
HEARING STATEMENT

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

MAIDSTONE BOROUGH LOCAL PLAN
EXAMINATION

EXAMINATION HEARING SESSIONS

PREPARED ON BEHALF OF
WATES DEVELOPMENTS LTD (REPRESENTOR ID REF 19218)

October 2016

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

SESSION R2 – ALTERNATIVE SITES

Prepared on behalf of Wates Developments Ltd

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Prepared by:	Emma Wreathall
Checked by:	Andrew Wilford
Authorised by:	Andrew Wilford

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

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

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Word Count: 1,302 words (excluding Inspector's Questions and title pages)

1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of Wates Developments Ltd in respect of Session 14B of the Inspector's Matters, Issues and Questions for the Maidstone Borough Local Plan (MBLP) Examination.
- 1.2 Session 14B relates to alternative sites that have been promoted to the MBLP Regulation 19 consultation (February – March 2016) and to the Examination in Public.
- 1.3 Wates Developments Ltd has land interests in Staplehurst, namely 'Land at Henhurst Farm, Maidstone' (hereafter referred to as the Site). Part of the Site (the northern most) is currently proposed as a draft allocation (Policy H1(51)) for 60 dwellings. Land immediately south of the allocation is proposed as open space/undeveloped land/ecological mitigation under MBLP Policy OS1(9). The remainder of the Site, towards Pinnock Lane to the south, has no specific designation and lies outside, but adjacent to the settlement boundary of Staplehurst.
- 1.4 Representations submitted on behalf of Wates Developments Ltd (Representor ID Ref: 19218) to the Regulation 19 consultation contains a description of the Site and Red Line Boundary (Appendix A of Regulation 19 Representations).

2.0 RESPONSE TO SESSION R2 – ALTERNATIVE SITES

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

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

- 2.1 The omission site in question (i.e. land not forming part of the proposed allocation for housing) does not have any relevant planning history.

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

- 2.2 The Site's policy status in the submitted Local Plan is:

- Housing Allocation (part) – Policy H1(51).
- Open Space / Ecological Enhancement (part) – Policy OS1(9).
- Countryside (remainder) – Policy SP17.

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

- 2.3 The Site is not allocated as part of the Staplehurst Neighbourhood Plan, for which the Referendum is to be held on 03 November 2016, but reference is made to the part allocated for housing in the Examiner's Report (paragraph 4.61). The Examiner concludes that if the site (covered by Policy H1(51)) is allocated by the Maidstone Local Plan Inspector, this should be addressed in a review of the Staplehurst Neighbourhood Plan.

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

- 2.4 The Site is greenfield.

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

- 2.5 Yes. Our Representations to the Regulation 19 consultation details the SHEDLAA on the Site, which assessed the whole Site (HO3-259) and the northern part allocated for housing (HO3-260), namely paragraphs 6.9 – 6.13 and includes extracts at Appendix H and I.
- 2.6 We disagree with the overall conclusions of the SHEDLAA in respect of HO3-259. The SHEDLAA concluded that the Site is '**available**' for development and '**achievable**'. However, it concluded that '*Part of the northern half of this site could be developed. Development on the southern half would have an adverse impact on landscape character as evidenced by the Landscape Capacity Study*' [page A1026 of HOU007]. We disagree with this conclusion.
- 2.7 It should be noted that a Proforma for HO3-259 was originally issued by MBC which concluded that the whole Site's development is acceptable and for a suggested yield of approximately 250 dwellings (subject to detailed masterplanning) (**Appendix 1**). However, MBC shortly advised that the Proforma had been sent in error and an amended version was provided, which concluded that the entire Site (HO3-259) should be rejected due to its harmful impact on landscape character. MBC justification for such a change is based on late assessment work received from Jacobs (**Appendix 2**).

- 2.7 Our Regulation 19 Representations demonstrated how a scheme could come forward that respects the landscape setting of the Site. This was based on a site-specific Landscape Assessment. We have since taken the opportunity to undertake an up-to-date Landscape Appraisal of the Site, which can be found in **Appendix 3** of this Hearing Statement. We acknowledge that any develop of the Site requires careful landscape consideration and our proposals would not seek to develop the whole site with built development. Notably, the development could be incorporated within a robust and attractive green framework, incorporating existing Site features and be integrated into the existing urban fabric of Staplehurst. The SHEDLAA [HOU007] does not take into account this position and assumes the complete development of the Site for the basis of its rejection.

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

- 2.8 The Site extends to 19.4 hectares (ha). Appendix A of our Regulation 19 Representations includes the Red Line Boundary.

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

- 2.9 Residential development of circa 250 dwellings (including the allocated 60 dwellings), could be accommodated on the Site, as identified by the Landscape Appraisal (**Appendix 3**). This would reflect a low density scheme appropriate to Staplehurst and allow for a genuinely landscape led scheme.

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

- 2.10 Delivery could commence from 2021 onwards at a rate of up to 50 dwellings per annum based on prevailing market conditions.

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

- 2.11 No viability assessment in relation to the Site has been submitted, but it is deemed viable by the site promoter.

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

- 2.12 The various Site boundaries submitted to the SHEDLAA have been tested as part of the Sustainability Appraisal (SA) (February 2016) [SUB002], supporting the MBLP [SUB001]. This is also reflected in our Regulation 19 representations (paragraph 6.14 – 6.17).
- 2.13 Table 6.1 and 6.2 of our Regulation 19 representations demonstrate that the Council has taken an inconsistent approach in considering housing sites in the SA. The tables demonstrate that the rejected Site (HO3-259) scores more highly (when red/amber/green codes are accounted for) than sites that have been allocated elsewhere in the Borough. The evidence base does not therefore support the rejection of this site in favour of other, less sustainable sites.
- 2.14 Notwithstanding, we dispute some of the conclusions of the SA. Within **Appendix 4** we set out in the 3rd column our assessment against the specific component parts tested as part of the SA exercise. Where we disagree with the overall conclusion (i.e. red/amber/green), we identify what colour that particular component should have received. We also provide commentary where we agree with the overall conclusion, but not the specific content.

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

- 2.15 There are no overriding constraints to the Site's development. Any identified potential harm would be appropriately mitigated through the development proposals. This would include strong landscape-led design, ecological mitigation and any other off-site infrastructure upgrades i.e. highways/education.
- 2.16 Staplehurst is a sustainable location and part of the Site has already been identified for potential allocation. If required, Staplehurst can accommodate further growth that would not require any amendment to the overall spatial strategy of the MBLP.
- 2.17 The Site can be considered as part of any Main Modifications as it has been tested in the Council's existing Evidence Base including the SHEDLAA and SA. Any delay to the adoption of the Local Plan to undertake these Main Modifications would not result in a delay to the delivery of housing sites that are already identified by MBC, as the Council is already approving emerging allocations ahead of the adoption of the Plan in this respect.

APPENDIX 1

Original SHEDLAA Proforma

Housing Sites Assessment Proforma - 2014

1. SITE INFORMATION	
Reference number	HO3-259
Site name/address	Land at Henhurst Farm, Staplehurst
Landowner	
Agent	Alex Anderson, Pegasus Group Ltd
Greenfield/PDL	Greenfield
Site area (ha)	22.3ha
Proposed yield	300
Is the site urban, adjacent to urban, rural settlement or rural	Adjacent to Staplehurst RSC
Site origin (call for sites/local plan rep?)	Call for sites

2. SITE ASSESSMENT/SUITABILITY	
Site description (including topography and surrounding land uses)	<p>This is a large site extending to 22.3ha in area and is predominantly in agricultural use. It immediately adjoins the designated Rural Service Centre of Staplehurst and its current settlement boundary as defined in the MBWLP 2000.</p> <p>The land comprises large open fields of varying sizes generally separated by hedgerows/trees. Midway along the western boundary adjacent to PROW KM313 (and outside the site) lies a substantial stand of trees with a pond at a significantly lower level than the surrounding land at its centre.</p> <p>Running through the centre of the site is a dry valley with the landform rising to the NE and W. To the North East, the land levels within Staplehurst village rise to in excess of 40m in the vicinity of the Parish Church, similarly to the W land levels rise more steeply again to over 40m. Land levels within the majority of the centre area of the site are between 25m and 30m.</p> <p>From the highest part of the site which is located closest to its western boundary north of the buildings at Henhurst Farm (35m+) there are clear views across the site from PROW (KM313) towards the village centre and the tower of the Parish Church is prominent in these views.</p> <p>The properties in McCabe Close and Bell Lane that back onto the site have clear views across it and are generally located on higher ground than the adjacent farmland.</p> <p>The NW corner of the site encircles the 'Oliver Road' development site where works to construct 53 units (by the proposers of this site, Taylor Wimpey) has recently commenced. This development contains open space and ecological mitigation areas the southernmost of which, the proposed site borders on two sides.</p>

	<p>The site's boundary with Bathurst Road is formed by a PROW and a woodland belt there is a pond at the southern end of the woodland.</p> <p>To the SW of 67 Bell Lane (which bounds the site) and within the site is a further stand of trees with a pond at its centre. This is surrounded by cultivated land.</p>
Current use	Agricultural
Adjacent uses	Residential and agricultural
Planning and other designations (AONB, greenbelt etc)	<p>The land immediately adjacent to the NW corner of the site at Aydhurst Farm is subject to an Article 4 direction made on 2 July 1975. The following PD Rights have been removed</p> <ul style="list-style-type: none"> • Erection of fences walls and other means of enclosure • Rights for 28 and 14 day temporary uses • Use of the land as a caravan site
Planning history	<p>03/1262 (17 BELL LANE, STAPLEHURST) - Use of agricultural land as additional garden area/workshop incidental to the enjoyment of 17 Bell Lane as a single dwellinghouse as described in application MA/03/1262. - Approved</p> <p>08/0673 (17 BELL LANE, STAPLEHURST) - Erection of 1no. bungalow Approved</p> <p>07/2221 (17 BELL LANE, STAPLEHURST) - Erection of 2no. detached chalet bungalows - Refused</p> <p>07/2221 (17, BELL LANE, STAPLEHURST, TONBRIDGE, TN120BB) - Erection of two detached chalet bungalows - Refused</p> <p>12/1986 (LAND TO THE SOUTH OF, OLIVER ROAD, STAPLEHURST, KENT) - Screening Opinion for proposed residential development consisting of 55 houses together with open space, nature conservation area/parkland, drainage and highway infrastructure. - Raise no Objections</p> <p>12/2106 (LAND TO THE SOUTH OF, OLIVER ROAD, STAPLEHURST, KENT) - Erection of 53 residential dwellings incorporating access, foul water pumping station, drainage infrastructure, nature conservation area, open space and landscaping - Approved Subject to Conditions</p>
Has site previously been considered in Local Plan Inquiry, if so, record Inspectors recommendation	No
Landscape/townscape impact – including reference to Landscape Character Assessment 2012 (inc. long distance views); cumulative landscape impact; existing screening	<p>Landscape Character Area No. 44. Staplehurst Low Weald</p> <p>KEY CHARACTERISTICS</p> <ul style="list-style-type: none"> • Low lying gently undulating clay landscape of the Low Weald • Small fields with orchards, pasture, ponds

- and watercourses enclosed by thick native hedgerows creating an intimate atmosphere
- Dominance of mature oak trees as imposing hedgerow trees and sometimes within fields where hedgerows have been lost
- Large scale open fields where hedgerows have been removed for intensive arable cultivation
- Sparse scattered small woodlands
- Winding roads with wide verges bounded by ditches and mixed native hedgerows
- Historic buildings scattered through the landscape and in the historic cores of Staplehurst and Marden

Condition Assessment - Good
Sensitivity Assessment - High

SUMMARY OF ACTIONS

- Consider the generic guidelines for the Low Weald
- Conserve the abundance of oak as a dominant species, and plant new isolated oaks within pasture and oak standards within hedgerows to replace ageing species
- Conserve and enhance the hedgerows, ensuring that they are correctly managed and gaps replanted
- Conserve the pastoral land and orchards and resist conversion to arable land
- Conserve and enhance the small scale field pattern and sense of enclosure, encouraging restoration and management of historic field boundaries
- Conserve the landscape setting of historic settlements
- Conserve the largely undeveloped rural landscape and the remote quality of isolated farmsteads and hamlets
- Resist further linear development and intrusive elements along the A229
- Soften the visual prominence of large agricultural barns through native planting and encourage native hedgerows around commercial and housing developments
- Enhance habitat opportunities around water bodies and ditches by promoting and managing a framework of vegetation in these areas

The southern half of the site is prominent when viewed from Pinnock Lane to the south. The village has a relatively 'hard' edge in the vicinity of Pinnock Lane with no buffer other than boundary hedges between the settlement and the countryside beyond.

The northern half of the site does currently have a

	<p>greater degree of enclosure from the north and rear of Bathurst Road due to the woodland but there are clear views of it from adjacent to the phone mast NW of Henhurst Farm (on the highest ground in the vicinity of the site) viewed from PROW KM313.</p>
<p>Ecological Impacts (inc. SSSI & local wildlife sites within or adjacent to site)</p>	<p>Officer comment A large site such as this is bound to have some implications. This site has a mixture of woodland adjacent to the site and field boundaries marked by hedging and trees. There are ponds within and adjacent to the site.</p> <p>Bats, Breeding birds, Reptiles and Great Crested Newts are likely to be potentially impacted. The fields themselves are intensively cultivated however.</p> <p>KCC Ecology Includes an area which has been granted planning permission (MA/12/2106) (this area is known to contain GCN and reptiles). The remainder of the site consists mainly of grassland fields with mature trees and 3 ponds within or adjacent to the site. Potential for breeding birds, GCN, reptiles to be present within the site. Ecological constraint level: 3</p>
<p>Trees (inc. TPO, ancient woodland within and adjacent to site)</p>	<ul style="list-style-type: none"> • 3 of 2005- 4no. individual oaks and groups of trees on land abutting the site, between the westerly and northerly arms of the north of the site. • 19 of 2004- same area as 3 of 2005 above, covering 'area of trees- A1- the trees of whatever species' • 1 of 2000 area of oak trees W of northern arm of site • <p>There is no designated Ancient Woodland in the vicinity of the site.</p> <p>Comments from Landscape team are as follows:</p> <p>Tree protection status: TPO No. 3 of 2005 protects trees to the north of the site and TPO No. 1 of 2000 protects an area of trees within the northern tip of the site. There are also significant trees on field boundaries and around ponds.</p> <p>Ancient woodlands (<i>from ' a revision of the Ancient Woodland Inventory for Maidstone borough, August 2012'</i>) There is no designated ancient woodland.</p> <p>Hedgerow status: There appear to be potentially 'important' hedgerows on field boundaries.</p>

Agricultural land quality	Grade 3
Heritage impacts (Listed building, conservation area)	<p>There is a listed barn, a listed cart-shed and a listed oasthouse at Henhurst Farm some 160m, 180m and 220m respectively west of the proposed site boundary.</p> <p>MBC Conservation Officer Historic Buildings: There will be some impact on the listed group at Henhurst Farm but the immediate rural context will largely remain. Conservation Areas: None affected Historic Parks and Gardens: None affected Archaeology: No known implications</p>
Archaeology (SAM etc.)	Not within a safeguarded area of archaeological potential
PROW (within or near site)	<p>The site is crossed or bounded by 5 PROW</p> <ul style="list-style-type: none"> • KM313 (D249, KM315, KM314, South Bank – D2950) dissects southerly third of site from South Bank running SWW. • KM314 (Pinnock Lane – C78, KM313) runs NNE from W corner of site on Pinnock Lane to South Bank • Nr KM315 (C78, KM313) • KM302A (Pagehurst Road – D649, KM311, KM312, Bell Lane, High Street – A229, KM307, KM303, KM306, KM305, Craddocks Lane – D661) runs NW from Pagehurst Road • KM311 (KM302A, KM312, Bathurst Road)
<p>Access (Highways)</p> <ul style="list-style-type: none"> • Site access • Impact on wider highway network • Access to strategic/main highway network • Availability of public transport/walking/cycling 	<p>KCC Highways comments Substantial potential impact on village roads. Concern about how this site would be connected to local facilities</p> <p>Officer comments This is a large site, and access is only likely to be available from within the new development at Oliver Road or from Pinnock Lane to the south of the site.</p> <p>Clearly if all development accessed the site solely from the south all traffic would then pass through the village centre and across the Marden Rd traffic-lights with a consequential impact on traffic flows.</p> <p>If access was split between north and south at least some of the traffic would avoid the village centre but that would still leave the Marden Rd junction to accommodate most of the traffic.</p>
Access to services – distances from bus stop/rail station/shop/GP/school	<ul style="list-style-type: none"> • Approximately 900m from Staplehurst village centre and facilities (by road). • Approximately 1.3km from primary school (by road). • Approximately 2.5km from Staplehurst railway station (by road)
Impacts on existing residential amenity (including access to open space)	There would be a substantial change to the outlook for many residents in South Bank, Hamner Way, the western section of Bell Lane and McCabe Close.

	<p>Particular care would need to be taken with any development close to McCabe Close as the bungalows here all have principal windows facing onto the site and they are sited close to the site boundary on higher land than the site.</p> <p>The development would not preclude access to any open space.</p>
Availability of utilities infrastructure – e.g. water/gas/electric	Potentially available but there would need to be additional connections
Air quality/noise	Not in an AQMA Noise unlikely to be an issue
Land contamination	Unlikely
Flood Risk (zone/drainage)	Not in Flood Zone 2 or 3 Environment Agency: No objections on grounds of fluvial flood risk.
Suitability (assessment conclusion)	<p>The site is suitable for development It is well related to the village.</p> <p>However in my view it should be developed in two halves. One accessed from the Oliver Road site (if capacity exists for further development on the road) and one accessed from Pinnock Lane</p>

3. AVAILABILITY

Is the whole site available for the proposed use: e.g. <ul style="list-style-type: none"> No existing uses Willing landowner Willing developer Existing tenancy or lease agreement 	<p>One developer interested Land potentially available particularly the northern part of the site once development of the Oliver Road site progresses far-enough.</p>
Availability conclusion	Available

4. ACHIEVABILITY

Identification of any abnormal costs or other constraints to development which would prevent or delay this site being delivered	No obvious abnormal constraints
Achievability conclusion	Achievable

Timing (following assessment - when could the site be delivered?)

now – 2016	X Northern Part
2016 – 2021	X Remainder
2021 – 2026	
2026 – 2031	

5. CONCLUSIONS

<p>The site is suitable for development but should be split into two sections</p> <p>The applicants have indicated 300 dwellings on the whole site and 120 on the northern part</p>

of the site. 300 dwellings over 22ha equates to a density of approximately 14dwellings/ha

Without detailed landscape and visual analysis and ecological and arboricultural surveys influencing the design it is difficult to say that these numbers/density will be appropriate.

Care will be need to integrate development into the existing framework of woodland hedgerows and ponds and also to ensure an appropriate transition between existing built development and the countryside and an appropriate relationship with the dwellings that bound the site, whilst maintaining important vistas of the central part of the village/Parish Church.

I would suggest that a more appropriate suggested yield for the whole site would be in the region of 250 units pending detailed master-planning/

ACCEPT

YIELD 250

APPENDIX 2

Correspondence from MBC regarding Original SHEDLAA Proforma

Emma Wreathall

From: Steve Clarke <steveclarke@maidstone.gov.uk>
Sent: 17 August 2015 13:56
To: Walker, Alison
Subject: RE: Land at Henhurst Farm Pinnock Lane Staplehurst Kent

Dear Alison

Landscape Capacity Study work undertaken by Jacobs for the Council (waiting for publication on the web-site due to size issues) received late in the assessment process indicated that the southern area of Henhurst Farm would have an unacceptable impact on landscape character whereas the northern section (now proposed to be allocated) would not.

You will need to contact the Landscape section for details of the Study deannecunningham@maidstone.gov.uk (However please note that Mrs Cunningham is currently on compassionate leave and is unlikely to be in the office until next week at the earliest).

I hope this helps

Regards

Steve

Steve Clarke

Principal Planning Officer

Spatial Policy

Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent, ME15 6JQ

t 01622 602418 w www.maidstone.gov.uk

From: Walker, Alison [mailto:Alison.Walker@wates.co.uk]
Sent: 17 August 2015 13:33
To: Steve Clarke
Subject: RE: Land at Henhurst Farm Pinnock Lane Staplehurst Kent

Dear Steve

Thanks for these emails. Please can you explain why the conclusion changed so fundamentally in the replacement version?

Regards

Alison



Alison Walker | Senior Land & Planning Manager | Wates Developments

T: 01372 861174 | M: 07912 788573 | www.wates.co.uk

Wates House, Station Approach, Leatherhead, Surrey, KT22 7SW

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From: Steve Clarke [mailto:steveclarke@maidstone.gov.uk]
Sent: 17 August 2015 11:27
To: Walker, Alison
Subject: Land at Henhurst Farm Pinnock Lane Staplehurst Kent

Dear Alison

Apologies the incorrect agreed proforma was attached first time round

As discussed please find attached the officer assessments for the above site (which as you are aware was subject to two submissions.

If you have any queries please feel free to contact me

Regards
Steve

Steve Clarke

Principal Planning Officer

Spatial Policy

Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent, ME15 6JQ

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APPENDIX 3

Landscape Character and Visual Appraisal (Allen Pyke Associates)

Allen Pyke Associates

Landscape Character and Visual Appraisal

Land at Henhurst Farm,
Staplehurst

Prepared on behalf of

WATES DEVELOPMENTS LTD.

Ref: 2703-RE-01_LB
Date: October 2016



Landscape architecture



Urban design



Environmental planning

LAND AT HENHURST FARM

LANDSCAPE CHARACTER AND VISUAL APPRAISAL

CONTENTS:

- 1. Introduction**
- 2. Background**
- 3. Landscape Features – Opportunities and Constraints**
- 4. Landscape and Visual Sensitivity**
- 5. Capacity to accept Development**

APPENDIX A

- Figure 1 Landscape Features - Opportunities and Constraints
- Figure 2 Local Landscape Character Areas
- Figure 3 Indicative Development Options Plan

APPENDIX B

Definitions of Landscape and Visual Appraisal criteria

I. INTRODUCTION

- 1.1. This Landscape Character and Visual Appraisal has been commissioned by Wates Developments and prepared by Landscape Architects, Allen Pyke Associates Ltd, specialists in advising on the landscape and visual sensitivity of potential development sites.
- 1.2. Wates Developments has an interest in land at Henhurst Farm to the west of Staplehurst in Kent and the purpose of this appraisal is to assess what potential the Site has to accept development without causing harmful impact on landscape character.

2. BACKGROUND

- 2.1. In February 2016, Wates made representations as part of the Maidstone Borough Local Plan Regulation 19 Public Consultation for the Site to be allocated as a potential development site. (The northern part of the Site has already been allocated to accommodate 60 dwellings (Policy HI/51) and a 1.22 ha area of natural/semi-natural open space (Policy OS1/9)).
- 2.2. The representations reviewed and rebutted the 2015 Maidstone Borough Landscape Capacity Assessment, which assessed the Site as having low capacity to accept development without detrimental effects on landscape character. Representations proposed that additional land forming a wider extent of the Site should be considered as an extension to the existing allocation for residential development. The representations included an Illustrative Development Options plan which showed how development could be accommodated on the Site.
- 2.3. The whole site (referred to as HO3-259) was tested as part of the 2016 Sustainability Appraisal (SA) supporting MBC's Local Plan and scored 5 red, 6 amber and 18 green scores against the sustainability criteria. None of the red scores related to landscape, however the SA assessed the Site's landscape capacity to accommodate change as Low, based on the conclusions of the 2014 MBC Landscape Capacity Assessment.
- 2.4. Since the February 2016 representations, Allen Pyke has taken the opportunity to undertake an up-to-date appraisal of the site. This Appraisal applies a methodology and terminology developed by Allen Pyke Associates based on best practice as set out in the Guidelines for Landscape and Visual Impact Assessment; Third Edition, 2013 (GLVIA3) published by the Landscape Institute and IEMA. The baseline study assesses the existing Site conditions and considers the landscape elements (landform, vegetation, historic features, adjacent development, key views etc.) that make up the Site and its surrounding context. This contributes to an assessment of the landscape character and the

visual amenity and aims to identify sensitive landscape and visual receptors which may be affected by development of the Site.

- 2.5. The second part of the assessment considers to what extent the Site could accommodate development without unacceptable impact on landscape character and visual amenity.

3. LANDSCAPE FEATURES - OPPORTUNITIES AND CONSTRAINTS (see Figure 1)

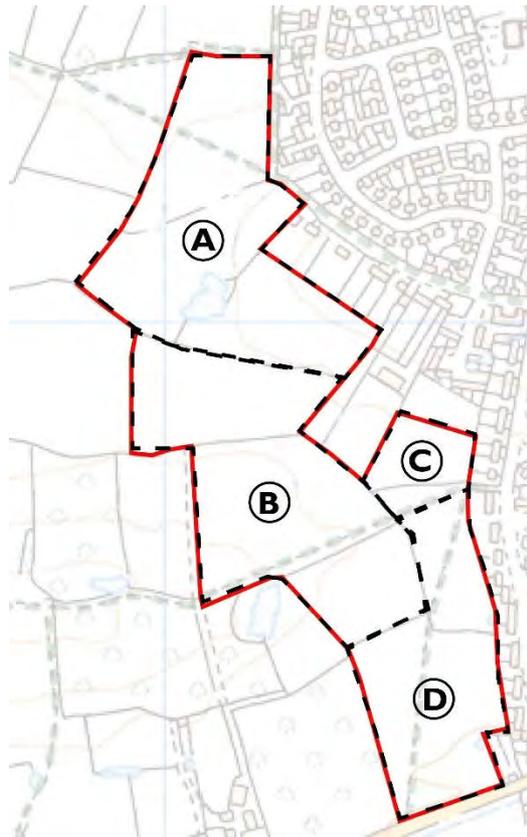
- 3.1. The existing landscape features represent opportunities and constraints which should be drivers of any development of the Site.

Landscape context

- 3.2. The whole Site measures approximately 19ha and lies to the southwest of Staplehurst. Pinnock Lane forms the southern boundary; there is farmland and woodland to the west. The land parcel to the immediate north, accessed from Oliver Road, has been recently developed and the area of woodland to the west of it is publicly accessible. A remnant orchard lies to the west between the Site and Henhurst Farm buildings.

Land Use

- 3.3. The Site comprises seven fields of varying sizes which are predominantly in pastoral use; all but one adjoin the south-western edge of the existing built up boundary of Staplehurst.
- 3.4. For ease of reference, the Site has been divided into four sub-areas (see below), based on existing field boundaries.



Public Rights of Way

- 3.5. Various public footpaths cross the Site and provide connectivity between the settlement area and the wider countryside. Their alignment and views from them should be considered in any development layout.

Heritage assets

- 3.6. Listed (Grade II) buildings in proximity to the Site include:
- Henhurst Farm Barn, Cartshed and Oastouse (approximately 170 metres from the western boundary of Area D); and
 - No 27 Bell Lane (approximately 50 metres from the norther western boundary of Area A)
- 3.7. The tower of All Saints' Church is visible to the east within the wider roofscape of the village.
- 3.8. It is not considered that the Site forms a significant component of the setting of the heritage assets. However, views toward the church tower from public viewpoints such as from footpath KM313 should be considered.

Topography and water bodies

- 3.9. Running through the centre of the Site from north to south is a dry river valley, with the landform rising to the northeast and west. There is a ten metre difference in level between the lowest level of the site adjacent to Pinnock Lane in the south of approximately 25m AOD and the highest point of approximately 36m AOD at the western central boundary.
- 3.10. There are two ponds within the Site boundary and numerous field ditches beside the hedgerows.

Vegetation

- 3.11. The managed field hedgerows with occasional mature oak trees are important to the landscape character of the Site and add visual interest. There are few standalone trees within the Site itself, however there are mature tree belts and areas of woodland on the boundaries which provide a sense of enclosure which is reinforced by the gently undulating landscape, particularly in sub areas A and C.
- 3.12. The area of woodland on the northwest boundary is subject to a group Tree Preservation Order.

4. LANDSCAPE AND VISUAL SENSITIVITY

- 4.1. MBC's Strategic Housing and Economic Development Land Availability Assessment (SHEDLAA) included an assessment of the Site in two parts. The full extent of the Site was assessed (ref: HO3-259), in addition to the northern half of the Site (ref: HO3-260).
- 4.2. The 2015 Maidstone Borough Landscape Capacity Assessment: Site Assessments (Jacobs) assessed the Site:

	<i>Henhurst Farm (H03-259)</i>	<i>North of Henhurst Farm (H03-260)</i>
<i>Landscape Character Sensitivity</i>	High	Moderate
<i>Visual Sensitivity</i>	High	Moderate
<i>Landscape Value</i>	Moderate	Moderate
<i>Overall Landscape Sensitivity</i>	High	Moderate
<i>Capacity to accommodate Housing</i>	Low	Moderate

- 4.3. This appraisal assesses to what extent development could be accommodated on the Site without resulting in adverse effects on landscape character and visual amenity.

Landscape Character and Sensitivity

- 4.4. The Site is well related to the village, which adjoins it to the east. To the south, the Site has a stronger relationship with the wider countryside.

4.5. To aid a more detailed understanding of the finer grain of the context of the Site and its setting, this assessment has defined several Local Landscape Character Areas (LLCAs) – see figure 2:

- Residential Staplehurst (including Conservation Area);
- Open farmland to the south;
- Rolling wooded farmland;
- Pinnock Lane and approach to Staplehurst;
- Site sub-area A;
- Site sub-area B;
- Site sub-area C; and
- Site sub-area D



View looking south from Area D towards open countryside



View towards Staplehurst from the highest point of the Site, with Area B in the foreground, Area A in the left mid-ground and Area C to the right. The church tower is visible on the skyline.



Area A, with development on Oliver Road to the north and properties on Bell Lane to the east

4.6. The assessment has determined 'sensitivity' by establishing the Character, Condition and Value of the LLCAs. The Character and Condition determine the Susceptibility to Change, which is the ability of a landscape element to accommodate development without undue negative consequences. The

Value and Susceptibility to Change determine the Sensitivity of the LLCA. (Definitions of the terms used can be found in Appendix A).

- 4.7. The LLCAs are all assessed as being of Moderate sensitivity, in contrast to the MBC Landscape Capacity Assessment which assessed the whole site as being of High Landscape Sensitivity. Moderate sensitivity means that although the elements that make up the character area are of merit, they could in part be restored or replaced/removed without a notable detriment to the overall character area. Table 1 summarises the findings.

LLCA	Character	Condition	Susceptibility to change	Value	Sensitivity
Residential Staplehurst	Moderate	Moderate	Medium	Moderate	Moderate
Open farmland	High	Moderate	High	Low	Moderate
Rolling wooded farmland	High	Moderate	High	Low	Moderate
Pinnock Lane	Moderate	Moderate	Medium	Low	Moderate
Site Area A	Moderate	Moderate	Medium	Low	Moderate
Site Area B	High	Moderate	High	Low	Moderate
Site Area C	Moderate	Moderate	Medium	Low	Moderate
Site Area D	Moderate	Moderate	Medium	Low	Moderate

Table 1: summary of landscape sensitivity

Visual Sensitivity

- 4.8. By virtue of the adjacent settlement edge and the footpaths which pass through and adjacent to the boundaries, much of the Site is visible from the immediate landscape. Views out indicate that there is some visibility from Pinnock Lane and the wider landscape to the south, however the Site is generally well contained by topography to the west and any views towards it are experienced in the context of the existing settlement.
- 4.9. The visibility of the Site has been established through desktop interpretation of mapping information and by visiting the area and the identified visual receptors with potential of being affected by development include walkers using the public footpaths, residents of properties along the western edge of Staplehurst and users of Pinnock Lane.
- 4.10 The methodology has been applied to assess the Type of Receptor and Nature of View of potential visual receptors, which determine the Susceptibility to Change. The Value of the View and the Susceptibility to Change determine the Sensitivity. This is summarised in Table 2 below. (The definitions used can be found in Appendix A).

Visual receptor	Receptor Type	Nature	Susceptibility to change	Value	Sensitivity
Properties on Hanmer Way & South Bank	A	Good	High	Low	Moderate
Properties on McCabe Close	A	Good	High	Low	Moderate
Properties on Bell Lane	A	Good	High	Low	Moderate
Properties on Bathurst Road	A	Poor	Medium	Low	Low
Properties in Oliver Road development	A	Poor	Medium	Low	Low
Pinnock Lane	B	Moderate	Medium	Low	Low
Footpaths KM302A & 311	A	Poor	Medium	Low	Low
Footpath KM312	A	Moderate	High	Low	Moderate
Footpath KM313	A	Good	High	High	High
Footpath KM314	A	Good	High	Low	Moderate

Table 2: summary of visual sensitivity

5. CAPACITY TO ACCEPT DEVELOPMENT

- 5.1. The assessment of landscape sensitivity concludes that development across the Site could be accommodated without undue adverse effects on the wider landscape or on residential Staplehurst, provided the landscape and visual sensitivities assessed above are duly considered and appropriate mitigation is implemented through a landscape led masterplan which responds to the local landscape context.
- 5.2. Residential development could be accommodated in the eastern and northern extent of the Site in the fields adjacent to the settlement edge where it would not be perceived as a significant intrusion into the open countryside to the south and would be visually more strongly related to the existing settlement edge.
- 5.3. The full extent of the Site is therefore deemed suitable for allocation for low to medium density development of circa 250 dwellings, in addition to significant landscaping and open space provision.
- 5.4. An Indicative Development Options Plan is provided at Figure 3 which shows the areas with potential for development.

Open Space

- 5.5. The Indicative Development Options Plan illustrates how locating a significant landscape buffer along the western extent of the Site would create a green edge to the settlement which would optimise

connectivity, provide a valuable element of green infrastructure and represent an appropriate interface between the settlement and the wider countryside to the west.

- 5.6. Amending the location of the open space designation from its current east-west orientation and instead locating it west of residential development on a north-south access would allow the open space to create a new permanent boundary for the village, providing an enduring and logical new western boundary to the town.

Landscape Character

- 5.7. The gently undulating landscape associated with the western extent of the internal valley is considered to have the most positive rural qualities and built form should be concentrated at the lower level, adjacent to the settlement boundary where it would form a natural extension to the settlement. Views across the lower area towards the settlement, and the church tower, should be considered in any development. layout.
- 5.8. The mature hedgerows and oak trees forming the field boundaries provide reference to the rural landscape pattern and should be retained as far as possible to form the basis for public realm corridors connecting to the existing public footpaths and settlement areas.
- 5.9. Keeping development set back from Pinnock Lane would retain its existing semi-rural character on the approach to Staplehurst. The existing native hedgerow should be continued alongside any new access into the Site and the southern extent of the Site could be reinstated as orchard, a typical feature of the wider landscape.

Views

- 5.10. There are no viewpoints from which built form would be seen against the horizon; indeed it would be experienced as a component within existing views of the settlement. Whilst the view from some adjoining residential properties would undergo change, this is symptomatic of the Site's sustainable location adjacent to the settlement boundary.
- 5.11. Retention of the existing hedgerows and trees, the substantial area of open space and the potential to soften the outlook from Pinnock Lane with fruit trees or similar planting would all improve the view toward the hard settlement edge as it is currently experienced in views from Pinnock Lane and from public footpaths.

Conclusion

- 5.12. Whilst the character and appearance of the Site would change, there is the potential to set development within a robust and attractive green framework, incorporating existing Site features, which would allow development to be readily integrated into the existing urban fabric without resulting in unacceptable adverse effects. Development could be accommodated without causing any substantial landscape impact beyond the Site's boundaries.

APPENDIX A

METHODOLOGY & TERMS FOR LANDSCAPE AND VISUAL IMPACT ASSESSMENTS

INTRODUCTION

This document set out the methodology and terms used by Allen Pyke Associates in LVIAs and Environmental Statements to establish and describe the potential effects on landscape character and visual amenity of development

The methodology has been adapted from the guidance given in the Landscape Institute/IEMA publication ‘Guidelines for Landscape and Visual Impact Assessment’ (3rd Edition 2013).

ASSESSMENT OF EXISTING BASELINE SENSITIVITY

The ‘**Sensitivity**’ of the existing **landscape character** or **view** is determined through the combined assessment of the ‘**susceptibility to change**’ and ‘**value**’ of the landscape or view. The ‘**susceptibility to change**’ is defined as ‘*the ability of the landscape to accommodate the proposed development without undue negative consequences*’. ‘**Susceptibility**’ is derived by combining the ‘**Character**’ of the landscape or type of ranking of the receptor experiencing the view with an assessment of its ‘**Condition**’ of the landscape or the ‘**nature of the view**’.

I. DETERMINING SUSCEPTIBILITY TO CHANGE

Ia. Assessing Landscape Character:

‘**Character**’ of the **Landscape** is defined using the following criteria:

Character	Criteria
High	Where the area is wholly/predominately intact, may have no/few incongruous elements or forms part of a wider distinct pattern/coherent landscape, or has a highly recognisable or distinct sense of place.
Moderate	Where the area has a recognisable pattern, may have some incongruous elements that detract from or only make a moderate contribution to the intactness of the area, or retains some sense of place.
Low	Where there is no recognisable pattern, or may have few similar/no coherent elements or make no contribution to the intactness of the area, or results in a minimal/no sense of place.

The ‘**Condition**’ of the **Landscape** is defined using the following criteria:

Condition	Criteria
Good	Where the area is highly managed/excellent repair/quality
Moderate	Where the area is reasonably managed/average repair/quality
Poor	Where the area is un-managed/poor repair/quality

Ib. Assessing Visual Amenity:

‘Visual Receptor Types’ are ranked in accordance with the land use of the viewpoint from which people (the receptors) will experience the view. These are defined using the following criteria:

Visual Receptor Type Ranking	Criteria
Type A - High	<ul style="list-style-type: none"> - Residents at home or using their gardens; - People engaged in outdoor recreation, including the use of public rights of way, whose attention or interest is likely to be focused on the landscape or particular views; - Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience; - Communities where views contribute to the landscape setting enjoyed by local residents.
Type B - Moderate	<ul style="list-style-type: none"> - Users of outdoor sport or recreation facilities that do not involve or depend on an appreciation of views in the landscape; - People at their place of work whose attention may be focussed on their work or activity, not on their surroundings. - Users of retail and employment sites, sports and recreational facilities where the views are secondary to the activity at hand; - Users of public roads and transport routes where views add to the travel experience.
Type C - Low	<ul style="list-style-type: none"> - Users of Industrial sites, agricultural land, derelict or abandoned land, or busy commuter links where there is little appreciation of the view.

The ‘Nature of the View’ is defined as follows and considers the extent to which the site can be seen from a particular receptor:

Nature of View	Criteria
Good	Where there is an open view/panoramic view of the landscape looking towards or from the site and/or is not enclosed or interrupted by/includes incongruous elements.
Moderate	Where the view to or from the site is largely open and/or partially screened/enclosed and is interrupted by/includes a few incongruous elements and/or the site is in the distance.
Poor	Where the view to or from the site is largely screened/obscured by intervening features, or is enclosed and/or only forms part of the view, or the site is difficult to perceive in the distance.

I.c. Quantifying Susceptibility to Change

Combining the ‘Character’ with ‘Condition’ or ‘Visual Receptor Ranking’ with ‘Nature of the View’ determines the ‘Susceptibility to Change’ of the landscape or view:

MATRIX TABLE: LANDSCAPE & VISUAL SUSCEPTIBILITY TO CHANGE

Character/ Receptor Ranking	LANDSCAPE & VISUAL SUSCEPTIBILITY		
High/Type A	High	High	Medium
Moderate/ Type B	High	Medium	Low
Low/ Type C	Medium	Low	Low
	Good	Moderate	Poor
	Condition/Nature of View		

The **definition** of the landscape or visual ‘Susceptibility to Change’ is:

Susceptibility	Criteria
High	Where the components and qualities of a landscape/view could be easily affected and would have a low ability/capacity to accommodate the proposed change.
Medium	Where the components and qualities of a landscape/view could be moderately affected and would have a medium ability/capacity to accommodate the proposed change.
Low	Where the components and qualities of a landscape/view could be affected in a minor/negligible manner and would have a high ability/capacity to accommodate the proposed change.

2. DETERMINING SENSITIVITY

2a. Assessing the Value of Landscape Character

The ‘Value’ of the landscape is defined as follows and considers any relevant designation or local recognition:

Value	Criteria	Examples	Level of importance/rarity
Exceptional	Very high importance and rarity.	World Heritage Site	International
High	High importance and rarity.	National Park, AONB, Broads and statutory designations	National, Regional
Moderate	Moderate importance.	Non-statutory landscapes - SLA, AGLV, Conservation Areas, Heritage Coast, undesignated local landscapes recognised through use/non-official publications.	County, Local
Low	Low importance with positive characteristics.	Undistinguished landscapes having some redeeming feature/features and possibly identified for improvement.	Local
Poor	Low importance but with negative characteristics.	Areas having few/no redeeming features and/or possibly identified for recovery.	Local

2b. Assessing the Value of the View

The 'Value of a view' is defined as follows and considers the relationship between specific features or locations with local residents and visitors and their enjoyment of the view:

Value of View	Criteria
Exceptional	A view of high scenic value, natural/man-made beauty, and/or is uninterrupted by incongruous elements, and/or is an important recognised view within/towards or across a statutory designated landscape or heritage/locally important feature/viewpoint.
High	A view of good scenic value, natural/man-made beauty, and/or uninterrupted by incongruous elements, and/or is a recognised view within/towards or across a designated landscape or heritage/locally important feature/viewpoint.
Moderate	A view of some scenic value, intrinsic merit or natural/man-made beauty with few incongruous elements within, towards or across a locally important landscape or towards a locally recognised feature or reference point.
Low	A view of little/no intrinsic merit but contains some positive attributes and/or a view which is not rare and does not have any local value attached to it.
Poor	An open or partially screened view which is unsightly with no positive attributes and/or a view which is not rare and does not have any local value attached to it.

2c. Quantifying Sensitivity

MATRIX TABLE: SENSITIVITY

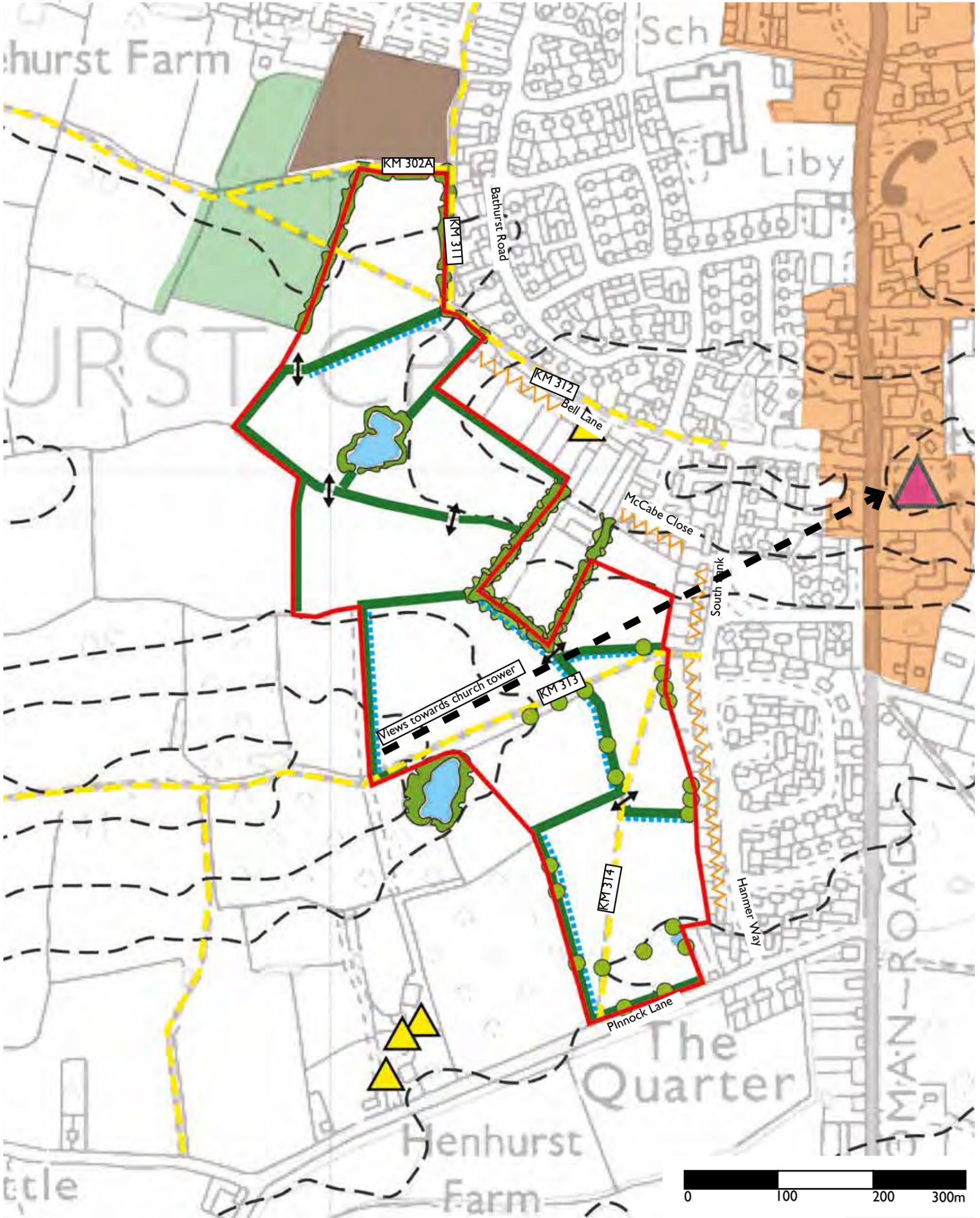
Combining the landscape 'Value' and the 'Susceptibility to Change' determines the sensitivity of the landscape character:

Landscape/ Visual Value	SENSITIVITY		
	Exceptional/High	High	High
Moderate	High	Moderate	Low
Poor/Low	Moderate	Low	Low
	High	Medium	Low
	Landscape/Visual Susceptibility		

The definition of 'Landscape or Visual Sensitivity' is as follows:

Landscape/Visual Sensitivity	Criteria
High	Where the elements that make up a character area or view are of considerable merit and/or would be difficult to restore or could not be replaced/removed without substantial detriment to the overall character area or view.
Moderate	Where the elements that make up a character area or view are of merit and/or could in part be restored or replaced/removed without a notable detriment to the overall character area or view.
Low	Where the elements that make up a character area or view are of little merit and/or could be restored or replaced/removed without detriment to the overall character area or view.

APPENDIX B

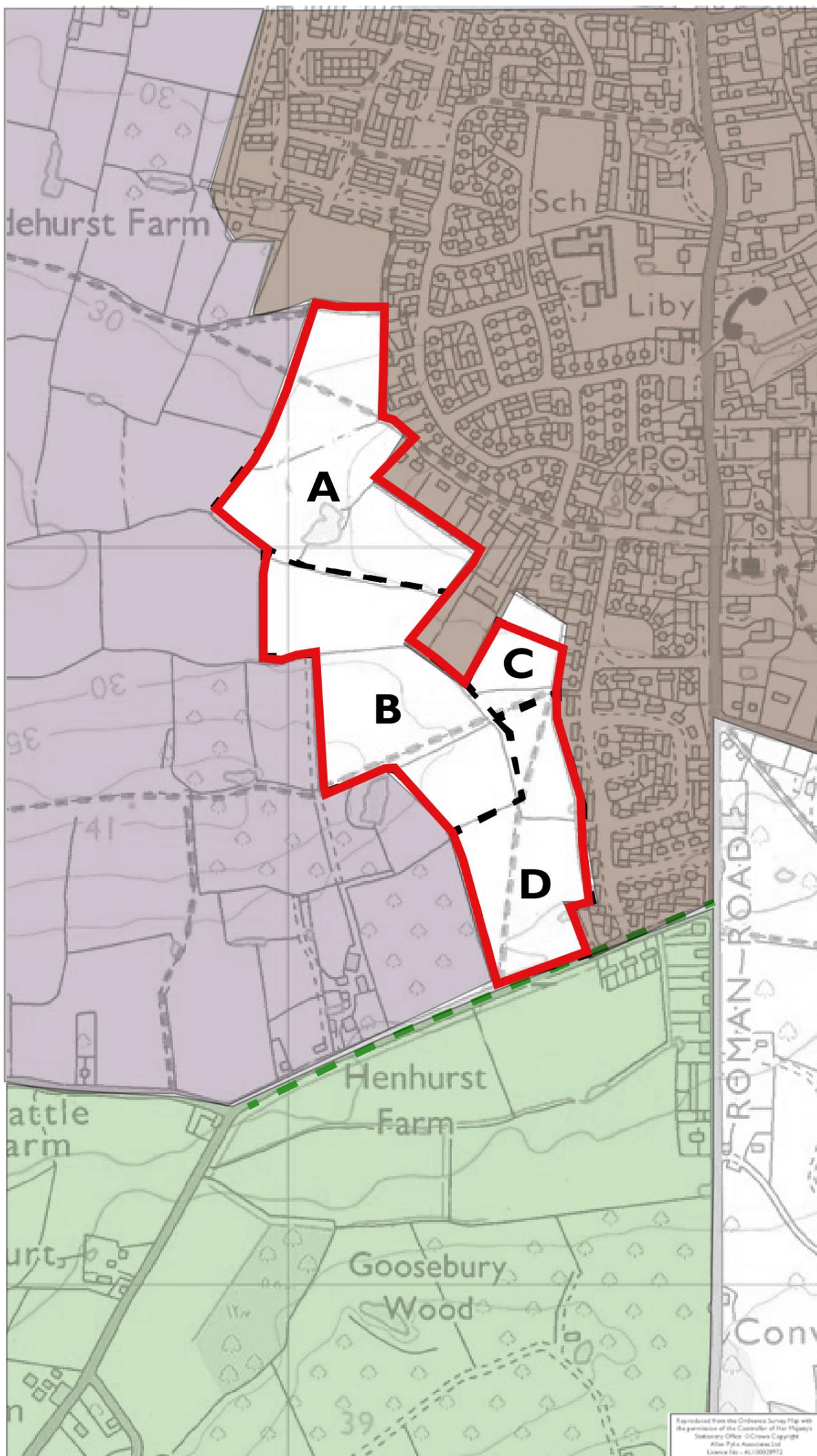


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Legend

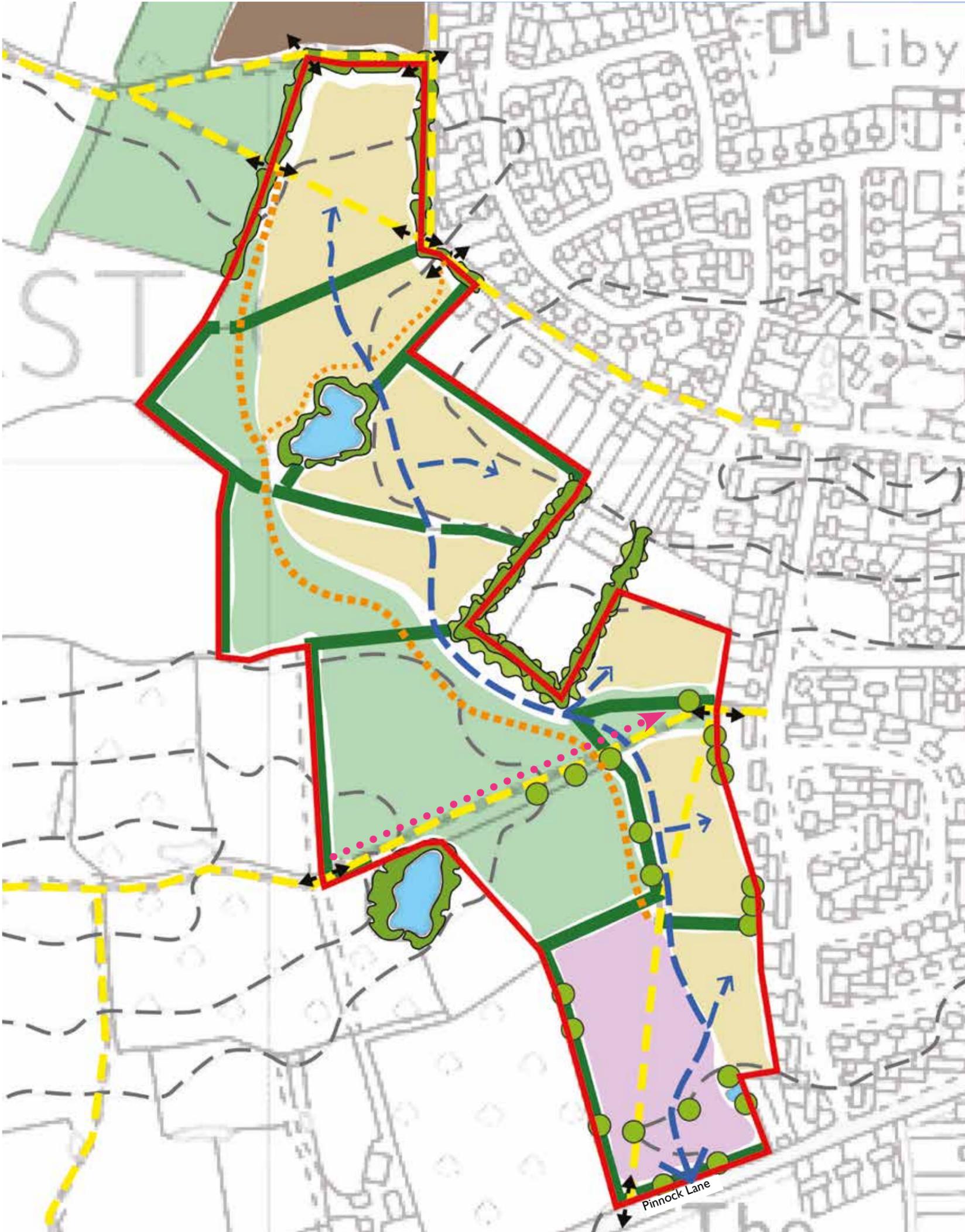
- | | | | |
|---|---|--|---|
| Site Boundary | Significant woodland or tree belts within or adjacent to the Site. | 5m contours | Public Right Of Ways |
| Listed Buildings within 100m of site boundary | Mature hedgerows | Water bodies and ditches | Views of Site from adjoining residential properties |
| All Saints' Church (Grade I) - tower as visual landmark | Mature trees - root protection areas, canopies and potential shading to be considered | Existing gaps in hedgerows | |
| Conservation Area | Publicly accessible woodland (Group Tree Protection Order) | Recent housing development in the vicinity of the Site | |





Legend

- Site Boundary
- Residential Staplehurst (including Conservation Area)
- Open farmland to the south
- Rolling wooded farmland to the west
- Pinnock Lane
- Site sub areas



Legend

- Proposed Site Allocation
- Open space within proposed site allocation - country park & agricultural land
- Open space within proposed site allocation - Orchard
- Indicative Development Areas
- Recent housing development in the vicinity of the Site
- Existing Public Right Of Ways
- Proposed Public Right Of Ways
- Proposed principal vehicular point of access
- Proposed pedestrian point of access
- Strategic Viewing Corridor
- Significant woodland or tree belts within or adjacent to the Site.
- Mature hedgerows
- Mature trees - root protection areas, canopies and potential shading to be considered



DRAFT FOR COMMENTS

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Client: **Wates Developments**

Allen Pyke Associates
Landscape Architecture Urban Design Environmental Planning

Henhurst Farm, Staplehurst

Indicative Development Options

The Factory, 2 Acre Road, Kingston upon Thames, Surrey KT2 6EF
T 020 8549 3434 F 020 8547 1075 www.allenpyke.co.uk
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Drawing Number: NTS @ A3 Date: 24/10/16 Revision: -
Figure 3 Scale: NM/LB Drawn by/ Chk: NM/LB

APPENDIX 4

BW Commentary on SA [SUB002]

Appendix 2
Commentary on Sustainability Appraisal [SUB002]

Both the whole Site (HO3-259) and northern part of the Site (HO3-260) were tested as part of the Sustainability Appraisal (SA) (February 2016) [SUB002] supporting MBC's Local Plan. The SA conclusions were the same for both sites.

Appraisal Question	SA 2016 Answer/Evidence	Barton Willmore Comments (Oct 2016) and re-shading where required.
SA TOPIC: COMMUNITY WELLBEING		
How far is the site from the Maidstone Urban Area or a Rural Service Centre?	Adjacent to the Maidstone Urban Area or a rural service centre, or could be more accessible to services if other sites allocated as well.	The Site is currently outside but adjacent to Staplehurst (Rural Service Centre). If the Site was allocated in the Local Plan, its location would be amended to be within the settlement boundary (i.e. 'green' category).
How far is the site from the nearest medical hub or GP service?	The Site is 281m from the nearest medical hub/GP.	
How far is the site from the nearest secondary school?	The Site is 7790m from the nearest secondary school.	The Site is no further away from other allocated sites in Staplehurst and therefore, whilst the SA concluded this to be 'red', this is the same for other allocated sites in Staplehurst.
How far is the site from the nearest primary school?	The Site is 299m from the nearest primary school.	
How far is the site from the nearest post office?	The Site is 329m from the nearest post office.	
How far is the site from the nearest outdoor sports facility?	The Site is 228m from outdoor sports facility.	

facilities (i.e. playing pitch, tennis court)?		
How far is the site from the nearest children's play space?	The Site is 272m from 'neighbourhood' children's play space.	
How far is the site from the nearest area of publicly accessible greenspace (>2ha in size)?	The Site is 0m from accessible greenspace.	
SA TOPIC: ECONOMY		
How accessible is the site to local employment provision (i.e. employment sites or the nearest local service centre?)	The Site is 291m from local service centre and 651m from employment sites.	
Will allocation of the site result in loss of employment land/space?	Allocation will not lead to the loss of employment land/space.	
SA TOPIC: TRANSPORT AND ACCESSIBILITY		
How far is the site from the nearest bus stop?	The Site is 60m from the nearest bus stop.	
How far is the site from the nearest train station?	The Site is 1050m from the nearest train station.	We consider the proximity of the Site to a Railway Station is good (at being just over 1km) and that this should be assessed as 'amber'.
How far is the site from the nearest cycle route?	The Site is 8687m from the nearest cycle route.	

SA TOPIC: AIR QUALITY AND CAUSES OF CLIMATE CHANGE		
Are there potential noise problems with the site – either for future occupiers or for adjacent/nearby occupiers arising from allocation of the site?	Unlikely adverse impact.	
Is the site within or near to an AQMA?	>1km of an AQMA.	
SA TOPIC: LAND USE, LANDSCAPE AND THE HISTORIC ENVIRONMENT		
Will allocation of the site lead to loss of the best and most versatile agricultural land?	Includes Grade 1, 2 or 3 agricultural land. 92% Grade 3b (22 hectares)	MBC acknowledge that the allocated sites will result in the loss of Grade 1, 2 and 3 agricultural land.
Will allocation of the site make use of previously developed land?	Does not include previously developed land.	As MBC has acknowledged, the majority of its Local Plan allocations comprise greenfield sites due to the limited availability of brownfield sites to meet its Objectively Assessed Need. In this respect, this Site does not differ from other proposed allocations in the submitted Local Plan [SUB 001].
Is the allocation of the site likely to impact upon a Scheduled Ancient Monument (SAM)?	Not on or adjacent to a SAM and is unlikely to have an adverse impact on a nearby SAM.	
Is the allocation of the site likely to impact upon a listed building?	Not on or adjacent to a Listed Building and is unlikely to have an impact of a nearby listed building.	

Is the allocation of the site likely to impact upon a Conservation Area?	Within or adjacent to a Conservation Area and there is the potential for negative impacts (165m away).	As set out in the SHEDLAA (2016) [HOU 006], MBC Conservation Officer concluded that Conservation Areas will not be affected by the development of either HO3-259 or HO3-260.
Does the site lie within an area with significant archaeological features/finds or where potential for archaeological features to be discovered in the future?	Within an area where significant archaeological features are present, or it is predicted that such features could be found in the future.	The Site is not within a safeguarded area of archaeological potential. MBC Conservation Officer advised that there are no known implications in archaeological terms to the Site's development, as set out in the SHEDLAA (2016) [HOU 006].
Is the site located within or in proximity to and/or likely to impact on the Kent Downs AONB?	Not in close proximity to the Kent Downs AONB and/or negative impacts on the AONB are unlikely.	
Is the site in the Green Belt? If so, is the allocation of the site likely to cause harm to the objectives of the Green Belt designation?	Not within or adjacent to the Green Belt.	
Would development of the site lead to any potential adverse impacts on local landscape character for which mitigation measures	A detailed assessment of 'landscape capacity to accommodate change' was undertaken for this site in 2014 and identified that the northern part of this area (HO3-260) is capable of some development.	As set out in our Regulation 19 representations (Representor ID: 19218), we disagree with the Site's assessment in landscape capacity terms. The Site has been subject to an initial independent Landscape

appropriate to the scale and nature of the impacts is unlikely to be achieved?	Therefore, it is not considered necessary or useful to undertake a separate assessment of 'potential landscape effects' using this particular criteria.	Appraisal, which identifies that development across the Site could be accommodated without undue adverse effects on the wider landscape or on Staplehurst, through the implementation of a landscape-led masterplan. The full extent of the Site is suitable for low to medium density development of circa 250 dwellings. We therefore consider this should be assessed as 'green'.
SA TOPIC: FLOOD RISK		
Is allocation of the site within a flood zone?	Flood risk zone 1.	
Is the proposed use of the site appropriate in terms of guidance set out in the 'Technical Guidance to the NPPF' relating to flood risk?	Development is appropriate.	
SA TOPIC: BIODIVERSITY AND GREEN INFRASTRUCTURE		
Is the allocation of the site likely to impact upon an Ancient Woodland (AW) or Ancient Semi-Natural Woodland (ASNW)?	The Site is 389m from an AW/ASNW.	The SHEDLAA (2016) [HOU 006] identifies that there is no designated AW in the vicinity of the Site. It is not considered likely that the Site's development would result in significant impacts on AW/ASNQ and therefore we consider this to be 'green'.
Is the allocation of the site likely to	No likely impacts identified at this stage.	

impact upon a Site of Special Scientific Interest (SSSI)?		
Is the allocation of the site likely to impact upon a Local Wildlife Site (LWS) or Local Nature Reserve (LNR)?	Potential impacts identified by County Council Ecologist (142m from LNR).	As noted in the SHEDLAA (2016), a large site is likely to have some ecological impacts. Any subsequent development proposals, would take this into account and provide suitable mitigation measures but importantly, also generate biodiversity enhancement as required by the NPPF. There would be an overall net gain in Ecological value that could complement any nearby LWS or LNRs. The same ecological constraints for the Site are applicable to the permitted development to the north (12/2106), as noted in the SHEDLAA (2016), and therefore should not be seen as an overriding constraint to development.