

Draft SLAA December 2020

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Introduction

The Strategic Land Availability Assessment (SLAA) identifies and assesses the land which is available to meet all objectively identified needs for the Local Plan Review 2022. This includes meeting need for housing, employment, retail, and infrastructural purposes. The SLAA draws together the outputs from:

- *Call for Sites 2019 (C4S)*
- *C4S Site Assessments*
- *Annual Monitoring Report into existing Local Plan progress*
- *Windfall Assessment update*
- *Retail, Employment, Housing, and G&T Needs Assessments*

This document includes site assessments of Call for Sites proposals and examines at a high level the suitability and achievability of sites which could potentially be allocated in the Local Plan Review. This is a draft document, and when complete they will be published in support of a draft of the Local Plan Review 2022-37. As such it is currently a working document, and may be added to or changed up until the point it is agreed by the Council to be final in support of a published Local Plan Review. Additionally, a site being considered suitable and achievable does not guarantee that it will be allocated in the Local Plan, it only confers to it the recommendation that it can be considered when determining the LPR's spatial approach.

1. Purpose of the SLAA

- 1.1 The purpose of this document is to identify the stock of potentially suitable, available, and achievable land to inform the emerging options for allocating growth in the Local Plan Review. The SLAA is not an exercise in allocating sites, rather it provides a comprehensive audit of available land for development. If a site is identified as deliverable (i.e. available, suitable, and achievable) in the SLAA, it does not mean that it will be taken forward and allocated in a local plan, merely it means that the site can be progressed for further assessment.
- 1.2 Through the identified status of sites in this document as potentially suitable/ unsuitable enables a picture of potential spatial approaches to be considered. In this respect the SLAA is an evidence document which informs the potential choices that can be made around the spatial approach to be identified in the LPR.
- 1.3 Data from this draft report has, and will be used to inform discussions with infrastructure providers, transport modelling. It has also been used to program indicative scenarios for the spatial distribution of development over the LPR plan period, including through the programming of Reasonable Alternatives within the Sustainability Appraisal for the LPR.

2.

2. Identification of need for housing and economic development uses

2.1 The methodology for identifying various development needs is set out in the National Planning Policy Framework (NPPF) and Guidance (NPPG). A key point to consider is that national regulations require LPAs to meet need, which means that the figures in this section are minimums, not targets or maximums. If a Council can sustainably deliver above the local need it may do so, including consideration of meeting the needs of neighbouring authorities.

Need for housing development

2.2 The Government, through the 2019 NPPF and associated Planning Practice Guidance, has introduced a new ‘standard method’ to calculate the boroughs minimum housing need. This takes projected household growth and applies an upward adjustment based on the affordability characteristics of the area – the average house price-to-earnings ratio. This standard method has been reviewed in the draft Strategic Housing Market Assessment (SHMA), and based on 2021 data results in a local housing need for 1,157 dwellings per annum in Maidstone Borough, which equates to 17,355 dwellings over the proposed 2022-37 plan period for the Local Plan Review.

2.6 Current allocations and permissions (Extant Supply including 2017 allocations, broad locations and other extant permissions), forecast windfall completions, and contributions from broad locations beyond the 2017 Plan period (Invicta Barracks) have the potential to meet some of this target amount:

- Extant Supply at 1st April 2022 = 7,870 units
- Windfall development (2022-2037) = 2,738
- Invicta Barracks (2031-2037) = 800 units

Windfall allowance

2.7 Windfall development is updated based on latest trends and forecasts. This is discussed in more detail in Chapter 8 of this report. The estimated windfall contribution 2022-2037 is 2,738 additional units. A modelled quantum of windfall applications granted in the 2021/22 financial year of 603 units is anticipated to be included in the extant housing figure. The methodology for this is also set out in Chapter 8.

Invicta Barracks

2.8 As per the 2019 calculation, 500 units are expected to come forward during the Local Plan 2017 period (2011-2031), with the remaining 800 units coming forward over the period 2022-2037.

Town Centre Opportunity Sites

2.9 In November 2019 The Council’s Strategic Planning & Infrastructure Committee adopted 5 planning guidance documents setting out it’s aspirations for the regeneration of town centre sites. These added design guidance and capacity certainty to a number of sites which were identified in Policy H2(1) – Town Centre Broad Location.

2.10 When the new site capacities are considered against the ranges included in the 2017 Local Plan, there is an expected uplift of 883 units. It should be noted that while these sites benefit from the certainty of having published planning guidance, many still need to secure full planning consent. For the purposes of identifying the current target, these sites are assumed to be “priced in”, and count as a reduction in the overall target amount. The capacities are disaggregated below:

Site	2017 Allocation capacity		2019 TC Opportunity Site capacity		Additional Contribution to development 2011-2031 above Local Plan 2017	
	Residential	Commercial & Retail	Residential	Commercial & Retail	Residential	Commercial & Retail
Len House	0	0	67	5495sqm	67	5,495sqm
Gala Bingo	0	0	71	1727sqm	71	1,727sqm
Maidstone West	0	0	201	445sqm	201	445sqm
Maidstone Riverside	190	0 – allocated for mixed A&B uses.	650	None specified.	460	0
Mote Road	TBD through DM process	2,000m ²	84	2,000m ²	84	0
Total	190	2,000m²	1,073	9,667m²	883	7,667sqm

4.3 Some sites have, or may obtain during the process of preparing the Local Plan Review, planning consent. This could be by grant of planning permission, or through receipt of a Council-approved masterplan or planning brief. Where this is the case, it is prudent that the development capacity modelled in that application or document is used, as it is likely to be more detailed and tailored to a site's characteristics than the modelling exercise set out above. The sites with this status are:

- Len House
- Mote Road Car Park

“New” LPR Housing Need Figure

2.11 Totalling all of these changes together provides as significant shift downwards in the Borough's future housing need. The new calculation is 17,355 (new target) – (7,870 (modelled extant supply @1st April 2022) + 2,738 (windfall 2022-2037) + 800 (Invicta) + 883 (town centre opportunity sites)) gives a new total of **5,064** units.

Need for different types of housing

2.12 The SHMA also provides an evidence base for the housing needs of specific groups. This includes needs for family housing, affordable housing including social and affordable rental and intermediate products such as shared ownership, private rental housing, and housing for groups with different needs such as the elderly and those with care needs. These are quite significant when added up as a whole, and there would be overlap between the types. The Government's planning guidance is clear that the overall need target takes precedence, and it is for the LPA to determine how much of the overall amount should be provided to meet the above list of needs.

Gypsy & Traveller development needs

- 2.13 The NPPF should be read in conjunction with the Planning Policy for Traveller Sites (NPPF para 4). In providing sufficient homes it is important to consider the housing needs of all groups within a community. Paragraph 61 of the NPPF indicates that 'the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to...travellers...)'.
- 2.14 ORS have been commissioned to undertake an assessment of need for gypsy and traveller accommodation. Work on the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) has been delayed due to the Covid-19 Pandemic. Interviews are as essential part of this study. But due to the social distancing measures in place to help reduce the spread

of the coronavirus the number of interviews with gypsy and traveller households carried out to date is below the required rate to be produce a robust evidence base.

- 2.15 An interim GTAA has been produced using the interviews carried out to date (either face to face or by telephone) and models the remaining need from households which have not yet been interviewed. Work to undertake the remaining interviews will continue to ensure a suitable response rate is achieved. Sites that were submitted to the Call for Sites exercise will be assessed separately outside of this SLAA exercise as part of the production of a separate gypsy & traveller housing DPD.

Employment development needs

- 2.16 National Planning Practice Guidance requires Local Planning Authorities to understand existing business needs in terms of both their current and future requirements in the preparation of Local Plans. This includes identification of the Functional Economic Market Area, assessment of recent employment land supply and loss patterns, as well as understanding of the current market and wider signals relating to economic growth, diversification and innovation.
- 2.17 The Council's Employment Need Assessment identifies three scenarios based on job growth forecasts (labour demand), past trends (development rates) and population growth (labour supply). These scenarios result in objectively assessed projected employment floorspace requirements (sqm, gross) for employment (E(g), B2 and B8 Use Classes) over the period 2022-2037. They re-set the requirement from 2022 and are not in addition to the current Local Plan requirement. The floorspace requirement for each scenario is as follows:

Scenario:	1. Labour demand	2. Development rates	3. Labour supply
Floorspace (m² gross):	101,555	-202,500	259,760

- 2.18 This figure is then translated into a land take requirement (in hectares), based on assumptions of the type of employment and its location in the borough. For example, offices (B1a/B1b use) located within Maidstone town centre are assumed to achieve a higher job density than offices located elsewhere in the borough, and will therefore have differing plot ratios applied. This will have implications on the overall land needed to provide the required floorspace.
- 2.19 At this time, we are working towards meeting the labour demand (scenario 1) as a minimum to ensure the market is not constrained by lack of land supply.
- 2.20 This evidence was updated through a newly commissioned Addendum in April 2021 to reflect the impact of Covid-19 and Brexit on the economy and its subsequent expected recovery. This work recommended the continuation of the minimum floorspace requirement of 101,555sqm (gross) over the plan period.

Retail and leisure development needs

- 2.21 The NPPF (2019) indicates that local plans should allocate a range of suitable sites to meet the scale and type of retail, leisure and other development needed in town centres, for at least 10 years. The retail need should be met in full and should not be compromised by limited site supply. Through application of a sequential approach, designated town centres should be the first choice for locating retail, leisure and main town centre uses.

- 2.22 Based on the expected population growth, combined with analysis of national and local retail trends and Experian forecasts; the objectively assessed projected retail floorspace requirements (sqm, gross) for all A-uses (now E Use Class) over the period to 2037 is as follows:

By year:	2032	2037
Floorspace (sqm, gross):	10,847	13,769

- 2.23 As we are only required to allocate sites to meet the retail need for the next ten years, the floorspace requirement 2022-2032 is 10,847 sqm (gross). This figure is not in addition to the existing Local Plan allocation, rather it resets and provides an entirely new target from 2022. There was no evidenced need to allocate land specifically for leisure uses. It is recommended that policies are flexible to accommodate such uses as and when they arise throughout the plan period.
- 2.24 This evidence was updated through a newly commissioned Addendum in April 2021 to reflect the impact of Covid-19 and Brexit on the retail and leisure economy and its subsequent expected recovery. The figures shown above are reflective of the findings of the updated evidence.

Infrastructure Development Needs

- 2.25 There is a need to ensure that housing and economic development is accompanied by the delivery of necessary infrastructure to support such development, and accordingly the NPPF makes it clear that Local Planning Authorities should engage early, proportionately and effectively with infrastructure providers.
- 2.26 Discussions have been undertaken with a range of infrastructure providers as part of the Local Plan Review process, and providers have been consulted at the required statutory stages. Additionally, in shaping its spatial strategy, Maidstone Borough Council engaged early with infrastructure providers in consulting them directly to establish the existing capacity and scope for the enlargement and/or improvement or new provision, of facilities to meet expected growth levels across the borough. The following infrastructure providers were included in this direct consultation:
- KCC Transport
 - KCC Waste
 - KCC Education
 - NHS CCG
 - Network Rail
 - Southeastern Trains
 - Highways England
 - MBC Parks
 - MBC Leisure
 - Sport England
 - Strategic Gas Networks
 - Southern Water
- 2.27 Providers were presented with maximum and minimum potential capacities for areas/settlement. The settlements/areas for growth were grouped as follows: Maidstone Urban Area; Rural Service Centres & Larger Villages; Garden Settlements; and The Countryside (as set out in Chapter 3).
- 2.28 The ability to accommodate additional infrastructure demands varied across areas, with some broad areas and settlements having surplus capacity for some functions, and existing capacity being full in others. The recurring theme coming back from the infrastructure providers is that

there are methods of identifying capacity for new infrastructure, and funding mechanisms in place to deliver them, but that while they could make estimates for how infrastructure can expand based on the potential for growth in various areas, until a preferred approach is generated, they cannot be specific about where and what it should be.

- 2.29 There was feedback from providers that development in larger “chunks” allowed populations in those areas to better meet the thresholds for providing new facilities (for example the population increase to require a new primary or secondary school class, or a new GP surgery. This suggests that planning for consolidated growth locations such as garden settlements is preferable to incremental growth over a wider area. The next stage in this process will be to consult providers on a preferred spatial approach.

3. Current Local Plan development geography

- 3.1 The current Local Plan (2017) covers as its Plan period 2011-2031. It identifies the spatial growth distribution of some 17,575 new residential units, approximately 181,800m² employment floorspace, and approximately 25,700m² retail floorspace.
- 3.2 The spatial distribution in the Local Plan 2017 is often described as having a “dispersed” approach to residential development. Development is generally allocated in and at the edges of Maidstone, and within and around Rural Service Centres and Larger Villages. This was allocated as follows:



- 3.3 As such *Maidstone*, the *five RSCs* & *five Larger Villages* are the current growth locations in the 2017 Local Plan. Development is also likely to continue to come forward in *The Countryside*, some as windfall, and some as planned developments, this is not considered to be a growth location, and effectively consists of the rest of the borough not covered by the above areas.

Additional Growth Locations

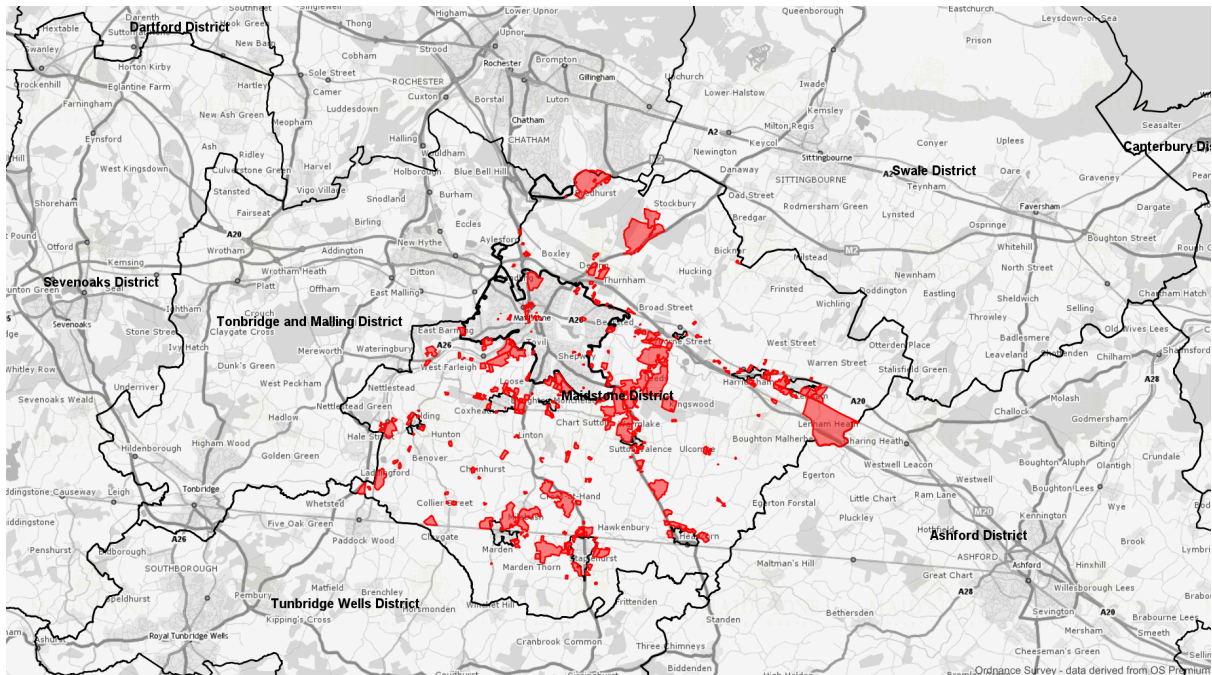
- 3.4 In the 2019 Call for Sites, land has been promoted for new Garden Settlements. These are generally located in The Countryside, but would grow to become self-sustaining settlements with their own infrastructure and services, as well as an employment and retail offer. Each

potential Garden Settlement will accommodate as a minimum 1,500 new homes, they will be treated as separate potential growth locations.

4 Site Assessment Methodology

Call for Sites 2019

- 4.1 The Call for Sites was issued between March-May 2019. 329 responses were received by 28th May 2019, mainly proposing residential use. The full suite of Call for Sites submissions is shown on the Map below, and published on the Council's website.



- 4.2 In undertaking the Call for Sites, the Council notified statutory bodies, stakeholders and those people listed on the consultation database and; placed a public notice in the local newspaper. Details were also published on the Council's website. A proforma for submission of sites was provided.

Late Submissions

- 4.3 Submissions received after the Call for Sites period ended will be considered for inclusion after the October 2020 consultation on the Local Plan Review Preferred Approach. These, along with other sites submitted during the consultation have been assessed for suitability and sustainability, and reported in this document.
- 4.4 Until a Reg 19 Plan (proposed submission) is produced, late sites will continue to be submitted. This is appropriate as it represents a cost-effective way of promoting land, as well as providing the Council with the opportunity to select from the widest supply of sites in producing its Plan. Land promoters will have the opportunity to challenge the Plan at Examination in Public following the Reg 19 consultation, and as such it is in the Council's interest to review and where appropriate include sites in the LPR until the latest possible moment. There is, however, a need to identify a "cut-off" for these sites to enable them to be reviewed for suitability, considered within the emerging spatial approach, and get them written up into the version of this document which will support the Reg 19 Plan. This "cut off" is recommended to be 3 months prior to determination of the Reg 19 Local Plan.

Desk-top Site Sources

- 4.5 In accordance with planning practice guidance, a desk-based review is being undertaken in order to proactively identify a range of sites and broad locations for development. This will include the consideration of existing site allocations that could be intensified or changed.
- 4.6 The desk-based study includes a range of potential sources as identified in the guidance:
- Planning applications that have been refused or withdrawn
 - Sites that have been subject to pre application discussions
 - Urban Capacity studies 2002 & 2006
 - Aerial/map observations
- 4.7 The results of this work are included in this document.

Analysis of Sites

- 4.8 There are three main steps in the assessment of sites in the assessment of sites:
1. Sorting of proposed residential/mixed-use sites into existing or logical potential additional growth locations as set out in Chapter 3 of this report;
 2. Sifting of all sites to remove duplication with each other, existing allocations or extant planning consents;
 3. Assessing the suitability and achievability of sites.
- 4.9 In addition to the assessment of the suitability, availability, and achievability included in this document, an assessment of the sustainability, and the potential sustainability patterns of collections of potentially suitable sites is being carried out through the Sustainability Appraisal of the Local Plan. As such, this document is the “gateway” to inclusion in the Sustainability Appraisal work, which then in turns provides an evidence base for the selection of spatial development strategies and alternatives.

Sorting of sites into existing or logical potential additional growth locations

- 4.10 The Call for Sites responses were mapped and allocated to growth locations according to the existing identified growth locations set out in the 2017 Local Plan. Many of these sites were in, adjacent to, or potentially adjacent to existing urban geographies as set out in the 2017 Local Plan.
- 4.11 New growth locations with the potential to deliver 1,500+ new residential units were assessed separately as Garden Community proposals (see Chapter 7). When observing the locations of the Call for Sites submissions, the following new potential growth locations were identified:
- South west of Maidstone Urban Area
 - South of Maidstone Urban Area
 - South East of Maidstone Urban Area

Sifting of sites to remove duplication with each other, existing allocations or planning consents.

- 4.12 A number of sites were received which either were the same as, or had overlap with extant planning consents, Local Plan 2017 allocations, or other Call for Sites submissions. To avoid

duplication, and thus the potential for double counting, a number of sites have been excluded or trimmed at this stage. Additionally, one site was for a road improvement which did not offer any land capable of creating new floorspace, and one site was split due to its size and proximity to multiple settlements (Sutton Valence & Maidstone). These amendments are set out below:

C4S Site Ref	Old Name	New Site Ref	New Name	Growth Area	Change to Site Boundary/ Comments
010	Bydews Place Site 1	010	No Change	No Change	Site boundary trimmed to remove overlap with Site 203
011	Bydews Place Site 1	011	No Change	No Change	Site boundary trimmed to remove overlap with Site 203
018	Land rear of Beech House	018	No Change	No Change	Site boundary trimmed to remove overlap with site 210
016	Fir Tree Farm and Norton Lea	016	Fir Tree Farm and Norton Lea (North)	South East of Maidstone	Site split into three due to size and adjacency of the site to both the Maidstone urban area & Sutton Valence.
		271	Fir Tree Farm and Norton Lea (Central portion)	The Countryside	
		335	Fir Tree Farm and Norton Lea (Southern portion)	Sutton Valence	
016	Fir Tree Farm & Norton Lea (North)	016	No Change	South East of Maidstone	Site boundary trimmed to remove overlap with Allocation H1(10)
041	Backland plot off Peens Ln	041	No Change	No Change	Site boundary trimmed to remove overlap with site 045
066	Land at the Lodge, Staplehurst	066	No Change	Staplehurst	Site boundary trimmed to remove overlap with Allocation H1(48)
089	Yalding Enterprise Park	089	No Change	The Countryside	Site boundary trimmed to remove overlap with site 087

118	Gibbs Hill Farm, Headcorn	118	No Change	Headcorn	Site boundary trimmed to remove overlap with Permission 16/507035
120	Rowan House Farm & Fairview	120	No Change	The Countryside	Site boundary trimmed to remove overlap with Site 104
121	Land at Redwood Glade	121	No Change	The Countryside	Site boundary trimmed to remove overlap with Permission 18/502929
124	Old Goods Yard Phase 2	124	No Change	Lenham	Site boundary trimmed to remove overlap with Permission 14/500219
128	Westerfield Dole Rd, Medway	382	No Change	Medway Urban Area	Site removed as it is wholly inside larger site 382
146	Maidstone East	N/A	N/A	Maidstone Town Centre	Duplicate of Local Plan 17 Site RMX1
149	Maidstone West	149	No Change	Maidstone Town Centre	Site boundary trimmed to remove overlap with Permission 16/502476
167	Leeds Wider Landholding	167	North & West of Leeds	M20 J8 Garden Settlement	Site split into two
		274	South of Leeds	South of Leeds	
167	Leeds wider Landholding	167	No Change	M20 J8 Garden Settlement	Site boundary trimmed to remove overlap with site 168
170	New roundabout and access roadway	N/A	N/A	Maidstone Urban Area	Site is a road improvement proposal – no development.
204	South of Eyhorne St, Hollingbourne	204	No Change	Eyhorne St (Hollingbourne)	Site boundary trimmed to remove overlap with Allocation H1(61)
219	Coxheath Car & Van Hire	219	No Change	Coxheath	Site boundary trimmed to remove overlap with site 325
221	Land at Appletree	N/A	N/A	Maidstone Urban Area	Duplicate of site 246

	House, Bearstead				
222	Land at Henhurst Farm	222	No Change	Staplehurst	Site boundary trimmed to remove overlap with Allocation H1(50)
230	Land at the Meadows, Headcorn	230	No Change	The Countryside	Site boundary trimmed to remove overlap with site 238
245	Land north of the M2 Lidsing	245	No Change	N of M2 Garden Settlement	Site boundary trimmed to remove overlap with site 330
264	Land at Police HQ	N/A	N/A	Maidstone Urban Area	Site boundary trimmed to remove overlap with Allocation H1(27)
265	Land at Abbey Farm, Tovil	265	No Change	No Change	Site boundary trimmed to remove overlap with Permissions 10/ 0256 and 18/502287
268	Land at Mount Farm	268	No Change	The Countryside	Site boundary trimmed to remove overlap with site 153
271	Fir Tree Farm & Norton Lea (Central portion)	271	No Change	The Countryside	Site boundary trimmed to remove overlap with sites 171 & 107
272	Len House	N/A	N/A	Maidstone Town Centre	Duplicate of Site 145
279	Langley Heath Strategic Settlement	279	No Change	Langley Heath Garden Settlement	Site boundary trimmed to remove overlap with sites 250, 058, 085 317, 263 & 016
280	Land at Forstal Lane	N/A	N/A	Coxheath	Duplicate of Site 202
282	Land rear of Kent Police Training School	N/A	N/A	Maidstone Urban Area	Site boundary trimmed to remove overlap with Allocation H1(28)
290	The Lodge, Water Lane	N/A	N/A	The Countryside	Duplicate of Site 291
305	Maidstone East	N/A	N/A	Maidstone Town Centre	Duplicate of Local Plan 17 Site RMX1

321	Land at Norton Lea Farm	N/A	N/A	Sutton Valence	Duplicate of Site 016
372	Boughton Mount Farm	N/A	N/A	The Countryside	Duplicate of Site 115

Sifting of sites to remove proposed uses for which there is not identified need

4.13 A number of sites were submitted for which there is not a need identified at the current time. These are listed below:

Site Ref	Site Name	Proposed use
030	Land at junction of Bearstead & New Cut Rds	Care Home
036	Premier Inn, Sandling	Hotel
052	Weald of Kent Golf Course	Hotel/golf course
076	Land east of Couchman Green Lane, Staplehurst	Children's Day Nursery
219	Coxheath Car & Van Hire	Car & van hire
325	Land off Stockett Ln, Coxheath	Mobile Home Park

Sifting of sites proposed for Gypsy & Traveller accommodation

4.14 A number of sites were submitted for provision of Gypsy & Traveller accommodation. As noted in Chapter 2, the land requirement for these uses has not yet been established. These sites will be considered following the completion of the Gypsy & Traveller Needs Assessment, and are listed below:

Site Ref	Site Name
022	Land Rear of Chart View Chart Hill Road - SITE A
023	Land Rear of Chart View Chart Hill Road - SITE B
032	Hawthorne Farm, Ulcombe
230	Land rear of the Meadows, Headcorn (Plots 1-5)
237	Land rear of the Meadows, Headcorn (Plots 6-10)
238	Land rear of the Meadows, Headcorn (Blossoms)
261	Oak Tree Farm Headcorn
354	The Old Cherry Orchard, Yalding

Withdrawn Sites

4.15 Sites 285 (Couthams House, Eythorne St) and 334 (Fir Tree Farm & Norton Lea (South)) were withdrawn at the landowners request.

The Site assessment process

4.16 There are three tests which a site must pass to be considered to be potentially deliverable within the LPR. Sites need to be available (normally by virtue of being promoted through the call for sites or a planning application they are considered available), suitable, and achievable. The methodology for assessment against these three criteria is set out below.

Unavailable Sites

4.17 At present we do not have any Unavailable sites. All the sites that have been proposed through the Call for Sites are considered to be Available. As the Plan progresses, and representations are

made on sites, the availability of these sites could be challenged, and the Council will need to ensure that there is landowner agreement for sites which are included in the Plan.

Site Suitability

- 4.18 Site constraints can impact on the cost of development as well as the timing of delivery and the extent of the site which could be developed. Such constraints to delivery were identified so as to assess the suitability, of each Call for Sites site.
- 4.19 In order to ensure consistency across site assessments, submitted sites were considered through the use of a standard site assessment proforma. The completed proformas are included as Appendix A (potentially suitable sites) and Appendix B (draft unsuitable sites).
- 4.20 The Call for Sites proforma issued in 2019 set out a list of criteria that submitted sites are considered against. The methodology for how this was considered is set out below. There are also other potential issues that may exist on a site, so the list below is not exclusive. Where other constraints have been identified these are listed in the individual Site Assessment.

Suitability Criteria	Methodology
Access to the highways network, public transport, services, and utilities	To help inform the assessment of suitability and achievability of submissions to Maidstone Borough Council's Call for Sites 2019, Kent County Council, as the local Highway Authority, have provided advice on the suitability and achievability of sites from a transport perspective. This advice has taken account of recognised technical guidance, including the Manual for Streets, the Design Manual for Roads and Bridges and the Kent Design Guide. In order for a site to be recommended as being potentially suitable for inclusion in the Plan, a site is required to achieve specific criteria relating to access and sustainability. These recommendations serve only to identify potential viability from a transport perspective and are not necessarily indicative of KCC's final position on any proposal. The criteria for access to the highways network requires that a site must have: • An existing access of the requisite width, visibility and radius and a road connection of suitable width to the primary route network* OR • the land control necessary to provide an access of the requisite width, visibility and radius and a road connection of suitable width to the primary route network* OR • the scope to achieve the such land control through collaboration with other adjacent or nearby sites. There are three sets of criteria relating to sustainability from a transport perspective. These are: 1. The whole site must be within 400m actual walking distance (via the footway network) of a bus stop or railway station providing 2 or more services per hour. 2. The whole site must be within 800m walking distance (via the footway network) of a convenience store, a primary school and a GP surgery.

	3. The whole site must be within 30 minutes door to door public transport time of a GP, a primary school, a secondary school, an employment area and a major retail centre. The whole site must also be within 60 minutes door to door public transport time of a Hospital. ** Access from the site to the required public transport services must be available via the footway network. In order to be considered as suitable, on sustainability grounds, a site must: • Achieve completely at least one of these three sets of criteria. OR • have the potential to achieve completely at least one of these three sets of criteria through improvements that are proportionate to the scale of the development. *** OR • have the potential to achieve all criteria within at least one of these sets through mitigation measures involving collaboration with other adjacent or nearby sites. If a site does not meet the criteria associated with both access and sustainability, it is recommended to be unsuitable on transport related grounds. A site that meets the criteria will be taken forward for further review, including a cumulative assessment of impact on highway network capacity. <u>Notes</u> * Within the recommendations provided, the term “suitable access” is used as shorthand for the requirements within this criterion. ** This timeframe is intended to reflect the longer journey times usually associated with travel to hospitals, thereby providing a more representative basis for assessment. *** This is based on a review of the potential costs and complexity of the improvements, set against the scale of the development. Larger sites are typically assumed to offer scope for more substantive improvements.
Proximity to Ancient Woodland	In accordance with Natural England Statutory Guidance, sites within 15m of an area of ancient woodland were identified using GIS, and deducted from the site area.
Areas of Outstanding Natural Beauty	Sites within the North Downs Area of Outstanding Natural Beauty and the Metropolitan Green Belt have been identified using GIS. The NPPF states that sites outside the Green Belt and AONB should be identified for growth prior to those inside, and as such at this point the Council is not considering sites within the AONB as being suitable for allocation in the LPR. At the current time there is sufficient land to meet development needs outside of these areas, and as such sites in these areas are considered to be unsuitable.
Green Belt	
MLB Landscapes of Local Value & Landscape Capacity	LLVs are set out in SP17 (The Countryside) as being suitable for conservation and enhancement due to their distinctive character. While LLV status is a factor in how a site should be designed/ developed, it does not “in principal” preclude development of a site. How a site should be

	designed to complement the landscape features of the LLV will be addressed at detailed design stage. Each site is assessed used the conclusions in the Landscape Character Assessment (2012). This document reviews the borough (outside of the existing Maidstone urban envelope) and identifies its landscape character, condition, sensitivity, and capacity for change. This information should then be used to inform the design of developments across the borough. This approach primarily provides context for the potential design of a site, rather than considering its suitability for allocation. There are particular circumstances in which landscape is a primary reason for a site being considered unsuitable. Examples of this are: • Creating coalescence of two (or more) settlements; • A site would unacceptably distort a settlement envelope within a particularly sensitive landscape context. Where this is the case a justification of the deduction to the site area or unsuitability of the site has been recommended.
Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites, Special Areas of Conservations, Hedgerows, Ecology (including ponds)	KCC Ecology have conducted a high-level assessment of each site submitted in the Call for Sites. The assessment contains a high level review of available desk-top information (including aerial photographs (1990 – 2018), Kent Habitat Survey 2012 data and designated sites), and does not present a definitive conclusion of the ecological importance of a site and any protected/notable species present. KCC advise that most of the allocation sites will require preliminary ecological appraisal as a minimum and some will require specific protected species surveys to ensure that all relevant material considerations can be addressed in the determination of applications. Ecological assessments will also support the developers in identify opportunities for ecological enhancements that will support Maidstone Borough Council in meeting the principles of the NPPF. The comments only assess the biodiversity likely to be present on site and generally do not provide advice regarding strategic issues or in-combination impacts. Impacts on the designated sties KCC ecology have highlighted which sites are adjacent to a designated site and therefore likely to have a negative impact individually on the designated sites – but it must be highlighted that all the sites in combination risk having a negative impact on the designated sites within Kent. Protected/Notable Species Protected/notable species which may be found within the site have been identified, but are not limited to those which are listed within the spread sheet - the species listed are those which are most likely to be found based on habitats present within the site. Ecological scoping surveys, which will need to be carried out on most sites, will highlight what species are expected to be found and highlight which specific species surveys will be required.

	KCC highlight that even sites which have been assessed as a category 4 may be utilised by protected species. There may not be optimum habitat within the site but the site may be used by species which are foraging/commuting through the site. All ecological surveys and details of any mitigation must be submitted with any planning application to ensure that all relevant material considerations are addressed when Maidstone Borough Council are determining the planning application. Each site has been considered individually but the impacts on the sites may be larger if there are a number of proposed developments within the surrounding/immediate area. Habitats Habitats descriptions which have a higher potential of containing protected/notable species – Rough grassland, mature hedgerows, mature/veteran trees, ponds, scrub and calcareous/acidic/neutral grassland. Habitat descriptions which have a lower potential of contain protected/notable species: grassland (implies regularly mown, cut or grazed), arable and hard standing. Although please be aware that species such as ground nesting birds can still be found within grassland/arable fields.
Potential impact on heritage assets such as Conservation Areas, Listed buildings, and areas of Archaeological potential	Site assessments have been predominantly undertaken by means of desktop research, aerial photos and Google Streetview. Historic England Advice Note 3 (The Historic Environment and Site Allocations in Local Plans, 2015) has been consulted. The guidance provides a best-practice Site Selection Methodology. A preliminary archaeological assessment has been undertaken primarily from readily available resources held by the Kent County Council Historic Environment Record, including early OS maps, aerial photographs and British Geological Society data. It is not a detailed appraisal but merely provides a broad initial view on the sensitivity of the archaeological resource and the way in which this should be approached for each of the options. The sensitivity of particular sites may change following more detailed appraisal and in light of new information. The process of assessment will be reviewed and refined as the Local Plan Review continues.
The presence of TPOs & Veteran Trees	Tree Preservation Orders were identified using GIS, with the presence of veteran trees identified by officers on site visits. Where this was identified as an issue on a site, the canopy to be preserved was identified, and that area of the site removed from the developable area.
Air Quality Management Area	Where sites are within Maidstone's AQMA this is identified. This does not automatically preclude the site from inclusion in the plan.
Flood Risk	Where sites are within flood zones 2 or 3 this is identified. A separate SFRA has been carried out to test the suitability of sites with an element of flood risk to be included within the LPR. Where appropriate land has been set aside to manage flood risk.

Drainage matters	KCC Drainage have provided comments on the likely drainage risks affecting the site. This includes reference to current sewer access, open watercourse issues, flood risk, source protection zone, ground formation, permeability of bedrock, and surface water discharge.
Contamination/ pollution	Existing contamination issues was identified through GIS analysis (not a showstopper issues).
Land stability	Unless issues around a site's land stability are already known to the site promoter at the time of submission, this is something only expected to become apparent until the assessment of a planning application. A site cannot therefore be reasonably ruled in or out of the assessment process based on this criterion at this stage.
Public Rights of Way	Where a Public Right of Way has been identified on a site, it will these will need to be reprovided and enhanced through the development of the site. It could result in a loss of developable land; this will be identified at the detailed planning stage of design.
Utilities (underground)	Where utilities infrastructure is identified on a site these will need to be managed through the development of the site. It could result in a loss of developable land; this will be identified at the detailed planning stage of design.
Pylons	Where high voltage electricity pylons were identified on a site these will need to be managed through the development of the site. It could result in a loss of developable land; this will be identified at the detailed planning stage of design.
Neighbour/ residential amenity	Sites were identified to determine whether they had a sensitive and/or potentially loud or otherwise unsuitable use in close proximity. Where a sensitive use, for example a school or neighbouring dwelling is present, design consideration will need to be given to ensuring the existing neighbouring use remains viable and/or amenity is not significantly impacted.

4.21 There are broadly three impacts that come from a constraint arising on a site:

1. A constraint may be present which requires the design of future development on the site to be adapted to respond to the constraint – at no loss to the development capacity of the site. In these cases a policy response requiring the development to respond to the identified constraint will likely be required.
2. A constraint may be present which requires the design of future development on the site to be adapted to respond to the constraint – at a loss of development capacity on the site. In these cases a policy response requiring the development to respond to the identified constraint will likely be required, and a deduction to the modelled capacity of the site will be factored in.
3. A constraint may be present which renders the site unsuitable (a “show stopper” constraint). In these cases, the site will be excluded from the stock of developable land.

Achievability

- 4.22 Sites are considered as achievable where there is a reasonable prospect that the site could be developed for the purpose specified within the plan period. Feeding into the determination of a site's achievability is the land or cost implications of overcoming site-level constraints identified through the suitability assessment. AS such a site may pass the suitability assessment, but the

impacts (design, land needing to be put aside, potential cost) could conspire to make the site unachievable.

Development modelling methodology

Phasing

- 4.23 The Council has an existing phasing methodology, which was developed for and accepted at Examination in Public into the existing Local Plan. We have started from this base to model the capacity and delivery timeframes for the Call for Sites data.
- 4.24 Each site will need to obtain planning permission before it can be delivered. After Planning Permission is granted, it takes on average 3 years to commence if Outline planning permission was granted, and 2 years once full planning permission has been granted.
- 4.25 Once a site has commenced development, it is expected that it will take on average 1 year to start achieving completions.

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Small sites (1 to 4 dwellings)										
Under construction site										
Greenfield site										
Brownfield site										
Outline permission - granted										
Large sites (5+ dwellings)										
Extant permissions										
Prior notification - site commenced										
Prior notification - site not commenced										
Full Plans application - site commenced										
Full Plans application - site not commenced										
Full Plans application - awaiting S106										
Reserved matters - site commenced										
Reserved matters - site not commenced										
Outline permission - granted										
Outline permission - awaiting S106										
No immediate intent to develop										
Allocated site										
Full Plans application - awaiting S106										
Full Plans application - pending decision										
Outline permission - awaiting S106										
Outline permission - pending decision										
Strong intention to develop										
Intention to develop										
No immediate intent to develop										

- 4.26 Completions per year on large sites should be capped, as developers don't want to flood the market, and there is a limit to the amount of activity that can be carried out in a 12-month period.
- 4.27 Since 2011 more than 40 dwellings have been delivered on a site in a year 35 times, with more than 70 dwellings being delivered on sites in a year 13 times. Conversely only 3 sites have delivered more than 100 units in a single year. Therefore it is considered that the following reasonable assumptions may be made:
- 50 units can be completed per annum on sites of 100+ units
 - 25-99 unit sites are split over 2 years
 - 5-24 dwelling sites will be delivered in one year

Density of residential development

- 4.28 The density of development across the borough varies considerably, with the principal difference being between the density of completions within and around Maidstone Town Centre and elsewhere. Within the Town Centre there is a strong correlation that larger sites produce higher density outcomes. Sites of between 5-10 units generally build out at densities of 100dph or less, and sites of 10-50 units, generally delivering 200-500dph. It is therefore considered that a reasonable density assumption for town sites is 175 dwellings per hectare.
- 4.29 Outside of Maidstone Town Centre there is limited evidence to justify densities over the current Local Plan density assumption of 30 dwellings per hectare.

Density of employment development

- 4.30 The density of employment development varies based on the type of employment provision and its geographical location in the borough. Standardised plot ratio assumptions have been applied to each site in order to provide a reasonable estimate of how much employment floorspace could be accommodated on site, once factors such as premises and associated car parking, space for lorry turning, landscaping etc. have been factored in. In addition, offices proposed within the town centre are assumed to achieve higher a higher density than offices located elsewhere in the borough.
- 4.31 As such, for offices located in the town centre, a plot ratio of 2.0 is applied. For industrial uses and offices located elsewhere in the borough, a plot ration of 0.4 is applied i.e. for a 1 hectare site, 4,000sqm of floorspace could be accommodated.

Mix of uses

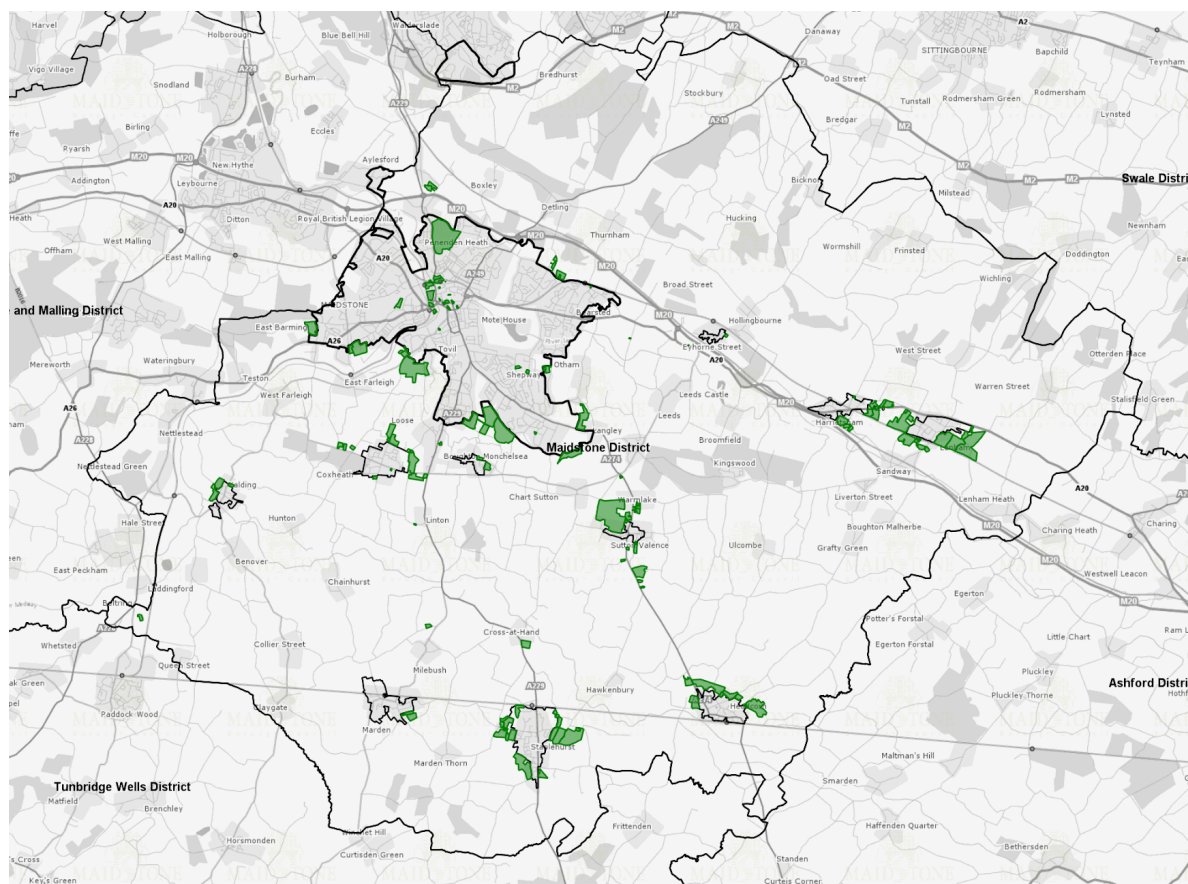
- 4.32 There is a need to provide for new employment, infrastructure and retail space across the borough as well as residential. In town centres this is likely to be as a part of mixed use developments, for example with retail and other services on ground floor sites, or with parts of the site delivering offices as opposed to new residential space. To ensure that at this stage a sufficiency of non-residential floorspace is modelled, 10% of town centre floorspace is allocated to town centre/ services, and 20% to commercial.
- 4.33 The method of delivering employment and services is likely to be different outside of the town centre, with specific allocations delivering commercial floorspace. As such there is no deduction from sites outside of Maidstone Town Centre for commercial, retail, or infrastructure. Infrastructure will be required to be accommodated alongside growth, and the Council will work with stakeholders to identify what the space requirements of this could be, and these will be applied into the modelling at a later date.

5 Site assessment outputs

Potentially Suitable Sites

- 5.1 A map of the potentially suitable sites after analysis from the Call for Sites submissions are shown below. The full list of sites, with deductions for constraints, is included as Appendix A. The Council has not made a decision on the suitability of this suite of sites, it is officer information only. This list should be treated as a potential land supply, the list of sites included in the Local Plan Review could draw from these sites, or there may be scope to use a combination of a selection of these sites and Garden Settlement submissions.

5.2 Just because a site is suitable does not mean that it will be allocated in the Local Plan. The individual sustainability, spatial strategy, and pattern of development across the borough remain to be tested through the identification of Reasonable Alternatives through the Sustainability Appraisal process.



Site reference	Site Name	Growth Location	Deduction (%)	Reason for deduction	Potential modelled capacity (units and/or sqm floorspace)
001	Land Adjacent to Brhemar Garage	the Countryside			16
005	Land Adjacent to Dingley Dell	the Countryside	30%	Veteran Trees	17
009	Right Kard	Maidstone Town Centre			2 units, 38m ² B use & 19m ² A use
010	Site 1, Bydews Place	South West of Maidstone			16
011	Site 2, Bydews Place	South West of Maidstone	3%	Ancient Woodland	5
012	Land At Forsham House, Forsham Lane	the Countryside			11

013	Land between Chartway Street and Maidstone Road	the Countryside			30
015	The Kia Site	the Countryside	5%	Veteran Trees	69
017	Land West of Maidstone Road	Headcorn	40%	Landscape buffer	42
018	Land rear of Beech House	the Countryside			5
019	Land north of Lenham Rd	Headcorn	48%	Flood Risk	47
021	Land adjacent 4 Southways	Sutton Valence			12
029	Court Lodge Farm	Lenham	50%	Heritage/ archaeology	126
037	Rear of The Gables	Staplehurst			31
050	Army Hut Stables	Coxheath	10%	Ancient Woodland	88
053	12-14 Week Street	Maidstone Town Centre	20%	Heritage	3 units, 41m ² A use, 81m ² B use
055	Victoria's Cabaret Club	the Countryside	5%	Veteran trees	6
056	Orchard House	Staplehurst			29
057	Land rear of 24A Oak Farm Gardens	Headcorn	64%	Veteran Trees & Flood Risk	6
060	Rush Farm	Staplehurst	5%	Flooding	18
064	Land South of Marden Rd	Staplehurst			88
066	Land east of Lodge Rd	Staplehurst	1.94 Ha	Employment designation	34units, 3,963m ² B use
071	Land adjacent to Keilen Manor	Harrietsham	25%	Veteran Trees	37
073	Bearstead Golf Club	Maidstone Urban Area	5%	Veteran Trees	19
078	Haven Farm	Sutton Valence	5%	Veteran Trees	41 units, 375m ² B use, 413m ² A use
080	Land west of Loder Close	Lenham			38
081	Land off Lenham Road,	Headcorn			40
083	Land at Hartley Dene (whole site)	the Countryside			37
084	Land off Heath Road	the Countryside			33
086	Elsfield Cottages, Ashford Road	the Countryside			1
093	Land at Linden Farm	Coxheath			9
095	Land at Halfe Yoke	Maidstone Urban Area			46
098	Land South of Ashford Rd	Harrietsham			96
101	Land south of A20	Harrietsham			60
102	Ringles Nursery & Ringles Gate	Headcorn	55%	5% adj TPO, 15% Flood Zone 3, 35% Reservoir	133
107	Land adjacent to Westholme	Sutton Valence			19
108	Land at South Lane	Sutton Valence			39
109	Orchard End	the Countryside			35
112	Sutton Valence Surgery	Sutton Valence	40%	Veteran Trees, GP use	4
114	Land at Home Farm	Staplehurst			64
116	Land at Headcorn Road	the Countryside			11
118	Gibbs Hill Farm	Headcorn	10%	TPO onsite & adj	9
122	The Orchard, L/a White Cottage	Boughton Monchelsea	20%	Heritage	18

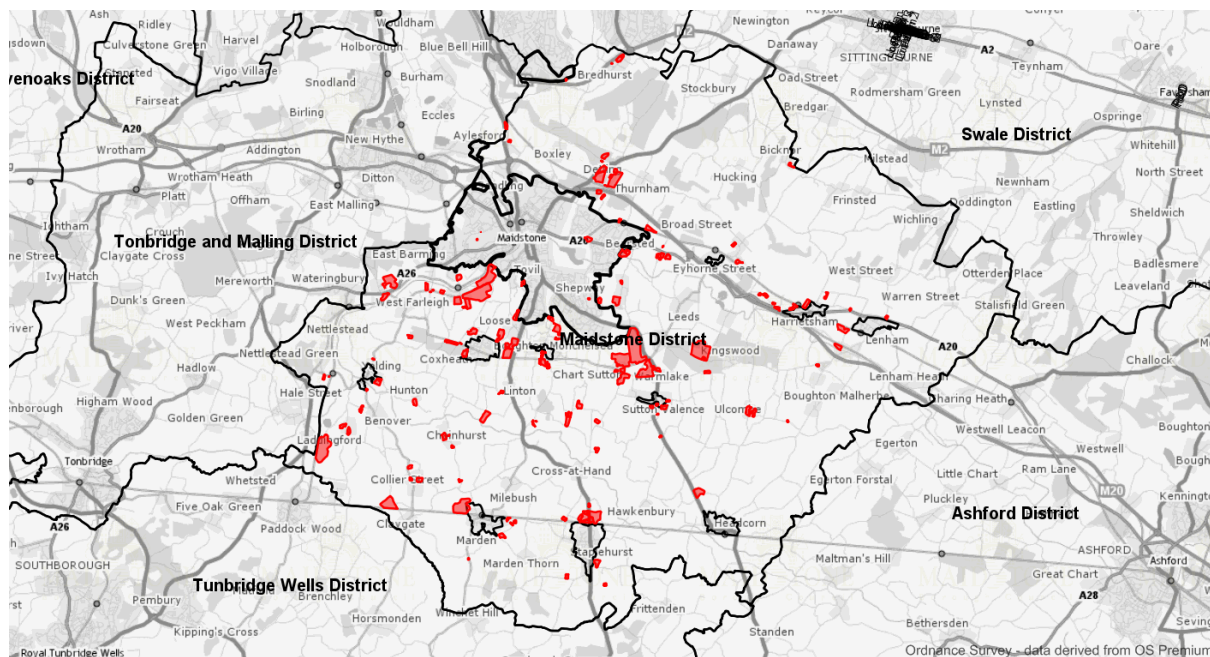
124	Old Goods Yard Phase 2	Lenham			25
125	Old Goods Yard Phase 3	Lenham			42
134	Baldwins Farm	Staplehurst			88
136	Tongs Meadow	Harrietsham			66
137	Land at Marden Rd	Staplehurst			116
140	Land at Squerries Oast	Maidstone Urban Area	50%	10% Oast, 40% Veteran trees	8
144	34-35 High Street	Maidstone Town Centre	50%	Listed buildings	2 units, 56m ² B use, 28m ² A-use
145	Len House	Maidstone Town Centre	50%	Listed buildings	67 units, 3,664m ² B use, 1,831m ² A use
147	Gala Bingo & Granada House	Maidstone Town Centre	50%	Heritage	71 units, 1,151m ² B use, 576m ² A use
148	Maidstone Riverside	Maidstone Town Centre	25%	Listed buildings	650 units, 5,148m ² B use, 2,574m ² A use
149	Maidstone West	Maidstone Town Centre	50%	Broadway	130 units, 1,034m ² B use, 517m ² A use
150	Mill Street Car Park	Maidstone Town Centre	20%	Listed buildings	15 units 358m ² B use, 179m ² A use
152	Former Royal British Legion Social Club	Maidstone Urban Area	10%	Trees	4
156	Danebury	Maidstone Urban Area			3
158	Land adjacent to Headcorn Road and Heniker Lane	the Countryside			114 units, 2,778m ² B use, 1,389m ² A use
161	Bell Farm East Street Harrietsham	Harrietsham	20%	Heritage	126
162	North of Headcorn	Headcorn	7%	Flood Risk	275
169	Land adjacent to Long Oast	The Countryside	20%	Flood risk mitigation	5,363m ² B use
171	Land adjoining Homewell House and fronting Maidstone Road	North of Sutton Valence			7
172	Land at Sutton Road	South East of Maidstone	40%	Trees	139
174	Land to the South of Sutton Road	South East of Maidstone	5%	Veteran trees	185
179	Land at Westerhill Road	Coxheath			2,805m ² B use
185	Otham Glebe	Maidstone Urban Area	40%	Ancient Woodland/ Trees	27
186	Land at Headcorn Road, Staplehurst	Staplehurst	25%	Landscape buffer	132
188	Land at East Lenham Farm Lenham	Lenham	20%	Archaeology	437
192	Land adjacent to Headcorn Road	the Countryside			10
196	Land at Willow Farm	the Countryside			45

197	Car Park Site at Former Golf Course	the Countryside	49%	Drainage	8
198	Main Golf Course Site at The Former Staplehurst Golf Course	the Countryside	40%	Landscape buffer	227
201	Inkstand Cattery and Equestrian Stables	Lenham	13%	Ancient woodland	21
202	Land at Forstal Lane	Coxheath			89
203	Land at Bydews Place	South West of Maidstone	20%	Listed buildings	47
204	Land south east of Eyhorne Street	Eyehorne St (Hollingbourne)			11
206	Summer Place	the Countryside			2
210	Newlyn's Farm	the Countryside			31
211	Land at Wheelers Lane	the Countryside			4
215	Woodford Yard Depot	Staplehurst		Trees - orchard	12,084m ²
216	Rochester Meadow	the Countryside			39
222	Land at Henhurst Farm	Staplehurst			309
224	Land west of Old Ham Lane	Lenham	22%	Ancient Woodland	275
225	Tanglewood and site adjacent	Coxheath			19
227	Land South of Green Lane	Boughton Monchelsea	10%	Trees	50
229	Land at Stanley Farm	Staplehurst	20%	Landscape buffer	32
234	Land west of North Street	Maidstone Urban Area			182
235	Land at Boughton Lane	South of Maidstone	67%	Townscape/ Landscape buffer	69
244	Land North of Iden Park	Staplehurst	65%	Landscape buffer	21
246	Land Rear of Appletree House	Maidstone Urban Area			25
248	Land North and South of Kenward Road	Yalding	15%	Flooding	160
251	Land to the South of Heath Road	Coxheath			4
257	Land at Junction of Heath Road/ Dean Street	the Countryside			20
260	Land at Ashford Road	Lenham			3,108m ² B use
262	Fant Farm	Maidstone Urban Area			260
265	Land at Abbey Farm	South West of Maidstone Urban Extension	20%	Heritage	527
266	Land at Ware Street	Maidstone Urban Area	25%	TPOs	67
270	Land at Pested Bars Road	South of Maidstone	50%	Town Structure/ convergence	463
273	Land between Maidstone Road and Whetsted Road	The Countryside	20%	Flood risk mitigation	41,023m ² B use
285	Land at Dickley Court	the Countryside			9 units, 188m ² B use
286	Land at Underlyn Lane	The Countryside	20%	Flood risk mitigation	4,127m ² B use
288	Land at Hill Farm	Coxheath			107

292	Land south of Old Ashford Rd	Lenham	50%	Archaeology/ Heritage	138
295	Land north of Copper Lane	Marden			74
296	Astor Hever	Maidstone Urban Area	10%	Trees	45
297	Bearstead Library	Maidstone Urban Area	45%	Heritage, Library use	1
298	Dorothy Lucy Centre	Maidstone Urban Area			16
299	St. Faiths AEC	Maidstone Town Centre	50%	Heritage	3 units, 37m ² A use, 74m ² B use
303	EIS Oxford Rd	Maidstone Urban Area	25%	Community use	14
307	Land north of Marden Rd, east of Clapper Lane	Staplehurst			27
310	Land north of Moat Rd	Headcorn	15%	Veteran trees/ Archaeology	116
312	Land north of Heath Rd	Coxheath			193
314	Land east of Albion Rd	Marden			39
322	Land north of Lughorse Lane	Yalding			21
324	The Grange	Lenham	3%	Veteran trees	8
328	Land at 59 Linton Rd	the Countryside			10
329	Land at Sapphire Kennels	the Countryside			9
333	Kilnwood Meadows	Lenham			184
334	Old Goods Yard	Lenham			7
335	Fir Tree and Norton Lea (South)	Sutton Valence	50%	Landscape/ Convergence	501
336	Land South of Glebe Lane and Tonbridge Road	Maidstone Urban Area			442
342	Land at Leadencross Green	Lenham			76
343	Dickley Wood	Harrietsham	73%	Ancient Woodland	343
344	Land adjacent to Fished Paddock	Staplehurst	20%	Drainage	344
348	Land east, west and south of Sharps Cottage	The Countryside	50%	Heritage	34
350	Wetlands	Staplehurst	2%	TPOs	45
351	White Pillars	Lenham			5
356	Land north of Marden Road	Staplehurst	5%	TPOs	29
360	Campfield Farm	Boughton Monchelsea			23
362	Kent Police HQ	Maidstone			119
363	Granville Road Garages	Maidstone			2
365	Warmlake Nursery	Sutton valence			14
366	KCC Springfield Library	Maidstone			31
367	Fairview North	The Countryside			46
369	N of Staplehurst (B use)	The Countryside			B use only
379	Sessions House	Maidstone Town Centre			TBD

Unachievable/ Unsuitable Sites

- 5.3 Some sites do not have a showstopper constraint, but have a number of constraints which cumulatively mean the site is unachievable. These sites may be potentially suitable, should constraints present be overcome. The cost of doing that could be very high, or unfeasible in design terms. These sites are considered as being Unachievable.
- 5.4 The list of sites considered to be unsuitable for development, or considered Unachievable are listed below:



Site Ref	Site Name	Growth Location	Reason(S) Site Excluded
002	The Homestead	the Countryside	Landscape & Heritage
003	Mid Kent Roofing Yard	the Countryside	Access to the site
004	Land adjacent to Penn Court	the Countryside	AONB, Access to the site
006	Land at Lenham Road	the Countryside	PT Access
007	The Paddocks Brickfield Cott	Staplehurst	Townscape (N of Staplehurst)
014	Land at Puddledock	the Countryside	Access to the site
020	Land adjoining the Limes	the Countryside	TPOs
024	Land adjacent to St Margarets School	the Countryside	Flood Risk
025	Land adjacent to the Village Hall	the Countryside	Flood Risk, PT Access
026	Land north of Green Lane	the Countryside	Flood Risk
027	Land at George Street	Staplehurst	Townscape (N of Staplehurst)
028	Land rear of 2 Mays Cottage	the Countryside	PT Access
030	Land at junction of New Cut Rd & Bearstead Rd	Maidstone Urban Area	Landscape impact
033	Land at Knowlesden Farm	the Countryside	Access to the site & PT Access
034	Land at George Street	Staplehurst	Townscape (N of Staplehurst)
035	The Alpines, Pilgrims Way	the Countryside	AONB, PT Access
038	Peacock Farm	the Countryside	Access to the site & PT Access

039	Land east of Stilebridge Lane	the Countryside	Access to the site & PT Access
040	Land at the corner of Dean St & B2163	the Countryside	TPOs
041	Backland plot off Peens Lane	the Countryside	Access to the site & PT Access
042	Land at Cherry Tree Park	the Countryside	Environmental, Accessibility
043	Land south of Peens Lane	the Countryside	Access to the site & PT Access
044	Land off Long Lane (west)	the Countryside	Access to the site & PT Access
045	Land West of Boughton Lodge	the Countryside	Access to the site & PT Access
046	Land South of Heath Rd	The Countryside	Environmental
047	Land off East Hall Hill	the Countryside	Access to the site & PT Access
048	Land south of Forge Lane	South West of Maidstone Urban Extension	Access to the site & PT Access
049	Land south of B2163	the Countryside	Veteran Trees
051	Land at Pinkham Farm	Headcorn	Townscape/ Landscape
054	Field on Dairy Lane	the Countryside	Access to the site & PT Access
059	Fellinpits	The Countryside	Flood Risk
061	Land at Kettle Lane	the Countryside	Access to the site & PT Access
062	Land rear of 243-245 Queens Rd	Maidstone Urban Area	Access to the site
063	Land rear of 10-15 Caring Lane	the Countryside	Access to the site
065	The Finches Caravan Park	the Countryside	PT Access
067	Land of Cliff House & Cliff Cottage	South of Maidstone Urban Extension	Landscape
068	MAP Depot and Adjacent Land	the Countryside	Access to the site & PT Access
069	Land at Homelands Farm	the Countryside	PT Access
070	Land adjacent to Willow Wood	South West of Maidstone Urban Extension	Access to the site & PT Access
072	31, 33 & 34 Garden Close	Maidstone Urban Area	Unachievable – weight of constraints
073	Bearstead Golf Club	Maidstone Urban Area	Access to the site
074	Land to the south of Little Cornwells	the Countryside	PT Access
075	Land north of Wheelers Lane	the Countryside	Access to the site & PT Access
077	Teiside Nurseries, Laddingford	the Countryside	PT Access
079	Lans South of Heath Rd	The Countryside	Environmental
082	Land Rear of Firenze	the Countryside	Access to the site & PT Access
087	Milsted's Field (part)	the Countryside	Green Belt, Flood Risk
088	Land South of Ashford Road	Maidstone Urban Area	Access to the site & Landscape
090	Land adjacent to Bridgehurst Oast	Marden	PT Access
091	Teston Field	the Countryside	Landscape impact
092	Land adjoining Cleavesland and St Marys Close	the Countryside	Flood Risk
094	Land on the south side of Tumblers Hill	Sutton Valence	Heritage & PT Access
096	Land east of Hunton Rd	the Countryside	PT Access, Flood Risk
097	Land west of Hunton Rd	the Countryside	PT Access
099	Mill Place Barn	the Countryside	Access to the site & PT Access & Flood Risk

100	Mill Place Farmhouse, Symonds Lane	the Countryside	Access to the site & PT Access & Flood Risk
103	58 The Quarries	the Countryside	Access to the site & PT Access
104	Gowan Park	the Countryside	Access to the site & PT Access
105	Land at junction of Vicarage Rd & Lower Rd	the Countryside	PT Access
106	Swanton Farm	the Countryside	Access to the site & PT Access & AONB
110	Land at Barham Court	the Countryside	Access to the site
111	Moatlands Farm	the Countryside	PT Access
113	Detling Quarry	the Countryside	Access to the site & PT Access & AONB
115	Boughton Mount Farm and Yard	South of Maidstone Urban Extension	Coalescence, Landscape
117	Loose Court Farm Cottage	Maidstone Urban Area	Access to the site & PT Access & Heritage
120	Rowan House Farm & Fairview (Broomfield Park)	the Countryside	Access to the site & PT Access
121	Land at Redwood Glade	the Countryside	Access to the site & AONB
123	Land off Hunton Road	the Countryside	PT Access
126	Abbots Court Farm	the Countryside	AONB
127	The Paddocks Brickfield Cott	the Countryside	Access to the site & PT Access & AONB
129	Rear of Ashford Rd	Maidstone Urban Area	Access to the site & Landscape impact
130	Land adjacent to Ivans Field	the Countryside	Hierarchy (Chart Sutton)
131	Owl Court	the Countryside	Access to the site & PT Access
132	Knoll House & Tower House	Staplehurst	Townscape (N of Staplehurst)
133	Land NE of Old Belringham Hall	Sutton Valence	Access to the site & PT Access & Landscape & Heritage
135	Land south of Ashford Rd	Maidstone Urban Area	Access to the site & Landscape
138	Abbots Court Farm	the Countryside	AONB
139	Paddock adjoining Greenway Forstal Farmhouse	the Countryside	Access to the site & PT Access
141	Rear south of Eastwood Rd	the Countryside	Access to the site & PT Access
142	The Acre	the Countryside	PT Access
153	Mount Farm	the Countryside	Access to the site & PT Access
154	Duckhurst Farm	the Countryside	Access to the site & PT Access
155	Field adjacent to Weavers, Howland Road	the Countryside	PT Access
157	Harrietsham Rectory	Harrietsham	PT Access
159	Hill Farm House	the Countryside	PT Access
160	Land at Thurnham	Maidstone Urban Area	Access to the site & PT Access & Existing Allotment
161	Bell Farm East Street Harrietsham	Harrietsham	Access to the site & PT Access
163	Land opposite Dingley Dell	the Countryside	Ecology/ Trees
164	Land to the north of Church Lane, Detling	the Countryside	AONB
165	Land to the south of Church Lane, Detling	the Countryside	AONB

166	Land East of Old Chatham Road	the Countryside	PT Access & AONB
173	Durrants Farm	the Countryside	PT Access
175	Land at Vicarage Road	Yalding	Ecology & PT Access
178	Land south of Warmlake Road and east of Chart Hill Road	the Countryside	Hierarchy (Chart Sutton)
180	Land to the west of Otham Street	the Countryside	Access to the site & PT Access, Heritage, Convergence
181	Madam Taylors Farm	the Countryside	Access to the site & PT Access
184	Brickfields Farm and Rosemount	Staplehurst	Townscape (N of Staplehurst)
189	Land North of Ashford Road	the Countryside	Ecology & PT Access
190	Iden Manor Farm	the Countryside	Access to the site & PT Access
191	Land adjacent to South Lane	the Countryside	PT Access & Landscape & Heritage
199	The Old Cricket Ground	Maidstone Urban Area	Access to the site & PT Access & Heritage
200	The Old Cricket Field	South of Maidstone Urban Extension	PT Access & Coalescence
205	Land south west of Greenway Court Road	the Countryside	Access to the site & PT Access & AONB
209	Rectory Fields	Staplehurst	Access to the site & PT Access & Heritage
212	Land at the Grange	Staplehurst	Townscape (N of Staplehurst)
213	Garden of Prospect House	the Countryside	PT Access
214	Brattle Farm	the Countryside	PT Access
217	The Former Poundstop	the Countryside	Access to the site & PT Access
218	Land at Wheelers Lane (site 2)	the Countryside	Access to the site & PT Access
220	Land at Bydews Farm	The Countryside	Access & Convergence
223	Land south of Ashford Road	the Countryside	Landscape
228	Land to the North West View	the Countryside	Townscape (N of Staplehurst)
231	Land at Lested Farm	the Countryside	Hierarchy (Chart Sutton)
232	Land Lying to the West Side of Firs Lane	the Countryside	Access to the site
233	Land west of Chart Corner / Plough Wents Road Junction	the Countryside	Hierarchy (Chart Sutton)
236	Fairview Farm (Northern parcel)	Coxheath	Coalescence
240	Banksy Meadow	Maidstone Urban Area	Green Infrastructure
241	Land adjoining Fox Pitt	the Countryside	Access to the site & PT Access
242	Land adjoining Court Lodge Mews	the Countryside	Access to the site
243	Three Acres	the Countryside	Green Belt, Flood Risk & PT Access
247	Land South of Court Lodge Road	Harrietsham	Landscape, Access to the site & PT Access
249	Land at Hockers Lane	the Countryside	Access to the site & PT Access
253	Land to East side of Benover Road	Yalding	Flood Risk & PT Access
256	Stede Row Woodland, South of Pilgrims Way	the Countryside	Access to the site & PT Access & AONB
259	Land at Hockers Farm	the Countryside	AONB
267	Spenny Farm	the Countryside	Access to the site & PT Access
268	Land at Mount Farm	the Countryside	Access to the site & PT Access

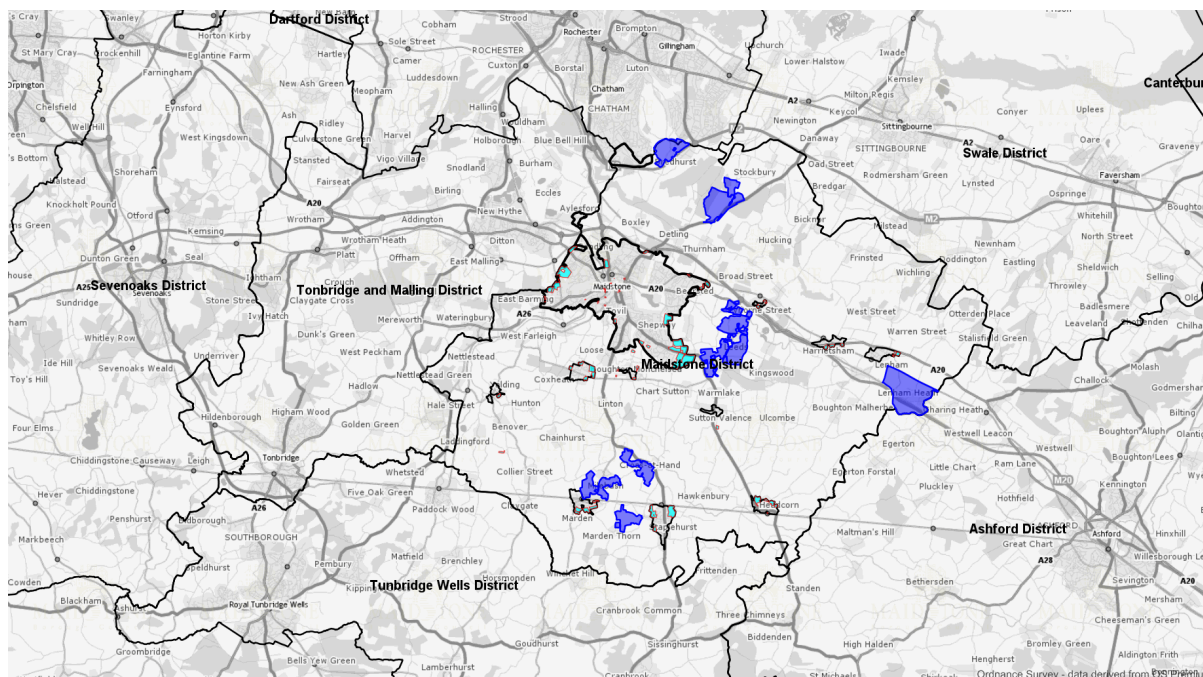
269	Land east of Copper Lane	Marden	Access to the site & PT Access
271	Fir Tree & Norton Lea (Middle Portion)	Sutton Valence	Coalescence
281	Land West of Pattenden Lane	Marden	Flood Risk & Access to the site & PT Access
284	Land at Wares farm	the Countryside	PT Access
287	Little Gaynes Farm	Lenham	AONB & PT Access
291	Bridge Farm	Maidstone Urban Area	Access to the site & PT Access
293	Land between A229 & Old Chatham Rd	the Countryside	AONB & PT Access
294	Land to East side of Jubilee Cottages	Sutton Valence	Landscape & Heritage & PT Access
300	Land north east of Hockers Lane	the Countryside	Access to the site & PT Access
302	Oakwood Overflow Carpark	Maidstone Urban Area	Piecemeal development
304	Land east of Hunton Rd	the Countryside	PT Access
306	Land south of Gore Court	Maidstone Urban Area	Access to the site & PT Access
308	58 Church St	Boughton Monchelsea	Access to the site & PT Access
311	Court Lodge Farm	South West of Maidstone Urban Extension	Access to the site & PT Access
313	Lenham Sand Pit	The Countryside	Access to the site & PT Access
315	Homewood Orchard Garden Centre	Maidstone Urban Area	Landscape
320	Land west of Well Street	Coxheath	Coalescence
323	Lenham Court	Lenham	Access to the site & PT Access
326	Land at Amsbury Rd	Coxheath	Access to the site & PT Access
327	Land at Hockers Farm	the Countryside	Access to the site & PT Access & AONB
331	Land South of The Lodge	Yalding	Ecology (trees) & PT Access
332	Fairview Farm (South)	Sutton Valence	Coalescence
337	Land adjacent to Benstead Close,	Hunton	Hierarchy
339	Land North and East of Howland Rd	Marden	Access
340	Land West of Howland Road	Marden	Access
341	Lakelands	Staplehurst	PT Access
345	Golden Oaks	The Countryside	Access
346	Land Rear 10-15 Caring Lane	The Countryside	Access
347	The Stables	The Countryside	Access/ Heritage
349	Land at St Helens Lane	The Countryside	Hierarchy
352	Old Orchard Barn	The Countryside	Access
353	Land at Dean Street, Coxheath	Coxheath	TPOs
357	Mote Cricket Club	Maidstone	Existing Open Space
358	Land to the South of Lenham Road	The Countryside	Access
359	Land to the north of Cokehurst	The Countryside	Access
361	Land at Stonestile Road	Headcorn	Access
364	Ambulance Headquarters	Coxheath	Access
368	Fairview South	Loose	Convergence
370	The Ridge	Sutton Valence	Landscape
371	Plough Wents Rd	Chart Sutton	Settlement Hierarchy
373	Cold Blow Farm	Detling	AONB
374	Allington Way	Maidstone Urban Area	Access

375	Green Lane	Platts Heath	Access to services, settlement hierarchy
376	Chartway St	Chart Sutton	Access to services, settlement hierarchy
377	L/a Condor House	Bredhurst	AONB
378	London Rd Park & Ride	Maidstone Urban Area	Existing infrastructure
380	Land west of Boxley village	The Countryside	AONB
381	Rozel & Westgate House	Harrietsham	Potential convergence
383	Land East of Maidstone	East of Maidstone Urban Area	Access
384	Elmscroft Farm	East Farleigh	Settlement Hierarchy
386	Moat Farmland	Headcorn	Landscape impact

6 Garden Settlement Assessments

Potential Garden Settlement Submissions

- 6.1 As a part of the Call for Sites, the Council encouraged land promoters to suggest potential locations for new Garden Settlements. These are a recent type of development supported by the Government in which new self-contained settlements will be constructed which will leverage an uplift in land value to help fund new infrastructure. These are considered as specific Growth Locations in this document as set out in Chapter 3. The sites with sufficient scale to be considered as potential Garden Settlements are shown below.



- 6.2 At present, only high-level estimates of the capacity of each potential settlement have been made. These are set out below. To maintain a cautious approach, we have assumed that 60% of each site's developable area will be for residential use, with 40% being for employment, retail, infrastructure and other uses. A density of 40 dwellings per hectare has been used to reflect the potential to achieve a higher density than in standard suburban residential development in a new settlement.

Potential Garden Settlement Housing Contribution					
	Call for Sites' site Ref(s)	@40dph			
		100%	80%	70%	60%
Binbury Park GS	316, 319	5,392	4,314	3,774	3,235
North of Marden GS	031, 309	3,106	2,485	2,174	1,864
Heathlands GS	289	8,601	6,881	6,021	5,161
North of Staplehurst GS	008, 226	2,877	2,302	2,014	1,726
M20 J8 GS	167, 168, 176, 177, 187, 195	3,583	2,866	2,508	2,150
Langley Heath GS	058, 085, 143, 207, 239, 250, 252, 263, 279, 317	2,592	2,074	1,814	1,555
Lidsing Urban Extension	245, 330	3,317	2,654	2,322	1,990
Pagehurst Farm GS	119, 318	1,891	1,513	1,324	1,135
South of Leeds	193, 208, 255, 274	2,563	2,050	1,794	1,538

Garden Settlement Suitability Assessment

- 6.3 A suitability assessment has been carried out by Stantec to establish independently the suitability of each of the garden settlement locations. The report is included as Appendix C (separate item for SPI 22/9/2020). The result was that of the nine locations above, four consolidated potentially suitable garden settlement locations were recommended:
- North of Marden
 - Heathlands
 - Lidsing
 - Leeds-Langley Relief Road corridor (including M20 J8, South of Leeds, and Langley Heath)

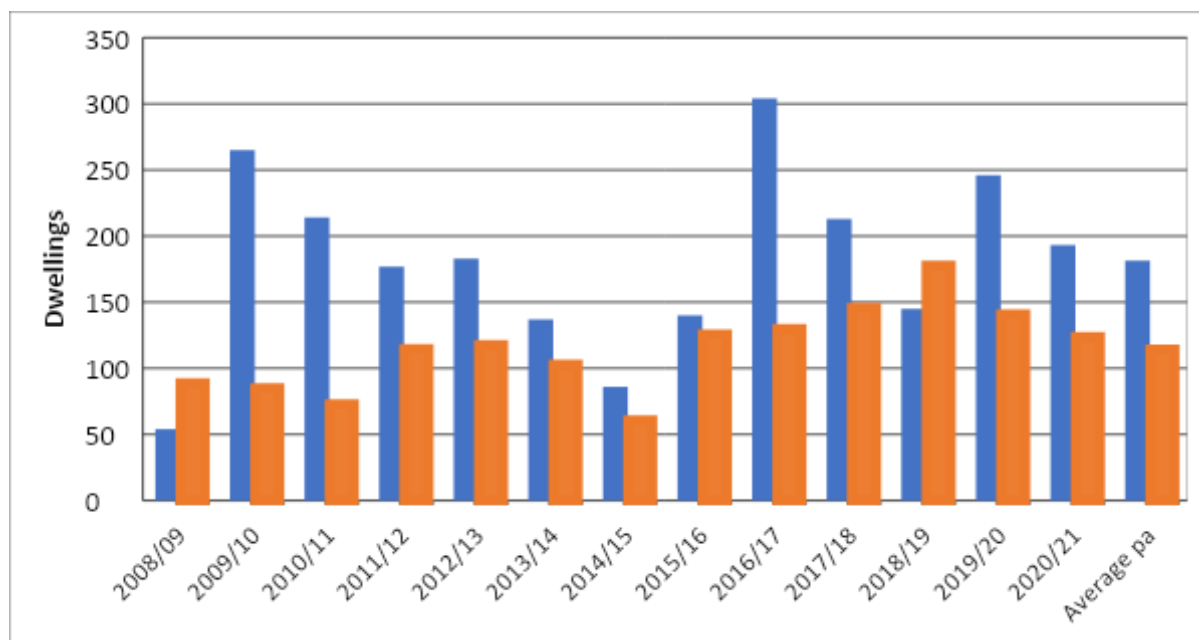
Garden Settlement Deliverability Assessment

- 6.4 Stantec were appointed to provide a deliverability assessment of the four potentially suitable garden settlement locations. At the commencement of this study, it was agreed between MBC, KCC & the promoters of landholdings in the Leeds-Langley corridor that a consolidated Garden Settlement proposal was not feasible to be produced to the standard required at the current time. This proposal was therefore not considered alongside the other three. The Garden Settlement Deliverability Assessment is included as Appendix D (separate item for SPI 22/09/2020).

7 Windfall Allowance

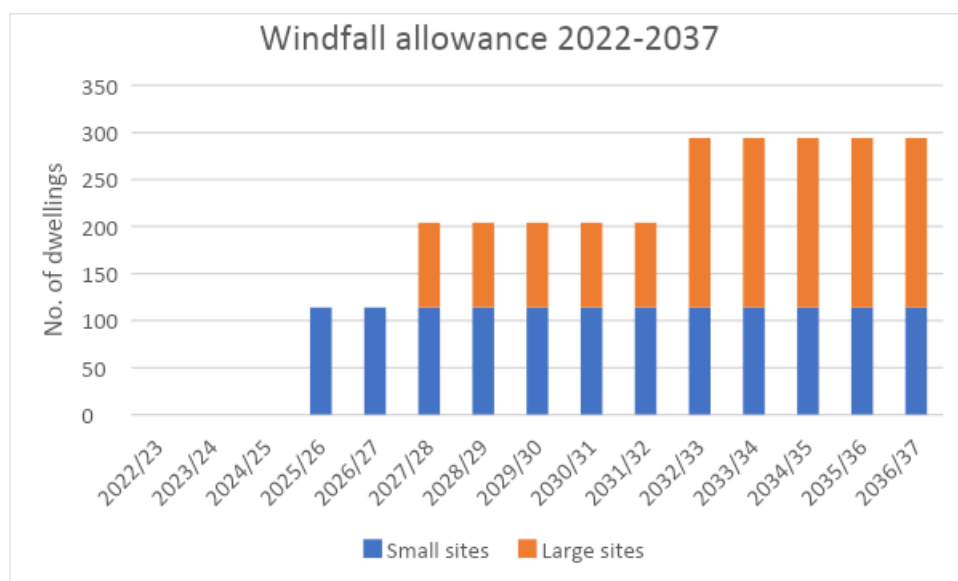
- 9.1 The NPPF defines windfall sites as those *“not specifically identified in the development plan’ and they can form part of the anticipated supply of housing, where there is compelling evidence they will provide a reliable source of supply. Any allowance should be realistic having regard to sites contained in this SLAA, historic windfall delivery rates and expected future trends”*.
- 9.2 The Planning Practice Guidance sets out how a windfall assessment can be determined as part of the SLAA. It states that *“a windfall allowance may be justified in the anticipated supply if a local planning authority has compelling evidence as set out in paragraph 70 of the NPPF. Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance (using the same criteria as set out in paragraph 67 of the NPPF)¹.”*
- 9.3 Using compelling evidence of historic delivery of housing on windfall sites dating back to 2008/09, we can anticipate and project a realistic supply of units from both small and large windfall sites over the plan period. Using data from 2008/09 ensures we are capturing a range of market conditions/economic cycles that will have occurred over that time. For small sites (1-4 units), the average number of unallocated units delivered each year since 2008/09 is 115. For large sites (5 or more units), the average number of unallocated units delivered each year since 2008/09 is 181. The total average number of units delivered annually through windfall sites therefore stands at 296. There is no evidence to suggest that sources of windfall sites are diminishing.

¹ PPG (2019), Paragraph: 023 Reference ID: 3-023-20190722



9.4 In projecting this historic delivery rate forwards, the small sites allowance of 115 units is assumed from year 4 onwards. This is because we are likely to have identified small sites, typically with three-year planning permissions, through our annual itemised housing land supply and do not want to risk ‘double counting’ units. Large sites are assumed to contribute from year 6 onwards, with a 50% allowance from years 6 to 10 (90.5 units per year), rising to 100% allowance (181 units) for the remaining plan period. This is because we are likely to know about specific large sites within the first 5 years through the itemised housing supply, allocations and SLAA. However, it is reasonable to assume that these sources of sites are not exhaustive and other development opportunities may present themselves in the medium to long term. This was accepted as a suitable methodology by the Inspector at the Local Plan 2017 examination and has therefore been continued now.

9.5 Applying the methodology with 2022/23 as ‘year 1’, we are able to project windfall allowance forwards, showing an anticipated 2,738 units over the plan period. This figure is reviewed and revised annually, as we add to the historic windfall delivery data. The graph below shows the windfall allowance, with a stepped change to account for the phasing of small sites from year 4, then large sites at 50% delivery rate from year 6 until year 10, then large sites at 100% delivery rate from years 11-15.



Modelled Completions 2021-2022

- 7.1 Whilst completions over 2020-2022 have been projected based on the current extant supply, no new permissions on non-allocated sites have been factored in over that same time frame. This information is included in the Council's Housing Land Supply statement, which is informed by developer-informed consideration of the build out of the current extant pipeline. Thus some sites that are currently permissions/ allocations with permission transition to become completions and are removed from the extant supply. For 2021/22 this figure is anticipated to be 603 units.

7.2

Year	Total units permitted on non-allocated sites
2017/18	544
2018/19	704
2019/20	672
2020/21	618
Annual average	635
Avg. w/ 5% discount	603

- 7.3 There may also be a small number of units permitted on non-allocated sites that are built and complete by 2022/23, so will not form part of the LPR supply. Whilst this has not been factored in, it is considered that the already cautious assumptions applied (as set out above) are reasonable and proportionate for the purposes of modelling.

9. Maximum Development by Area

- 9.1 By adding the Call for Sites (potentially suitable sites + Garden Settlement locations) data to the minimum development data, we can show the maximum potential development for each area. This is set out below.

Spatial Location	Total expected growth 2011-2031	Call for Sites capacity 2022-2037	Total potential capacity 2011-2037
Maidstone Town Centre	3,592	25	3,617
Maidstone Urban Area	8,462	2,170	10,632
Invicta Barracks	500	800	1,300
Lenham	1,252	576	1,828
Marden	614	113	727
Staplehurst	820	973	1,793
Harrietsham	316	319	635
Headcorn	559	667	1,226
Boughton Monchelsea	112	67	179
Coxheath	611	542	1,153
Sutton Valence	64	597	661
Yalding	109	181	290
Eyehorne St (Hollingbourne)	39	11	50
Medway Urban Area inc. Lidsing	39	1,000	1,039
Heathlands	0	1,400	1,400
North of Marden	0	1,300	1,300
Countryside/Windfall	2,879	788	3,667
Total	19,778	11,529	31,497

APPENDICES

APPENDIX A – Site Assessments – Green Sites

APPENDIX B – Site Assessments – Red Sites

APPENDIX C – Garden Settlement Assessment – Stage 1 (Suitability Assessment)

APPENDIX D – Garden Settlement Assessment – Stage 2 (Deliverability Assessment)