



Maidstone Local Plan Examination

Response to Inspector's Session 5A Questions: Housing Supply

Prepared on behalf of Messrs Cyster

September 2016

DHA/11751

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1 Introduction

1.1 Overview

- 1.1.1 This additional evidence is submitted on behalf of Messrs Cyster in respect of the emerging Maidstone Local Plan.
- 1.1.2 Our clients are actively promoting land at Bell Farm South, Harrietsham as an allocation and object to the site's omission. Furthermore, they wish to comment on the soundness of the plan and appear at the Examination given the significant flaws associates to the housing strategy and supply given the clear need to identify additional sites.
- 1.1.3 We expand upon the evidence for this within this statement specifically responding to the questions of the Inspector.

1.2 Scope of Representations

- 1.2.1 Maidstone Borough Council (MBC) has submitted its Local Plan and associated documentation for Independent Examination. An Examination Programme has been published, which divides the hearings into various sections over six weeklong sessions. The first tranche of hearings will be held in October 2015 and will address issues of national policy consistency, housing land supply and other strategic borough-wide policy issues. The subsequent parts, to be heard in November and December 2016, will consider site-specific allocations and more generic planning issues.
- 1.2.2 This statement constitutes Messrs Cyster formal response to questions raised by the Inspector in regards to Matter 5A in respect of housing supply.

2 Response to The Inspector's Questions

2.1 Overview of Evidence

- 2.1.1 The Inspector has raised ten questions in respect of matters relating to Housing Supply. Whilst the majority of these questions are directed to the Council, we also take the opportunity to respond where we feel can add to the discussion and assist the Examination. Furthermore, in order to aid the Inspector, we append, as evidence, our own independent critique of the Council's housing land supply evidence included within the Housing Topic Paper (2016).
- 2.1.2 This evidence highlights in detail why there are very real concerns about the Council's ability to put in place a robust five-year supply of housing land (or to meet the overall housing target for the plan period) if the plan is adopted without significant modification. This critique is included as **Appendix 1**.

2.2 Qn5.1 - Is the Council proposing a formal modification to the land supply information?

- 2.2.1 As set out in detail within our critique, there are areas of the current housing land supply that are not credible, not supported by sufficient evidence and provide an overly optimistic prediction of delivery that is unlikely to be realised. Accordingly, the evidence base is flawed and the plan is not justified.
- 2.2.2 As an example, MBC's housing completion rates have persistently been substandard when analysed over a five (no achievement of target), ten (40% achievement of target) or twenty year period (40% achievement), yet the Council disregards this past performance, resists applying a 20% buffer and fails to positively plan for the housing need with a robust contingency.
- 2.2.3 Furthermore, having regard to the unknown potential of Invicta Barracks, the high windfall allowance and the question marks surrounding the Broad Locations, a third of the Council's local plan housing supply is to be derived from unspecific sites and uncertain sources. This is simply too high to ensure that the plan is effective and deliverable over the plan period.
- 2.2.4 To be justified the plan should be the most appropriate strategy when considered against the reasonable alternatives and based on a proportionate evidence base. On the basis that there are further sustainable, deliverable and developable sites available, a more appropriate and positive strategy would be to allocate these for development rather than rely on components of housing that are unlikely to be delivered and fall outside of the Council's control.
- 2.2.5 The need to put in place robust and realistic assumptions should be of greater importance as the implication of not putting in place a robust housing strategy are significant. Should the level of under delivery continue, as we fear it will, the identified under supply of housing will quickly render the emerging Local Plan out of date - potentially within 12 months of adoption.
- 2.2.6 For the reasons outlined above, we consider it is within the Council's own best interest to review and amend the plan and housing supply strategy to ensure that the plan will endure the plan period. These points are expanded upon where necessary below and within the appended critique and subsequent responses below, but in conclusion the housing supply

elements of the plan are not positively prepared, justified or effective and would fail to boost the supply of housing to the required levels as set out in national policy.

2.3 Qn 5.2 to 5.4 - Policy H2 and Broad Locations

2.3.1 The Council's decision to rely on Broad Locations as a core component of the housing land supply does not represent positive, effective or justified planning when genuinely sustainable and deliverable sites are available. Accordingly, we consider amendments are required to policy H2 and the housing strategy as a whole.

Is the proposed 990 dwelling yield for H2 (1) (Town Centre) adequately justified?

2.3.2 Given the reducing supply of brownfield sites, there is no genuine evidence available to demonstrate 990 additional homes will come forward in Maidstone town centre. Whilst we note the level of low-grade office accommodation that has been identified as having potential to provide housing, this does not mean that such delivery will materialise. For example, there remains an ongoing need for budget office accommodation in the town and it is naïve to assume that only high-grade (more expensive) commercial floorspace is attractive.

2.3.3 Furthermore, the Council must take into consideration that the majority of legitimate and viable opportunities have already largely been exhausted via the SHLAA process, with suitable sites identified within emerging housing and mixed use policies. Accordingly, to allow for 990 unidentified additional units in the town centre, plus a windfall allowance that averages 106 dwellings per annum for the remaining plan period represents 'double counting'.

2.3.4 For this reason, we favour the deletion of Maidstone Town Centre as a Broad Location as part of the housing supply but do not oppose the retention of a credible windfall allowance to allow for unplanned completions that may arise. Alternatively, if the Town Centre broad location is to be retained the subsequent windfall rates should be further reduced.

What should happen if Invicta Park Barracks were not surplus to requirements?

2.3.5 There remains a distinct lack of certainty regarding the long-term future of Invicta Park Barracks and whether the site will become available for development within the plan period.

2.3.6 In this regard, it is noteworthy that on 6th September 2016 The Ministry of Defence (MOD) announced plans for an ambitious Estate Optimisation Strategy programme and the expected release of 13 sites that will contribute 17,017 homes.

2.3.7 The 13 sites subject to Estate Optimisation Strategy programme are listed below but does not include the Invicta Barracks site:

- RAF Henlow (Bedfordshire)
- Middlewick Ranges (Essex)
- Amport House (Andover)
- Land at Harley Hill (Catterick)
- Chalgrove Airfield (Oxford) Transferred to the Homes and Communities Agency
- Colerne Airfield (Chippenham)
- Azimghur Barracks (Chippenham)

- Prince William of Gloucester Barracks (Grantham)
- Old Dalby (Melton Mowbray)
- Venning Barracks (Telford)
- Parsons Barracks (Donnington)
- Southwick Park (Fareham)
- Royal Marines Stonehouse (Plymouth)

- 2.3.8 Given this recent announcement, we retain the view that question marks exist regarding the timescales for release of the land. For this reason, if the site cannot meet these tests of being deliverable or developable and it should not be relied upon at the expense of other genuinely sustainable housing sites that would come forward.
- 2.3.9 Furthermore, given the scale of a potential 1,300-unit development, even a high delivery rate of 100 units pa would require approximately 13 years to complete the development. Furthermore, preparing an outlining application and discharging conditions and reserved matters for a scheme of this size is likely to take several years to achieve. In simple terms, the site would need to be confirmed for release, plans be agreed for the decommissioning of the MOD site and a planning application already advancing through the planning process if there was any chance of the site being delivered in full within the plan period.
- 2.3.10 For clarity, we do not consider it is wrong of the Council to have regard to the site and to plan for a potential re-use in the event that it becomes available. However, to assume that it will deliver 1,300 new homes prior to 2031 is tantamount to unreasonable and therefore for it to be relied upon at the expense of other deliverable sites is grossly unsound.
- 2.3.11 Finally, the site and reliance is of such a scale that as drafted the plan has no contingency should it not come forward.

Is the H2 (3) Lenham Broad allocation for 1,500 dwellings realistic?

- 2.3.12 We see no sound planning reason why the identification of sites in Lenham have been treated differently to other settlements, or delayed, when sufficient land is available to allocate for housing.
- 2.3.13 We also remain concerned that the proposed strategy relies on all 1,500 units being delivered within the plan period, yet restricts development to between 2026 and 2031 resulting in a need for a consistent delivery of 300 units per year for an intense five-year period. This notion is illogical and unsound in planning terms on the basis that even a healthy housing market could not sustain this form of intensified growth in a five-year period, nor is there any explanation why such sites should be delayed or not spread over the plan period as a whole. This does not represent positive planning and is not an effective or justified planning strategy.
- 2.3.14 Finally, we retain our concern that by not identifying specific sites it would encourage a 'first come first served' style arrangements whereby the growth of Lenham is disaggregated and comes forward on an ad hoc basis rather than via a comprehensive planning strategy.

2.4 Qn5.6 Is the Council's revised windfall allowance justified?

- 2.4.1 We agree that some windfall sites are likely to continue during the plan period. However, we can see no genuine evidence to rely upon them as a key component of the housing supply, particularly in the early stages of the plan period. This is because they will be a reducing supply as brownfield land and other opportunities are increasingly used up and any office/pdl land in Maidstone Town Centre will be included within the 990 unit Broad Location allowance.
- 2.4.2 The NPPF is very clear that Local planning authorities may make an allowance for windfall sites only if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should also be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.
- 2.4.3 Given the age of the current development plan any historic delivered of windfall sites cannot be a robust basis to calculate a new allowance, so windfalls should be approached with significant caution to ensure no over reliance. They should be treated as a 'bonus' until such time as robust evidence of windfall generation, over a sustained period, has been established.
- 2.4.4 To ensure there is not an over reliance, we consider any windfall rates should be capped to 50 units per year for the later part of the plan period (for the period 2021 – 2031) whilst credible new evidence can be collated. This is even more important given the Council has a duty to balance housing and economic needs as the Council simply cannot continue to allow the loss of employment sites (the key source) to supplement housing need.

2.5 Qn5.7 Can the Council estimate windfall sites in the extant planning permissions?

- 2.5.1 Whilst this analysis would be a useful guide, there can be no doubt that a windfall allowance within the immediate five year period, plus any reliance of extant consents on non-allocated sites, would represent double counting and would over predict the level of housing that would be provided. Whilst this may assist the supply on paper, it will make it more fragile in reality.

2.6 Qn5.8 Is the 5% allowance for non-implementation reasonable?

- 2.6.1 We note that a discount has been made to allow for the non-implementation of extant planning permissions. Whilst an industry standard approach is to apply a discount of 10% we note the evidence presented to justify a reduced discount of 5% on the full and outline consents and raise no objection to this approach.
- 2.6.2 However, given the fact that localised evidence does not yet exist in respect of the non-delivery of prior notification consent, a more cautious approach is advocated for this source of housing.
- 2.6.3 Classes M to Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 make provision for the change of use of various different uses to dwellings without the need for full planning permission. Proposals made under these provisions are subject to 'prior notification' applications.

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- 2.6.4 In total, 700 units (737 minus 5% for non-implementation) of the Council's five year housing land supply are made up of prior notification approvals rather than full or outline planning permissions, so these need to be treated with a degree more caution than full or outline planning permission.
- 2.6.5 Given the simplicity of Prior Notification applications, we have first-hand knowledge that some applicants and business owners have sought to make best use of these new opportunities to increase land values and negotiate higher rental charges. Furthermore, undertaking the prior notification process does not show the commitment to deliver in the same way as those landowners and developers wishing to progress full planning applications. Accordingly, we consider there to be far more risk of the consents expiring without implementation, which should be reflected by a more cautious non-delivery rate.
- 2.6.6 In order to ensure the Council is not overly reliant on a less secure component of the housing land supply, we consider a higher non-implementation rate should be applied to the Prior Notification consents. We consider 20% appropriate based upon the need to take a cautious approach and deliver a robust and credible supply of housing land.

2.7 Qn5.9 Is there a need for reserve allocations?

- 2.7.1 Given that 33% of the Council's overall housing supply is from general and nonspecific sources, we consider there to be a need to insert a significant number of additional housing sites as firm housing allocations. Nevertheless, we also consider that the addition of a strategic reserve site would be a sound approach and would build some further flexibility in the event that the supply does not come forward as predicted.
- 2.7.2 A reasonable example of a reserve policy within Kent is policy LO6 of the Sevenoaks District Core Strategy (adopted 2011), which allocated land to the west of Edenbridge as Reserve Land to be brought forward for development after 2015 if required to maintain a five year supply of housing land in the District. The identification of the site in this form was not included within the housing land supply components for the plan period, yet still provided a contingency capable of providing approx. 8.5% of the overall housing requirement in the event that housing did not come forward in the period envisaged.
- 2.7.3 If a similar 8.5% approach were followed for Maidstone, the outstanding need to provide 16,465 new homes would yield the need for land capable of providing approximately 1,300 new homes. This land would need to be capable of being brought forward swiftly in the event of a housing supply shortage, so given the scale it would likely be prudent to provide this over a series of wider opportunities to ensure swift delivery in the event of a deficit of housing.
- 2.7.4 Any reserve sites, and associated delivery mechanism, must be integral to the emerging plan and not left to a subsequent review. This is because a review process would be too lengthily for the authority to be able to rapidly respond to changes in circumstances, which is a key component of the presumption in favour of sustainable development when plan making.
- 2.7.5 As per the Sevenoaks Core Strategy, we would suggest that reserve land be identified and subject to a 'trigger' that it will not be considered for release before 2021 with the test for its release after that date to be whether the Annual Monitoring Report shows a five year supply of deliverable sites without the inclusion of the Reserve Land. Having a strategic bank of

reserve sites available would allow the plan to bring land forward swiftly and to maintain a consistent source of supply and keep it valid.

2.7.6 Finally, in respect of the selection process for reserve land, the nature of the designation means it must be unconstrained, suitable for development and able to be brought forward swiftly. Accordingly, such site selection should be subject to further evidence gathering, public consultation and sustainability appraisal as part of a main modification process.

2.8 Qn5.10 Is the Council's 5 years supply calculation accepted or disputed and, if so, why?

2.8.1 Taking into consideration both the matters outlined above, and the detailed critique of the Council's housing land supply, we consider the Council's five-year supply to be unrealistic and not underpinned by robust evidence. Accordingly, without modification it renders the Council's emerging Local Plan unsound.

3 Conclusions and Suggested Modifications

3.1 Summary

- 3.1.1 The Council's planning strategy is currently not underpinned by robust evidence and therefore is unsound. Accordingly, it is recommended that main modifications are necessary owing to the housing land supply deficiency and due to the inadequate identification of housing to meet the plan target as a whole.
- 3.1.2 For this reason, existing firm housing allocations within the draft plan must be maintained and a significant amount of additional sites and reserve land must be identified and included within the plan.

3.2 Suggested Modifications

- 3.2.1 We consider modifications are required in respect of both firm allocations and through the identification of strategic reserve sites. In this regard, Messrs Cyster control land at Bell Farm South, situated to the south of East Street and to the north of the M20 on the southern edge of Harrietsham.
- 3.2.2 Whilst we recognise that this must be achieved via the main modification process that must be subject to further public consultation, the land consists of approximately 2 hectares of undeveloped agricultural land primarily used for arable purposes that could be brought forward for development swiftly.
- 3.2.3 The northern boundary of the site abuts the settlement confines of Harrietsham, backing on to residential properties fronting onto East Street. Land to the north of East Street has an extant outline planning permission for residential development and a draft allocation within the plan policy H1(35) and therefore it represents a logical further inclusion.
- 3.2.4 Only with the addition of suitable sites such as our clients will the plan be modified to make it sound.

1

APPENDIX



**MAIDSTONE
BOROUGH COUNCIL**

Housing Supply Study

(as at 1 April 2016)

SEPTEMBER 2016

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1 Introduction

1.1 Purpose of this Statement

- 1.1.1 This housing supply assessment has been prepared by DHA Planning to provide an independent assessment of Maidstone Borough Council's (MBC) current housing land supply position (as at 1 April 2016) and to critically review the housing evidence that underpins the emerging Local Plan, which is currently subject to Independent Examination.
- 1.1.2 The report provides an overview of national planning policy that requires local planning authorities to identify a robust supply of housing land to meet five year's supply against the housing requirement. We then undertake our own impartial analysis of the latest housing land supply position set out within the Local Plan Housing Topic Paper 2016, as this represents the key housing evidence that underpins the submission draft of the emerging Local Plan. The Topic Paper is provided in full at **Appendix A**.
- 1.1.3 Our critique includes an assessment of the robustness of the assumptions made by MBC having regard to key sites and components of the current supply that may not come forward as planned and the implications that such sites may have on the future provision of housing in Maidstone Borough.
- 1.1.4 The report concludes by providing a summary of our findings and the wider implications of the Council not being able to demonstrate a credible five year land supply. We also have regard to concerns about the potential to meet the housing target included within the emerging new Local Plan.

1.2 Statement Structure

- 1.2.1 Section 2 sets out the national requirement for providing a robust supply of housing land and provides an overview of the key legal principles regarding housing need and meeting housing requirements.
- 1.2.2 Section 3 outlines the Council's current Local Plan position and the latest housing supply figures having regard to the latest published information.
- 1.2.3 Section 4 analyses the various components of supply and whether the Council can robustly demonstrate a five year supply of housing land. We also identify the areas of supply that must be challenged in order to ensure the land identified for housing will come forward as planned. Within this chapter we also provide a revised assessment of the current supply position based on what we consider to be more realistic assumptions about key sites and delivery rates.
- 1.2.4 Section 5 considers the emerging Local Plan period as a whole, reviews the evidence that underpins the housing strategy and draws conclusions regarding the likelihood of the Council achieving its desired level of housing delivery over the plan period 2011 to 2031.
- 1.2.5 Section 6 provides a conclusion on the current position and the implications for the Council given concerns that neither the five year, of full plan period, positions show the

ability to robustly deliver the required levels of housing. We also summarise the decision making process that should apply in the absence of an up to date housing strategy.

2 National Housing Requirements

2.1 The National Planning Policy Framework

2.1.1 The National Planning Policy Framework (NPPF) came into effect on 28th March 2012.

2.1.2 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means:

- *local planning authorities should positively seek opportunities to meet the development needs of their area; and*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or*
 - *specific policies in the Framework indicate development should be restricted.*

2.1.3 For decision-taking, the presumption means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or*
- *specific policies in the Framework indicate development should be restricted.*

2.1.4 For decision making, the key to the presumption in paragraph 14 is the proposition that (providing there are no specific policies that dictate development should be resisted) sustainable development means granting planning permission unless the adverse consequences of doing so significantly and demonstrably outweigh the benefits.

2.1.5 Paragraph 14 does not indicate that permission should be withheld if the planning balance was a little bit against the grant of permission. To the contrary, it is part of a pro-development policy which has the effect of radically tilting the balance in favour of the grant of permission. Consequently, it would be wrong in such cases to approach the presumption by applying a simple balancing between positive and negative factors. Until a plan is up to date it is only proposals that have adverse effects markedly (“significantly”) outweighing the benefits overall and would constitute development that was unsustainable, that should not be granted.

2.1.6 In respect of planning for housing, The NPPF places pressure on Local Authorities to ‘*significantly boost*’ the supply of housing by adhering to the requirements cited under Paragraph 47, which states that in order to increase housing supply, Local Authorities should;

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
- *identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;*
- *identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;*
- *for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and*
- *set out their own approach to housing density to reflect local circumstances.*

2.1.7 Importantly, paragraph 49 states:

'relevant local policies for the supply of housing should not be considered up to date if the Local Planning Authority cannot demonstrate a five-year supply of deliverable housing sites'.

2.2 Constructing Arguments for a Planning Application

- 2.2.1 In the event that paragraph 49 is engaged and an authority cannot demonstrate a robust supply of housing land, the decision maker must revert back to the tests set out in the presumption in favour of sustainable development.
- 2.2.2 Whilst this does not automatically lead to the grant of planning permission, it drastically alters the weight that can be attributed to existing policies for the supply of housing.
- 2.2.3 The flow chart in figure 1 overleaf summarises the process by which applications should be considered in the event of an authority not being able to demonstrate the required supply of housing.

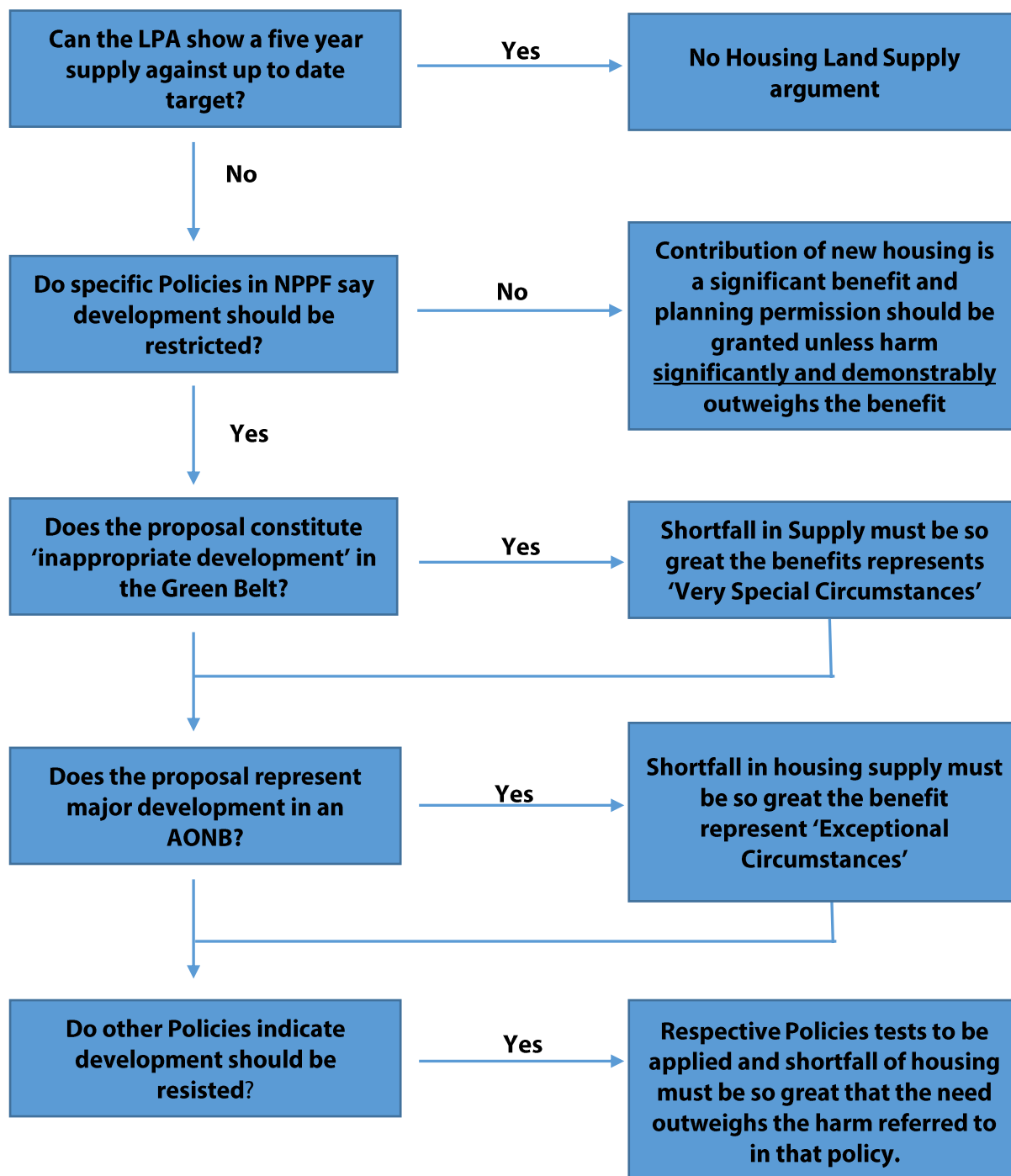


Figure 1: decision making process in the event of a five year supply deficit.

2.3 Relevant Legal Principles

2.3.1 The proper interpretation of the policy within paragraph 47 was addressed by the Court of the Appeal in *St Albans CDC v Hunston* (2013 EWCA Civ 1610).

2.3.2 This case had regard to how determination of the requirement for the five-year housing land supply was to be approached within the context of a development control decision. Delivering the leading judgment of the Court of Appeal, Sir David Keene observed as follows:

"25. I am not persuaded that the inspector was entitled to use a housing requirement figure derived from a revoked plan, even as a proxy for what the local plan process may produce eventually. The words in paragraph 47(1), "as far as is consistent with the policies set out in this Framework" remind one that the Framework is to be read as a whole, but their specific role in that sub-paragraph seems to me to be related to the approach to be adopted in producing the Local Plan. If one looks at what is said in that sub-paragraph, it is advising local planning authorities:

"to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework."

That qualification contained in the last clause quoted is not qualifying housing needs. It is qualifying the extent to which the Local Plan should go to meet those needs. The needs assessment, objectively arrived at, is not affected in advance of the production of the Local Plan, which will then set the requirement figure.

Moreover, I accept Mr Stinchcombe QC's submissions for Hunston that it is not for an inspector on a Section 78 appeal to seek to carry out some sort of local plan process as part of determining the appeal, so as to arrive at a constrained housing requirement figure. An inspector in that situation is not in a position to carry out such an exercise in a proper fashion, since it is impossible for any rounded assessment similar to the local plan process to be done. That process is an elaborate one involving many parties who are not present at or involved in the Section 78 appeal. I appreciate that the inspector here was indeed using the figure from the revoked East of England Plan merely as a proxy, but the government has expressly moved away from a "top-down" approach of the kind which led to the figure of 360 housing units required per annum. I have some sympathy for the inspector, who was seeking to interpret policies which were at best ambiguous when dealing with the situation which existed here, but it seems to me to have been mistaken to use a figure for housing requirements below the full objectively assessed needs figure until such time as the Local Plan process came up with a constrained figure.

27. It follows from this that I agree with the judge below that the inspector erred by adopting such a constrained figure for housing need. It led her to find that there was no shortfall in housing land supply in the district. She should have concluded, using the correct policy approach, that there was such a short fall. The supply fell below the objectively assessed five year requirement.

28. However, that is not the end of the matter. The crucial question for an inspector in such a case is not: is there a shortfall in housing land supply? It is: have very special circumstances been

demonstrated to outweigh the Green Belt objection? As Mr Stinchcombe recognised in the course of the hearing, such circumstances are not automatically demonstrated simply because there is a less than five year supply of housing land. The judge in the court below acknowledged as much at paragraph 30 of his judgment. Self-evidently, one of the considerations to be reflected in the decision on "very special circumstances" is likely to be the scale of the shortfall.

29. But there may be other factors as well. One of those is the planning context in which that shortfall is to be seen. The context may be that the district in question is subject on a considerable scale to policies protecting much or most of the undeveloped land from development except in exceptional or very special circumstances, where because such land is an Area of Outstanding Natural Beauty, National Park or Green Belt. If that is the case, then it may be wholly unsurprising that there is not a five year supply of housing land when measured simply against the unvarnished figures of household projections. A decision-maker would then be entitled to conclude, if such were the planning judgment, that some degree of shortfall in housing land supply, as measured simply by household formation rates, was inevitable. That may well affect the weight to be attached to the shortfall."

2.3.3 In *Oadby & Wigston BC v SSCLG* [2015] EWHC 12, Hickinbottom, J summarised the relevant legal principles in the following terms:

"17. In respect of housing provision, the NPPF thus effected a radical (generally, pro- housing development) change from the previous policy (Solihull Metropolitan Borough Council v Gallagher Estates Limited and Lioncourt Homes Limited [2014] EWCA Civ 1610 at [7]-[16]); and, if the local planning authority has not adopted a new local plan since the NPPF came into effect, its housing requirement should be calculated on the current FOAN, unqualified and unconstrained by other policies (City and District Council of St Albans v Hunston Properties Limited and the Secretary of State for Communities and Local Government [2013] EWCA Civ 1610 ("Hunston") at [21]-[27])."

3 Maidstone Borough Council Published Supply

3.1 Objectively Assessed Housing Need

- 3.1.1 Following the Government's announcement that the starting point for a Local Plan is to meet the full objectively assessed need (FOAN) for development, a Strategic Housing Market Assessment (SHMA) was first produced in January 2014 by GL Hearn (in conjunction with Ashford Borough Council and Tonbridge and Malling Borough Council). This initial report identified a need for 980 homes per annum for Maidstone Borough during the period 2011-2031.
- 3.1.2 Following an addendum in August 2014 and publication of revised population projection figures in May 2015, an update to the SHMA was produced by the consultants to reflect more up-to-date demographic data. This work revealed a slightly decreased annual need of 928 homes per year, or 18,560 dwellings over the plan period as a whole.
- 3.1.3 In addition to the FOAN, a minimum 980 residential institution bed-spaces are needed over the Plan period (this represents an average of 49 bed-spaces per annum).

3.2 Starting Point for Calculating Five Year Requirement

- 3.2.1 Pending the outcome of the ongoing Local Plan review process and the absence of a development plan adopted in accordance with the NPPF, the FOAN figure of 928 dwellings per annum represents the starting point for considering the Council's five year housing land supply requirement.
- 3.2.2 As the FOAN has been calculated over the period 2011 to 2031 we are already five years into the new plan period. Existing completions between 2011 and 2016 therefore need to be factored into the calculations of future supply needs. The current target, having regard to completions that have taken place between 2011 and 2016, is shown within figure 2 below.

	No. of Dwellings
Requirement	
SHMA Requirement - 2011 to 2031 (928 per annum)	18,560
Completions – 2011 to 2016	2,860
Remaining Requirement – 2016 to 2031	15,700
Deficit Accrued to Date (2011 – 2016)	-1,780
Revised Annual Target (5 x 928)	4640
Deficit Recovery (Sedgefield)	1,780
Total Requirement	6,420
Target with 5% buffer (+321 units)	6,741
Target with 20% buffer (+1,284 units)	7,704

Figure 2: Housing Supply requirement 2016 to 2019

3.2.3 The Council's published figures accept a housing land supply requirement of 6,741 dwellings in line with a 5% buffer requirement.

3.2.4 We address the validity of applying a 5% buffer rather than 20% within Section 4 of this report.

3.3 Maidstone Borough Council Published Supply Position

3.3.1 At the time of writing, the most up-to-date information on the five year supply position is Local Plan Examination Core Document SUB 005 (Maidstone Borough Local Plan Housing Topic Paper 2016). The Council's latest supply figures are summarised in Figure 3.

	No. of Dwellings
Supply 2016/2021	
Sites with Planning Permissions (inc MBC non implementation discount)	4,259
Housing from Emerging Allocations	2,540
Windfall Allowance	96
Total Published Supply	6,895

Figure 3: MBC's published housing supply components 2016 to 2021

3.4 Ability to Demonstrate a Five Year Supply

3.4.1 Based on the current housing land supply requirement, and the published MBC figures, we consider the Council's published position shows a minor surplus of 106 units if a 5% buffer is applied and all of the assumptions and methodology is accepted. However, even based on the published position, a major deficit would occur if a precautionary 20% buffer is included.

3.4.2 The figures are emphasised in Figure 4 overleaf.

	No. of Dwellings
SHMA Requirement - 2011 to 2031 (928 per annum)	18,560
Completions – 2011 to 2016	2,860
Remaining Requirement – 2016 to 2031	15,700
Deficit Accrued to Date (2011 – 2016)	-1,780
Revised Annual Target (5 x 928)	4640
Deficit Recovery (Sedgefield)	1,780
Total Requirement	6,420
Target with 5% buffer (+321 units)	6,741
Target with 20% buffer (+1,284 units)	7,704
Published Supply 2016/2021	
Sites with Planning Permissions (inc non implementation discount)	4,260
Housing from Emerging Allocations	2,540
Windfall Allowance	96
Total Published Supply	6,896
Surplus based on 5% buffer being required	155 units
No. years supply based on 5% buffer being required	5.12 years
Deficit based on 20% buffer being required	- 808
No. years supply based on 20% buffer being required	4.48 years

Figure 4: MBC's published housing supply components 2016 to 2021

3.5 Summary

3.5.1 The above published position highlights two critical points:

- (1) The Council's own published position is reliant on a 5% buffer rather than a 20% buffer; and
- (2) Even with a more generous buffer being applied, the modest surplus of 155 units is marginal as can be seen when the components are examined in further detail.

3.5.2 Chapter 4 outlines further concerns about the validity of the calculation and includes our own critique of the supply components.

4 Critique of Five Year Supply Components

4.1.1 This chapter scrutinises the Council’s supply methodology, the components of the current supply and provides commentary on the robustness of the Council’s assumptions and methodology. In turn, these matters inform a revised assessment of the current housing land supply.

4.2 Deficit Recovery Methodology

4.2.1 Where a deficit has arisen against the FOAN requirement during earlier phases of the plan period, there are two established ways this can be addressed within the five-year housing land supply calculation; the ‘Liverpool’ or ‘Sedgefield’ methods.

4.2.2 The Liverpool approach is to spread the unmet need equally over the remaining years of the plan. The Sedgefield approach ensures the deficit will be addressed within the immediate five year period.

4.2.3 Whilst the Liverpool method is on occasions utilised by Inspectors through the Local Plan process where there are unique circumstances (i.e. reliance on a major strategic site that will come forward later in the plan period), it is usually resisted because spreading the deficit often just masks delivery problems rather than tackling them. Furthermore, the ‘Sedgefield approach’ is supported by National Planning Practice Guidance (PPG) (paragraph: 035 Reference ID: 3-035-20140306), which is clear that local planning authorities should aim to deal with any undersupply within the forthcoming five year period.

4.2.4 We welcome that MBC has accepted the need to apply the Sedgefield method within the current calculation and consider it to be the correct approach.

4.3 Applying a 5% or 20% Buffer

The NPPF states that to boost the supply of housing, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirement, with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. However, where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.

4.3.1 Whilst it is accepted that there is no clear definition of ‘persistent under-delivery’, in principle it is about understanding an authority’s track record by comparing completions against requirement over a reasonable time period. In broad terms, persistent under delivery is something that has continued over time. Judge Lewis in the Cotswold judgement ([2013] EWHC 3719 (Admin) 27 November 2013) said that ‘it should not be a ‘temporary or short lived fluctuation’.

4.3.2 The Practice Guidance also recognises that the local delivery record is likely to be more robust if a longer term view is taken since this has regard to the economic cycles and

market conditions. Equally, it is clear that recession should not be used as an excuse for low delivery.

4.3.3 Given the above advice, MBC's performance for a full twenty year period is shown within Figure 5 below.

Year	Annualised Target (at the time)	Status
1996/97	460	Under Delivery
1997/98	460	Under Delivery
1998/99	460	Under Delivery
1999/2000	460	Target Exceeded
2000/01	460	Under Delivery
2001/02	460	Target Exceeded
2002/03	460	Under Delivery
2003/04	460	Under Delivery
2004/05	460	Target Exceeded
2005/06	460	Target Exceeded
2006/07	554	Target Exceeded
2007/08	554	Target Exceeded
2008/09	554	Under Delivery
2009/10	554	Target Exceeded
2010/11	554	Target Exceeded
2011/12	928	Under Delivery
2012/13	928	Under Delivery
2013/14	928	Under Delivery
2014/15	928	Under Delivery
2015/16	928	Under Delivery

Figure 5: Housing Completions 1996 to 2016

4.3.4 Figure 5 shows that during the course of the recent twenty year period MBC has under delivered on 12 (60%) of the twenty occasions.

4.3.5 If one were to take the ten year period since 2006, six of these have seen the authority fail to meet the required level of housing supply (again 60%). Furthermore, the Council has fallen woefully short of the current FOAN target for five years consecutively (100% under delivery).

4.3.6 Given the evidence of completions against target requirements, there clearly has been a record of persistent under delivery of housing within MBC that should now lead to the local planning authority increasing the housing supply buffer to a precautionary 20% until such time as housing targets can consistently be met. Furthermore, it should be remembered that the provision is to be applied to ensure a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land and should not be seen as a punishment.

4.3.7 Should the level of under delivery be allowed to continue for a longer period of time, it will undoubtedly weaken the Council's overall housing supply position and quickly render the emerging Local Plan out of date.

4.3.8 For the reasons outlined above, we consider the Council's current housing supply evidence demonstrates a need for a 20% buffer to be applied.

4.4 Sites with Planning Permission (Extant Consents)

4.4.1 As part of this analysis we have reviewed the detailed list of planning permissions that make up the 'Sites with Planning Permission List'. From here we have analysed the deliverability of the sites and identified a series of discrepancies that influence the supply calculations.

Marden Cricket and Hockey Club (13/1928)

4.4.2 DHA Planning represents Countryside Properties who are the developer for the above site and as such we have up to date access to information regarding delivery of the site.

4.4.3 In summary, planning permission was granted for 124 units as part of a wider development that will see the construction of new and improved sports facilities within Marden, including a new clubhouse, cricket pitch, artificial multi-purpose sports pitches and tennis courts. There will also be a community orchard for the local residents.

4.4.4 Given the need to provide the new and replacement community facilities in advance of the delivery of housing, the Council's assumption that all 124 units will be delivered in the immediate five year period is considered to be overly optimistic. Accordingly, a more realistic position would be to assume 80 units would be delivered prior to 2021 with the remaining 44 delivered in the year 2021 to 2022. Given the above, we consider the extant permissions source of the five year supply calculation should be reduced by 44 units.

Land off Farleigh Hill, Tovil (10/0256)

4.4.5 Planning application 10/0256 approved outline planning permission for 272 new dwellings at the above site. Furthermore, an application for reserved matters (siting, design, external appearance and landscaping) is currently pending consideration under planning reference 15/509041/REM.

4.4.6 Nonetheless, despite the presence of a pending application, a number of developers have expressed an interest in the site only to fail to conclude a deal when due diligence was carried out. This is due to significant development constraints and the presence of contamination that poses a significant threat to the overall viability. In this regard, it should be noted that the applications are being advanced via the landowner rather than a named developer partner.

4.4.7 Given the well-known constraints, and the number of developers that have failed to consider a land deal, we consider further evidence must be presented in respect of this site and that it would be prudent not to rely upon this site as a source of housing during the immediate five year period – particularly when the site has not progressed in the five years prior.

- 4.4.8 We consider the extant permissions should be reduced by 72 units to reflect the uncertainty of this site and that it is most likely to come forward post 2021 (if at all).

Land between Mill Bank, Ulcombe Road and Kings Road, Headcorn (15/503325)

- 4.4.9 DHA Planning represents the developer for this site.
- 4.4.10 Application 15/503325 was permitted in 2015 in outline form for the residential element of a wider hybrid scheme. Based on up to date information, we are advised that given the cumulative levels of development already taking place in Headcorn, reserved matters applications and subsequent commencement is programmed for late within the five year period. Accordingly, approximately 50 units are likely to come forward pre 2021.
- 4.4.11 Reliance of delivery on this site should be reduced by 75 units for the purpose of the five year supply calculation.

Child Adolescent Services, Garland House, Maidstone (13/1709)

- 4.4.12 Following the grant of planning permission 13/1709 for conversion of the premises to apartments, Garland House has now been changed to a Free School under Maidstone planning reference 14/503957/FULL. Accordingly, planning permission upon which the Council relies cannot be implemented.
- 4.4.13 The supply figure should be reduced by 14 units.

Overall Reduction from Extant Sites List

- 4.4.14 In light of the proposed discounts on sites identified above, 205 units should be deleted from the Council's extant permission source of the five year supply.

4.5 Non Implementation Rates

Change of use to residential permitted under Classes M, N, O, P and Q of the GPDO.

- 4.5.1 Classes M to Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 make provision for the change of use of various different uses to dwellinghouses without the need for full planning permission. Proposals made under these provision are subject to 'prior notification' applications.
- 4.5.2 In total, 700 units (737 minus 5% for non-implementation) of the Council's five year housing land supply are made up of prior notification approvals rather than full or outline planning permissions and these need to be treated with a degree more caution than full or outline planning permission. Given the simplicity of such applications, many applicants and business owners have sought to make best use of these new opportunities to increase land values and in some instances negotiate higher rental charges. Furthermore, undertaking the prior notification process does not show the commitment to deliver in the same way as those landowners and developers wishing to progress full planning applications. Accordingly, we consider there to be far more risk of the consents expiring without implementation which should be reflected by a more cautious non delivery rate.

4.5.3 In light of the above, and to ensure the Council is not overly reliant on a less secure component of the housing land supply, we consider a higher non implementation rate should be applied to these consents. We consider 20% to be appropriate based upon the need to take a cautious approach and deliver a robust and credible supply of housing land.

4.5.4 Based on a 20% discount 147 units should be deleted from the five year supply calculation.

Non Implementation Rate for Full/Outline Extant Permission

4.5.5 Notwithstanding the position outlined above, we note that a discount has been made to allow for the non-implementation of extant planning permissions.

4.5.6 Whilst an industry standard approach is to apply a discount of 10% we note the evidence presented to justify a reduced discount of 5% on the full and outline consents and raise no objection to this approach. However, given the fact that localised evidence does not yet exist in respect of the non-delivery of prior notification consent, a more cautious approach is advocated for this source of housing.

4.6 Phasing of Proposed Housing Allocations

H1 (10) Land South of Sutton Road, Langley

4.6.1 DHA Planning represents Countryside Properties who are the developer for the site and as such we have access to up to date information regarding delivery.

4.6.2 In summary, an outline scheme for 800 new homes has a Council resolution to grant permission, subject to the completion of a Section 106 agreement. However, given the size of the scheme the drafting and completion of the agreement is not anticipated until late 2016/early 2017. Upon completion, it will then be necessary to discharge planning conditions, submit and agree reserved matters and upgrade the infrastructure necessary to serve a scheme of this nature.

4.6.3 It is also important to stress that there is ongoing discussion between Kent County Council and MBC in respect of the local highway network and its capacity to absorb development of the scale proposed, which remains a significant objection to the soundness of the emerging Local Plan. Whilst we do not support these objections, it is an outstanding issue that may remain unresolved pending the outcome of the Local Plan review process.

4.6.4 In summary, given the significant degree of additional work that is required prior to construction and delivery of the scheme, and the outstanding transport objection, the Council's phasing requires review. The Council's 200 dwellings within the immediate five year period assumes an average completion rate of 50 dwellings per year from 2017/2018, which is entirely unrealistic given the scale of the development and the need for detail to be agreed.

4.6.5 A more robust estimate would be for completions to commence in the years 2019/2020 at a rate of 50 dwellings per annum (100 dwellings within the immediate five year period). Accordingly, we consider the Council's figures must be discounted by 100 units.

H1 (17) Laguna Motors, Hart Street

- 4.6.6 This site has previously been subject to a planning application by a developer in 2007. However, we understand that since this time the developer has relinquished the site and is no longer actively pursuing development.
- 4.6.7 Given the ongoing commercial use, the complexities of delivering a development within the tight surroundings and the lack of any developer interest, we consider the assumption that all units will be planned for, constructed and delivered within the immediate five year period to be overly optimistic. We consider these units should not be relied upon within the five year calculation and the supply calculation should be reduced by 76 units to reflect the uncertainty.

H1 (20) Wren's Cross, Maidstone

- 4.6.8 As with Laguna Motors, the lack of any developer interest means that the MBC assumption that all units will be planned for, constructed and delivered within the immediate five year period is over optimistic. In the absence of advanced evidence that the site is deliverable pre 2021, we consider these units should not be relied upon within the five year calculation.
- 4.6.9 In the absence of firm interest or a pending application, we consider the supply calculation should be reduced by 60 units to reflect the uncertain nature of this site.

H1 (48) Land South of the Parsonage, Marden

- 4.6.10 Land south of the Parsonage relies solely on adjacent land being delivered before the site itself can start to be delivered. Whilst this adjacent site has been subject to outline planning permission and an approved reserved matters application for up to 144 new homes (approved July 2016), it seem unrealistic that all of these 144 homes would be delivered, planning permission secured, conditions discharged and units delivered on the second phase pre 2021.
- 4.6.11 To the contrary, it seems far more probable that the site yield would be realised upon completion of the initial development post 2021. For this reason, we consider 50 units are likely to be completed after the immediate five year period and should be deleted from the supply calculation.

H1 (49) Hen and Duckhurst, Staplehurst

- 4.6.12 An outline scheme for 248 new homes has a Council resolution to grant planning permission subject to the completion of a Section 106 agreement. However, given the S106 agreement has not been signed 18 months after a resolution to grant, the timescale for completion of the agreement is very open.
- 4.6.13 Upon completion, it too would need to be subject to discharge of planning conditions, submission and agreement of reserved matters and installation of the necessary infrastructure to serve a scheme of this nature.

- 4.6.14 Given the significant degree of additional work that is required, the Council's phasing requires review.
- 4.6.15 The Council's 164 dwellings within the five year period assumes an average completion rate of 55 dwellings per year from 2018/2019, which in our view is unrealistic given the the need for detail to be agreed. A more robust estimate would be for completions to commence in the years 2019/2020 at a rate of 50 dwellings per annum (100 dwellings within the immediate five year period).
- 4.6.16 Accordingly, we consider the Council's figures should be discounted by 64 units.

RMX 1(4) Former Syngenta Site, Yalding

- 4.6.17 The former Syngenta works was previously used for agro-chemicals production and is now vacant. However, it is a long standing development site having been first allocated within the adopted Maidstone Local Plan. Nevertheless, development has not advanced due to the number of constraints that apply to the land.
- 4.6.18 Whilst there is no strategic objection to the site being identified for residential led mixed use development, a cautious approach is needed given the ongoing history of non-delivery. Accordingly in the absence of specific and robust evidence of immediate delivery, we consider no units should be relied upon within the immediate five year period.
- 4.6.19 We propose that the housing supply figures be reduced by 40 dwellings to reflect this change.

Summary of Allocation Discounts

- 4.6.20 Based on the summary of issues outlined above, a total of 390 units should be pushed into the period post 2021 to ensure that the Council is not reliant on speculative sites that are unlikely to deliver the required levels of housing.

4.7 Summary

- 4.7.1 Taking into account the issues identified above, we consider there are a number of areas where the Council is over predicting delivery. Accordingly we provide our own updated assessment of the current situation overleaf.

Figure 6: Revised Assessment of Five Year Housing Supply

Requirement	No. Dwg
SHMA Requirement – 2011 to 2031 (928 per annum)	18,560
Completions – 2011 to 2016	2,860
Remaining Requirement – 2016 to 2031	15,700
Deficit Accrued to Date (2011 – 2016)	-1,780
Revised Annual Target (5 x 928)	4640
Deficit Recovery (Sedgefield)	1,780
Total Requirement	6,420
Target with 20% buffer	7,704
MBC Published Supply Assumptions 2016/2021	
Sites With Full or Outline Planning Permissions (Prior to Discounts)	3,747
Sites With Prior Notification Consent (Prior to Discounts)	737
Housing from Emerging Allocations (2016 to 2021)	2,540
Windfall Allowance	96
Total Published Supply prior to discounts	7,120
DHA Proposed Discounts (See Chapter 4)	
Discount for unrealistic assumptions regarding extant consents	-205
1. Marden Cricket and Hockey Club (13/1928)	-44
2. Land off Farleigh Hill, Tovil (10/0256)	-72
3. Land between Mill Bank, Ulcombe Road and Kings Road, Headcorn (15/503325)	-75
4. Child and Adolescent Services, Garland House, Maidstone (13/1709)	-14
Discount for non-implementation of remaining sites with Full/Outline permission (5%)	-177
Discount for non-implementation of sites with Prior Notification consent (20%)	-147
Discount for unrealistic assumptions regarding emerging allocations phasing	-390
1. H1 (10) Land South of Sutton Road, Langley	-100
2. H1 (17) Laguna Motors, Hart Street	-76
3. H1 (20) Wren's Cross, Maidstone	-60
4. H1 (48) Land south of the Parsonage, Marden	-50
5. H1 (49) Hen and Duckhurst, Staplehurst	-64
6. RMX1(4) Former Syngenta Site	-40
Discount for removal of windfall allowance (see section 5.4)	-96
Total Discounts	-1,015
Revised Assessment	
Five Year Target	7,704
Five Year Supply	6,105
Total Surplus/Deficit	-1,599
No. Years Supply	3.9 Years

4.8 Summary

- 4.8.1 As can be seen from the revised assessment, the Council's current housing supply position shows a significant deficit against the formal requirement for housing that amounts to approximately 1,600 units when the appropriate and necessary buffers and discounts are applied to the figures.
- 4.8.2 Furthermore, whilst we maintain that a 20% buffer is absolutely necessary because of persistent under delivery, if an Inspector were to conclude that a 5% buffer were reasonable, there would still be a shortfall of 636 new homes once speculative sources of the supply are removed.

5 Housing Supply for the Plan Period

- 5.1.1 Notwithstanding the importance of delivering a rolling five year supply of housing land, we have wider concerns regarding the overall delivery of the FOAN for the plan period as a whole.
- 5.1.2 As can be seen from the table below, the Council seeks to allocate land to accommodate the FOAN figure of 18,560 new homes. This means that having regard to existing completions that have taken place to date (2011 to 2016), there is a subsequent need to identify land sufficient to provide 15,700 new houses between 2016 and 2031.
- 5.1.3 The Council has consequently identified the following sources of supply as outlined in Figure 7.

Component	MBC Published Position (units)
Extant planning permissions (including resolutions to Grant Planning Permission) after non implementation rates.	5,475
Local Plan Allocations	5,600
Broad Locations for Growth <ul style="list-style-type: none"> • Maidstone Town Centre (990 units); • Invicta Park Barracks (1,300 units) • Lenham Rural (1,500 units) 	3,790
Windfall Contribution	1,600
Total	16,465

Figure 7: MBC Published Position for Plan Period 2011 -2031

- 5.1.4 In our view, these sources of supply are not sufficient to ensure the housing requirement is met. We set out our reasoning for this assumption below.

5.2 Local Plan Allocations

- 5.2.1 We consider that it is naïve on the part of the Council to assume that all draft allocation sites will come forward and that there is a need to build in some wider flexibility. Some of the identified allocations sites will inevitably become delayed, become unavailable, be deemed unviable when due diligence is carried out or will ultimately be secured in alternative uses.
- 5.2.2 Likewise, an allocation does not automatically mean that the permissions will be implemented or that existing uses will be displaced within the plan period and these sites do not provide the certainty of those that have genuine developers in control.
- 5.2.3 In light of the Government's desire to ensure Local Plans can be flexible and rapidly respond to change, it is essential that a cautious approach is adopted and that an over reliance on the proposed allocations does not prejudice other suitable sites from coming forward. Consequently, an industry standard 10% discount should be applied to the emerging allocations.

5.3 Broad Locations

5.3.1 The Council's decision to rely on Broad Locations as a core component of the housing land supply does not represent positive, effective or justified planning when genuinely sustainable and deliverable sites are available.

Maidstone Town Centre

5.3.2 Bearing in mind the limited remaining supply of brownfield sites, there is no genuine evidence available to demonstrate 990 additional homes will come forward in Maidstone town centre even with the level of low grade office accommodation that has been identified. The majority of legitimate opportunities have already been exhausted via the SHLAA process and suitable sites identified within policy H1.

5.3.3 Furthermore, to allow for 990 additional units in the town centre, plus a windfall allowance that averages 106 dwellings per annum over the remaining years of the plan period undoubtedly represents double counting.

5.3.4 For this reason we consider that if the broad location is to be retained in respect of Maidstone Town Centre, the subsequent windfall rates should be restricted accordingly.

Invicta Park Barracks

5.3.5 In respect of other Broad Locations, there also remains a lack of certainty regarding the long term future of Invicta Park Barracks and whether the site will become available for development (and certainly within the plan period). In this regard, it is noteworthy that on 6th September 2016 The Ministry of Defence (MOD) announced plans for an ambitious Estate Optimisation Strategy programme and the expected release of 13 sites that will contribute some £225 million toward the MOD's £1 billion target for land release sales and will contribute 17,017 homes.

5.3.6 The 13 sites subject to Estate Optimisation Strategy programme are listed below and exclude the Invicta Barracks site:

- RAF Henlow (Bedfordshire)
- Middlewick Ranges (Essex)
- Ampport House (Andover)
- Land at Harley Hill (Catterick)
- Chalgrove Airfield (Oxford) Transferred to the Homes and Communities Agency
- Colerne Airfield (Chippenham)
- Azimghur Barracks (Chippenham)
- Prince William of Gloucester Barracks (Grantham)
- Old Dalby (Melton Mowbray)
- Venning Barracks (Telford)
- Parsons Barracks (Donnington)
- Southwick Park (Fareham)
- Royal Marines Stonehouse (Plymouth)

- 5.3.7 Given this recent announcement, we retain the view that question marks exist regarding the timescales for release of the land. For this reason, if the site meets the tests of being suitable, available and achievable now it should be allocated and relied upon as a key component of the housing supply for this plan period. However, if the site cannot meet these tests, it should not be relied upon at the expense of other genuinely sustainable potential housing sites that would come forward.

Lenham Broad Location

- 5.3.8 Finally, we see no logical planning reason why the identification of adequate sites in or around Lenham has been delayed when more than sufficient land has been promoted during the evidence gathering process.
- 5.3.9 If sites promoted via the SHLAA process are not considered to be deliverable or developable to the degree that allocations can be made, the evidence does not exist to support that level of growth in Lenham and the 1,300 unit Broad Location component should be deleted from the overall housing land supply.

5.4 Windfall Allowance

- 5.4.1 We agree that some windfall sites are likely to continue at a modest rate during the plan period. However, we can see no genuine evidence base to rely upon them as a key component of the housing supply as they will be a reducing supply as brownfield land and other opportunities are increasingly used up. In this regard, the NPPF is very clear that LPAs may make an allowance for windfall sites only if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.
- 5.4.2 Notwithstanding the advice of the NPPF, the age of the existing outdated development plan means that any historic delivery of windfall sites cannot be a robust basis to calculate a new allowance. In the absence of such evidence, windfalls should again be treated as a 'bonus' and should not be so heavily relied upon until such time as robust evidence of windfall generation against the new plan target/allocations has been established.
- 5.4.3 To ensure there is not an over reliance, windfall rates should be capped to 50 units per year for the later part of the plan period (for the period 2021 – 2031) whilst credible new evidence for an increased number can be collated. This is even more important given the Council has a duty to balance housing and economic needs as the Council simply cannot continue to allow the loss of employment sites to supplement housing need.

5.5 Summary of Updated Position

- 5.5.1 Based on the areas of doubt identified above, and to ensure an adequate degree of flexibility is built in, we consider the overall housing provision should be discounted as shown in Figure 8.

Component	MBC Published Position (units)
Extant Planning Permissions (after non implementation rate and (including resolutions to Grant Planning Permission)	5,475
Local Plan Allocations (5,400 units – 10% for non-delivery)	5,040
Broad Locations for Growth (including deletion of Invicta Park Barracks (1,300 units) but retention of Lenham Rural Area via site specific allocations (1,500 units) and Maidstone Town Centre (990 units))	2,490
Windfall Contribution (reduced to 50 units per annum 2021 to 2031)	500
Total	13,505
Shortfall	-2,195

Figure 8: DHA revised assessment of supply for the plan period 2011 -2031

5.6 Summary

- 5.6.1 The NPPF is clear that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. Whilst the Council has provided a list of sources of supply, much of this is speculative. For example, having regard to the unknown potential of Invicta Barracks, the high windfall allowance and the question marks surrounding the Broad Locations, 33% of the Council's supply is to be derived from unspecific sources. This is simply too high to ensure that the plan can respond if sites were not to come forward as planned.
- 5.6.2 In simple terms, to be justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives and based on a proportionate evidence base. On the basis that there are other genuinely sustainable sites that are deliverable and developable during the plan period, a sound strategy would be to allocate these for development rather than rely on sites where the future is unclear.

6 Summary and Conclusion

6.1 Summary

- 6.1.1 At the heart of National Planning Policy is a presumption in favour of sustainable development and a desire to boost the supply of housing. Local Authorities must therefore use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing. To do this authorities must identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements.
- 6.1.2 The PPG is clear that where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered as the starting point for a five year supply calculation.
- 6.1.3 Paragraph 49 of the NPPF also states that relevant local policies for the supply of housing should not be considered up to date if the Local Planning Authority cannot demonstrate a five-year supply of deliverable housing sites.
- 6.1.4 Based on our assessment of the current supply components, we consider that the Council's position is far less secure than stated within the evidence that supports the emerging Local and that there is a current deficit of approximately 1,600 units against the up to date five year housing supply requirement and a deficit of 2,195 units for the plan period as a whole.
- 6.1.5 Taking this into account, Maidstone Borough Council cannot demonstrate a robust five year supply of housing land at present, nor would it be able to do so if the plan were adopted in its current form.

6.2 Implications for a Planning Application

- 6.2.1 As the Council cannot demonstrate a robust supply of housing land, the NPPF tells us that policies for the supply of housing cannot be considered up to date (paragraph 49) and that (paragraph 14) where the development plan is absent, silent or relevant policies are out-of-date, planning permission should be granted unless:
- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted.*
- 6.2.2 In the absence of a up to date housing policies, the decision maker must first ascertain whether there are specific policies in the Framework that indicate development should be restricted. For example, policies relating to sites protected under the Birds and Habitats Directives, designated as Sites of Special Scientific Interest; land designated as Green Belt or in an Area of Outstanding Natural Beauty. Where no such policy applies the planning balance becomes whether any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole

In this respect, the key passage within the presumption is the proposition that sustainable development means granting planning permission unless the adverse consequences of doing so significantly and demonstrably outweigh the benefits. It would be wrong in such cases to approach the Framework by applying a simple balancing exercise between positive and negative factors. Until the plan is up to date it is only proposals that have adverse effects markedly (“significantly”) outweighing the benefits overall and would constitute development that was unsustainable, that should not be granted. Paragraph 14 does not indicate that permission should be granted unless the balance was only a little bit against the grant of permission. Paragraph 14 is part of a pro development policy which has the effect of radically tilting the balance in favour of the grant of permission.

6.3 Overall Conclusion

- 6.3.1 The Council cannot currently demonstrate a sound five year supply of deliverable housing sites nor would it be able to do so if the emerging Local Plan were adopted in its current form. For this reason the presumption in favour of sustainable development is engaged.
- 6.3.2 From a wider perspective, the above assessment draws reason for significant concerns regarding the overall soundness of the emerging housing strategy.

A

APPENDIX

Maidstone Borough Council

Maidstone Borough Local Plan Housing Topic Paper 2016





Affordable housing,
Armstrong Road, Maidstone



Scania Depot, Brooklyn Yard



Lenham Village Square



Kent Institute of Medicine
and Surgery, Maidstone



Langley Park, Maidstone



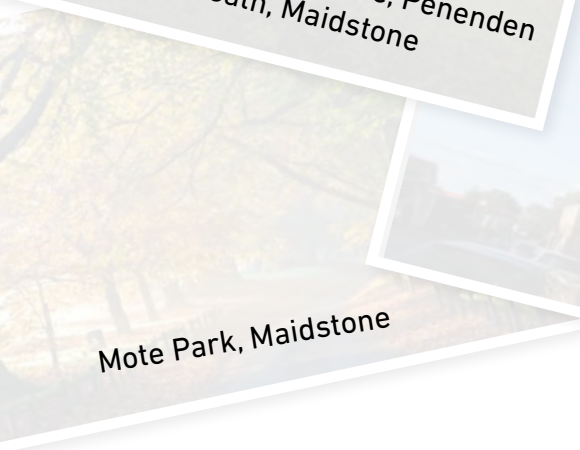
Captain Nolan Sculpture,
Old Ophthalmic Hospital



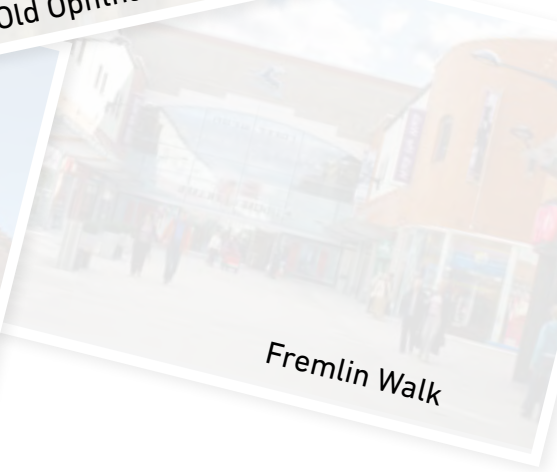
Sandling Lane, Penenden
Heath, Maidstone



Marden



Mote Park, Maidstone



Fremlin Walk

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1 Introduction

1.1 The purpose of this topic paper is to update the Council's housing land supply position to a base date of 1 April 2016, and to demonstrate that the Borough's objectively assessed housing needs can be delivered through the sites allocated in the Maidstone Borough Local Plan and the development management process. The topic paper aims to demonstrate that the housing land supply evidence is robust and to provide further evidence that the assumptions made by the Council are justified. It reviews the contribution made by outstanding planning permissions and proposed allocations to ascertain progress since the Local Plan base date of 1 April 2011.

1.2 Section 2 provides a summary of the Borough's objectively assessed housing needs and cross-references to documents that explain the steps the Council has undertaken to meet its needs. Section 3 shows how Maidstone's overall needs for market housing, affordable housing and registered care homes will be met, setting out the updated assumptions behind each of the components of housing land supply. A series of tables and methodologies explaining the source of data are included in Appendix A. The lists of sites contributing to the completed dwellings and extant permissions components of housing land supply are set out in Appendices B and C, respectively.

1.3 Appendix D includes an analysis of poorer quality office stock within the town centre.

1.4 Correspondence supporting the allocation of Invicta Park Barracks as a broad location for potential future housing growth is attached to Appendix E.

1.5 The methodology used to prepare the Council's housing trajectory is set out in Section 4, and the trajectory graph which demonstrates the delivery of dwellings against annual targets is shown in Appendix F. The assumptions behind the Council's five-year housing land position are explained in Section 5, and the rolling five-year supply calculations are set out in Appendix G. Section 6 explains how the delivery of the Borough's housing land supply will be monitored, and Section 7 draws together the conclusions of this topic paper.

Document references

Examination library reference	Document title	Author	Date
HOU 002	Strategic Housing Market Assessment	G L Hearn	January 2014
HOU 003	Strategic Housing Market Assessment Addendum	G L Hearn	August 2014
HOU 004	Strategic Housing Market Assessment Update	G L Hearn	June 2015

1 . Introduction

2

Examination library reference	Document title	Author	Date
HOU 007	Strategic Housing and Economic Land Availability Assessment Combined Report	Maidstone Borough Council	January 2016
ECON 002	Qualitative Employment Site Assessment	GVA	September 2014
SUB 001	Sustainability Appraisal of the Maidstone Local Plan	AECOM	February 2016
DEL 001	Local Plan Viability Testing	Peter Brett Associates	April 2013
DEL 002	Revised Plan and CIL Viability Study	Peter Brett Associates	July 2015
HOU 005	Revised Plan Viability and CIL Study (Affordable Housing)	Peter Brett Associates	August 2015
STR 002	Exploration of the 'Broad Location' Allocation at Lenham Village, Kent	Thomas Design Regeneration & Consultation Ltd	May 2016
	South East Plan (former Regional Strategy for the South East of England)	Government Office for the South East	May 2009

2 Objectively assessed housing needs

Strategic Housing Market Assessment

2.1 The Strategic Housing Market Assessment (SHMA) was first published in January 2014 and has been reviewed and updated as new population and household projections from the Office for National Statistics (ONS) and Department for Communities and Local Government (DCLG) are released (SHMA Addendum in August 2014 and SHMA Update in June 2015). The assessment has been produced jointly with Maidstone's Housing Market Area partners: Ashford and Tonbridge & Malling Borough Councils. The SHMA is compliant with the National Planning Policy Framework and Practice Guidance, and the methodology used has withstood two independent critiques following a number of challenges that the objectively assessed housing need for the Borough was too high.

2.2 The iterations of the SHMA reported:

- January 2014 - an objectively assessed need for the Borough of 19,600 additional dwellings for the period 2011 to 2031 (980 dwellings per annum);
- August 2014 Addendum - a revised objectively assessed need for the Borough of 18,600 additional dwellings for the period 2011 to 2031 (930 dwellings per annum), and a need for 960 bedspaces between 2013 and 2031 to meet future care home needs (48 bedspaces per annum over the plan period); and
- June 2015 Addendum - a revised objectively assessed need for the Borough of 18,560 additional dwellings for the period 2011 to 2031 (928 dwellings per annum), and a revised need for 980 bedspaces between 2013 and 2031 to meet future care home needs (49 bedspaces per annum over the plan period).

Market forces

2.3 Planning Practice Guidance (PPG) states⁽¹⁾ that where market signals point to affordability problems, including access to affordable homes, an upwards adjustment should be made to increase housing numbers set at a reasonable level. In deriving the Borough's objectively assessed housing needs, the 2015 SHMA Update takes account of market forces, increasing household projections from 883 to 928 dwellings per annum.

London pressures

2.4 The 2015 SHMA Update also quantifies the increase in demand for housing that there would be if, as predicted by the Greater London Authority (GLA), migration from London is higher than projected by the ONS population projections. The influence of migration to/from London will continue to impact on the demand for housing in all south-east authorities to a greater or lesser degree. London is a world city generating a significant demand for additional workforce which in turn puts an upward pressure on housing. At this point in time, however, there is uncertainty about when and indeed whether the increased

1 PPG, Ref ID: 2a-019-20140306, paragraph 019

demand predicted by the GLA, above that already included in the ONS projections, will come to fruition. It is uncertain whether regional or sub-regional mechanisms will eventually emerge to address the complex issues raised within a consistent framework and what types of solutions may be instituted. Consequently, Maidstone's objectively assessed need does not include any uplift for the additional impacts of London migration predicted by the GLA (which would increase need by a further 45 units to 973 dwellings per annum). The recent election of a new London mayor may also herald a change in the approach to meeting the capital's housing needs.

Conclusion

2.5 The Council is satisfied that the methodology used to determine the Borough's objectively assessed housing needs set out in the SHMA is robust. Further that, as referred to in the Duty to Cooperate Statement, no additional housing needs have arisen from any of the adjoining local/unitary authorities.

Strategic Housing Land Availability Assessment

2.6 The combined report for the Strategic Housing and Economic Land Availability Assessment was published in January 2016. The combined report sets out the methodology for the identification and assessment of potential development sites, and includes detailed site appraisals together with a map of the Borough identifying accepted and rejected sites. The Assessment has informed the allocation of housing sites in the Local Plan, which assist in meeting the Borough's objectively assessed housing needs.

Sustainability Appraisal

2.7 The preparation of the Sustainability Appraisal for the Local Plan is an iterative process which helps to ensure that the Local Plan achieves an appropriate balance between environmental, economic and social objectives. All sites that formed part of the Strategic Housing Land Availability Assessment were subject to sustainability appraisal, which assisted in the selection of sites for allocation in the Maidstone Borough Local Plan.

Viability

2.8 Viability is key to the delivery of housing schemes. Peter Brett Associates have undertaken a series of viability studies to support the deliverability of both market and affordable housing policy alternatives⁽²⁾. The studies concluded that, overall, rural areas were more viable than urban areas, and within urban locations brownfield sites were less viable than greenfield sites. The assessments indicated that the Local Plan policies most likely to impact on residential viability were affordable housing and the delivery of infrastructure to support growth, and the studies concluded that policy trade-off decisions were required between the costs of infrastructure delivery and meeting affordable housing needs. The studies' recommendations have been incorporate into policies DM13 (Affordable Housing), ID1 (Infrastructure Delivery) and the H1 Housing Site Allocations of the Local Plan.

2 Local Plan Viability Testing 2013; Revised Plan and CIL Viability Study 2015; Revised Plan Viability and CIL Study (Affordable Housing) 2015

3 Delivery of housing sites

Housing land supply

3.1 Table 3.1 below updates Table 4.1 of the Regulation 19⁽³⁾ Publication draft version of the Maidstone Borough Local Plan (the Regulation 19 draft Local Plan) from a base date of 1 April 2015 to 1 April 2016, setting out the Council's housing land supply position over the 20-year plan period 2011 to 2031. All dwelling totals in the table are net of dwelling losses. Appendix A includes a series of tables and methodologies that explain the source of the data in Table 3.1.

3.2 Between 1 April 2015 and 1 April 2016 a further 521 homes have been completed (Appendix B), and the Council's stock of extant planning permissions (including those subject to the signing of Section 106 legal agreements⁽⁴⁾) of dwellings that have either not started or are under construction has risen to 5,475 dwellings (Appendix C), primarily due to the granting of planning permission on sites allocated in the Regulation 19 draft Local Plan. Consequently, the balance of Local Plan allocations has reduced to 5,600 dwellings. The development potential within allocated broad locations has risen by 290 units to 3,790 dwellings as a result of additional analyses undertaken for the town centre broad location. There is strong evidence that previously unidentified sites (windfalls) will continue to contribute towards the housing land supply and an allowance from this source has been added to supply.

3.3 Table 3.1 demonstrates a housing land supply of 19,325 dwellings (a surplus of 765 dwellings against the Borough's objectively assessed housing need of 18,560 units). Despite the step change required in housing provision, the Council is confident that objectively assessed housing need can be met through a flexible supply of housing sites and a surplus of over 4% above the assessed need.

	Housing land supply 1 April 2011 to 31 March 2031	Dwellings (net)	Dwellings (net)
1	Objectively assessed housing need/ Local Plan housing target		18,560
2	Completed dwellings 1 April 2011 to 31 March 2016	2,860	
3	Extant planning permissions as at 1 April 2016 (including a non-implementation discount)	5,475	
4	Local Plan allocated sites (balance of Regulation 19 Local Plan allocations not included in line 3 above)	5,600	
5	Local Plan broad locations for future housing development	3,790	

3 Town and Country Planning (Local Planning) (England) Regulations 2012

4 Section 106 of the Town and Country Planning Act 1990

3 . Delivery of housing sites

	Housing land supply 1 April 2011 to 31 March 2031	Dwellings (net)	Dwellings (net)
6	Windfall sites contribution	1,600	
7	Total housing land supply		19,325
8	Housing land surplus 2011/2031		765

Table 3.1 Meeting objectively assessed housing need

Completed dwellings (Table 3.1, line 2)

3.4 The total number of dwellings completed (net of losses) between 1 April 2011 and 31 March 2016 is 2,860 units (Table 3.2).

Year 1st April to 31st March	No. of Dwellings (net)
2015/16	521
2014/15	413
2013/14	423
2012/13	630
2011/12	873
Total dwellings completed 2011/2016	2,860

Table 3.2 Completed dwellings 1st April 2011 to 31st March 2016

3.5 During the first two years of the plan period when the South East Plan was in force, the target of 554 units was exceeded due to the availability of town centre brownfield sites that were being developed at a high density. Following the downturn in housebuilding during the economic recession dwelling completions have begun to rise, not least due to planning permissions granted generally on sites allocated in the Regulation 19 draft Local Plan in the context of a lack of a five-year housing land supply following publication of the SHMA in January 2014. A list of sites making up the completions is included in Appendix B.

Extant planning permissions (Table 3.1, line 3)

3.6 As at 1 April 2016, the total capacity of sites with extant planning permissions was 5,763 dwellings (Appendix A, Table 8.1). The figures include dwellings on approved prior notification applications and a small number of sites approved subject to section 106 agreements (247 dwellings). It is reasonable to expect that a proportion of these may not be implemented, although a total of 1,850 dwellings (32%) were on sites which were under construction and are highly likely to be built out.

3.7 Historic data reveals that over the past eight year period (2008/16) an average of 2.11% of dwellings on all sites with extant permissions expired in Maidstone Borough (Appendix A, Table 8.2). For the purposes of determining a non-implementation discount for current extant permissions a prudent approach has been adopted to avoid overestimating the yield from this source: a rate of 5% has been applied, reducing the contribution to housing land supply from this source to 5,475 dwellings.

Housing allocations (Table 3.1, line 4)

3.8 Table 3.3 below shows the progress of housing sites allocated in the Regulation 19 draft Local Plan at 1 April 2016 which had capacity for 8,707 dwellings. This total has been reduced by 41 units to 8,666 dwellings due to a proposed reduction in capacity for policy H1(29) New Line Learning (220 to 180 units) which is listed in the submitted Schedule of Proposed Changes, and the loss of one dwelling on policy H1(16) Slencrest House which was allocated for 10 units and permitted for nine.

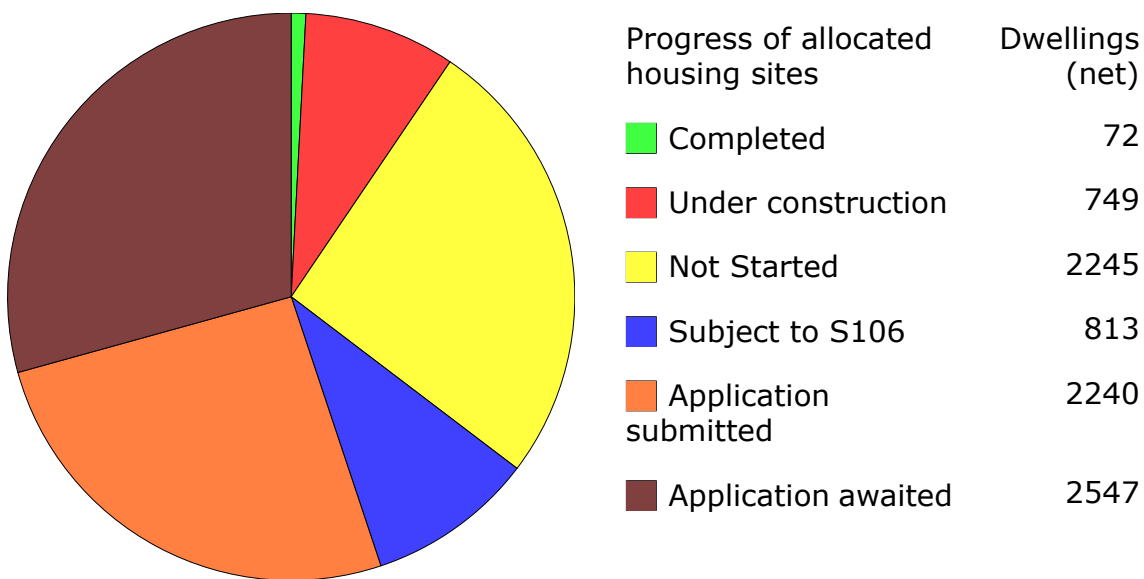


Table 3.3

Broad locations (Table 3.1, line 5)

3.9 The Regulation 19 draft Local Plan identifies three broad locations for future housing growth:

- Town Centre (700 dwellings)
- Invicta Park Barracks (1,300 dwellings)
- Lenham Rural Service Centre (1,500 dwellings)

3 . Delivery of housing sites

Town Centre Broad Location

3.10 Evidence shows that there is an oversupply of poorer quality office stock in the town centre⁽⁵⁾ which is no longer fit for purpose due to age, condition, environs and a lack of parking facilities. A combination of reduced demand for office space (locally and nationally) together with the availability of new and better quality office accommodation in nearby areas (e.g. Kings Hill and Ashford) has the effect of suppressing demand for office accommodation in the Maidstone Town Centre, thereby inhibiting new development which could better meet modern business needs. A route to tackle this is to rationalise the supply of the poorest quality stock through conversion or redevelopment to alternative uses. Over the time frame of the plan it is expected that the value of the lowest quality office stock, in terms of rents, will fall further making redevelopment for alternative uses increasingly viable. With a corresponding uplift in the market for town centre apartments, this trend could see the delivery of significant new housing in and around the town centre.

3.11 Permitted development rights allowing the conversion of certain buildings to homes, first introduced on a three-year temporary basis in 2013, were made permanent on 6 April 2016⁽⁶⁾. This has clear implications for potentially increasing the future delivery of homes in the town centre. Table 8.3 (Appendix A) gives a breakdown of all prior notification applications by geographical area over the past three years. Out of a total 907 homes from this source of supply, the town centre (as defined in the Regulation 19 draft Local Plan) contributes 665 dwellings; 85% of these were in the identified poorer quality office stock.

3.12 An exercise has been undertaken to examine how much of the poorer office stock located within the town centre has been subject to conversion, and how much remains. The calculations and methodology applied are included in Appendix D. The potential additional capacity from the balance of poor quality office stock is likely to be in the region of 300+ dwellings. Additionally, there may be a dwelling contribution from the conversion of better quality office stock and retail premises. As well as the existing supply of 665 dwellings from prior notification sites, it is reasonable to expect this source of supply to contribute around a further 350 dwellings to the town centre broad location over the plan period.

3.13 In addition to the potential from prior notifications, there are medium and long term prospects of the redevelopment of larger sites in the town centre, such as Baltic Wharf and The Mall. Baltic Wharf has consent (2014 on appeal) for a scheme of retail, office and mixed use. Given the location and listed building status of the property, there is some doubt that a retail scheme would be viable. At the appeal a residential scheme comprising 240 units (115 units from conversion and 125 new build) was proposed and, although not considered viable at that time, improvements in the housing market may support the viability of a similar scheme in the medium term. Discussions between the Council and the landowners to review options for the site are ongoing. There is potential for the

5 Qualitative Employment Site Assessment 2014, GVA

6 Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2016

site to deliver around 240 dwellings within the town centre. There are likely to be other redevelopment schemes within the town centre which include a residential component over the remaining plan period.

3.14 In February 2014 a public exhibition was held by the owners of the Mall for a potential redevelopment scheme for [The Mall](#) and its surrounds. An area was earmarked for substantial housing redevelopment which could have yielded in excess of 400 dwellings. In addition, there may be opportunities to intensify the existing built development of The Mall buildings themselves. Discussions between the Council and the landowner to consider the various options are ongoing, and The Mall has confirmed its intention to include a residential element in its long-term plans for redeveloping the site.

3.15 The recent trend of Prior Notification applications for Class Q of Part 3 permitted development proposals to redevelopment of poorer quality office stock, together with discussions with site owners, provides a reasonable basis for the Council's confidence that the potential yield within the Town Centre broad location should be increased to a total of 990 dwellings.

Invicta Park Barracks Broad Location

3.16 The broad location at Invicta Park Barracks comprises a range of military buildings, including army accommodation, set within expansive parkland. The Ministry of Defence (MoD) has categorised the site as a 'retained' site in its most recent estates review (2013) and, whilst there are no immediate plans to vacate the site, the MoD keeps its property portfolio under regular review. Recent correspondence from the Defence Infrastructure Organisation of the MoD confirms it supports the inclusion of Invicta Park Barracks in Policy H2(2) for potential future housing growth (Appendix E). Preliminary site visits indicate potential to deliver approximately 1,300 homes in the latter period of the Local Plan (2026 to 2031), and the next step will be an assessment of potential development options for the site.

Lenham Rural Service Centre Broad Location

3.17 The broad location at Lenham Rural Service Centre is allocated towards the end of the plan period (2026 to 2031), so that requirements for supporting infrastructure and mitigation measures can be addressed, and to ensure future development is integrated into the existing village through the preparation of a master plan. Consultants have been appointed to explore the potential for growth at the village, and a stakeholder workshop was held on 15 April 2016 to seek the views of the Lenham Neighbourhood Plan Steering Group and parish councillors, local land owners, developers and their advisors, representatives of local organisations, and officers from the Borough and County Councils. An initial report has been published: Exploration of the 'Broad Location' Allocation at Lenham Village, Kent (2016) which reviews the potential for growth at the village. Early indications are that 1,500 dwellings could be delivered in this broad location towards the end of the Local Plan period, and additional studies will be undertaken to understand the potential impacts from growth, including infrastructure needs, and the precise capacity of different areas.

Windfall sites contribution (Table 3.1, line 6)

3.18 In accordance with paragraph 48 of the National Planning Policy Framework (NPPF), local planning authorities may make an allowance for windfall sites if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.

3.19 Based on an examination of completed dwellings on previously developed (brownfield) small sites (1 to 4 units) and large sites (5+ units) there is strong evidence of a regular and continuing supply of windfall sites in the Borough. Sites that have previously been identified through the Local Plan process have been removed from calculations, i.e. sites identified in the adopted Maidstone Borough-wide Local Plan 2000, Urban Capacity Studies 2002 and 2006, and the Strategic Housing Land Availability Assessment (2016 combined report). Garden land has been excluded from figures in accordance with the NPPF. Sites within the town centre have also been excluded as otherwise this would result in double counting the Town Centre Broad Location contribution.

3.20 Table 8.4 (Appendix A) demonstrates that, over the past eight years, the average annual windfall rate for small sites has been 48 dwellings and for large sites 136 dwellings. The supply from small sites has been fairly consistent and, since sites below five units are not allocated in the Local Plan, it is reasonable to expect this rate to continue during the plan period from 2019/20. Prior to this date there is a risk of double counting the windfall sites with planning permission and these early years have therefore been excluded.

3.21 For large sites, there are a number of factors that affect the setting of a realistic future rate for large windfall sites: sites have been allocated in the Local Plan, so fewer sites will be "unidentified" in the short to medium term. The Council has therefore exercised caution and has assumed no large site windfalls over the next five years. After that it is reasonable to assume that the 'call for sites' exercise would not have revealed all medium to long term opportunities and so the Council has applied 50% of the average past windfall rate (68 dwellings per annum) for the period 2021/2026, and 100% (136 dwellings per annum) for the period 2026/2031 (Appendix A, Table 8.4).

3.22 Although dwellings built on garden land have been excluded from site forecasts in accordance with NPPF requirements, such sites continue to deliver an average of 28 dwellings per annum in Maidstone (Appendix A, Table 8.5), so could deliver 280 units over a 10-year period under the enabling Local Plan policy DM10. Forecasts also exclude local needs housing delivery on exception sites. Build rates will fluctuate due to the nature of this type of housing provision (Appendix A, Table 8.6) but, based on historic trends and current activity with the Housing Service, exception sites could reasonably be expected to deliver an additional 100 dwellings over the remainder of the plan period. Excluding these two sources from the Council's housing land supply forecasts introduces additional flexibility in supply.

Conclusion: meeting objectively assessed housing needs

3.23 In conclusion,

- The Council has taken on the significant rise in the objectively assessed housing need in the Borough;
- The Council is making excellent progress early in the plan period at meeting this need with 45% of the identified need already committed as completed dwellings or planning permissions granted (and in many cases commenced);
- The Council has taken a reasonable position on discounting planning permissions;
- The Council has allocated further suitable sites for development where applications are pending on a significant proportion (2,240 units, representing 12% of objectively assessed needs), with discussions with developers underway on further sites;
- The Council has also taken a relatively cautious but evidence based approach concerning the delivery of windfall sites and development within the identified broad locations; and
- Overall, the Council is confident that the objectively assessed housing need will be delivered through the policies and allocations of the Local Plan.

Affordable housing delivery

3.24 The Strategic Housing Market Assessment Update (2015) identifies an affordable housing need for the Borough of 5,800 dwellings from 2013 to 2031 (322 dwellings per annum over 18 years). Between 1 April 2013 and 31 March 2016, 491 affordable homes were completed (Appendix A, Table 8.7). Table 3.4 below demonstrates the Council's affordable dwelling supply.

3.25 Prior notification applications and small site windfalls (1 to 4 units) do not attract affordable housing and are excluded from figures, although the table includes an estimated contribution from local needs housing delivery on exception sites over the plan period (100 dwellings).

Affordable housing land supply 1 April 2013 to 31 March 2031	Dwellings (net)	Dwellings (net)
Objectively assessed affordable housing need		5,800
Completed affordable dwellings 1 April 2013 to 31 March 2016	491	
Contribution from extant planning permissions as at 1 April 2016 (including a non-implementation discount)	1,471	
Contribution from Local Plan allocated sites	1,800	

Affordable housing land supply 1 April 2013 to 31 March 2031	Dwellings (net)	Dwellings (net)
Contribution from Local Plan broad locations for housing development	1,182	
Windfall sites contribution (large sites of 5+ dwellings only)	306	
Contribution from local needs housing (exception sites)	100	
Total affordable housing land supply		5,350

Table 3.4 Delivery of affordable housing 2013 to 2031

3.26 The SHMA (2015 Update) recognises that not all affordable housing will be delivered through planning obligations on market-led development schemes. In particular, it cites the significant role of the private rented sector in Maidstone Borough. Similarly, it is reasonable to expect a proportion of 100% affordable housing where the developer is a registered provider of social housing.

3.27 Finally, the Council is aware that provisions contained within the Housing and Planning Bill which is currently passing through the House of Lords, including starter homes as part of affordable housing supply, may change the assumptions of provision.

3.28 At this stage, the Council is confident that the identified need for affordable housing can be met through the application of policies DM13 and DM14 as well as the actions of the registered providers of social housing and the private sector.

Registered Care Homes

3.29 The Strategic Housing Market Assessment Update (2015) identifies a need for a total of 980 registered care bedspaces over the plan period 2011 to 2031 (49 bedspaces per annum). Table 3.5 below sets out the Council's current position (all figures are net of losses of bedspaces).

Care homes bedspaces 1 April 2011 to 31 March 2031	Bedspaces (net)	Bedspaces (net)
Objectively assessed need		980
Completed bedspaces 1 April 2011 to 31 March 2016	42	
Bedspaces under construction at 1 April 2016	31	
Bedspaces on extant planning permissions at 1 April 2016	316	
		389

Table 3.5 Registered care homes - bedspaces

3.30 The Council has made good progress on the delivery of the identified need and has eight years' supply of registered care homes bedspaces (980/49 bedspaces per annum). On this basis the Council considers that the need identified for the remainder of the plan period can be met and the provision of this specialist accommodation will be closely monitored.

4 The housing trajectory

Methodology

4.1 The Council's housing land supply is updated annually to a base date of 1 April, and new sites granted planning permission in the preceding year are added to the Council's monitoring database. The database holds information on market and affordable housing, permanent Gypsy and Traveller sites and prior notification applications. At 1 April 2016 the Maidstone Borough Local Plan housing allocations were also added to the database. A Borough-wide survey of all sites (down to one unit) is undertaken to establish how many dwellings have been built in that year or are under construction, and the information is uploaded to the database. Analyses of the data are undertaken, including the projected phasing of individual sites.

4.2 To assist with the projected phasing exercise, contact was made with landowners, developers and their agents for all permitted and allocated sites of five units and above (Table 4.1). A minimum of three contact attempts was made and the feedback received was of a good standard.

	Percentage of sites - feedback received through contacts	Percentage of sites - no feedback through contacts	Percentage of sites - unable to make contact
Sites with extant planning permissions	55%	29%	16%
Local Plan allocated sites	65%	20%	15%
Total	59%	25%	16%

Table 4.1 Development industry feedback on phasing of sites of 5+ dwellings

4.3 In addition to contact with the development industry to establish the projected phasing of development sites, there has been regular input to the Local Plan process through the Council's 'call for sites' exercises, the SHLAA process and formal Local Plan consultations, all of which have helped to inform the allocation of development sites in the Local Plan. Regular discussions with the industry occur through the Kent Planning Officers Group, the Borough Council's biannual Development Industry Forum, and pre-application discussions.

4.4 The Council's housing land supply comprises dwellings completed between 1 April 2011 (the base date of the Local Plan) and 31 March 2016; extant planning permissions (discounted by 5%) together with those granted permission subject to the signing of section 106 agreements; sites allocated in the Maidstone Borough Local Plan; broad locations for future housing development identified in the Local Plan; and an allowance from estimated windfall sites. Care has been taken to avoid double counting across the various elements of supply.

4.5 Table 3.1 sets out the Council's overall housing land supply position. The housing trajectory (Appendix F) shows completed and projected dwellings, phased on an annual basis, for each component of supply over the plan period.

4.6 The Council is making good progress through increases in the number of completed dwellings and the pipeline of planning permissions. It is confident of continuing to deliver housing sites in line with the trajectory following close liaison with the development industry on a site by site basis. Past rates of delivery, together with the opportunities and policy framework for the continued delivery of windfalls (including prior notifications in the town centre broad location), give further confidence in the housing trajectory. The Council is developing master plans to support the implementation of the Lenham and Invicta Park Barracks broad locations. Given the progress made to date on meeting the objectively assessed housing need and the contact with the development industry, the Council believes the housing trajectory to be realistic in profile but will continue to monitor its progress.

5 Five-year housing land supply

Methodology

5.1 NPPF paragraph 47 is clear that local authorities should identify and update annually a five-year housing land supply of deliverable sites. There is no standard methodology for this calculation, and the Council's approach to establishing its five-year supply at 1 April 2016 is set out below. The methodology is PPG-compliant in that it delivers the under-supply of dwellings in the past five years over the next five years, and demonstrates a surplus of 155 dwellings (Table 5.1). This represents 5.12 years' worth of housing land supply at 1 April 2016⁽⁷⁾.

		Dwellings (net)
1	Requirement 1 April 2011 to 31 March 2021 928 dwellings p.a. x 10 years	9,280
2	Number of dwellings completed 1 April 2011 to 31 March 2016 (Appendix B)	(2,860)
3	Residual requirement 1 April 2016 to 31 March 2021 (line 1 - line 2)	6,420
4	5% buffer against potential non-delivery (5% of 6,420)	321
5	Total requirement 1 April 2016 to 31 March 2021 (line 3 + line 4)	6,741
6	Total land supply 1 April 2016 to 31 March 2021 (Appendix G)	6,896
7	Surplus in delivery 1 April 2016 to 31 March 2021 (line 5 - line 6)	155

Table 5.1 Five-year housing land supply at 1 April 2016

Completed dwellings (Table 5.1, line 2)

5.2 Appendix B lists the sites that contribute to total completions between 1 April 2011 and 31 March 2016 which total 2,860 dwellings.

5% Buffer (Table 5.1, line 4)

5.3 Policy AOSR6 of the Regional Strategy for the South East, the [South East Plan](#) (2009), set an annual dwelling target for Maidstone of 554 units, and the Strategy was not revoked (in part) until March 2013. The Maidstone Strategic

⁷ Calculation: $6,741 \div 5 = 1,348$; $6,896 \div 1,348 = 5.12$

Housing Market Assessment was first published in January 2014 and established an objectively assessed need for the Borough of 980 dwellings per annum for the period 2011 to 2031, subsequently reduced to 928 dwellings following updated national household projections in 2015. Table 8.8 (Appendix A) demonstrates that the Council has an excellent record of meeting its housing targets, even during periods of recession, up to the point that objectively assessed needs were increased by 68% (retrospectively applied).

5.4 It is therefore reasonable to apply a 5% buffer to the Council's residual housing requirement, brought forward from the latter years of the plan in order to introduce additional flexibility in the delivery of five years' worth of housing sites. This buffer is in addition to the non-implementation discount applied to extant permissions.

Five-year housing land supply (Table 5.1, line 6)

5.5 Following a detailed sites survey, the Council's housing information database is updated to a base date of 1 April each year. The housing land supply phased for the five year period from 1 April 2016 to 31 March 2021 totals 6,896 dwellings (Appendix G). The supply includes a proportion of dwellings from the discounted stock of extant planning permissions and Local Plan allocations (Appendix C), and a contribution from small site (1-4 units) windfalls for 2019/20 and 2020/21 as explained in paragraph 3.20.

Rolling five-year housing land supply

5.6 Following a considerable increase in the Borough's objectively assessed housing needs, applied retrospectively to 1 April 2011, the Council has made every effort to deliver the shortfall in housing land supply (2011/16) over the next five years (2016/21). The calculation in Table 5.1 reveals a surplus of dwellings at 1 April 2016 of 155 units. To demonstrate the Council can maintain a five-year supply over the plan period, the rolling five-year housing land supply is set out in Appendix G.

6 Monitoring and review

6.1 In line with standard practice, a review of the success of Local Plan policies will be undertaken in annual monitoring reports.

Objectively assessed needs

6.2 The Council will monitor new releases of population and household projections from ONS/DCLG, and will assess the impact of new figures on the Borough's objectively assessed needs and respond accordingly.

Monitoring the delivery of market and affordable dwellings and the delivery of bedspaces in care homes

6.3 The Council will undertake effective monitoring of the Borough's housing trajectory and five-year housing land supply position, together with the delivery of affordable housing and bedspaces in registered care homes, to ensure objectively assessed needs are being met. The Council's database will be updated annually (at a base date of 1 April) following completion of detailed site surveys, and the results will be published on the Council's website in annual monitoring reports.

Broad locations for future housing growth

6.4 Recent analyses, set out in Section 3 of this Topic Paper, demonstrates how the town centre broad location for future housing growth could be delivered. The masterplanning for the broad locations of Invicta Park Barracks and Lenham Rural Service Centre are in progress. The delivery of all three broad locations will be carefully monitored. Lenham will be the prime focus for a partial review of the Local Plan through the preparation of a Development Plan Document, to establish the boundaries of the broad location and to allocate specific sites for development.

7 Conclusion

7.1 Overall, housing land supply exceeds the objectively assessed housing need of 18,560 dwellings (2011 to 2031) by over 4%, despite the step change required in housing provision and the cautious evidence based approach applied to each component of housing provision. Every effort has been made to deliver the past under-supply of dwellings within the next five years, and the housing trajectory demonstrates that the Council can maintain a rolling five-year supply of housing land to meet needs over the period of the plan.

7.2 At this stage, the Council is confident that the identified need of 5,800 affordable dwellings can be met almost entirely (92%) through the application of policies DM13 and DM14 which will be supplemented by the actions of the registered providers of social housing and the private sector

7.3 The Council's objectively assessed need for registered care homes is 980 bedspaces, and 389 bedspaces can be delivered through completions and permissions on sites, representing eight years' worth of bedspaces to meet this specialist need. Given the good progress on the delivery of the identified need it is likely that the remaining need will be met in the plan period and the Council will monitor the position closely.

7.4 The Council is confident that its objectively assessed needs set out in the Strategic Housing Market Assessment Update 2015 will be delivered through the policies and land allocations of the Maidstone Borough Local Plan.

8 Appendices

Appendix A Tables

Component of extant planning permission	Dwellings (net)
Small sites (1 to 4 dwellings) under construction	90
Small sites (1 to 4 dwellings) not started	300
Large sites (5+ dwellings) under construction	1,850
Large sites (5+ dwellings) not started	3,523
Extant planning permissions	5,763
Non-implementation discount 5%	(288)
Extant planning permissions as at 1 April 2016 (including a non-implementation discount)	5,475

Table 8.1 Summary of extant planning consents at 1st April 2016

	Total dwellings (net) on all permissions	Dwellings (net) on expired permissions	Annual % dwellings (net) on expired permissions
2015/16	5,605	89	1.59
2014/15	3,742	66	1.76
2013/14	2,116	66	3.12
2012/13	2,007	64	3.19
2011/12	2,987	53	1.77
2010/11	3,429	76	2.22
2009/10	3,514	127	3.61
2008/09	3,150	20	0.63
Total	26,550	561	2.11
Average	3,319	70	2.11%

Table 8.2 Annual rates of expired planning permissions 2008 to 2016

	Total	2015/16	2014/15	2013/14
All	907	694	144	69
Rural	102	62	33	7
Urban	805	632	111	62
Town Centre	669	542	84	43

	Total	2015/16	2014/15	2013/14
Town Centre (office to residential only)	665	539	83	43
Town Centre (office to residential only) as a % of all prior notifications		77.67%	57.64%	62.32%

Table 8.3 Breakdown of Prior Notification applications

	Large site dwellings (net)	Small site dwellings (net)	Total dwellings (net)
2015/16	125	60	185
2014/15	96	39	135
2013/14	111	59	170
2012/13	148	49	197
2011/12	139	51	190
2010/11	189	26	215
2009/10	228	38	266
2008/09	46	55	101
Total	1,082	377	1,459
Annual average windfall rates	136	48	

Table 8.4 Large site (5+ units) and small site (1-4 units) windfalls 1 April 2008 to 31 March 2016

	Dwellings (net)
2015/16	18
2014/15	13
2013/14	19
2012/13	36
2011/12	55
2010/11	28
2009/10	27
2008/09	28
Total	224
Average annual contribution	28

Table 8.5 Completed net dwellings on garden land 1 April 2008 to 31 March 2016

Five year periods	Dwelling completions
2011/2016	68
2006/2011	8
2001/2006	20
1996/2001	15
1991/1996	30

Table 8.6 Delivery of local needs housing on exceptions sites

	Market Sector	Market Sector %	Affordable Housing	Affordable Housing %	Total Completions
2015/16	382	73%	139	27%	521
2014/15	250	61%	163	39%	413
2013/14	234	55%	189	45%	423
Total			491		
<i>2012/13</i>	<i>447</i>	<i>71%</i>	<i>183</i>	<i>29%</i>	<i>630</i>
<i>2011/12</i>	<i>493</i>	<i>56%</i>	<i>380</i>	<i>44%</i>	<i>873</i>
<i>2010/11</i>	<i>395</i>	<i>61%</i>	<i>254</i>	<i>39%</i>	<i>649</i>
<i>2009/10</i>	<i>308</i>	<i>53%</i>	<i>273</i>	<i>47%</i>	<i>581</i>
<i>2008/09</i>	<i>237</i>	<i>54%</i>	<i>204</i>	<i>46%</i>	<i>441</i>

Table 8.7 Affordable housing completions 1 April 2008 to 31 March 2016

Year 1st April to 31st March	Annualised housing target	Completed dwellings (net)
2015/16	928	521
2014/15	928	413
2013/14	928	423
2012/13 (South East Plan 554 units)	928	630
2011/12 (South East Plan 554 units)	928	873
<i>Annual average 2011/2016 (SHMA 2015)</i>	<i>928</i>	<i>572</i>
2010/11	554	649
2009/10	554	581
2008/09	554	441

Year 1st April to 31st March	Annualised housing target	Completed dwellings (net)
2007/08	554	992
2006/07	554	714
<i>Annual average 2006/2011 (South East Plan 2009)</i>	554	675
2005/06	460	756
2004/05	460	816
2003/04	460	379
2002/03	460	444
2001/02	460	722
<i>Annual average 2001/2006 (Kent Structure Plan 2006)</i>	460	623
2000/01	460	416
1999/00	460	755
1998/99	460	262
1997/98	460	444
1996/97	460	298
<i>Annual average 1996/2001 (Kent Structure Plan 1996)</i>	460	435

Table 8.8 Past delivery rates against annual housing targets

Appendix B List of sites with completed dwellings

Site location - Dwellings on sites making up completions	built	loss	Total
Completions 2015/16			
Street Farm, The Street, Boxley, Maidstone, Kent, ME14 3DR	3	0	3
The Nook, Boxley Road, Walderslade ME5 9JG	1	1	0
The Woodyard, East Street, Hunton, ME15 0RA	1	0	1
Gudgeon Oast, West Street, Hunton, Maidstone, KENT, ME15 0SA	1	0	1
Pegasus Gymnasitics Club, Crismill Lane, Bearsted, Kent, ME14 4NT	3	0	3
Old School House, Thurnham Lane, Thurnham, Maidstone, Kent, ME14 4PL	1	0	1
Cobtree Lodge, Chalky Road, Stockbury, ME9 7OP	1	0	1
The Barn, Pollyfields Farm, Detling, ME14 3HL	1	0	1
Little Couchman Green Cottage, Little Couchman Green Farm, Couchman Green Lane, Staplehurst, TN12 0RT	1	0	1
Little Couchman Green Stables, Little Couchman Green Farm	1	0	1
Marshalls Farm, Hunt Street, West Farleigh, ME15 0ND	1	0	1
The Granary, Bletchenden Farm, Bletchenden Road, Headcorn, Ashford, Kent, TN27 9JB	1	0	1
Mockbeggar Barn, Collier Street, Tonbridge, Kent, TN12 9RJ	1	0	1
Scammell Lodge, Friningham, Detling, Maidstone, Kent, ME14 3JD	1	0	1
35, Tonbridge Road, Maidstone, Kent, ME16 8SA	9	1	8
Fiddlers Green, Lenham Road, Headcorn, TN27 9LG	1	0	1
The Cottage, Kenward Orchard, Kenward Road, Yalding, ME18 6AH	1	0	1
Manor Farm Barn, Dunn Street, Bredhurst, ME7 3ND	1	0	1
Silverhill, Caring Lane, Bearsted, ME14 4NJ	1	0	1
Land West Of Bicknor Farm Cottages, Sutton Road, Maidstone, Kent	14	0	14
Land at Crinnis, Heath Road, Coxheath, ME17 4EH	2	0	2
Maidstone Golf Centre, Langley Park, Sutton Road, Langley, Kent, ME17 3NQ	1	0	1
The Yard, Hermitage Lane, Boughton Monchelsea, Kent, ME17 4DA	2	0	2
The Oast, Brishing Lane, Boughton Monchelsea, Maidstone, Kent, ME17 4NF	0	1	-1
Poplar Barn, Brishing Lane, Boughton Monchelsea, Maidstone, Kent, ME17 4NF	1	0	1
Greenhill Bungalow, Green Hill Lane, Harrietsham, Kent, ME17 1NF	1	0	1
Greenhill Bungalow, Green Hill Lane, Harrietsham, Kent, ME17 1NF	1	0	1

Site location - Dwellings on sites making up completions	built	loss	Total
Land at Northland and Groom Way, Old Ashford Road, Lenham, ME17 0QY	12	1	11
1 West Street, Harrietsham, ME17 1JL	3	0	3
Land At Langley Park, Sutton Road, Maidstone, Kent	41	0	41
74 Buckland Road, Maidstone, ME16 OSD	2	1	1
22 Tonbridge Road, Maidstone, ME16 8RT	37	0	37
53-53A London Road, Maidstone, ME16 8JH	1	0	1
Land off, Marigold Way, Maidstone, KENT	20	0	20
Glyndale, Laddingford, Maidstone, Kent	3	1	2
Ashtree Place, Hampstead Lane, Nettlestead, ME18 5HN	2	0	2
Cart Shed And Implement Store, Poplar Tree Farm, Milebush Lane, Marden, TN12 9AS	2	0	2
Moat Farm, Collier Street, Tonbridge, Kent, TN12 9RR	2	0	2
The MAP Depot Site, Goudhurst Road, Marden, Kent	36	0	36
The Bridge House, High Street, Marden, Tonbridge, Kent, TN12 9DP	1	0	1
Land Reaof 12 Cleavesland, Yalding, ME18 6BS	5	0	5
Benchmark Cottage, Shearway Lane, Headcorn, TN27 9LR	2	1	1
Headcorn Scout Group, Ulcombe Road, Headcorn, Ashford, Kent, TN27 9QR	2	0	2
2 Orchard Cottages, Lughorse Lane, Yalding, ME18 6EB	1	0	1
Great Oak Farm, Friday Street, East Sutton, ME17 3EA	1	0	1
39 Albion Place, Maidstone, Kent, ME14 5DZ	2	0	2
Westbrook House, 18 - 20, Albion Place, Maidstone, Kent, ME14 5DZ	9	0	9
Westbrook House, 18 - 20, Albion Place, Maidstone, Kent, ME14 5DZ	3	0	3
69-77 Week Street, Maidstone, Kent, ME14 1QU	14	0	14
Globe House, 13-15 Pudding Lane, Maidstone, Kent	8	0	8
15, Ashford Road, Maidstone, Kent, ME14 5DA	4	0	4
The Old School, 92A, Melville Road, Maidstone, Kent, ME15 7UT	10	0	10
Star House, Pudding Lane, Maidstone, ME14 1LT	44	0	44
24 Ashford Road, Maidstone, ME14 5BH	6	0	6
4 Albion Place, Maidstone, ME14 5DY	7	0	7
45 Upper Stone Street, Maidstone, ME15 6EU	3	0	3
Miller House, 43-51 Lower Stone Street, Maidstone, ME15 6GB	11	0	11
Romney Court, 25 Romney Place, Maidstone, ME15 6LG	1	0	1

Site location - Dwellings on sites making up completions	built	loss	Total
10A, Brunswick Street East, Maidstone, KENT, ME15 7UU	3	0	3
66, Hampshire Drive, Maidstone, ME15 7ES	1	0	1
Maidstone Care at Home Service, Mote House, Mote Park, Maidstone, ME15 8NQ	34	0	34
Maidstone Care at Home Service, Mote House, Mote Park, Maidstone, ME15 8NQ	4	0	4
68, Sutton Road, Maidstone, Kent, ME15 9AL	1	0	1
54 Holtje Crescent, Maidstone, Kent, ME15 7DD	1	0	1
41 Hedley Street, Maidstone, ME14 5AD	9	0	9
Land adj to 70 Bargrove Road, Maidstone, ME14 5SB	1	0	1
44 Sittingbourne Road, Maidstone, ME14 5LP	8	1	7
Faraday House, Hedley Street, Maidstone, KENT, ME14 5AD	4	0	4
KLH House, High Street, Staplehurst, Kent, TN12 0AH	3	0	3
5 Butcher Close, Staplehurst, TN12 0TJ	1	0	1
Land Adjacent to Surrenden Mews, High Street, Staplehurst, TN12 0BL	4	0	4
Land South of 1, Bell Lane, Staplehurst, Kent, TN12 0BA	6	0	6
Loddington House, High Street, Staplehurst, Tonbridge, Kent, TN12 0AD	1	0	1
Land at Fishers Oast, Fishers Road, Staplehurst, TN12 0DD	6	2	4
Bell Hotel, High Street, Staplehurst, TN12 0AY	3	0	3
Land Rear Of The Pride Of Kent, High Street, Staplehurst, Kent, TN12 0AH	1	0	1
Land to the South of, Oliver Road, Staplehurst, Kent	25	0	25
Spuds and Buds, Rathbond House, High Street, Staplehurst, TN12 0AD	2	0	2
50 Sandling Road, Maidstone, ME14 2RH	1	0	1
18A Kerry Hill Way, Maidstone ME14 2GZ	1	0	1
2A, Gladstone Road, Maidstone, Kent, ME14 2AU	4	0	4
18 Kerry Hill Way, Maidstone, ME14 2GZ	1	0	1
Bridge Nursery, London Road, Maidstone,	10	0	10
Land South of, Wallis Avenue, Maidstone, Kent	69	100	-31
Land North of Sutton Road, Otham	7	0	7
Land R/O 3 Cripple Street and fronting Melrose Close, Maidstone	2	0	2
Land at Hayle Place, Postley Road, Maidstone, ME15 6DW	11	0	11

Site location - Dwellings on sites making up completions	built	loss	Total
14 Dover Street, Maidstone, Kent, ME16 8LE	1	0	1
14 Dover Street, Maidstone, Kent, ME16 8LE	2	1	1
2 Beaumont Road, Maidstone, ME16 8NQ	1	0	1
Land Adj to 1 Gatland Lane, Maidstone, ME16 8PG	1	0	1
62 Bower Lane, Maidstone, ME16 8ED	3	0	3
511, Tonbridge Road, Maidstone, Kent, ME16 9LH	1	0	1
513, Tonbridge Road, Maidstone, Kent, ME16 9LH	1	0	1
24 St Michaels Road, Maidstone, ME16 8BS	0	1	-1
The Coopers Cask, 50 Bower Lane, Maidstone, ME16 8ED	4	0	4
Lorne Greenacre, Lenham Road, Headcorn, Ashford, Kent, TN27 9LE	1	0	1
Neverend Lodge, Neverend Farm, Pye Corner, Ulcome ME17 1EF	1	0	1
Park Wood Stables / Three Sons, Park Wood Lane, Staplehurst TN12 0DL	2	0	2
Kwana, Cross Drive, Kingswood, Maidstone, Kent, ME17 3NP	1	0	1
The Orchard Place, Benover Road, Yalding, Kent	1	0	1
The Orchards, Snowey Track, Park Lane, Boughton Monchelsea, ME17 4JJ	2	0	2
Land Off, Clapper Lane, Staplehurst, Kent, TN12 0RB	1	0	1
Blossom, Maplehurst Lane, Frittenden Road, Staplehurst, Kent, TN12 0DL	1	0	1
Willow Gardens, Lindfield Farm, Willow Lane, Paddock Wood, Tonbridge, Kent, TN12 6PE	4	0	4
Stilebridge Paddock, Stilebridge Lane, Linton, ME17 4DE	2	0	2
Peas Place, Green Lane, Chart Sutton, Kent, ME17 3ET	1	0	1
Land Adjacent Vine Cottage, Pye Corner	7	0	7
Link House, Knightrider Court, Knightrider Street, Maidstone, Kent, ME15	17	0	17
American Oast, Tutsham Farm, West Farleigh, Kent, ME15 0NE	5	0	5
16 Ashford Road, Bearsted, Kent, ME14 4LP	1	0	1
Total 2015/16			521
Completions 2014/15			
Friningham Manor, Friningham, Detling, ME14 3JD	0	5	-5
1 and 2 Cottage Wood, Castle Hill, Thurnham, ME14 3JE	1	0	1
Purplehill Works, White Hill Road, Detling, Maidstone, KENT, ME14 3HH	2	0	2
Purplehill Works, White Hill Road, Detling, Maidstone, KENT, ME14 3HH	2	0	2

Site location - Dwellings on sites making up completions	built	loss	Total
Pride of Kent, High Street, Staplehurst, Kent, TN12 0AH	1	0	1
5-6 High Street, Staplehurst, TN12 0AH	4	0	4
Thornhill Farm, Headcorn Road, Sutton Valence, ME17 3EL	1	0	1
Berrylands, 73, Charlesford Avenue, Kingswood, Maidstone, Kent, ME17 3PH	1	0	1
33, Reeves Close, Staplehurst, Tonbridge, Kent, TN12 0NN	1	0	1
Land adj. to 4, Lughorse Lane, Yalding, Maidstone, Kent, ME18 6EQ	1	0	1
Redudant Water Tower, Stede Hill, Harrietsham, ME17 1NR	1	0	1
36, West Street, Harrietsham, Maidstone, Kent, ME17 1HX	1	0	1
Land East and West of, Fairbourne Lane, Harrietsham, Kent	1	0	1
Land at Crinnis, Heath Road, Coxheath, ME17 4EH	1	0	1
74 Buckland Road, Maidston, ME16 OSD	1	1	0
522 Loose Road, Maidstone, ME15 9UF	1	0	1
14 Dover Street, Maidstone, Kent, ME16 8LE	0	1	-1
Car Park to the rear of Victoria Orchard, Maidstone, ME16 0ED	4	0	4
10 Rectory Lane, Maidstone, ME16 9BE	2	0	2
Kent Cottage, Grigg Lane, Headcorn, Ashford, Kent, TN27 9TD	2	0	2
Land at Penhurst Close, Grove Green, ME14 5BT	7	0	7
Pine Lodge, Somerfield Road, Maidstone, ME16 8JJ	6	0	6
2 - 3, Bedford Place, Maidstone, Kent, ME16 8JB	9	0	9
152, Upper Fant Road, Maidstone, Kent, ME16 8DJ	1	0	1
46, Salts Avenue, Loose, Maidstone, Kent, ME15 0AY	2	1	1
80 and 82, Wrangleden Road, Maidstone, Kent, ME15 9LJ	4	0	4
The Mount, Church Lane, Bearsted, Maidstone, Kent, ME14 4EF	1	0	1
Labd Rear of 43 Sandling Lane, Maidstone, ME14 2HU	1	0	1
Westreet Court, Rowland Close, Maidstone, KENT, ME16 8HQ	25	0	25
11 Gabriels Hill, Maidstone, ME15 6HL	0	1	-1
97A, High Street, Maidstone, Kent, ME14 1SA	2	0	2
Broughton House, 31 Earl Street, Maidstone, ME14 1PF	4	0	4
Chillington House, St Faiths Street, Maidstone, Kent, ME14 1LH	4	0	4

Site location - Dwellings on sites making up completions	built	loss	Total
Cornerstone, 49-50 Marsham Street, Maidstone, ME14 1HH	2	0	2
30, Ashford Road, Maidstone, Kent, ME14 5BH	3	1	2
46, College Road, Maidstone, Kent, ME15 6YF	4	0	4
66, College Road, Maidstone, Kent, ME15 6SJ	1	0	1
61 Courtenay Road, Maidstone, Kent, ME15 6UW	0	1	-1
Idenden House, Medway Street, Maidstone ME14 1JT	22	0	22
Former Highways Depot, Marley Road, Harrietsham, Maidstone, Kent, ME17 1AU	9	0	9
Land at Northland and Groom Way, Old Ashford Road, Lenham, ME17 0QY	0	1	-1
Land at West Street and, Hook Lane, Harrietsham, Kent	57	0	57
A20 Northside, Ashford Road, Harrietsham, ME17 1JU	10	0	10
Former Horticultural Unit HADL, Oakwood Park, Tonbridge Road, Maidstone, Maidstone, Kent, ME16 8AW	8	0	8
Saxon Chief, 250, Queens Road, Maidstone, Kent, ME16 0LD	6	0	6
4, Mil Street, Maidstone, Kent, ME15 6XH	2	0	2
The Ten Bells, Upper Street, Leeds, ME17 1SE	3	0	3
The Ten Bells, Upper Street, Leeds, ME17 1SE	1	0	1
George Marsham House, Holmesdale Close, Loose, Maidstone, Kent, ME15 0BE	14	0	14
Senacre Technology School, Sutton Road, Maidstone, ME15 9DT	4	0	4
Land at Junction of West Park Road and York Road, Maidstone, ME15 7AF	12	0	12
The Victory Inn, 23 Church Street, Tovil, ME15 6RB	7	0	7
Ambulance Station, Loose Road, Maidstone, ME15 9QB	8	0	8
Cuckoofield House, Linton Park, Linton, ME14 4AN	1	0	1
Sorrento, Station Road, Staplehurst, TN12 0PZ	1	0	1
Great Oak Farm, Friday Street, East Sutton, Kent	1	0	1
The Cottage, Kenward Road, Kenward Orchard, Yalding MAIDSTONE	1	0	1
Calcot, Coldbridge Lane, Egerton, Ashford, Kent, TN27 9BP	1	0	1
Oak Lodge, Tilden Lane, Marden, Tonbridge, Kent, TN12 9AX	1	0	1
Willows End, Green Lane, Yalding, Tonbridge, Kent, TN12 9RB	2	0	2
Land off, Marigold Way, Maidstone, Kent	20	0	20
The MAP Depot Site, Goudhurst Road, Marden, Kent	14	0	14

Site location - Dwellings on sites making up completions	built	loss	Total
Land at Hayle Place, Postley Road, Maidstone, ME15 6DW	1	0	1
Land at Hayle Place, Postley Road, Maidstone, ME15 6DW	105	0	105
Land to the South of, Oliver Road, Staplehurst, Kent	10	0	10
Total 2014/15			413
Completions 2013/14			
110A, Marion Crescent, Maidstone, Kent, ME15 7DU	1	1	0
Clerys, ST Faiths Lane, Bearsted, Maidstone, Kent, ME14 4JN	0	1	-1
17 Willington Street, Maidstone, ME15 8JW	1	0	1
26, Cotswold Gardens, Downswood, Maidstone, Kent, ME15 8TB	1	0	1
1 and 2 Cottage Wood, Castle Hill, Thurnham, ME14 3JE	0	2	-2
The Oast House, Boy Court Lane, Ulcombe, TN27 9LA	1	0	1
Southgate Barn, High Banks, Loose, ME15 0EQ	1	0	1
36, Roseleigh Avenue, Maidstone, Kent, ME16 0AS	1	0	1
Saltash, Oakwood Road, Maidstone, Kent, ME16 8AL	1	0	1
Land at 36, Huntington Road, Coxheath, Kent, ME17 4DY	1	0	1
Weimear, Malling Road, Teston, Maidstone, Kent, ME18 5AR	1	0	1
Land at Depot Site, George Street, Maidstone, Kent, ME15 6NX	33	0	33
Land at The Cottage, Gravelly Bottom Road, Kingswood, ME17 3NT	1	0	1
Caring Wood, Caring Lane, Leeds, Maidstone, Kent, ME17 1TJ	1	0	1
17, North Street, Sutton Valence, Maidstone, Kent, ME17 3AP	1	0	1
75, College Road, Maidstone, Kent, ME15 6TF	2	0	2
13, Mangravet Avenue, Maidstone, Kent, ME15 9BQ	0	1	-1
127 Cambridge Crescent, Maidstone, ME15 7NS	1	0	1
New Melbourne House, Canning Street, Maidstone, Kent, ME14 2RU	9	0	9
37A Hillary Road, Maidstone, ME14 2JR	2	0	2
Rising Sun, 22, Marsham Street, Maidstone, Kent, ME14 1EP	4	0	4
85 Upper Stone Street, Maidstone, ME15 6HE	2	0	2
Land at Church Street, Maidstone, ME14 1EL	26	0	26
Land adj to 37, Ashford Road, Maidstone, Kent, ME14 5DB	4	0	4
68, Brunswick Street, Maidstone, Kent, ME15 6NP	1	0	1

Site location - Dwellings on sites making up completions	built	loss	Total
68, Bank Street, Maidstone, Kent, ME14 1SN	4	0	4
9, Mill Street, Maidstone, Kent, ME15 6XP	1	0	1
29, Old Tovil Road, Maidstone, Kent, ME15 6PR	1	0	1
66, Melville Road, Maidstone, Kent, ME15 7UT	1	0	1
3 Falcon Court, 73, College Road, Maidstone, ME15 6TF	1	0	1
53, High Street, Maidstone, Kent, ME14 1SY	2	0	2
Aylesbury House, 56 London Road, Maidstone, ME16 8QL	2	0	2
8 Lower Road, Maidstone, ME15 7RQ	2	0	2
76-78 College Road, Maidstone, ME15 6SJ	1	0	1
20-24, Melville Road, Maidstone, Kent, ME15 7UY	8	0	8
82, Hardy Street, Maidstone, Kent, ME14 2SJ	2	1	1
22 Spot Lane, Bearsted, ME15 8NU	1	0	1
8, Manor Close, Bearsted, Maidstone, Kent, ME14 4BY	2	0	2
FirTree Yard, Stockett Lane, Coxheath, ME17 4PY	6	0	6
21- 25 The Street, Detling, Kent, ME14 3JT	6	0	6
Royal George, 2, Boxley Road, Maidstone, Kent, ME14 2TH	1	0	1
31 Brewer Street, Maidstone, ME14 1RU	6	3	3
97, Tonbridge Road, Maidstone, Kent, ME16 8JN	3	1	2
2, Upper Fant Road, Maidstone, Kent, ME16 8DN	5	0	5
13, Tonbridge Road, Maidstone, Kent, ME16 8HG	3	0	3
13, Tonbridge Road, Maidstone, Kent, ME16 8HG	8	0	8
Land r/o 125, Tonbridge Road, Maidstone, Kent, ME16 8JS	2	0	2
17, Bower Lane, Maidstone, Kent, ME16 8BJ	2	1	1
Westwood Ham Lane, Lenham, ME17 2LP	5	0	5
Land East and West of, Fairbourne Lane, Harrietsham, Kent	3	0	3
3, Northdowns View, Harrietsham, Maidstone, Kent, ME17 1AQ	1	0	1
Land at West Street and, Hook Lane, Harrietsham, Kent	23	0	23
Land East of Chance, Grigg Lane, Headcorn, TN27 9TD	25	0	25
11, Station Road, Headcorn, Ashford, Kent, TN27 9SB	1	0	1
Low House Annexe, Pilgrims Way, Thurnham, Maidstone, Kent, ME14 3LD	1	0	1
13, Wheatsheaf Close, Maidstone, Kent, ME15 9QA	2	1	1

Site location - Dwellings on sites making up completions	built	loss	Total
37, Ashford Road, Maidstone, Kent, ME14 5DP	1	0	1
Yelstead Farm, Yelstead Road, Yelstead, Sittingbourne, Kent, ME9 7UT	1	0	1
18, Buckland Road, Maidstone, Kent, ME16 0SL	2	0	2
2, Albion Place, Maidstone, Kent, ME14 5DY	7	0	7
62, West Street, Harrietsham, Maidstone, Kent, ME17 1HU	1	0	1
Wind in The Willows Farm, Wagon Lane, Paddock Wood, Tonbridge, Kent, TN12 6PT	1	0	1
Lyle's Yard, Bicknor Lane, Bicknor, Sittingbourne, Kent, ME9 8BA	1	0	1
The Cottage in The Wood, East Lodge, Harple Lane, Detling, Maidstone, Kent, ME14 3ET	1	0	1
Lodge Cottage, Court Lodge Road, Harrietsham, Maidstone, Kent, ME17 1AS	1	0	1
11, Upper Stone Street, Maidstone, Kent, ME15 6EU	2	0	2
315, Tonbridge Road, Maidstone, Kent, ME16 8ND	1	0	1
Valley Farm, Dean Street, East Farleigh, Maidstone, Kent, ME15 0HT	1	0	1
2, Upper Fant Road, Maidstone, Kent, ME16 8DN	1	0	1
The George, Benover Road, Yalding, Maidstone, Kent, ME18 6EJ	1	0	1
Braye House, North Street, Sutton Valence, Maidstone, Kent, ME17 3HT	2	0	2
40, Gladstone Road, Maidstone, Kent, ME14 2AX	3	1	2
28, Sutton Road, Maidstone, Kent, ME15 9AH	0	1	-1
Fairbourne Manor, Fairbourne Lane, Harrietsham, Maidstone, Kent, ME17 1LN	0	1	-1
The Piggeries, The Quarries, Boughton Monchelsea, Maidstone, Kent, ME17 4NJ	0	1	-1
Westree Court, Rowland Close, Maidstone, Kent, ME16 8HQ	11	0	11
74 Buckland Road, Maidstone, ME16 0SD	0	1	-1
Former Horticultural Unit Hadl, Oakwood Park, Tonbridge Road, Maidstone, Kent, ME16 8AW	42	0	42
Halls Place, Rigshill Road, Otterden, ME13 0JD	1	0	1
Norton Hall, Rigshill Road, Otterden, ME13 0JD	1	0	1
Land East of, South Street Road, Stockbury, Kent, ME9 7UH	8	0	8
Senacre Technology School, Sutton Road, Maidstone, ME15 9DT	55	0	55
Senacre Technology School, Sutton Road, Maidstone, ME15 9DT	14	0	14
Land at 14 Ellingham Lees, Maidstone, ME15 9AQ	1	0	1

Site location - Dwellings on sites making up completions	built	loss	Total
Land at Hayle Place, Postley Road, Maidstone, ME15 6DW	11	0	11
Former Rose Inn site 1, Farleigh Hill, Tovil, Maidstone, Kent, ME15 6RG	14	0	14
Mill House, High Street, Staplehurst, Tonbridge, Kent, TN12 0AU	1	0	1
Somersby Stables, Headcorn Road, Sutton Valence, ME17 3EL	2	0	2
The Orchards, Snowey Track, Park Lane, Boughton Monchelsea, ME17 4JJ	4	0	4
Roydon Farm, Pye Corner, Ulcombe, ME17 1EF	2	0	2
Mulberry Farm, East Street, Hunton, ME15 0RA	2	0	2
Bramblewood Stables, Pitt Road, Langley, ME17 3NR	4	0	4
Quarter Paddocks, Bletchenden Road, Headcorn, TN27 9JB	4	0	4
2-8 Brunswick Street, Maidstone, ME15 6NP	8	0	8
Old School Hall, Lower Road, East Farleigh, ME15 0JL	1	0	1
Total 2013/14			423
Completions 2012/13			
Ruby, Chatham Road, Sandling, Maidstone, Kent, ME14 3AY	1	0	1
Homstall Farm, Love Lane, Headcorn, Ashford, Kent, TN27 9HJ	1	0	1
Guildstead Lodge, Yelstead Lane, Sittingbourne, Kent, ME9 7UT	1	0	1
66 & 67, Queen Elizabeth Square, Maidstone, Kent, ME15 9DA	0	2	-2
Applelyn, Benover Road, Yalding, Maidstone, Kent, ME18 6EY	1	0	1
Fishers Oast, Fishers Road, Staplehurst, Tonbridge, Kent, TN12 0DD	1	0	1
Fishers Oast, Fishers Road, Staplehurst, Tonbridge, Kent, TN12 0DD	1	0	1
Frogs Hole, Pilgrims Way, Hollingbourne, Maidstone, Kent, ME17 1UZ	1	2	-1
Unit 4A Rowan House Farm, Gravelly Bottom Road, Kingswood, Maidstone, Kent, ME17 3NU	1	0	1
46, Melville Road, Maidstone, Kent, ME15 7UR	5	1	4
110A, Marion Crescent, Maidstone, Kent, ME15 7DU	0	1	-1
Ground Floor Flat, 1C, Whitmore Street, Maidstone, Kent, ME16 8JX	1	0	1
76, Bower Mount Road, Maidstone, Kent, ME16 8AT	1	0	1
Clerys, St Faiths Lane, Bearsted, Maidstone, Kent, ME14 4JN	0	1	-1
Land to the rear of Tahsis, White Hill Road, Detling, ME14 3HH	1	0	1
Land adj to the Retreat, Ware Street, Weaving, ME14 5LA	1	0	1
Two Tress, 25 The Landway, Bearsted, ME14 4BE	4	0	4
72 Boxley Road, Maidstone, ME14 2TW	4	1	3

Site location - Dwellings on sites making up completions	built	loss	Total
72 Boxley Road, Maidstone, ME14 2TW	2	1	1
East Court, The Street, Detling, Maidstone, Kent, ME14 3JX	3	0	3
Post Office Stores, 16-20 The Street, Detling, ME14 3JT	3	0	3
1 and 2 Cottage Wood, Castle Hill, Thurnham, ME14 3JE	0	2	-2
The Barn, Thurnham Lane, Thurnham, ME14 4QZ	1	0	1
Orchard House, Dunn Street Road, Bredhurst, Gillingham, Kent, ME7 3LY	1	0	1
8, Manor Close, Bearsted, Maidstone, Kent, ME14 4BY	0	1	-1
3, Heathfield Road, Penenden Heath, Maidstone, Kent, ME14 2AD	1	0	1
24 & 25, Well Road, Maidstone, Kent, ME14 1XL	2	0	2
Linscot, Roundwell, Bearsted, ME14 4HJ	2	1	1
Land rear of Frantom, Grove Green Road, Maidstone, ME14 5JT	1	0	1
Hubbards Farm, Hook Lane, Lenham Heath, ME17 2BX	2	0	2
Fairbourne Manor Farm, Silverdale, Fairbourne Lane, Harrietsham, ME17 0QY	1	0	1
Snagbrook Farm, Snagbrook Oast, Eyhorne Street, Hollingbourne, ME17 1UA	1	0	1
South Green Farm, South Green Lane, Sittingbourne, ME9 7RR	1	0	1
Blue House Farm, Warren Street, Lenham, ME17 2ED	1	0	1
Land adj to Bryher, Dawks Meadow, Headcorn, TN27 9NJ	1	0	1
9 Jaggard Way, Staplehurst, TN12 0LF	1	0	1
Land to the rear of Blue Tops, Walnut Tree Lane, Maidstone, ME15 9RG	1	0	1
Land between Pebbledene and Hollydene, Ulcombe Road, Headcorn, TN27 9QR	1	0	1
The Piggeries, The Quarries, Boughton Monchelsea, Maidstone, Kent, ME17 4NJ	1	0	1
off Knights Way, Knights Way, Headcorn, Kent, TN12 0QX	3	0	3
13, Mill Bank, Headcorn, Ashford, Kent, TN27 9RB	1	0	1
1 Odiham Drive, Maidstone, ME16 0TW	0	1	-1
1 Kilndown Close, Maidstone, ME16 0PL	1	0	1
478, Loose Road, Maidstone, Kent, ME15 9UB	1	0	1
1 Church Road, Tovil, ME15 6QX	4	0	4
Frith Hall Barn, Frith Hall, Dean Street, East Farleigh, ME15 0PR	1	0	1
Stocks, Claygate Road, Laddingford, Maidstone, ME18 6BJ	1	0	1

Site location - Dwellings on sites making up completions	built	loss	Total
Rectory Barn, Rectory Lane, Chart Sutton, ME17 3RD	1	0	1
Wolverley, Vicarage Lane, Yalding, ME18 6DT	1	0	1
85, The Quarries, Boughton Monchelsea, Maidstone, Kent, ME17 4NJ	2	0	2
Land adj Michael House, Charlton Lane, West Farleigh, ME15 ONU	3	0	3
Plot 10, Wilson Court, Yalding, ME18 6JN	1	0	1
Pine Lodge, Somerfield Road, Maidstone, ME16 8JJ	0	1	-1
Cedarwood, Queens Avenue, Maidstone, ME16 0EN	14	1	13
58 - 62 Sittingbourne Road, Maidstone, ME14 5HZ	5	0	5
21, Brewer Street, Maidstone, ME14 1RU	6	0	6
Kent Music School, Hastings Road, Maidstone, ME15 7SG	21	0	21
Fintonagh House, Fintonagh Drive, Penenden Heath, Maidstone, ME14 2AQ	11	0	11
Holly Bush Inn, 38 Fisher Street, Maidstone, ME14 2SU	7	0	7
Maidstone Borough Council Transport Depot, Armstrong Road, Maidstone, Kent, ME15 6AY	65	0	65
Former Park and Ride, Coombe Quarry, Armstrong Road, Maidstone, ME15 6ZT	32	0	32
Former Park and Ride, Coombe Quarry, Armstrong Road, Maidstone, ME15 6ZT	3	0	3
Land rear of Maidstone Fire Station, Loose Road, Maidstone, Kent, ME15 9QB	100	0	100
48 Lancet Lane, Maidstone, ME15 9SD	1	0	1
21, Franklin Drive, Weaving, Maidstone, Kent, ME14 5SY	9	0	9
Land at 113, 115 and 123 Tonbridge Road, Maidstone, ME16 8JS	6	0	6
49, Lower Fant Road, Maidstone, KENT, ME16 8DP	7	0	7
Wallis Yard, Hart Street, Maidstone, ME16 8RE	43	0	43
30 Milford Close, Maidstone, ME16 0EY	1	0	1
100 Tonbridge Road, Maidstone, ME16 8SL	5	0	5
56, Bower Lane, Maidstone, KENT, ME16 8ED	0	1	-1
Land adj 13 Warden Close, Maidstone, ME16 0JL	1	0	1
The Dell, Queens Road, Maidstone, ME16 0JG	2	0	2
48 Whitmore Street, Maidstone, ME16 8JU	4	0	4
Sunnyside, 4 Buckland Hill, Maidstone, ME16 0SB	1	0	1

Site location - Dwellings on sites making up completions	built	loss	Total
Charhurst, Chart Road, Sutton Valence, ME17 3AW	2	0	2
Langley Park Farm, Sutton Road, Langley, Maidstone, ME17 3NQ	1	0	1
Langley Park House, Langley Park Farm, Sutton Road, Langley, Maidstone, ME17 3NQ	1	0	1
The Hawthorns, Leeds Road, Langley, Maidstone, Kent, ME17 3JN	1	0	1
126, College Road, Maidstone, Kent, ME15 6SU	0	2	-2
177 Coombe Road, Maidstone, ME15 6UR	2	0	2
3 Marsham Street, Maidstone, ME14 1EW	1	0	1
29 Ashford Road, Maidstone, ME14 5DP	1	0	1
1A King Edward Road, Maidstone, ME15 6PN	2	0	2
Cornerstone, 49-50 Marsham Street, Maidstone, ME14 1HH	0	1	-1
20-24, Melville Road, Maidstone, Kent, ME15 7UY	0	14	-14
Westwood Ham Lane, Lenham, ME17 2LP	14	0	14
Threeways Depot, Sherway Close, Headcorn, TN27 9SP	7	0	7
Former Leonard Gould Works, Pickering Street, Loose, ME15 9RS	47	0	47
Former Leonard Gould Works, Pickering Street, Loose, ME15 9RS	1	0	1
The Willows, Church Green, Marden, TN12 9HL	22	0	22
Betherseden Court Site, Betherseden Court, Maidstone, Kent, ME15 8SS	11	0	11
Parisfield, Headcorn Road, Staplehurst, TN12 0BT	5	0	5
20A Wordsworth Road, Maidstone, ME14 2HH	2	0	2
Land adj to 22 Raymer Road, Maidstone, ME14 2JQ	1	0	1
Garages Corner of John Street &, Peel Street, Maidstone, Kent	2	0	2
1A, Wordsworth Road, Maidstone, KENT, ME14 2HH	1	0	1
79 Lower Boxley Road, Maidstone, ME14 2UU	4	0	4
19, Hardy Street, Maidstone, Kent, ME14 2SH	2	1	1
Land adj to 12 Coverdale Avenue, Maidstone, ME15 9DR	1	0	1
2 & 3, Lansdowne Avenue, Maidstone, Kent, ME15 9DJ	2	2	0
30 Sutton Road, Maidstone, ME15 9AH	1	0	1
Land adjacent to No 14, Ellingham Leas, Maidstone, Kent, ME15 9AQ	1	0	1
13, Mangravet Avenue, Maidstone, Kent, ME15 9BQ	0	1	-1
125 Westmorland Road, Maidstone, ME15 8JD	1	0	1

Site location - Dwellings on sites making up completions	built	loss	Total
Haven Farm, North Street, Sutton Valence, Maidstone, Kent, ME17 3HS	12	0	12
The Brambles, Ulcombe Road, Langley, Maidstone, Kent, ME17 3JE	5	0	5
The Bungalow, New Barn, Park Lane, Boughton Monchelsea, Maidstone, Kent, ME17 4JJ	1	0	1
Senacre Technology School, Sutton Road, Maidstone, ME15 9DT	31	0	31
Senacre Technology School, Sutton Road, Maidstone, ME15 9DT	4	0	4
Senacre Technology School, Sutton Road, Maidstone, ME15 9DT	1	0	1
Maidstone Care at Home Service, Mote House, Mote Park, Maidstone, ME15 8NQ	0	5	-5
50, Hedley Street, Maidstone, Kent, ME14 5AD	1	0	1
Coombe Road, Maidstone	40	0	40
Coombe Road, Maidstone	4	0	4
27, Randall Street, Maidstone, Kent, ME14 2TB	1	0	1
Orchard Farm Nursery, Chartway Street, Sutton Valence, Maidstone, Kent, ME17 3JB	1	0	1
Land at Chartview, Chart Hill Road, Chart Sutton, Kent, ME17 3EX	1	0	1
Land at, Love Lane, Headcorn, Kent	1	0	1
Granada, Lenham Road, Headcorn, Ashford, Kent, TN27 9LE	1	0	1
Tommy's Maize, Summerhill Road, Marden, Tonbridge, Kent, TN12 9BX	2	0	2
1, Oak Lodge, Tilden Lane, Marden, Tonbridge, Kent, TN12 9AX	2	0	2
Blue Bell Farm, George Street, Staplehurst, Tonbridge, Kent, TN12 0RB	2	0	2
The Paddocks, George Street, Staplehurst, Tonbridge, Kent, TN12 0RA	2	0	2
Seaview Farm, South Street Road, Stockbury, Maidstone, Kent, ME9 7QS	2	0	2
Kilnwood Farm, Old Ham Lane, Lenham, Maidstone, Kent, ME17 2LT	2	0	2
24 Charlton Street, Maidstone, ME16 8LA	3	0	3
116A, London Road, Maidstone, Kent, ME16 0DJ	1	0	1
Downs Oak Farm, West Street, Harrietsham, Maidstone, Kent, ME17 1JZ	1	0	1
Total 2012/13			630
Completions 2011/12			
Senacre Technology School, Sutton Road, Maidstone, ME15 9DT	18	0	18
Plot at Eyhorne Manor, Musket Lane, Hollingbourne, ME17 1UU	1	0	1

Site location - Dwellings on sites making up completions	built	loss	Total
Parisfield, Headcorn Road, Staplehurst, TN12 0BT	7	0	7
Lenham Library, The Square, Lenham, ME17 2PQ	0	1	-1
85 Upper Stone Street, Maidstone, ME15 6HE	0	1	-1
79 Lower Boxley Road, Maidstone, ME14 2UU	0	1	-1
65 Week Street, Maidstone, ME14 1QU	1	0	1
67 High Street, Headcorn, TN27 9QA	1	0	1
Rectory Farm, Sutton Road, Langley, ME17 3LY	1	0	1
Redpit Barn, Redpit, Leeds Road, Langley, ME17 3JN	1	0	1
Dalkeith, Maidstone Road, Staplehurst, TN12 0RE	2	1	1
Cornerstone, 49-50 Marsham Street, Maidstone, ME14 1HH	1	0	1
Dingley Dell Cottage, Cobtree Manor, Forstal Road, Sandling, ME14 3AX	1	0	1
52 Union Street, Maidstone, ME14 1ED	0	1	-1
3 Maidstone Road, Lenham, ME17 2QH	0	1	-1
5 Westmorland Road, Maidstone, ME15 8BE	1	0	1
Kent Music School, Hastings Road, Maidstone, ME15 7SG	4	0	4
8 Lower Road, Maidstone, ME15 7RQ	0	1	-1
24 Charlton Street, Maidstone, ME16 8LA	0	1	-1
Little Benover Farm, Benover Road, Yalding, ME18 6AS	1	0	1
Annexe, Hall Lodge, Biddenden Road, Headcorn, TN27 9JD	1	0	1
Boughton Mount Farm, Cliff Hill, Boughton Monchelsea, ME17 4NB	1	0	1
1A Brunswick Street and rear of 45 Upper Stone Street, Maidstone, ME15 6NP	6	0	6
69 Bank Street, Maidstone, ME14 1SN	5	0	5
Olivia's Barn, Heath Road, Coxheath, ME17 4EF	1	0	1
1 Church Road, Tovil, ME15 6QX	0	1	-1
19 Marsham Street, Maidstone, ME14 1EP	1	0	1
16 Mote Road, Maidstone, ME15 6ES	1	3	-2
North Lodge, New Road, Langley, ME17 3NE	1	0	1
The Honeysuckles, Cross Drive, Kingswood, ME17 3NP	1	0	1
The Chances, Lughorse Lane, Hunton, ME15 0QU	1	0	1
Plum Tree Farm, Park Road, Marden, TN12 9LG	2	0	2

Site location - Dwellings on sites making up completions	built	loss	Total
Stable Paddocks, Marden Road, Staplehurst, TN12 0JG	1	0	1
Whiteacres, Marden Road, Staplehurst, TN12 0JG	4	0	4
Cobnut Tree Place (Plot 1), Church Hill, Boughton Monchelsea, ME17 4HP	1	0	1
Greenacre (Plot 5), Church Hill, Boughton Monchelsea, ME17 4HP	1	0	1
Land adj Amsbury Cottage, Amsbury Road, Coxheath, ME15 0QH	1	0	1
Four Oakes (Plot 2), Church Hill, Boughton Monchelsea, ME17 4HP	2	0	2
Stilebridge Paddock, Stilebridge Lane, Linton, ME17 4DE	2	0	2
The Orchards, Snowey Track, Park Lane, Boughton Monchelsea, ME17 4JJ	4	0	4
Little Appleby, Lucks Lane, Chart Sutton, ME17 4DA	3	0	3
Land East of Queen Street, Queen Street, Yalding, TN12 6PH	1	0	1
Land rear of Orchard Farm Nursery, Chartway Street, Kingswood, ME17 3JA	2	0	2
Cherry Cottage, Roseacre Lane, Bearsted, ME14 4JX	1	0	1
Land rear of 13-21 Ware Street, Bearsted, ME14 4PH	3	0	3
Little Orchard, Church Lane, Bearsted, ME14 4EF	5	0	5
Land Adj, 9 Mynn Crescent, Bearsted, ME14 4AS	1	0	1
51, Yeoman Way, Bearsted, Maidstone, Kent, ME15 8PH	1	0	1
Oaks, Westfield Sole Road, BOXLEY, ME14 3EH	1	0	1
Land rear of Ty Saith and Style Cottage, Weaving Street, Maidstone, ME14 5JQ	2	0	2
Land rear of Ty Saith, Weaving Street, Maidstone, ME14 5JQ	1	0	1
Land rear of Burnlea and Woodside, Grove Green Lane, Weaving, Kent, ME14 5JW	1	0	1
Plot 2 Land rear of Burnlea and Woodside, Grove Green Lane, Weaving, Kent, ME14 5JW	1	0	1
Rosemount and Krithia, Ashford Road, Weaving, ME14 4AG	4	0	4
Rosemount and Krithia, Ashford Road, Weaving, ME14 4AG	2	0	2
Land rear of 4 Senacre Cottages, Gore Court Road, Otham, ME15 8RE	2	0	2
Gore Court, Church Road, Otham, Maidstone, Kent, ME15 8RF	1	0	1
40 Ash Grove, Maidstone, ME16 0AA	1	0	1
Land on West Side, New Road, Headcorn, TN27 9SE	2	0	2
Bletcheden Manor Barn, Bletcheden Road, Headcorn, TN27 9JB	1	0	1
Land at 33 Wheeler Street, Headcorn, TN27 9SH	1	0	1

Site location - Dwellings on sites making up completions	built	loss	Total
7 Mill Bank, Headcorn, TN27 9RB	1	0	1
Water Lane Farm, Water Lane, Ulcombe, ME17 1DE	1	0	1
Hallam House, North Street, Headcorn, TN27 9NN	17	0	17
Shoreham Nursery, Windmill Hill, Ulcombe, ME17 1EP	1	0	1
Oltims, Dawk's Meadow, Headcorn, Ashford, Kent, TN27 9NJ	1	0	1
Linton Water Tower, Linton Road, Loose, ME15 0DR	2	0	2
Detached Storage Building, rear of Scriba House, Old Loose Hill, Loose, ME15 0AA	1	0	1
5 AND 7 Shernolds, Maidstone, ME15 9QG	1	0	1
418 Loose Road, Maidstone, ME15 9TX	1	0	1
Spills Hill Farm Cradducks Lane Yard, Cradducks Lane, Staplehurst, Kent	1	0	1
Wattle Gates, Station Road, Staplehurst, Tonbridge, Kent, TN12 0QQ	1	0	1
34, Stanley Close, Staplehurst, Tonbridge, Kent, TN12 0TA	1	1	0
Former Lipscomb Volvo Site, Cavendish Way, Bearsted, ME15 8PN	20	0	20
47 West Street, Harrietsham, ME17 1HX	8	0	8
Land adj 28, Ashford Drive, Kingswood, Kent	18	0	18
Nine Oaks, Lenham Road, Kingswood, ME17 1LZ	2	0	2
Land off Winch's Garth, Winch's Garth, Staplehurst, Kent, TN12 0QX	5	0	5
The Brambles, Ulcombe Road, Langley, Maidstone, Kent, ME17 3JE	1	1	0
Kingsley Road Post Office, 118 Kingsley Road, Maidstone, ME15 7UL	1	0	1
Rear of 82 Bank Street, Maidstone, ME14 1SD	1	0	1
Brunswick House 18 - 30, Upper Stone Street, Maidstone, Kent, ME15 6EZ	4	0	4
82-84 Union Street, Maidstone, ME14 1EH	2	0	2
10, Marsham Street, Maidstone, Kent, ME14 1EP	1	0	1
County Furnishing Centre, 21, Waterloo Street, Maidstone, Kent, ME15 7UH	1	0	1
53, Hayle Road, Maidstone, Kent, ME15 6PE	5	1	4
Former Kent County Ophthalmic and Aural Hospital, Church Street, Maidstone, ME14 1DT	20	0	20
Former Kent County Ophthalmic and Aural Hospital, Church Street, Maidstone, ME14 1DT	32	0	32
100 Union Street, Maidstone, ME14 1EH	8	0	8
6A Bower Mount Road, Maidstone, ME16 8AU	6	0	6
Gardens rear of 48, 50, 52 AND 54 Buckland Road, Maidstone, ME16 0SH	24	0	24

Site location - Dwellings on sites making up completions	built	loss	Total
49, Lower Fant Road, Maidstone, Kent, ME16 8DP	0	1	-1
30-31 Prospect Place, Maidstone, ME16 8EG	7	0	7
105 Tonbridge Road, Maidstone, ME16 8JN	12	0	12
Land at James Whatman Way, Maidstone	117	0	117
Land off Collington Terrace and 160 to 170, Bicknor Road, Maidstone, KENT	12	0	12
YMCA, Melrose Close, Maidstone, ME15 6BD	15	0	15
Threeways Depot, Sherway Close, Headcorn, TN27 9SP	35	0	35
The Old Forge, 26A High Street, Lenham, ME17 2QD	1	0	1
88 West Street, Harrietsham, ME17 1HU	1	0	1
Boltons Cottage, Rose Lane, Lenham, Kent, ME17 2JN	1	0	1
Foxdene, Rumstead Lane, Stockbury, ME9 7RT	1	0	1
Land rear of Maidstone Fire Station, Loose Road, Maidstone, Kent, ME15 9QB	22	0	22
58 - 62 Sittingbourne Road, Maidstone, ME14 5HZ	8	0	8
Land at 113, 115 and 123 Tonbridge Road, Maidstone, ME16 8JS	7	0	7
Wallis Yard, Hart Street, Maidstone, ME16 8RE	25	0	25
Fintonagh House, Fintonagh Drive, Penenden Heath, Maidstone, ME14 2AQ	5	0	5
Senacre Technology School, Sutton Road, Maidstone, ME15 9DT	232	0	232
Maidstone Care At Home Service, Mote House, Mote Park, Maidstone, ME15 8NQ	24	0	24
1-3 Hardy Street, Maidstone, ME14 2SH	3	0	3
Land adj to 43A Park Way, Maidstone, ME15 7DN	1	0	1
85, The Quarries, Boughton Monchelsea, Maidstone, Kent, ME17 4NJ	0	1	-1
Land to the east of Beresford Cottage, The Quarries, Boughton Monchelsea, ME17 4NH	1	0	1
Land adj to Carpenters Cottage, Pleasant Valley Lane, East Farleigh, ME15 0BB	1	0	1
1, Markham Cottages, Charlton Lane, West Farleigh, ME15 0NL	1	0	1
Calf Pens, Little Cheveney Farm, Sheephurst Lane, Marden, TN12 9NX	1	0	1
Winifred, Howland Road, Marden, TN12 9EZ	3	1	2
Far Acre Farm, Goudhurst Road, Marden, TN12 9LT	1	0	1
Coombe Road, Maidstone	1	0	1

Site location - Dwellings on sites making up completions	built	loss	Total
Maidstone Borough Council Transport Depot, Armstrong Road, Maidstone, Kent, ME15 6AY	31	0	31
25 Warden Close, Maidstone, ME16 0JL	1	0	1
16, Warden Close, Maidstone, Kent, ME16 0JL	1	0	1
49, London Road, Maidstone, Kent, ME16 8JE	1	0	1
Fant Arms, 224, Upper Fant Road, Maidstone, Kent, ME16 8DH	2	0	2
575, Tonbridge Road, Maidstone, Kent, ME16 9LN	0	1	-1
Land between Elder Close and Charlesford Avenue, Kingswood, ME17 3PR	2	0	2
Broadlands, Leeds Road, Langley, ME17 3JN	1	0	1
Redpit, Leeds Road, Langley, ME17 3JN	1	0	1
Red Hough House, Lower Road, Sutton Valence, Kent, ME17 3AL	1	0	1
Lynrick, Orchard Close, Langley, Maidstone, Kent, ME17 3LL	1	0	1
9 & 10, Granada House, Lower Stone Street, Maidstone, Kent, ME15 6JP	2	0	2
Former Leonard Gould Works, Pickering Street, Loose, ME15 9RS	8	0	8
Total 2011/12			873
Total			2860

Table 8.9 List of sites making up completions

Appendix C List of extant planning permissions and allocations

8.1 The following tables list the number of dwellings (net of losses) on sites that contribute towards housing land supply. The figures exclude the non-implementation discount for extant permissions for individual sites. The total number of dwellings discounted for non-implementation are quoted at the end of the extant planning permission table. The 'status' column indicates whether planning applications are full, outline or prior notifications (PN); where permission has been granted subject to the signing of section 106 agreements; and where an application for a Local Plan allocation is pending a decision. The 'feedback' column confirms where phasing on large sites (5+ dwellings) has been guided by feedback from landowners and developers, or their agents. A 'yes' indicates positive feedback; and a 'no' indicates contact was made but the phasing of sites was unknown. The blank cells for large sites indicate where, following three attempts, contact had been unsuccessful.

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
85, Heath Road, Maidstone, Kent, ME16 9LD	4			Full	
Land West Of, Hermitage Lane, Maidstone, Kent	160	90		Out	Yes
1 St Andrews Road, Maidstone, ME16 9AN	10			Full	Yes
Land at Oakapple Lane and Hermitage Lane, Maidstone	69			Full	Yes
Harrietsham House, Burdock Court, ME16 0GN	2			Full	
Land South West of, Oakapple Lane, Maidstone	80			Out	Yes
Land To The East Of, Hermitage Lane, Maidstone	205	250	45	Out	Yes
Land to rear of 170 Tonbridge Road, Maidstone, ME16 8SR	1			Full	
Kent House Beaver Road, Allington, Maidstone, Kent, ME16 0XR	8			Out	Yes
Bridge Nursery, London Road, Maidstone,	130			Full	Yes
Parkwood Cottages, Teston Corner, Teston, ME18 5BA	-1			Full	
Little Court Lodge Farm, Tonbridge Road, Teston, ME18 5BY	1			PN	
Mount Lodge, Church Lane, Bearsted, Maidstone, Kent, ME14 4EF	1			Full	
7 Cavendish Way, Bearsted, ME15 8PW	1			Full	
Tremayne, Church Lane, Bearsted, Kent, ME14 4EF	1			Full	
4 Manor Close, Bearsted, Kent, ME14 4BY	1			Full	
1, Sandy Mount, Bearsted, Maidstone, Kent, ME14 4PJ	1			Full	

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
The Old Plantation PH, 33 Plantation Lane, Bearsted, ME14 4BJ	2			Full	
The Mount, Church Lane, Bearsted	1			Full	
The Piggeries, The Quarries, Boughton Monchelsea, Maidstone, Kent, ME17 4NJ	1			Full	
Eel House Farm, Lower Farm Road, Boughton Monchelsea, ME17 4DD	2			PN	
Barn, Lested Farm, Plough Wents Road, Chart Sutton, ME17 3SA	3			PN	
The Oast, Brishing Lane, Boughton Monchelsea, Maidstone, Kent, ME17 4NF	2			Full	
Albion Inn, Church Street, Boughton Monchelsea, Maidstone, Kent, ME17 4HW	2			Full	
East Lyewood House, Green Lane, Boughton Monchelsea, Maidstone, Kent, ME17 4LD	1			Full	
Barn The Nursery, Wierton Hall Farm, East Hall Hill, Boughton Monchelsea, ME17 4JU	1			PN	
Amber Green Farm, Amber Lane, Chart Sutton	1			PN	
Ladds Court Farm, Chart Hill Road, Chart Sutton, ME17 3RQ	1			PN	
The Apple Barn, The Oast, Brishing Lane, Boughton Monchelsea, ME17 4NF	2			PN	
The Nook, Boxley Road, Walderslade, ME5 9JG	1			Full	
Street Farm, The Street, Boxley, Maidstone, Kent, ME14 3DR	1			Full	
The Maidstone Studios, New Cut Road, Maidstone, ME14 5NZ		77		Full	No
Hillah, Cossington Road, Boxley, Chatham, Kent, ME5 9JB	1			Full	
Boxley Church Hall, The Street, Boxley, Maidstone, Kent, ME14 3DX	1			Full	
Court Lodge Farm, The Street, Boxley, Maidstone, Kent, ME14 3DX	1			Full	
The Pump House, Forstal Road, Aylesford, Kent	6			PN	No
The Pump House, Forstal Road, Aylesford, Kent	3			Full	
Tyland Corner, Tyland Lane, ME14 3BL	9			Full	Yes
Land Adjacent 1 Bakery Cottages, Chatham Road, Boxley, ME14 3BE	1			Full	

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
Medway Cottage, Forstal Road, Sandling, ME14 3AR	1			Out	
Land at Blind Lane, Bredhurst, ME7 3JR	1			Full	
Cherry Orchard Stables, Dunn Street Road, Bredhurst, ME7 3LY	1			Full	
Land Adjoining, 35 Timber Tops, Boxley, ME5 8XQ	1			Full	
22 Goldstone Walk, Boxley, ME5 9QB	1			Out	
Land East Of, Gleamingwood Drive, Lordswood	89			Out	No
Land North at, Blind Lane, Bredhurst	2			Full	
Abbots Court Farm, The Street, Bredhurst, ME7 3LQ	1			Full	
3 Blind Lane, Bredhurst, ME7 3JR	4			Out	
Somerfield House, 59, London Road, Maidstone, Kent, ME16 8JH		12		Full	No
Ashmore House, 57, London Road, Maidstone, Kent, ME16 8JH		5		Full	No
10 Buckland Road, Maidstone, ME16 0SL	14			Full	Yes
44 Bower Street, Maidstone, ME16 8SD	2			Full	
12, Tonbridge Road, Maidstone, Kent, ME16 8RP	9			Full	Yes
Focus House, 6, Tonbridge Road, Maidstone, Kent, ME16 8RP	10			PN	Yes
42 Bower Street, Maidstone, ME16 8SD	2			Full	
Focus House, 6, Tonbridge Road, Maidstone, Kent, ME16 8RP	5			Full	Yes
88 London Road, ME16 0DP	1			Full	
4A, Cloudberry Close, Maidstone, Kent	1			Full	
Land adj. Little Foxes, Greenwich Close, Maidstone, Kent, ME16 0JA	1			Out	
Concorde House, 10, London Road, Maidstone, Kent, ME16 8QA	74			PN	Yes
Buckland Hill Car Park, Buckland Hill, Maidstone, ME16 0YN	64			Full	Yes
58 - 60 Tonbridge Road, Maidstone, Kent, ME16 8SE	2			PN	
81, London Road, Maidstone, ME16 0DU		13		Full	No
54 Tonbridge Road, Maidstone, ME16 8SE	4			Full	

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
10 Tonbridge Road, Maidstone, ME16 8RP	5			PN	No
Ewell Manor, Ewell Lane, West Farleigh, Maidstone, Kent, ME15 ONG	1			Full	
Land at Londis Store & Bird in Hand PH, Heath Road, COXHEATH, ME17 4EH	8			Full	Yes
Land Adj Cloudbank & Hillcrest, Lower Road, East Farleigh	1			Full	
Eastleigh, Workhouse Lane, East Farleigh, Maidstone, Kent, ME15 0PZ	1			Full	
Tutsham Farm, Hunt Street, West Farleigh, ME15 0NE	3			PN	
Redwall Oast, Redwall Farmhouse, Redwall Lane, Linton, ME17 4AX	1			Full	
Home Farm Buildings, Linton Park, Linton, Kent	1			PN	
Tractor Shed, Linton Park, Linton, ME17 4AN	1			PN	
44 Stocket Lane, Coxheath, ME17 4PT	1			Full	
The Coach House Rear Of The Victoria Public House, Heath Road, East Farleigh	1			Full	
Land adj. Amsbury Cottage, Amsbury Road, Coxheath, MB15 0QH	1			Full	
Land south of Heath Road, Coxheath, Kent, ME17 4PB	72			Out	Yes
Farleigh Green Yard, Lower Road, West Farleigh, ME15 0PF	4			Full	
Land At 36, Huntington Road, Coxheath, ME17 4DY	1			Out	
Land North of Heath Road, Coxheath	110			Full	Yes
Land Adjacent To 1 The Valley, Coxheath, ME17 4EW	1			Full	
Land r/o Barker Cottages, New Cut, Dean Street, East Farleigh	1			Full	
Park House, Lughorse Lane, Hunton, ME15 0QS	1			PN	
The Hay Barn, Tutsham Farm, West Farleigh, ME15 0NE	1			PN	
Barn Adjacent To Southover, Grove Lane, Hunton, Kent, ME15 0SE	1			PN	
Friningham Manor, Friningham, Detling, Maidstone, Kent, ME14 3JD	1			Full	

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
Radar Studio, Coldblow Lane, THURNHAM, KENT, ME14 3LR	5			Full	Yes
Fairways, Thurnham Lane, Thurnham, Maidstone, Kent, ME14 4PL	1			Full	
Land Adjoining, 1 Fancy Row, Thurnham Lane, Thurnham, Kent, ME14 4PL	1			Full	
The Coach House Adj to Thornham Friars, Pilgrims Way, Thurnham ME14 3LN	1			Full	
Old School House, Thurnham Lane, Thurnham, Maidstone, Kent, ME14 4PL	1			Full	
26 The Street, Detling, Kent, ME14 3JT	2			Full	
The Stables, East Court, The Street, Detling, ME14 3JX	2			Full	
Land Adjacent To Fancy Cottages And Claymore, Thurnham Lane, Thurnham, ME14 4PL	1			Full	
Chestnut Wood Farm, Scragged Oak Road, Detling, ME14 3HL	1			Full	
Land West Of Bicknor Farm Cottages, Sutton Road, Maidstone, Kent	86			Full	Yes
Land to rear of 56-62 Boxley Road, Maidstone, ME14 2TW	4			Full	
9 Brewer Street, Maidstone, ME14 1RU	1			PN	
3, Heathfield Road, Penenden Heath, Maidstone, Kent, ME14 2AD	1			Full	
Frederick House And 28 Brewer Street, Maidstone, ME14 1RY	11			PN	No
97 Holland Road, Maidstone, ME14 1UN	5			Full	Yes
7 Brewer Street, Maidstone, ME14 1RU	1			Full	
23 Union Street, Maidstone, ME14 1EB	6			PN	Yes
The Oast House, Rectory Lane, Barming, Maidstone, Kent, ME16 9NG	1			Full	
26, Tonbridge Road, Maidstone, KENT, ME16 8RT	4			Out	
Child And Adolescent Services, Gatland House, Gatland Lane, Maidstone, Kent, ME16 8PF		14		Full	No
The Old Rectory, Farleigh Lane, Maidstone, Kent, ME16 9LX	2			Full	
77A Tonbridge Road, Maidstone, ME16 8JN	4			Full	
3 Tonbridge Road, Maidstone ME16 8RL	9			PN	No

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
First Floor, 5 Tonbridge Road, Maidstone ME16 8RL	1			PN	
4, Little Court, Lower Fant Road, Maidstone, Kent, ME16 8DL	1			Full	
2a Western Road, Maidstone, ME16 8NE	1			Full	
169 Milton Street, Maidstone ME16 8LL	1			PN	
Land Adjoining 12, Lower Fant Road, Maidstone,	1			Full	
20 Milton Street, Maidstone	1			Full	
Land To The Rear Of Milton Street And Hartnup Street, Milton Street, Maidstone, ME16 8LL	22			Full	Yes
Barker Chambers, Barker Road, Maidstone, ME16 8SF	14			PN	Yes
Land Rear Of Pats Cottage, Farleigh Lane, Maidstone, ME16 9LY	1			Full	
Land rear of former BP Filling Station, 531 Tonbridge Road, Maidstone ME16 9LN	14			Full	Yes
Fairbourne Manor, Fairbourne Lane, Harrietsham, Maidstone, KENT, ME17 1LN	1			Full	
Land at Elmstone Farm, Elmstone Hole Road, Grafty Green, ME17 2AJ	1			Full	
8, Faversham Road, Lenham, Maidstone, Kent, ME17 2PN	4			Full	
22 High Street, Lenham, Kent, ME17 2QD	1			Full	
New Shelve Farm, Ashford Road, LENHAM, ME17 2DS	1			Full	
3, Maidstone Road, Lenham, Maidstone, KENT, ME17 2QH	1			Full	
14 Quested Way, Harrietsham, ME17 1JJ	2			Full	
Kilnwood Meadow, Oldham Lane, Lenham	3			PN	
Land South Of Ashford Road, Harrietsham,	113			Full	Yes
Barn, Liverton Hill, Sandway, ME17 2NJ	2			PN	
The Old Goods Yard, Headcorn Road, Lenham, ME17 2HT	66			Out	No
Fairbourne Manor Farm, Fairbourne Lane, Harrietsham	1			Full	
Sunnybank Barn, Headcorn Road, Sandway, ME17 2ND	1			PN	
Land At, Church Road, Harrietsham	80			Out	No

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
Tanyard Farm, Old Ashford Road	5			Full	No
Lenham United Reformed Church, Maidstone Road, Lenham, ME17 2QH	24			Full	Yes
51 West Street, Harrietsham, ME17 1HX	1			Full	
72, Knaves Acre, Headcorn, Ashford, Kent, TN27 9TJ	1			Full	
Boy Court Oast, Boy Court Lane, Ulcombe, TN27 9LA	1			Full	
Land east of Chance, Grigg Lane, Headcorn, TN27 9TD	5			Full	Yes
Old School House Day Nursery, Station Approach, Headcorn, TN27 9SD	9			Full	Yes
Land R/O Hardwicks & Elizabeth House, Grigg Lane, Headcorn, TN27 9TD	20			Out	Yes
Land adj Ulcombe C of E Primary School, The Street, Ulcombe, ME17 1DU	3			Full	
Land adjoining 49 Oak Lane, Headcorn, TN27 9TG	1			Full	
Naked Foods Ltd, Smarden Road, Headcorn, TN27 9TA	14			Full	Yes
Kent Cottage, Grigg Lane, Headcorn, Ashford, Kent, TN27 9TD	25			Out	Yes
The Kings Arms Public House, High Street, Headcorn, Kent, TN27 9NH	6			Full	Yes
2 Stone Cottages, Maidstone Road, Headcorn, Kent, TN27 9RR	1			Full	
Highlands Lodge, Chartway Street, Sutton Valence, Maidstone, Kent, ME17 3HZ	1			PN	
Kingsnorth Manor Farm, Crumps Lane, Ulcombe, Maidstone, Kent, ME17 1EU	1			Full	
35, Knaves Acre, Headcorn, Ashford, Kent, TN27 9TJ	1			Full	
The Surgery, Clerks Field, Headcorn, TN27 9QL	4			Full	
The Barn At Brambling, Hawkenbury Road, Hawkenbury, Kent, TN12 0EA	1			Full	
23 Forge Lane, Headcorn, Kent, TN27 9QN	1			Full	
Upper Boy Court Oast, Boy Court Lane, Headcorn, TN27 9LA	1			Full	
The Cow Shed, Land adj to Little Southernden Barn, Southernden Road, Headcorn, TN27 9LL	3			PN	

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
Agricultural Barn, Coldbridge Lane, Grafty Green, ME17 2AX	1			PN	
Leighbridge Farm, Plumtree Road, Headcorn, TN27 9PD	2			Full	
Naked Foods Ltd (Site 2), Smarden Road, Headcorn, TN27 9TA	7			Full	Yes
Land To The North Of, Lenham Road, Headcorn, TN27 9TU	48			Full	Yes
Oakhurst Farm, Ulcombe Road, Headcorn, TN27 9JX	3			PN	
Land To The Rear Of Elizabeth House, Grigg Lane, Headcorn, TN27 9LY	1			Full	
White Mill, 11 Mill Bank, Headcorn, TN27 9RB	1			Full	
Summerhill Free Range Farm, Four Oaks Road, Headcorn, TN27 9NX	1			Full	
Land Between Mill Bank, Ulcombe Road & Kings Road, Headcorn, TN27 9LD	125	95		Out	No
Park House Farm, Lenham Road, Headcorn, TN27 9LJ	3			PN	
Hill Farm, Lenham Road, Harrietsham, ME17 1LT	1			PN	
33-34, Church Street, Maidstone, ME14 1EN	1			Full	
Rear of 11/13, Albion Place, Maidstone, Kent, ME14 5DY	8			Out	No
11 Gabriels Hill, Maidstone, ME15 6HL	1			Full	
36 High Street, Maidstone, ME14 1JH	3			Full	
Miller House, 43-51 Lower Stone Street, Maidstone, ME15 6GB	99			PN	Yes
British Queen, 7 - 8 Square Hill, Maidstone, Kent, ME15 7TJ	13			Full	Yes
10A, Queen Anne Road, Maidstone, Kent, ME14 1HB	1			Full	
1, Marsham Street, Maidstone, Kent, ME14 1EW	2			Full	
1, Marsham Street, Maidstone, Kent, ME14 1EW	1			Full	
2 Coutenay Road, Maidstone, ME15 6UL	2			Full	
Invicta House, Pudding Lane, Maidstone ME14 1NX	2			PN	
Faith House, 2 St Faiths Street, Maidstone ME14 1LL	13			PN	Yes

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
26-28 Albion Place, Maidstone, Kent, ME14 5DZ		9		PN	No
Bishops Terrace, Bishops Way, Maidstone, Kent ME14 1LA	42			PN	No
Link House, Knightrider Court, Knightrider Street, Maidstone, Kent	17			PN	Yes
65 College Road, Maidstone, Kent, ME15 6SX		7		PN	No
Kent House, Romney Place, Maidstone, ME15 6LA	137			PN	No
Sussex House, 21, Lower Stone Street, Maidstone, Kent, ME15 6YT	12			PN	No
11 Queen Anne Road, Maidstone, ME14 1XB	39			PN	No
35 Albion Place, Maidstone, Kent, ME14	3			PN	
Stone Court Hotel, 28 Lower Stone Street, Maidstone, ME15 6LX	14			Full	No
75 Bank Street, Maidstone, ME14 1SJ	2			Full	
12 - 13 Middle Row, Maidstone, ME14 1TG	4			Full	
84 King Street, Maidstone, ME14 1DZ	9			Full	Yes
Royal Star Arcade, High Street, Maidstone, ME14 1JL	8			Full	No
Cornwallis House, Pudding Lane, Maidstone, ME14 1NY	27			PN	No
Prime House, 1a Queen Anne Road, Maidstone, ME14 1HU	6			PN	Yes
24 Week Street, Maidstone, ME14 1RN	3			Full	
4 Clarendon Place, King Street, Maidstone, ME14 1BQ	5			Full	Yes
Lenworth House, 4 Ashford Road, Maidstone, ME14 5EA	14			Full	No
Medway House, 22-26 Medway Street And 21-22 Fairmeadow	15			PN	Yes
61 - 63 Week Street, Maidstone, ME14 1QU	2			PN	
Brenchley House, 123 - 135 Week Street, Maidstone, ME14 1RF	89			PN	No
Holbrook House, 72 Bank Street, Maidstone, ME14 1SN	6			PN	Yes
46 College Road, Maidstone, ME15 6YF	3			Full	
4 Colman Parade, King Street, Maidstone, ME14 1DJ	1			PN	

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
115 Week Street, Maidstone, ME14 1RB	2			PN	
59 - 71 King Street, Maidstone, ME14 1BG	53			Full	Yes
36 And 36A Week Street, Maidstone, ME14 1RP	4			Full	
70 Bank Street, Maidstone, Kent, ME14 1SN	6			Full	No
Land Adjacent Corpus Christi Hall, Fairmeadow, Maidstone, Kent	21			Full	Yes
Ledian Farm, Upper Street, Leeds, Maidstone, Kent, ME17 1RZ	14			Out	No
Abbey Farm, Lower Street, Leeds, ME17 1TL	3			Full	
Land at, Ashford Drive, Kingswood, ME17 3PA	3			Full	
Rowan House Farm, Gravelly Bottom Road, Kingswood, ME17 3NU	3			PN	
Arnold Farm, Back Street, Leeds, ME17 1TR	3			PN	
Gravelly Barn, Gravelly Bottom Road, Kingswood, ME17 3NX	1			PN	
Land Adjacent To Beggars Roost, Well Street, Loose, Kent, ME15 0EN	4			Full	
Land adj to Sunnydale, Plain Road, Marden, TN12 9EH	1			Full	
Wolsey Place, Claygate Road, YALDING, MAIDSTONE, ME18 6BD	1			Full	
Gain Hill Yard, Claygate Road, Yalding	2			Out	
The Parsonage, Land East Of Goudhurst Road, Marden	144			Out	Yes
Tanner Oast, Goudhurst Road, Marden, TN12 9ND	2			Full	
The Threshing Barn, Tanner Farm, Goudhurst Road, Marden, Tonbridge, KENT, TN12 9ND	2			Full	
Former Syngenta Works, Hampstead Lane, Yalding, Kent	19			Out	Yes
Spindlebush Farm, Yalding Hill, Yalding, Kent, ME18 6AL	1			PN	
Great Thorn Farm, Marden Thorn, Marden, Kent, TN12 9LJ	2			PN	
Wickham Field, Pattenden Lane, Marden TN12 9QU	1			Full	
Reed Court Farm, Hunton Road, Marden, Tonbridge, Kent, TN12 9SX	1			Full	

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
The MAP Depot Site, Goudhurst Road, Marden, Kent	60			Full	Yes
Willows, Howland Road, Marden, TN12 9EP	1			Out	
Bumpers Hall, Maidstone Road, Marden, TN12 9AG	1			Full	
Hartridge, Maidstone Road, Marden, Kent, TN12 9AG	1			PN	
The Old Coach House, Spenny Lane, Marden, Kent, TN12 9PL	1			PN	
Eden Barn, Vicarage Road, Yalding, Kent, ME18 6DW	1			Full	
Golden Hill Nurseries, Goudhurst Road, Marden, Kent, TN12 9LT	1			Full	
Land To The North Of, Howland Road, Marden, Kent	44			Out	Yes
Mount Pleasant Farm, Maidstone Road, Marden, TN12 9AG	1			PN	
Bridgehurst Farm, Howland Road, Marden, TN12 9EP	1			PN	
Oakbarn, Fosters Farm, Benover Road, Yalding, ME18 6AY	1			PN	
Downs House, Blunden Lane, Yalding, ME18 6JD	1			Out	
Little Sheephurst Farm, Sheephurst Lane, Marden, TN12 9NZ	1			PN	
Russetings, Albion Road, Marden, TN12 9ED	1			Full	
Stores At Rear Of, 1 & 2 Hillside Cottages, Kenward Road, Yalding, ME18 6AH	2			PN	
The Old Bakery, Maidstone Road, Marden, TN12 9AB	1			PN	
Land At Stanley Farms, Plain Road,	85			Out	Yes
Eastwells, Kenward Road, Yalding, ME18 6JP	3			Full	
Marden Cricket & Hockey Club, Stanley Road, Marden	124			Full	Yes
4 Haviker Street, Collier Street, TN12 9RG	1			PN	
Barn At Beech Depot, Sheephurst Lane, Marden, TN12 9NU	7			PN	No
Shingle Barn Orchards, Shingle Barn Lane, West Farleigh	2			PN	

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
The Lodge, Little Cheveney Farm, Sheephurst Lane, Marden, TN12 9NX	1			PN	
Unit 4, Trumans Oast, Upper Fowle Hall Farm, Willow Lane, Paddock Wood, TN12 6PF	1			PN	
2 Nursery Cottages, Staplehurst Road, Marden, TN12 9BS	1			PN	
The Byre, Cheveney Farm, Vicarage Road, Yalding,	1			PN	
Cedarden Farm, Hunton Road, Marden, TN12 9SL	1			Full	
Springfield Park, Royal Engineers Road, Maidstone	180	12		Full	Yes
11-17 Castle Dene, Maidstone, ME14 2NH		10		Full	No
77, Lower Boxley Road, Maidstone, Kent, ME14 2UU	1			Full	
83, Lower Boxley Road, Maidstone, KENT, ME14 2UT	1			Full	
KCC Springfield Library Site, Sandling Road, Maidstone		114		Out	No
Land Adj to 27 Castle Dene, Maidstone, ME14 2NH	2			Full	
3 Arundel Street, Maidstone, Kent, ME14 2RS	1			Full	
Paragon House, Granville Road, Maidstone, Kent, ME14 2BJ	14			Out	No
47 Randall Street, Maidstone, Kent, ME14 2	1			Full	
The Russell Hotel, 136 Boxley Road, Maidstone, Kent, ME14 2AE	14			Full	Yes
23 Cross Street, Maidstone, ME14 2SL	3			Full	
Land adjoining, 64 Downs View Road, Maidstone, ME14 2JR	1			Full	
School House, Peel Street, Maidstone, ME14 2BP	4			Full	
253 Boxley Road, Maidstone, ME14 2AS	1			Full	
143 Chatham Road, Maidstone, ME14 2ND	1			Full	
Land adj Claygate House, 3 Claygate, Hollingbourne, ME17 1XA	1			Full	
Mobile Home at, Catharos Lithos, Yelsted Road, Yelsted, ME9 7UU	1			Full	
Twinacre, Hill Green Road, Stockbury, Sittingbourne, Kent, ME9 7UN	1			Full	

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
Hinecon, South Green, Sittingbourne, Sittingbourne, Kent, ME9 7QD	-1			Full	
1 Culpepper Close, Hollingbourne, ME17 1UD	1			Full	
Land Adj 103 Eyhorne Street, Hollingbourne, ME17 1TX	14			Full	Yes
Land Between 3 AND 4 Lansdowne Avenue, Maidstone, ME15 9DJ	2			Full	
Land at the rear of 4 Lansdowne Avenue, Maidstone, ME15 9DJ	1			Full	
Land at the rear of 3 Lansdowne Avenue, Maidstone, ME15 9DJ	1			Full	
Land North of Sutton Road, Otham	179			Full	Yes
Land North & South of, Wallis Avenue, Maidstone, Kent	-31			Full	Yes
1 Wrangleden Road, Maidstone, ME15 9LN	1			Full	
Maidstone Care At Home Service, Mote House, Mote Park, Maidstone, ME15 8NQ	8			Full	Yes
28, Sutton Road, Maidstone, Kent, ME15 9AH	1			Full	
13, Mangravet Avenue, Maidstone, Kent, ME15 9BQ	1			Full	
101, Sutton Road, Maidstone, Kent, ME15 9AD	4			Full	
93 Sutton Road, Maidstone, Kent, ME15 9AD	1			Full	
36 South Park Road, Maidstone, ME15 7AH	1			Full	
184 South Park Road, Maidstone, ME15 7AJ	1			Full	
St Annes Residential Care Home, 221 Loose Road, Maidstone, ME15 7DR	1			Full	
2 School Lane, Maidstone, ME15 8DU	1			Full	
70 Highland Road, Maidstone, ME15 7QH	1			Full	
38 Westmorland Road, Maidstone, ME15 8BS	1			Full	
Land adj, to 70 Highland Road, Maidstone, ME15 7QH	1			Full	
Land off, Farleigh Hill, Tovil, Kent	72	200		Out	Yes
Land West of Eccleston Road, Maidstone, Kent, ME15 6QP	35			Full	Yes
565 - 567 Loose Road, Maidstone, Kent, ME15 9UH	1			PN	
Land West of, Burial Ground Lane, Tovil, Kent	27			Full	Yes

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
Archbishop Courtenay School, Church Road, Tovil, ME15 6QY	8			Full	Yes
355 Loose Road, Maidstone, Kent, ME15 9PY	1			Full	
Bockingford Mill Cottages, Bockingford Lane, Maidstone, ME15 6DP	1			Full	
48 Lancet Lane, Maidstone, ME15 9SD	5			Full	Yes
539 Loose Road, Maidstone, ME15 9UQ	6			Full	Yes
Land at, Forest Hill, Tovil	3			Full	
Land East Of Tovil Green, Tovil	24			Full	Yes
Land rear of 418 Loose Road, Maidstone, ME15 9TX	1			Full	
Land at Green Court, High Street, Staplehurst, TN12 0AP	1			Full	
Iden Croft Nurseries, Frittenden Road, Staplehurst, TN12 0DH	1			Full	
Land to the South of, Oliver Road, Staplehurst, KENT	18			Full	Yes
The Wild Duck, Pagehurst Road, Staplehurst, Tonbridge, Kent, TN12 9LH	2			Full	
59 Bell Lane, Staplehurst, TN12 0BB	1			Full	
The Diary, Great Pagehurst Farm, Pagehurst Road, Staplehurst, TN12 0JD	1			PN	
The Diary, Great Pagehurst Farm, Pagehurst Road, Staplehurst, TN12 0JD	1			PN	
The Furrow, Great Pagehurst Farm, Pagehurst Road, Staplehurst, TN12 0JD	1			PN	
Homeleigh Timber Supplies, Station Road, Staplehurst, Tonbridge, Kent, TN12 0PY	12			Out	Yes
Baywood, Headcorn Road, Staplehurst, Tonbridge, Kent, TN12 0BU	1			Out	
Land rear of the Pride of Kent, High Street, Staplehurst, TN12 0AH	3			Full	
Duckhurst Farm, Clapper Lane, Staplehurst, Tonbridge, Kent, TN12 0JW	2			Full	
Bell Hotel, High Street, Staplehurst, TN12 0AY	6			Full	Yes
Oakhurst Orchard, Pagehurst Road, Staplehurst, Kent, TN12 0JB	2			PN	
Barn Adjoining Maplehurst Barn, Frittenden Road, Staplehurst, Kent, TN12 0DL	1			PN	

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
Thorford Hall Farm, Goudhurst Road, Staplehurst, Kent, TN12 0HQ	2			PN	
Tanyard House, High Street, Staplehurst, TN12 0AU	1			Full	
Land Adj to Iden Grange, Cranbrook Road, Staplehurst, TN12 0ET	1			PN	
Land South Of The Gables, Marden Road, Staplehurst, TN12 0PE	1			PN	
Tallow Barn, Fitzgerald Close, Staplehurst, TN12 0FD	1			Full	
Roofing Centre Group Ltd, Mendip House, Leeds Road, Langley, ME17 3JN	6			Out	No
Kings Head, North Street, Sutton Valence, ME17 3AP	1			Full	
Swan Inn, Broad Street, Sutton Valence, Maidstone, Kent, ME17 3AJ	1			Full	
The Parlour, Babylon Farm, Babylon Lane, Hawkenbury, Kent, TN12 0EG	1			PN	
Land At, 1 Warmlake Cottages, Warmlake Road, Sutton Valence, Kent, ME17 3LP	2			Full	
Wheelwrights, Hunton Hill, Hunton, Maidstone, Kent, ME15 0QX	1			Full	
Greentops, Headcorn Road, Sutton Valence, Kent, ME17 3EH	5			Full	Yes
Land At Langley Park, Sutton Road, Maidstone, Kent	404	155		Full	Yes
South Belringham, South Lane, Sutton Valence, ME17 3BD	2			Full	
Atcost Building, Babylon Farm, Babylon Lane, Hawkenbury, TN12 0EG	1			PN	
The Oaks, Maidstone Road, Sutton Valence, ME17 3LR		9		Full	No
Brandys Bay, South Lane, Sutton Valence, ME17 3AZ	39			Full	Yes
Warmlake Farmhouse, Maidstone Road, Sutton Valence, ME17 3LR	1			Full	
Land Adjacent To Little New Barn Farm, New Barn Road	2			PN	
Headcorn Hall, Biddenden Road, Headcorn, Ashford, Kent, TN27 9JD		10		S106	No

Site location - dwellings on extant permissions	16/21	21/26	26/31	Status	Feed back
Romney Court, 25, Romney Place, Maidstone, Kent, ME15 6LG		10		S106	No
Tovil Quarry Site, Straw Mill Hill, Tovil, Maidstone, Kent, ME15 6FL		113		S106	No
2 & 3, Foster Street, Maidstone, Kent		14		S106	No
Land Adjacent Old Tovil Boat Yard, Beaconsfield Road, Tovil, Maidstone, Kent, ME15 6RU		3		S106	
1, Foster Street, Maidstone, Kent, ME15 6NH		12		S106	No
The Paddock, Grove House, Old Ashford Road, Lenham Kent ME17 2PX	23			S106	No
Land west of Mill Bank, Maidstone Road Headcorn Kent TN27 9RJ	62			S106	No
Dwellings	4484	1234	45		
Non Implementation 5%	224	62	2		
Total dwellings	4260	1172	43		

Table 8.10 List of extant planning permissions

Site location - Local Plan allocations	16/21	21/26	26/31	Status	Feed back
H1 (4) Oakapple Lane, Barming	130	57		Pending	Yes
H1 (7) Land North Of Bicknor Wood, Sutton Road, Maidstone,	170	20		Pending	Yes
H1 (8) West of Church Road, Otham	125	250	65	Pending	Yes
H1 (9) Land At Bicknor Farm, Sutton Road, Langley, ME17 3NG	140	195		Pending	Yes
H1 (10) Land South Of, Sutton Road, Langley,	200	425	175	Pending	Yes
H1 (11) Springfield site, Monktons Lane, Royal Engineers Rd MAIDSTONE	80	350	70	Pending	No
H1 (12) 180-188 Union Street, Maidstone, ME14 1EY	30			S106	Yes
H1 (13) Medway Street, Maidstone		40		S106	No
H1 (14) American Golf, Tonbridge Road, Maidstone	60			Pending	Yes
H1 (15) 6 Tonbridge Road, Maidstone		15		Pending	No
H1 (17) Laguna, Hart Street, Maidstone	76			Pending	No
H1 (18) Dunning Hall, Fremlin Walk, Week Street, Maidstone	14			Pending	Yes

Site location - Local Plan allocations	16/21	21/26	26/31	Status	Feed back
H1 (19) 18-21 Foster Street, Maidstone	5			Pending	Yes
H1 (20) Wren's Cross, Upper Stone Street, Maidstone	60			Pending	Yes
H1 (21) Land At Barty Farm, Roundwell, Bearsted, ME14 4HN	80	42		Pending	No
H1 (22) Whitmore Street, Maidstone		5		Pending	No
H1 (23) Bell Farm, North Street, Barming	35			Pending	Yes
H1 (24) Land At, Postley Road, Maidstone, ME15 6RH	62			S106	Yes
H1 (25) Bridge Industrial Centre, Wharf Road, Tovil		15		Pending	No
H1 (26) Tovil Working Men's Club, Tovil Hill, Maidstone	20			Pending	Yes
H1 (27) Land Rear Of Police Headquarters, Sutton Road, Maidstone	22	90		S106	Yes
H1 (28) Land To Rear Of Kent Police Training School Off, St Saviours Road, Maidstone, ME15 9DW	18	72		S106	Yes
H1 (29) Land At, New Line Learning, Boughton Lane, Maidstone	130	50		Pending	No
H1 (30) West of Eclipse, Old Sittingbourne Road, Maidstone	35			Pending	Yes
H1 (31) Bearsted Station Goods Yard, Bearsted		20		Pending	No
H1 (32) Land To The South Of, Cross Keys, Bearsted	50			S106	Yes
H1 (34) Mayfield Nursery, Ashford Road, Harrietsham, ME17 1BN	49			S106	Yes
H1 (38) Land East Of Thatch Barn Road And South Of, Lenham Road, Headcorn,	13			S106	Yes
H1 (38) Land North Of, Grigg Lane, Headcorn,	28			S106	Yes
H1 (39) South of Grigg Lane, Headcorn		55		Pending	No
H1 (40) Knaves Acre, Headcorn		5		Pending	No
H1 (42) Tanyard Farm, Old Ashford Road, Lenham		155		Pending	No
H1 (43) Land East Of Glebe Gardens, Old Ashford Road, Lenham	10			Pending	No
H1 (48) Land south of the Parsonage, Goudhurst Road, Marden	50			Pending	No

Site location - Local Plan allocations	16/21	21/26	26/31	Status	Feed back
H1 (49) Hen And Duckhurst Farm, Marden Road, Staplehurst, TN12 0PD	164	86		S106	Yes
H1 (50) (Fishers Farm) Land North Of, Headcorn Road, Staplehurst, TN12 0DT	225	175		Pending	Yes
H1 (51) Land to the North of Henhurst Farm, Staplehurst	30	30		Pending	No
H1 (52) Land West Of 73 Haste Hill Road, Boughton Monchelsea Kent ME17 4LN	20			Pending	No
H1 (53) Land at Boughton Lane, Boughton Monchelsea and Loose	75			Pending	Yes
H1 (54) Boughton Mount, Boughton Lane, Boughton Monchelsea		25		Pending	No
H1 (55) Land At Church Street And Heath Road, Boughton Monchelsea	40			Pending	Yes
H1 (56) Lyewood Farm, Green Lane, Boughton Monchelsea		25		Pending	No
H1 (57) Land South Of Sunny Brae, Hubbards Lane, Boughton Monchelsea, ME17 4HY		8		Pending	No
H1 (58) Linden Farm, Stockett Lane, East Farleigh, ME15 0QD	74			S106	No
H1 (60) Forstal Lane, Coxheath	90	105		Pending	No
H1 (61) Land North Of, Heath Road, Coxheath, ME17 4TB	55			S106	No
H1 (63) East of Eyhorne Street, Eyhorne Street, Hollingbourne	10			Pending	Yes
H1 (65) Land adjacent to the Windmill, Eyhorne Street, Hollingbourne	15			Pending	Yes
H1 (67) Vicarage Road, Yalding		65		Pending	No
H1 (68) Bentletts Farm, Claygate Road, Yalding, ME18 6BB	10			Pending	Yes
RMX1 (2) Maidstone East and Maidstone Sorting Office, Sandling Road, Maidstone		210		Pending	No
RMX1 (4) Former Syngenta Works, Hampstead Lane, Yalding	40	160		Pending	No
Total Dwellings	2540	2750	310		

Table 8.11 List of Local Plan allocations phased by 5-year periods

Appendix D Analysis of poorer quality office stock in the town centre

8.2 Planning consents were checked for all sites identified in the GVA Qualitative Employment Site Assessments, Appendix V Town Centre Office Map & Stock Observations as poor. Where floorspace was not available from the GVA assessment, data was obtained from the council's economic development team and through internet searches. The quantity of floorspace within poor quality office stock that has been, or was in the process of being converted to residential was identified. This enabled identification of the remaining floorspace capacity on sites of poor quality, excluding floors currently in use for retail or other non office use. The quantities of dwellings for each site with planning consent were used to gain an average dwelling size. The average dwelling size was then applied to the available floor space to identify potential dwelling capacity, and a 10% reduction was applied to allow for access and site amenities.

GVA Ref	Building Name	Total floorspace ft ²	PN floorspace ft ²	Available floorspace ft ²	Further potential dwelling yield
2	Cantium House	15,736	0	15,736	28
3	Brenchley House	85,883	60,990	0	0
5	Star House	28,932	19,770	0	0
6	Cornwallis House	13,843	9,657	0	0
8	Recruit House (60-61 High Street)	No data	Completed 2011	0	0
9	Sunley House	7,539	0	5,655	10
10	Colman House	49,169	0	41,180	73
11	89 King Street	8,100	0	8,100	14
13	Lyndean House	12,058	0	12,058	20
14	Brecon House, 16A Albion Place	8,387	0	8,387	15
15	GLH House	7,372	0	7,372	13
20	Kent House	116,871	116,871	0	0
21	Medvale House	44,612	0	44,612	79
22	Miller House	61,520	55,860	5660	10
23	Sussex House	10,078	7,605	0	0
24	Romney Court	7,343	0	7343	15
30	Bishops Terrace	27,267	27,267	0	0
31	Medway House (26-30 Medway Street)	5,909	4,431	1,477	3
37	1 Albion Place	No data	No data	No data	No data

GVA Ref	Building Name	Total floorspace ft²	PN floorspace ft²	Available floorspace ft²	Further potential dwelling yield
	3 Albion Place	No data	No data	Pending planning decision	4
	5 Albion Place	No data	No data	No data	No data
	7 Albion Place	No data	No data	Pending planning decision	4
	9 Albion Place	No data	No data	No data	No data
	11-13 Albion Place	No data	No data	Pending planning decision	10
	15 Albion Place	No data	No data	No data	No data
	19-21 Albion Place	No data	No data	Pending planning decision	14
38	Corner Sittingbourne Road, Queen Anne Road	10,269	10,269	0	0
Total					312

Table 8.12 Analysis of poorer quality office stock in the town centre

Appendix E MoD correspondence for Invicta Park Barracks



Ministry of Defence
Main Building GM44
Horse Guards Avenue
London
SW1A 2HB
United Kingdom

Telephone [MOD]: +44 (0)20 7218 2083
Facsimile [MOD]: +44 (0)20 7218 2614
E-mail: Louise.Spalding442@mod.uk

Ms C Parks
Project Manager, Local Plan
Maidstone Borough Council
King Street

Maidstone
ME15 6JQ

18 May 2016

Dear Ms Parks
Maidstone Borough Plan
Publication Draft (Regulation 19)
Policy H2 (2)
Invicta Park Barracks, Maidstone

Thank you very much for meeting myself and colleagues from Carter Jonas on 4 May. It was good to talk through the Maidstone Borough Plan and discuss the future development potential of Invicta Park Barracks with you and your colleagues.

The barracks is being studied in the context of the UK Footprint Strategy for Defence which is an estate wide departmental asset review, the aim of which is to create a smaller and better estate that effectively supports and serves the needs of our armed forces.

A number of sites are being looked at as part of the work on the Footprint Strategy. This barracks, which is in the urban area, may be one where the operations could be relocated elsewhere in the UK portfolio.

In the light of the work we are doing, DIO is very pleased to see the inclusion of the Barracks in the draft Local Plan for residential led development for up to 1300 units. Our Strategy and its likely programme are due to be reported in the Autumn of this year and in the interim the site should continue to be allocated.

At our meeting we shared with you the work that has been completed to date and the emerging illustrative proposals for the site. Housing units which come forward on the site will count towards MoD targets for housing and also deliver part of Maidstone Borough Council's housing allocation in the plan period.

Our work will continue over the next few months and as agreed we should look to meet again in the near future, to discuss the local plan progress and our work on the site.

I will contact you again once our study has concluded but in the meantime please do not hesitate to contact me if you have any further questions.

My thanks once again for your time on 4 May.

Yours Sincerely

Louise Spalding
Senior Town Planner

Appendix F Housing trajectory graph

	11/16	16/17	17/18	18/19	19/20	20/21	21/2	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	Total
Completions	2,860																2,860
Extants (incl. Discount)		1,086	940	905	723	605	273	252	156	203	289	43	0	0	0	0	5,475
Allocated sites		35	331	594	723	857	791	604	535	435	385	205	100	5	0	0	5,600
Broad locations		0	0	0	0	0	75	85	85	85	85	495	695	725	725	735	3,790
Windfall allowance		0	0	0	48	48	116	116	116	116	116	185	185	185	185	184	1,600
Total	2,860	1,121	1,271	1,499	1,494	1,510	1,255	1,057	892	839	875	928	980	915	910	919	19,325

Table 8.13 Housing trajectory 1 April 2011 to 31 March 2031

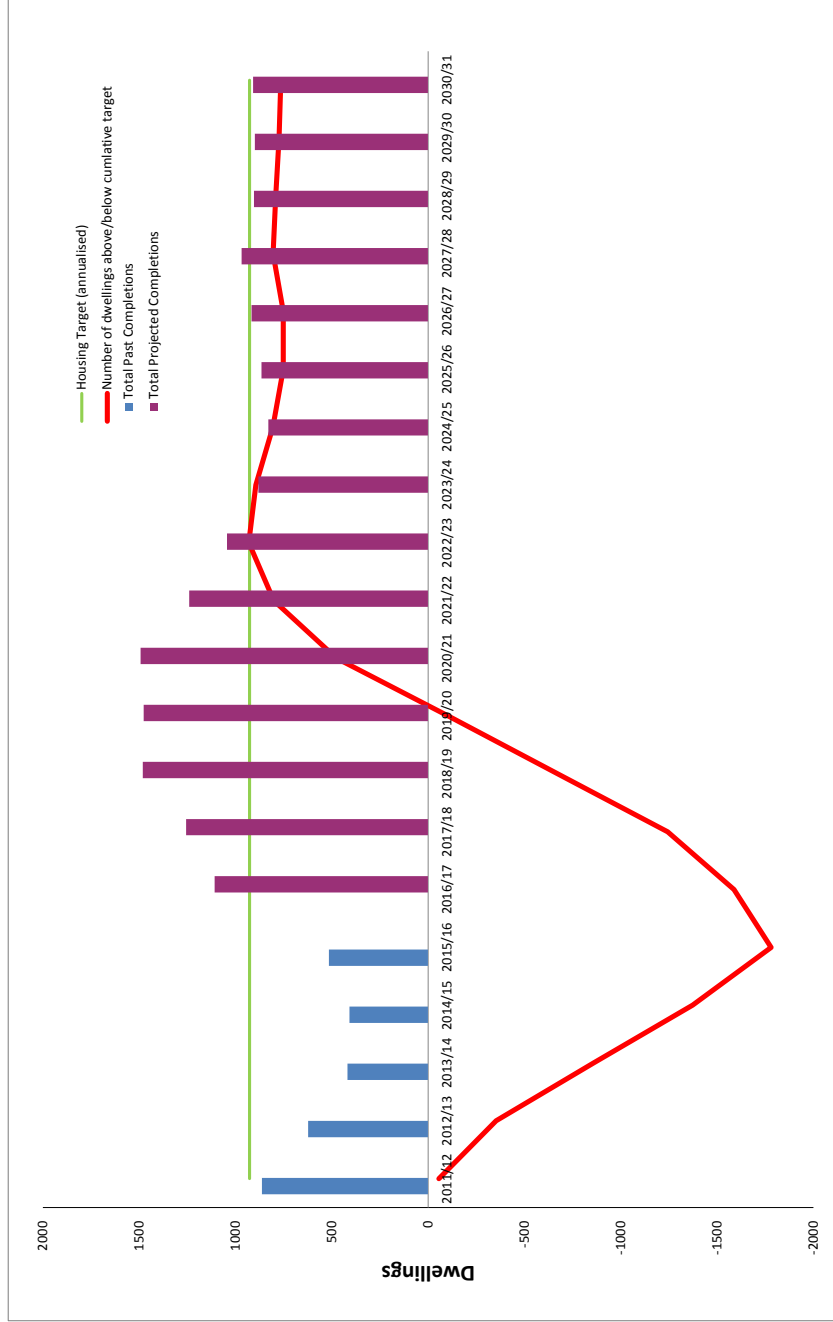


Figure 8.1 Housing Trajectory 2011/31

Appendix G Rolling five-year housing land supply

	16/17	17/18	18/19	19/20	20/21	21/2	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31
Objectively assessed need	18,560	18,560	18,560	18,560	18,560	18,560	18,560	18,560	18,560	18,560	18,560	18,560	18,560	18,560	18,560
Cumulative projected completions	-2,860	-3,981	-5,253	-6,752	-8,246	-9,756	-11,011	-12,068	-12,960	-13,799	-14,674	-15,602	-16,582	-17,497	-18,407
Cumulative target	15,700	14,579	13,307	11,808	10,314	8,804	7,549	6,492	5,600	4,761	3,886	2,958	1,978	1,063	153
5-year rolling target (reducing from 2027/28)	4,640	4,640	4,640	4,640	4,640	4,640	4,640	4,640	4,640	4,640	4,640	3,712	2,784	1,856	928
Cumulative shortfall (-) / surplus	-1,780	-1,587	-1,243	-672	-106	476	803	932	896	807	754	754	806	793	775
Residual 5-year rolling target with 5% buffer	6,741	6,538	6,177	5,578	4,983	4,372	4,029	3,893	3,931	4,025	4,080	3,106	2,077	1,116	161
Cumulative housing land supply	6,896	7,030	6,815	6,208	5,553	4,918	4,591	4,514	4,537	4,608	4,652	3,724	2,744	1,829	919
Housing land surplus	155	492	638	630	570	546	562	621	606	583	572	618	667	713	758

Table 8.14 Rolling five-year housing land supply 1 April 2016 to 31 March 2031