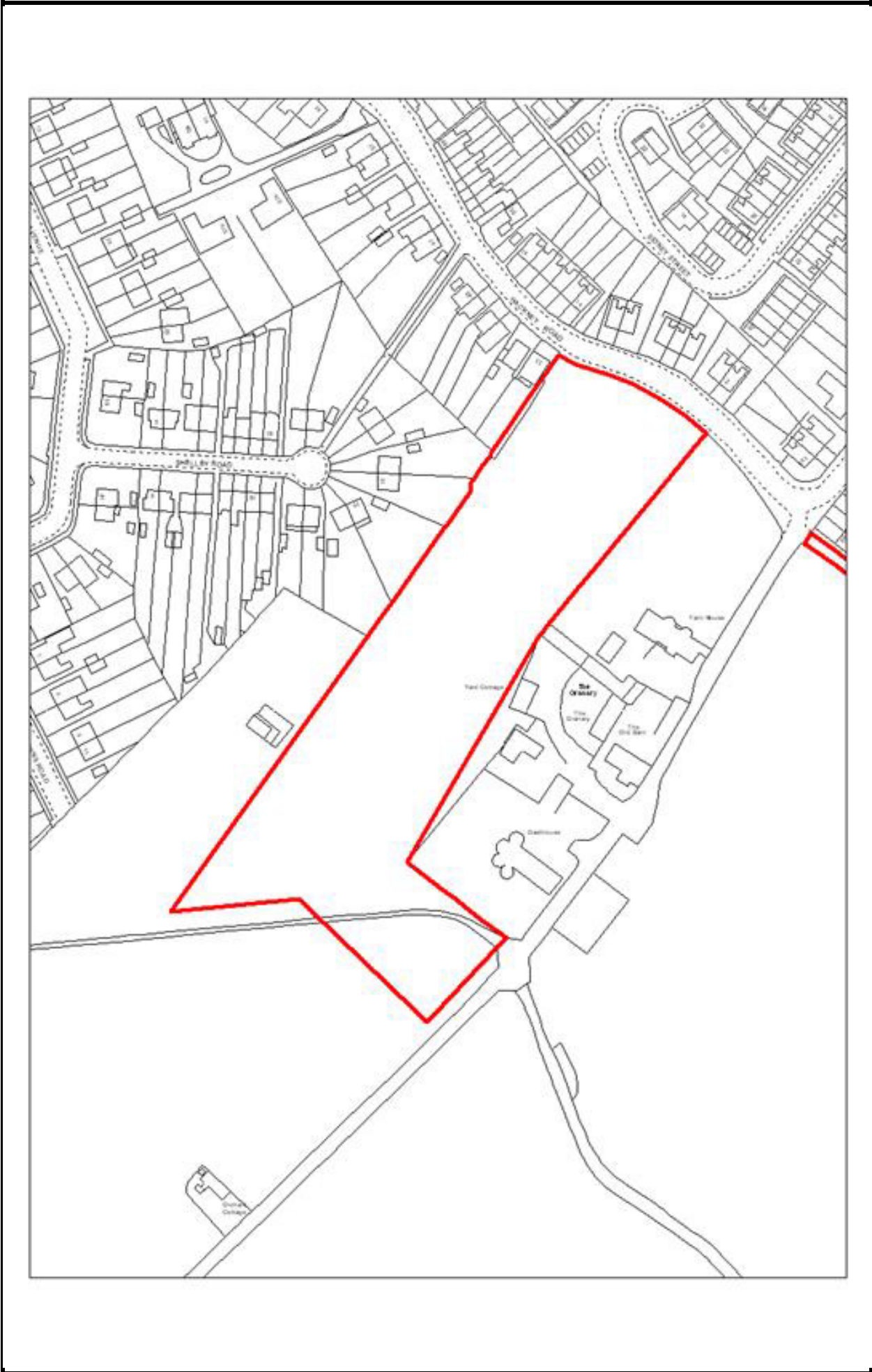
APPENDIX 1

Extract of SHLAA (May 2009)

Site ref	Site address	Settlement	Area (ha)	Final suggested yield	Yield 2008 - 2013	Yield 2013 - 2018	Yield 2018 - 2026
132	Land west of Hermitage Lane	Maidstone	8.64	160	40	120	0
133	Hen and Duckhurst Farm	Staplehurst	15.30	160	0	160	0
134	Land east of Hermitage Lane	Maidstone	1.74	0	0	0	0
135	Kent Cottage/Chance Holdings	Headcorn	1.58	0	0	0	0
138	Land off Tonbridge Road	Maidstone	0.39	12	12	0	0
139	Land at Fant Farm	Maidstone	1.45	50	50	0	0
144	Land at Gore Court	Maidstone	150.87	0	0	0	0
145	Land north of Sutton Road	Maidstone	5.69	0	0	0	0

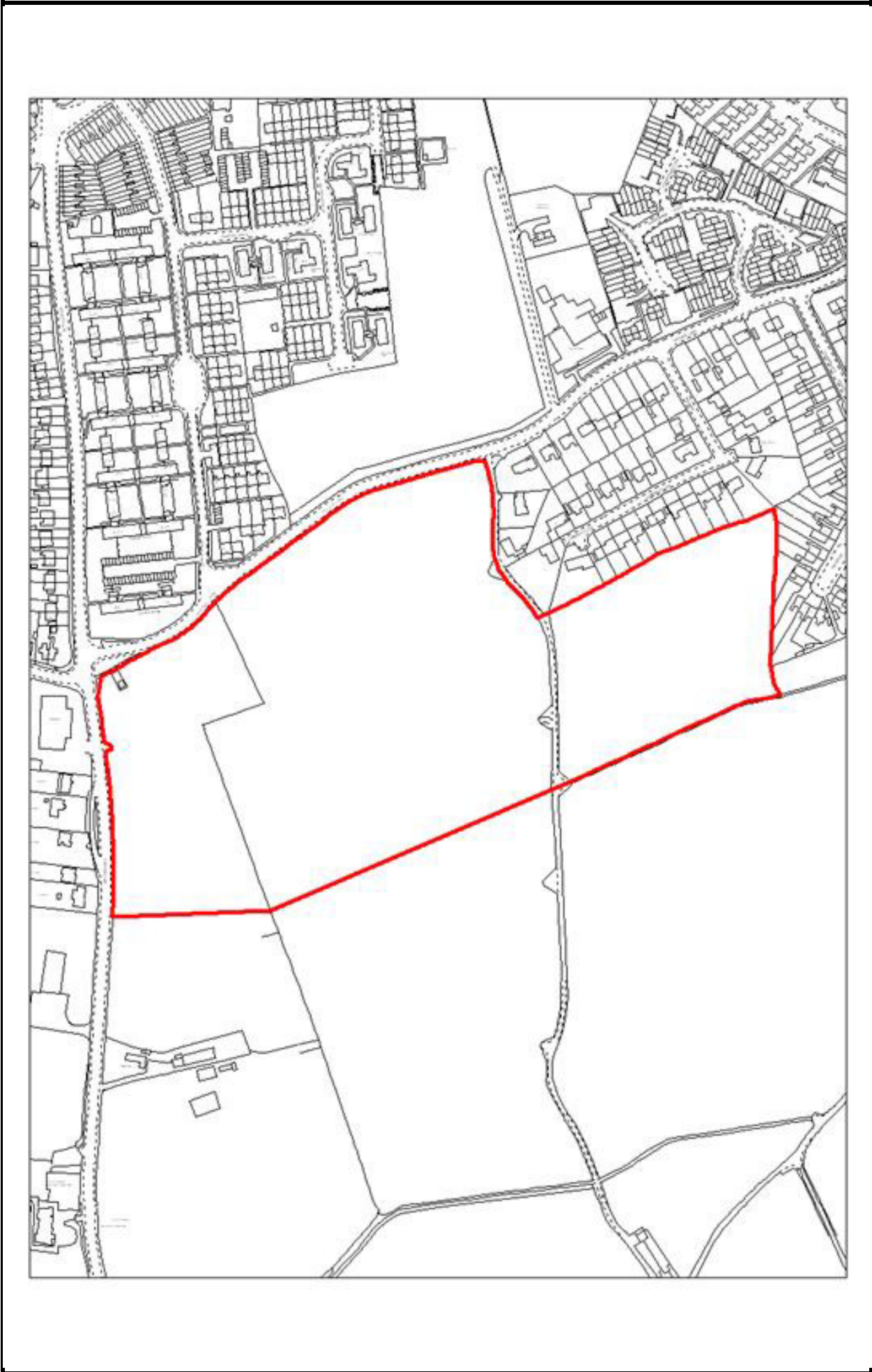
Site ref	Site address	Settlement	Area (ha)	Final suggested yield	Yield 2008 - 2013	Yield 2013 - 2018	Yield 2018 - 2026
146	Land north of Howland Road	Marden	2.44	60	60	0	0
147	Bell Farm, North Street, Barming	Maidstone	10.17	260	160	100	0
148	Hen and Duckhurst Farm, Marden Road	Staplehurst	3.09	100	30	70	0
151	Land at Ledian Farm	Leeds (Upper & Lower Street)	1.40	13	13	0	0
152	Land at Gatland Lane/Farleigh Lane	Maidstone	9.53	300	100	200	0
153	Land st Stanley Farm, Plain Road	Marden	3.13	100	35	65	0
154	Land at Springfield	Maidstone	0.61	115	60	55	0
156	Land south of Linden Farm, Stockett Lane	Coxheath	1.81	60	30	30	0

Site ref	Settlement	Site Address	Local Authority	
139	Maidstone	Land at Fant Farm	Not known	
Status	Site Area (ha)	Type of site		
Accepted	1.45	Greenfield		
Current/previous landuse		Planning status		
Agriculture		No planning status		
Source		Site Location		
Call for sites promotion		Adjacent development boundary - greenfield		
Description of site				
<p>The site consists of orchard land sloping from north to south toward the river, with a mature tree line on the eastern boundary. Surrounding uses include residential two storey housing to the north and west. Defined area proposed for 40 dwellings with remaining part of the site proposed open space.</p>				
Planning history				
<p>MBC - Defined area proposed for 40 dwellings with remaining part of the site proposed open space. 1) 08/0669, 31, SHELLEY ROAD, MAIDSTONE, ME168NS, Erection of a single storey rear extension as shown on drawing no.s CJ0111-02, CJ0111-03, CJ0111-04 received 31/03/08 and site location plan received 09/04/08., Approved/Granted with Conditions, 27/05/2008. 2) 07/0772, FANT OAST, FANT FARM, MAIDSTONE, ME168DE, Construction of garden wall and general re-landscaping as shown on scale 1:500 site plan, 1:1250 site location plan received on 12 April 2007 and amended Drawing No 0603/! Rev A received on 02 July 2007., Approved/Granted with Conditions, 12/07/2007. 3) 05/2098, FANT OAST, FANT FARM, MAIDSTONE, ME168DE, An application for listed building consent for the removal and replacement of Kent peg tiles to the oast roofs, replacing broken tiles with Kent pegs, removal of existing roof coverings and replacement with keymer shire hand made clay tiles as shown on t, Approved/Granted with Conditions, 16/12/2005.</p>				
Suitability summary				
<p>The site is in a sustainable location within 800m of a primary school and local shops, and offers a suitable location for development and would contribute to the creation of sustainable, mixed communities. In principle, if there is a requirement for further greenfield development, this site should be considered as a possible development site through the LDF process.</p>				
Availability summary				
<p>•<input type="checkbox"/>The owner or agent confirms that the site is available for development. There are no legal or ownership problems which could limit development here and the site has been promoted by a developer/ landowner for the purposes of this study.</p>				
Achievability summary				
<p>From the information available, it is considered that there is a reasonable prospect that housing will be delivered on the site. It is also considered that, given current and probable future sales prices, and alternative land values, the site is economically viable and the capacity of the developer to complete and sell the housing in the short/medium term in this area is good</p>				
Conclusion				
<p>Because of its location and characteristics, this site would be suitable for a mix of dwellings of about 50 units including detached, semi detached and terraced dwellings, likely to be started in about 2012, depending on the recovery of the housing market.Site is suitable for medium density development typically comprising a mix of detached, semi detached and terraced dwellings.</p>				
		Yield and time frame: 2008-2013	2013 - 2018	2018 - 2026
		50	0	0
		Final suggested yield:		
		50		



This map is reproduced from the Ordnance Survey map by Baker Associates with the permission of the Controller of Her Majesty's Stationery Office - Crown Copyright. All rights reserved. Maidstone Borough Council. License number: 100078484

Site ref	Settlement	Site Address	Local Authority	
152	Maidstone	Land at Gatland Lane/Farleigh Lane	Not known	
Status	Site Area (ha)	Type of site		
Accepted	9.53	Greenfield		
Current/previous landuse		Planning status		
Agriculture		Not Known		
Source		Site Location		
Call for sites promotion		Adjacent development boundary - greenfield		
Description of site				
The land consists of open fields. The land flattens out (east) and orchards owned by the garden centre are located to the west which is located south of the site. Site lies within an ALLI.				
Planning history				
Site is currently being promoted for 220 dwellings at 35 dph. No previous planning application and no pre-application discussion known for this site.				
Suitability summary				
The site is in a sustainable location within 800m of a primary school and local shops, offering a suitable location for development which would contribute to the creation of sustainable, mixed communities. In principle, if there is a requirement for further greenfield development, this site should be considered as a possible development site through the LDF process.				
Availability summary				
Owners and agent confirm availability				
Achievability summary				
From the information available, it is considered that there is a reasonable prospect that housing will be delivered on the site. It is also considered that, given current and probable future sales prices, and alternative land values, the site is economically viable and the capacity of the developer to complete and sell the housing in the short/medium term in this area is good.				
Conclusion				
Because of its location and characteristics, this site would be suitable for a mix of dwellings of about 300 units including flats and houses, likely to be started in about 2011/12 and completed by 2015, depending on the recovery of the housing market, and assuming 2 developers on site, producing completions at a rate of about 100 dpa. The net area would reduce to about 8.5 ha because of a need to provide strategic landscaping, so the yield might be 300 units at an average density of 31 dph which will provide an appropriate range of dwellings for the housing market in this location.				
		Yield and time frame: 2008-2013	2013 - 2018	2018 - 2026
		100	200	0
		Final suggested yield:		
		300		



This map is reproduced from the Ordnance Survey map by Baker Associates with the permission of the Controller of Her Majesty's Stationery Office - Crown Copyright. All rights reserved. Maidstone Borough Council. License number: 100078484

APPENDIX 2

Extract of Strategic Sites Assessment (November 2009)

139

Land at Fant Farm
Maidstone



Site Area (ha)	1.45
----------------	------

Landowner details

Richard Watts & City of Rochester Almshouses charities

Agent details

Philip Aelen
DHA Planning
Eclipse House
Eclipse Park
Sittingbourne Road
Maidstone ME14 3EN

Availability

The owner or agent confirms that the site is available for development. There are no legal or ownership problems which could limit development here and the site has been promoted by a developer/ landowner for the purposes of this study.

Site description and surroundings

The site is located on the south western edge of Maidstone, south of Hackney Road. The site is rectangular in shape and consists of a former orchard which slopes down to the south. There are dispersed hedgerow boundaries with trees located along the eastern boundary. There is no defined southern boundary. There is a narrow track to the south of the site.

The site adjoins the existing built up area to the north and east which consists of 2 storey semi detached and detached housing. To the east are larger semi rural residential properties and to the south is agricultural land.

Planning status/policy

The site is located outside but adjacent to the urban area as defined on the Local Plan Proposal Map.

The site is located within an Area of Local Importance. Policy ENV39 requires particular attention to the maintenance of open space and the character of the landscape.

Planning history

Site proposed for 40 dwellings with remaining part of the site proposed open space.

1) 08/0669, 31, SHELLEY ROAD, MAIDSTONE, ME168NS, Erection of a single storey rear extension as shown on drawing no.s CJ0111-02, CJ0111-03, CJ0111-04 received 31/03/08 and site location plan received 09/04/08. Approved/Granted with Conditions, 27/05/2008.

2) 07/0772, FANT OAST, FANT FARM, MAIDSTONE, ME168DE. Construction of garden wall and general re-landscaping as shown on scale 1:500 site plan, 1:1250 site location plan received on 12 April 2007 and amended Drawing No 0603 Rev A received on 02 July 2007. Approved/Granted with Conditions, 12/07/2007.

3) 05/2098, FANT OAST, FANT FARM, MAIDSTONE, ME168DE. An application for listed building consent for the removal and replacement of Kent peg tiles to the oast roofs, replacing broken tiles with Kent pegs, removal of existing roof coverings and replacement with keymer shire hand made clay tiles. Approved/Granted with Conditions, 16/12/2005.

Landscape

The Enderby Associates landscape assessment concludes that this is a small site is to the east of site 152 and also located in the Fant Orchards Character Area and ALLI. The site is a continuation of the larger featureless arable field that extends from the west and which narrows to form a strip of land bounded on the north side by a residential estate and Fant House to the south; the latter comprises a cluster of old buildings including a converted Oast house, a large house and various traditional outbuildings. These form a distinctive and attractive grouping and tall brick and stone walls enclose part of the proposed site which, by virtue of its containment by buildings is relatively discrete within the wider landscape. The wall is a key feature of the frontage of Hackney Road to the east.

Whilst, in landscape terms, the contained strip of land does offer potential for accommodating some development without wider landscape and visual impact, any such development is likely to impact on the setting (two buildings are listed) and attractive character of the building group the integrity of which is enhanced greatly by its separation from other development. Access would need to be provided off Hackney Road and this would involve breaching the distinctive stone wall. Overall, the site is considered to be not suitable for development for these reasons.

Ecology

According to the Kent Red Data Book and the National Red Data Book there are no endangered/venerable species within the site. According to the Protected Species Inventory again there are no records of endangered/venerable species within the site. The KMBRC have records of 397 bats within a 5km buffer zone of the site. There is no record of UK Biodiversity Action Plan species (conservation concern/priority species) within the site. There are no records of endangered or protected birds since 1999 and Great Crested Newts within and adjacent to the site. A phase 1 ecological survey will be required as part of any planning application to develop the site. Given the above information it is likely that this will be accompanied by a detailed bat survey.

TPO

There are no TPOs within or adjoining the site.

Agricultural quality

A small area to the south of the site is Grade 1 Agricultural Land - Excellent.

Built environment

There are no Listed Buildings within the site, however, there are two Listed Buildings adjacent to the site to the south east.

Archaeology

Kent County Council Archaeological office has confirmed that there were Prehistoric flint tools found 250m east, prehistoric beaker found 290m north east. Burial urns and brooch 425m south. General Roman potential from nearby villa sites. There is significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures should be possible on this site.

Transport/access summary

The County Highway Officer comments that access off Hackney Road for 40 units should be okay. The officer concludes that that there are unlikely to be access problems.

Air/noise quality

Environmental Health have identified the site being adjacent to an Air Quality Management Area. There could be air quality issues and this should be dealt with by Planning Condition.

Services

South East Water has confirmed that there is enough capacity to supply water to this location, however off site reinforcement will be required at the cost to the developer. Sites within the main urban areas generally incur fewer costs than that of more rural locations.

National Grid have confirmed that the anticipated additional growth at Maidstone Borough will not create capacity issues particularly given the scale of the electricity and gas transmission networks. Detailed assessments of each site will be required to determine site specific issues.

Southern Water has confirmed that in terms of sewage there is no fundamental reason why this site would not be suitable for development. However, it is likely that improved infrastructure will be required to serve the site. Detailed assessments will be required at the planning application stage however if capacity is insufficient the developer will need to requisition a connection to the sewage system.

Southern Water have confirmed that surface water should not be discharged to the foul sewer but to a separate system e.g. soakaways, SUDS or local water course. Southern Water will not adopt these systems and if a discharge is proposed to an existing surface water sewer owned by Southern Water, a capacity test will be required

Flood risk

The site is outside of the defined flood risk area.

Land contamination

Environmental Health have stated that the site is less than 250m from fant farm quarry - records of unauthorised waste deposition and less than 250m from fant farm extension licensed to take inert & commercial waste. This can be addressed by a Landfill Gas Planning Condition.

Accessibility

The accessibility of the site is assessed against the sites location to key services and facilities such as education, health, employment, retail and public transport. The site is scored from A-D (A=Good and D=Poor). The assessment concludes that the site has poor access to employment and moderate/poor access to all other key facilities and services. The site scores C in the overall assessment which concludes that the site has moderate to poor accessibility to key services and facilities.

Site summary

There are both minor and relatively major constraints to be considered relating to this site, including ecology, archaeology, agricultural land quality (major), conservation, air/noise quality, contamination, and accessibility. The Enderby Associates landscape appraisal finds the site not to be suitable for development. The overall conclusion is that the site is not suitable for further consideration. In the context of the SSA, it is placed in the LOW category of development potential, and no dwelling yield is accorded.

Development Capacity	0
-----------------------------	---

Development Potential	LOW
------------------------------	-----





152 – Land at Gatland Lane/Farleigh Lane, Maidstone

- 3.17 The site lies on the southern edge of Barming and consists of orchards in the western and eastern parts separated by a large arable field, all located on the upper slopes of the Medway Valley within an area identified as an ALLI identified as being an area of attractive countryside. Existing development adjoins the western and northern boundaries and, parts of the former are apparent behind the site when viewed across the valley from the south and form a poor settlement edge. Orchards and shelterbelts are a typical characteristic of the wider area. A right of way crosses the central part of the site and there are other unofficial routes.
- 3.18 The site falls within the Fant Orchards Character Area in the LCAA (that extends across a considerably larger area of land than the site) which is identified as being in Poor Condition, of Moderate Sensitivity, where there is 'Scope for Change with certain constraints'. Detailed analysis shows that the orchards and shelterbelts form the main landscape components within the site. It is apparent that parts of the site are more sensitive than others in visual terms; whilst the site lacks landscape structure and is in Poor Condition, it is possible that well planned development within parts of the site would provide an opportunity to define the boundary between the ALLI and the town in a more appropriate manner in the long term. Parts of the site, notably to the east where the existing urban edge is harsh, are therefore considered **SUITABLE** for accommodating some development. Any new development should restore landscape structure and the use of structured 'shelterbelt' planting would be consistent with prevailing character.

139 – Land at Fant Farm, Maidstone

- 3.19 This small site is to the east of site 152 and also located in the Fant Orchards Character Area and ALLI. The site is a continuation of the larger featureless arable field that extends from the west and which narrows to form a strip of land bounded on the north side by a residential estate and Fant House to the south; the latter comprises a cluster of old buildings including a converted Oast house, a large house and various traditional outbuildings. These form a distinctive and attractive grouping and tall brick and stone walls enclose part of the proposed site which, by virtue of its containment by buildings is relatively discrete within the wider landscape. The wall is a key feature of the frontage of Hackney Road to the east.
- 3.20 Whilst, in landscape terms, the contained strip of land does offer potential for accommodating some development without wider landscape and visual impact, any such development is likely to impact on the setting (two buildings are listed) and attractive character of the building group the integrity of which is enhanced greatly by its separation from other development. Access would need to be provided off Hackney Road and this would involve breaching the distinctive stone wall. Overall, the site is considered to be **NOT SUITABLE** for development for these reasons.

South east

036 – Boughton Mount Farm, Maidstone

- 3.21 The site comprises a number of relatively flat arable fields (some formed from cleared orchards with some boundary removal), set around a group of modern farm buildings at Boughton Mount Farm (located off Pested Bars Road - a narrow hedge-lined lane) which crosses the central part of the site to run along the north eastern edge. A number of well used rights of way cross parts of the site. The site falls within the Boughton Farm Character Area in the LCAA and is noted as being in Poor Condition, principally due to the loss of the historic landscape pattern and influence of some urban features, and of Moderate Sensitivity. It is noted as being a landscape with 'Scope for change with certain constraints'.
- 3.22 To the west lies Boughton Manor, surrounded by mature vegetation, and the small settlement of The Quarries lying within the Loose valley to the south. To the north east lies established and new housing areas, and Police School at Parkwood. The area has a clear rural character with the development to the north east being generally well

APPENDIX 3

Extract of Sustainability Appraisal (February 2016) [SUB 002]

1. Site Information		
Number (linked to GIS database)	HO-74	
Site name/address	Land at Fant Farm, Maidstone	
Site area (ha)	47.71ha	
Approximate yield	358	
Proposed no. of pitches	N/A	
Site description	<p>The site is located to the south of the urban boundary and lies within the Medway Valley. The site has a sloping topography with the land sloping southwards towards the river Medway. The land is bordered by Gatland Lane to the north and an existing residential area, to the west by Farleigh Lane and to the south by the river Medway, Medway Valley Rail line and the Medway walk.</p> <p>Due to the Valley location of the site, views across the valley are possible with the proposed site visible from the East Farleigh valley area. The site includes agricultural land and extends around the existing farm buildings of Fant Farm. This includes a number of Grade II listed buildings sited in a cluster to the eastern side of the site.</p>	
Current use	Orchards and agricultural fields	
Adjacent uses	Residential (urban area)	
2. Sustainability Appraisal		
SA Topic: Community wellbeing		
Accessibility to existing centres and services:		
Appraisal Question	Criteria	Answer/Evidence
How far is the site from the Maidstone Urban Area or a Rural Service Centre?	<p>R = Not adjacent to the Maidstone Urban Area, or a rural service centre and would not be more accessible to services even if other sites were allocated</p> <p>A = Adjacent to the Maidstone Urban Area or a rural service centre, or could be more accessible to services if other sites allocated as well</p> <p>G = Within the Maidstone Urban Area or a rural service centre</p>	A = Adjacent to the Maidstone Urban Area or a rural service centre, or could be more accessible to services if other sites allocated as well
How far is the site from the nearest medical hub or GP service?	<p>R = >800m</p> <p>A = 400m – 800m</p> <p>G = <400m</p>	A = The site is 515m from the nearest medical hub/GP.
How far is the site from the nearest secondary school?	<p>R = >3900m</p> <p>A = 1600-3900m</p> <p>G = <1600m;</p>	G = The site is 742m from the nearest secondary school.

How far is the site from the nearest primary school?	R = >1200m A = 800-1200m G = <800m;	G = The site is 671m from the nearest primary school.
How far is the site from the nearest post office?	R = >800m A = 400m – 800m G = <400m	R = The site is 910m from the nearest post office.
Accessibility to outdoor facilities and greenspace:		
Appraisal Question	Criteria	Answer/Evidence
How far is the site from the nearest outdoor sports facilities (i.e. playing pitch, tennis courts)?	A = >1.2km G = <1.2km	G = The site is 22m from the nearest sports facility.
How far is the site from the nearest children's play space?	A = >300m from 'neighbourhood' children's play space G = <300m	G = The site is 269m from the nearest play space.
How far is site from the nearest area of publicly accessible greenspace (>2ha in size)?	A = >300m (ANGST) G = <300m	G = The site is 5m from the greenspace.
SA Topic: Economy		
Appraisal Question	Criteria	Answer/Evidence
How accessible is the site to local employment provision (i.e. employment sites or the nearest local service centre?)	R = >2400m A = 1600-2400m G = <1600m	G = The site is 440m from the nearest employment site. G = The site is 420m from the nearest service centre.
Will allocation of the site result in loss of employment land/space?	R = Allocation will lead to significant loss of employment land/space A = Allocation will lead to some loss of employment land/space G = Allocation will not lead to the loss of employment land/space	N/A
Will allocation of the site result in employment-generating development in or close to (<2400m) deprived areas?	A = Not within or close to the 40% most deprived Super Output Areas within the country, according to the Index of Multiple Deprivation, 2010.	G = Within or close to the 40% most deprived Super Output Areas within the country.

G = Within or close to the 40% most deprived Super Output Areas within the country.

SA Topic: Transport and Accessibility

Appraisal Question	Criteria	Answer/Evidence
How far is the site from the nearest bus stop?	R = >800m A = 400 - 800m G = <400m	G = The site is 269m from the nearest bus stop.
How far is the site from the nearest train station?	R = >800m A = 400 - 800m G = <400m	A = The site is 428m from the nearest train station.
How far is the site from the nearest cycle route?	R = >800m A = 400 - 800m G = <400m	R = The site is 3908m from the nearest cycle route.

SA Topic: Air quality and causes of climate change

Appraisal Question	Criteria	Answer/Evidence
Are there potential noise problems with the site – either for future occupiers or for adjacent/nearby occupiers arising from allocation of the site?	A = Potential adverse impact G = Unlikely adverse impact N = No information available at this stage	N = No information available at this stage.
Is the site within or near to an AQMA?	R = Within or adjacent to an AQMA A = <1km of an AQMA G = >1km of an AQMA	R = Within or adjacent to an AQMA

SA Topic: Water resources and quality

Not addressed by the Pro Forma. Development management policies will address this issue.

SA Topic: Land use, landscape and the historic environment

Land Use:

Appraisal Question	Criteria	Answer/Evidence
Will allocation of the site lead to loss of the best and most versatile agricultural land?	<p>A = Includes Grade 1, 2 or 3 agricultural land</p> <p>G = Does not include 1, 2 or 3 agricultural land</p>	<p>A = Includes Grade 1, 2 or 3 agricultural land.</p> <p>28% Grade 2, 53% Grade 3a, 2.5% Grade 3b (Total of >40 hectares)</p>
Will allocation of the site make use of previously developed land?	<p>R = Does not include previously developed land</p> <p>A = Partially within previously developed land</p> <p>G = Entirely within previously developed land</p>	<p>R = Does not include previously developed land.</p>

Landscape, townscape and the historic environment:

SA Objective 7. To create and sustain vibrant, attractive and clean communities

SA Objective 14: To protect, enhance and make accessible for enjoyment, the Borough's countryside, open space and historic environment

Appraisal Question	Criteria	Answer/Evidence
Is the allocation of the site likely to impact upon a Scheduled Ancient Monument (SAM)?	<p>A = On a SAM OR Allocation will lead to development adjacent to a SAM with the potential for negative impacts</p> <p>G = Not on or adjacent to a SAM and is unlikely to have an adverse impact on a nearby SAM.</p>	<p>G = Not on or adjacent to a SAM and is unlikely to have an adverse impact on a nearby SAM.</p>
Is the allocation of the site likely to impact upon a listed building?	<p>A = Contains or is adjacent to a listed building and there is the potential for negative impacts.</p> <p>G = Not on or adjacent to a listed building and is unlikely to have an impact on a nearby listed building.</p>	<p>A = Contains or is adjacent to a listed building and there is the potential for negative impacts.</p> <p>This issue would need to be investigated in more detail through the pre-application and planning application processes, if the site was considered suitable and allocated for development in the Local Plan.</p>
Is the allocation of the site likely to impact upon a Conservation Area?	<p>A = Within or adjacent to a Conservation Area and there is the potential for negative impacts.</p> <p>G = Not within or adjacent to a Conservation Area and is unlikely to have an impact on a nearby listed building.</p>	<p>G = Not within or adjacent to a Conservation Area and is unlikely to have an impact on a nearby listed building.</p>
Does the site lie within an area with significant	<p>A = Within an area where significant archaeological</p>	<p>A = Within an area where significant archaeological</p>

archaeological features/finds or where potential exists for archaeological features to be discovered in the future?	features are present, or it is predicted that such features could be found in the future. G = Not within an area where significant archaeological features have been found, or are likely to be found in the future. N = No information available at this stage	features are present, or it is predicted that such features could be found in the future. This issue would need to be investigated in more detail through the pre-application and planning application processes, if the site was considered suitable and allocated for development in the Local Plan.
Is the site located within or in proximity to and/or likely to impact on the Kent Downs AONB?	A = In close proximity to the Kent Downs AONB and/or there is the potential for negative impacts. G = Not in close proximity to the Kent Downs AONB and/or negative impacts on the AONB are unlikely.	G = Not in close proximity to the Kent Downs AONB and/or negative impacts on the AONB are unlikely.
Is the site in the Green Belt? If so, is the allocation of the site likely to cause harm to the objectives of the Green Belt designation?	A = Within or adjacent to the Green Belt and development could potentially cause harm to the purposes of the Green Belt designation and/or its openness G = Not within or adjacent to the Green Belt	G = Not within or adjacent to the Green Belt.
Would development of the site lead to any potential adverse impacts on local landscape character for which mitigation measures appropriate to the scale and nature of the impacts is unlikely to be achieved?	R = Likely adverse impact (taking into account scale, condition and sensitivity issues), which is unlikely to be appropriately mitigated A = Likely adverse impact (taking into account scale, condition and sensitivity issues), which is likely to be appropriately mitigated G = Opportunity to enhance landscape character or there is unlikely to be an adverse impact	A = The Landscape Character Assessment (2012) states the area should maintain a buffer of open space and vegetation respecting the current setting.

SA Topic: Flood Risk

Appraisal Question	Criteria	Answer/Evidence
Is allocation of the site within a flood zone?	R = Flood risk zone 3b A = Flood risk zone 2 or 3a G = Flood risk zone 1	A = 3% of the site is in flood risk zone 2.
Is the proposed use of the site appropriate in terms of guidance set out in the 'Technical Guidance to the NPPF' relating to flood risk? See table 3 (page 8) of the technical guidance.	R = Development should not be permitted A = Exception test is required G = Development is appropriate	G = Development is appropriate.

SA Topic: Biodiversity and Green Infrastructure

Appraisal Question	Criteria	Answer/Evidence
Is the allocation of the site likely to impact upon an Ancient Woodland (AW) or Ancient Semi-Natural Woodland (ASNW)?	<p>R = Includes AW/ASNW</p> <p>A = <400m from an AW/ASNW</p> <p>G = >400m</p>	A = The site is 50m from an AW/ASNW.
Is the allocation of the site likely to impact upon a Site of Special Scientific Interest (SSSI)?	<p>A = Potential impacts identified by County Council Ecologist</p> <p>G = No likely impacts identified at this stage</p>	G = No likely impacts identified at this stage.
Is the allocation of the site likely to impact upon a Local Wildlife Site (LWS) or Local Nature Reserve (LNR)?	<p>A = Potential impacts identified by County Council Ecologist</p> <p>G = No likely impacts identified at this stage</p>	G = No likely impacts identified at this stage.

APPENDIX 4

BW Commentary on SA [SUB002]

Appendix 4
Commentary on Sustainability Appraisal [SUB002]

The Site (HO-74) was tested as part of the Sustainability Appraisal (SA) (February 2016) [SUB002] supporting MBC's Local Plan.

Table A

Appraisal Question	SA 2016 Answer/Evidence	BW Comments and re-shading where required
SA TOPIC: COMMUNITY WELLBEING		
How far is the site from the Maidstone Urban Area or a Rural Service Centre?	Adjacent to the Maidstone Urban Area or a rural service centre, or could be more accessible to services if other sites allocated as well.	The Site is currently outside but adjacent to Maidstone Urban Area. If the Site was allocated in the Local Plan, its location would be amended to be within the Urban Area boundary (i.e. 'green' category).
How far is the site from the nearest medical hub or GP service?	The Site is 515m from the nearest medical hub/GP.	
How far is the site from the nearest secondary school?	The Site is 742m from the nearest secondary school.	The Site is within close proximity to Oakwood Park campus, which has a number of secondary schools that serve the wider Maidstone Area. It is within an acceptable walking distance to secondary schools (usually 2km) and represents sustainable access to secondary education.
How far is the site from the nearest primary school?	The Site is 671m from the nearest primary school.	

Appraisal Question	SA 2016 Answer/Evidence	BW Comments and re-shading where required
How far is the site from the nearest post office?	The Site is 910m from the nearest post office.	Whilst the distance has been identified as 'red', access to a Post Office is not deemed as a critical component to the success of a site's sustainability or not.
How far is the site from the nearest outdoor sports facilities (i.e. playing pitch, tennis court)?	The Site is 22m from the nearest sports facility.	
How far is the site from the nearest children's play space?	The Site is 269m from the nearest play space.	The proposed development would also provide for a children's play area.
How far is the site from the nearest area of publicly accessible greenspace (>2ha in size)?	The Site is 5m from the greenspace.	
SA TOPIC: ECONOMY		
How accessible is the site to local employment provision (i.e. employment sites or the nearest local service centre?)	The Site is 440m from the nearest employment site. The Site is 420m from the nearest service centre.	
Will allocation of the site result in loss of employment land/space?	N/A	No. This should be considered a net positive.

Appraisal Question	SA 2016 Answer/Evidence	BW Comments and re-shading where required
Will allocation of the site result in employment-generating development in or close to (<2400m) deprived areas?	Within or close to the 40% most deprived Super Output Areas within the country.	
SA TOPIC: TRANSPORT AND ACCESSIBILITY		
How far is the site from the nearest bus stop?	The Site is 269m from the nearest bus stop.	
How far is the site from the nearest train station?	The Site is 428m from the nearest train station.	The Site is in close proximity to a railway line and can be accessed within a 5 minute walk. This is deemed a short distance for access to such a facility.
How far is the site from the nearest cycle route?	The Site is 3908m from the nearest cycle route.	The Outline proposals include the provision of 2no. pedestrian/cycle accesses on Gatland Lane to enable connectivity and permeability through the Site. A detailed walking and cycling audit was undertaken and identified that the main desire lines fulfil the 5no. core principles common to both pedestrians and cyclists, identified within the Department for Transport Local Transport Note 1/04 Policy.

Appraisal Question	SA 2016 Answer/Evidence	BW Comments and re-shading where required
SA TOPIC: AIR QUALITY AND CAUSES OF CLIMATE CHANGE		
Are there potential noise problems with the site – either for future occupiers or for adjacent/nearby occupiers arising from allocation of the site?	No information available at this stage.	The Outline application submission confirmed there are no noise constraints.
Is the site within or near to an AQMA?	Within or adjacent to an AQMA.	The Site is outside, but adjacent to the Maidstone Town AQMA. The Outline application was accompanied by an Air Quality Assessment. Mid Kent Environmental Health raised no objection to the Outline, subject to the imposition of a suitable Condition relating to air quality mitigation measures.
SA TOPIC: LAND USE, LANDSCAPE AND THE HISTORIC ENVIRONMENT		
Will allocation of the site lead to loss of the best and most versatile agricultural land?	Includes Grade 1, 2 or 3 agricultural land.	The agricultural land grading of the Site has been assessed and is detailed in the Agricultural Land Classification report, submitted as part of the Outline application. It is identified that the land quality of the Site comprises Grade 2, Grade 3a and Grade 3b agricultural land.

Appraisal Question	SA 2016 Answer/Evidence	BW Comments and re-shading where required
Will allocation of the site make use of previously developed land?	Does not include previously developed land.	As MBC has acknowledged, the majority of its Local Plan allocations comprise greenfield sites due to the limited availability of brownfield sites to meet its Objectively Assessed Need. In this respect, this Site does not differ from other proposed allocations in the submitted Local Plan [SUB 001].
Is the allocation of the site likely to impact upon a Scheduled Ancient Monument (SAM)?	Not on or adjacent to a SAM and is unlikely to have an adverse impact on a nearby SAM.	
Is the allocation of the site likely to impact upon a listed building?	Contains or is adjacent to a listed building and there is the potential for negative impacts. This issue would need to be investigated in more detail through the pre-application and planning application processes, if the site was considered suitable and allocated for development in the Local Plan?	No designated or undesignated Heritage Assets are located in the Site. The Site is located within proximity to 3no. heritage assets. MBC Heritage raised no objection to the proposed development, and concluded that the development would have no adverse impacts on the heritage assets or its settings.
Is the allocation of the site likely to impact upon a Conservation Area?	Not within or adjacent to a Conservation Area and is unlikely to have an impact on a nearby listed building.	

Appraisal Question	SA 2016 Answer/Evidence	BW Comments and re-shading where required
Does the site lie within an area with significant archaeological features/finds or where potential for archaeological features to be discovered in the future?	<p>Within an area where significant archaeological features are present, or it is predicted that such features could be found in the future.</p> <p>This issue would need to be investigated in more detail through the pre-application and planning application processes, if the site was considered suitable and allocated for development in the Local Plan.</p>	<p>An Archaeological Desk Based Assessment, submitted as part of the Outline application, concluded that the Site has low potential for archaeological features/finds. KCC Archaeology raised no objection to the development, subject to the imposition of a suitable Condition that requires archaeological evaluation works.</p>
Is the site located within or in proximity to and/or likely to impact on the Kent Downs AONB?	<p>Not in close proximity to the Kent Downs AONB and/or negative impacts on the AONB are unlikely.</p>	
Is the site in the Green Belt? If so, is the allocation of the site likely to cause harm to the objectives of the Green Belt designation?	<p>Not within or adjacent to the Green Belt.</p>	
Would development of the site lead to any potential adverse impacts on local landscape character for which mitigation measures appropriate to the scale and nature of the impacts	<p>The Landscape Character Assessment (2012) states the area should maintain a buffer of open space and vegetation respecting the current setting.</p>	<p>The Site is on the urban fringe with existing development to the north, east and in part, to the west. Its development would be seen as an infill development rather than a protrusion into the open countryside and it would also ensure that the most sensitive part of the Medway</p>

Appraisal Question	SA 2016 Answer/Evidence	BW Comments and re-shading where required
is unlikely to be achieved?		Valley will remain undeveloped and that green and blue infrastructure remains and is enhanced. MBC's SHEDLAA (2014 & 2016) supports this conclusion.
SA TOPIC: FLOOD RISK		
Is allocation of the site within a flood zone?	3% of the Site is in flood risk zone 2.	The Site is located within Flood Zone 1.
Is the proposed use of the site appropriate in terms of guidance set out in the 'Technical Guidance to the NPPF' relating to flood risk?	Development is appropriate.	
SA TOPIC: BIODIVERSITY AND GREEN INFRASTRUCTURE		
Is the allocation of the site likely to impact upon an Ancient Woodland (AW) or Ancient Semi-Natural Woodland (ASNW)?	The Site is 50m from an AW/ASNW.	The Ecological Report concludes that the proposed development is not likely to result in significant impacts on AW/ASNQ, which KCC Ecological Advice Service accepted.
Is the allocation of the site likely to impact upon a Site of Special Scientific Interest (SSSI)?	No likely impacts identified at this stage.	Natural England raised no objection to the development as it is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes.
Is the allocation of the site likely to impact upon a Local Wildlife Site (LWS) or Local Nature Reserve (LNR)?	No likely impacts identified at this stage.	