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# Representations to the Maidstone Borough Council Regulation 18b Local Plan Consultation

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## **Land North of Moat Road, Headcorn**

Prepared for:

Catesby Estates PLC

Prepared by:

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## 1. Introduction

- 1.1. These representations have been prepared on behalf of Catesby Estates PLC (herein referred to as “our client” or “Catesby”), in relation to the Land North of Moat Road in Headcorn and are submitted in response to the consultation on the Maidstone Borough Council (MBC) Regulation 18b Local Plan Review (R18b LPR) and Sustainability Appraisal (SA). The consultation opened on 1<sup>st</sup> December and closes on 22<sup>nd</sup> December 2020.
- 1.2. The current consultation comprises the following documents:
- The Local Plan Review – Preferred Approaches (regulation 18b)
  - The Local Review – Sustainability Appraisal.
- 1.3. The current Local Plan was adopted by MBC in October 2017. Policy LPR 1 requires that a review takes place shortly after adoption to review the housing needs, specific allocations, housing land, employment land and transport infrastructure.
- 1.4. The Land at Moat Road has been actively promoted to MBC through the ‘Call for Sites’ for a residential scheme of 150 homes and Regulation 18a Local Plan Review Consultation. It comprises 7.26 hectares (ha) of agricultural land on the western edge of Headcorn (see Appendix A). The site is considered suitable, available, achievable and deliverable for this quantum of development. It has been given a draft allocation within the Regulation 18b Local Plan Document (R18b LPR) under policy LPRSA310.
- 1.5. Headcorn is recognised as a ‘Rural Service Centre’ in the adopted local plan, and this is reiterated in the Draft Local Plan Consultation. These centres are considered to be the most sustainable settlements in the borough outside of Maidstone. The site is therefore in a prime location for development and would ensure that much needed new homes are capable of being provided in a location which already is regarded as sustainable.
- 1.6. These representations examine the R18b LPR consultation document providing observations on the preferred approach and draft policies. Additionally, the representations consider the information within the published evidence base and Sustainability Appraisal.
- 1.7. A summary of the site and its location is provided, and where applicable, recommendations are included for further work to assist the LPA in preparing the Local Plan Review. The following supporting documents provide more details on the site:
- Site location Plan;
  - Design & Technical Response to Reg 18 & SLAA Papers
- 1.8. This representation follows an earlier representation to the Regulation 18a Local Plan Review consultation that took place between 19<sup>th</sup> July 2019 and 30<sup>th</sup> September 2019.

- 1.9. Catesby and Savills reserve the right to comment further on all elements of the emerging Local Plan Review including its evidence base, at future consultation stages.

## 2. The Site

### Site Context

- 2.1. The land north of Moat Road, herein referred to as “the site” is situated on the western edge of Headcorn and comprises 7.26 hectares (ha) of agricultural land. It lies outside of but immediately adjacent to the settlement edge and to the immediate south of Catkins Gardens, a development of 62 homes that has recently been built by a national housebuilder.
- 2.2. The site is otherwise bounded by Moat Road to the South, residential back gardens of Mill Bank to the east, and agricultural land to the west. A number of dwellings and farm buildings are situated to the north west (off Black Mill Lane) and an electricity substation sits to the south west corner of the site off Moat Road.
- 2.3. Existing access to the site is via an area of hardstanding off Moat Road which currently accommodates former farm sheds. Secondary access is available from a field gate to the north east corner connecting to Mill Bank. The High Street of Headcorn is within 800m of the site and is reasonable walking and cycling distance for new residents. For context, a site location plan is attached at **Appendix A**.
- 2.4. Headcorn is a well serviced village with a number of facilities and is recognised in the current Local Plan as a Rural Service Centre. Such locations are regarded as sustainable and sit below only Maidstone town centre and urban area in the settlement hierarchy. The facilities in Headcorn range from a primary school, a library, a Post Office, convenience stores, petrol station, and public houses / restaurants. There are also a number of churches and a village hall, in addition to a doctor’s surgery and pharmacy. All of these facilities are within walking and cycling distance of the site.
- 2.5. For access further afield, the village is well located within the public transport network, with the Headcorn train station situated approximately 0.6 miles from the site. This provides regular services to London Charing Cross, London Canon Street, Dover Priory, Ramsgate and Folkstone. There are also a number of bus stops in the immediate area, notably in the vicinity of the high street and train station, providing access to services towards Tenterden and Maidstone. A public footpath also crosses the site.
- 2.6. With regards to designations, the site is relatively unconstrained. The majority of the site lies in flood zone 1, which has the lowest fluvial risk of flooding. A small section of the south eastern corner of the site is however in flood zones 2 and 3. This is due to the proximity of the site to the River Beult (to the south) which is also a SSSI. Whilst the northern most part of the site lies within the Low Weald National Character Area this is not a national landscape designation such as AONB.
- 2.7. From a heritage perspective, the site is not within a conservation area and does not contain a listed building or registered park and garden. The closest listed building to the site is The Moat, which is a grade II Listed former farmhouse (reference ID: 1060848). This is located to the south east of the site. Whilst there are a number of other listed buildings in Headcorn, these predominantly lie in the centre of the village which is also designated as a Conservation Area.

- 2.8. There are a number of TPOs on the site within the central tree belt.
- 2.9. In terms of the wider area, it is relevant to note that in addition to land to the north at Catkins Gardens, which is currently being built out for 62 homes, MBC has previously allocated a site to the east of Mill Bank for 220 units. This site is a short distance away from land at Moat Road and does provide a clear indication that MBC regards this area as sustainable, accessible and suitable for additional housing development.

### **Development Opportunity**

- 2.10. As expressed through our earlier representation to the Regulation 18a Consultation, the site provides an opportunity to deliver much needed new homes in this location and is capable of accommodating circa 150 new dwellings in a range of sizes, types and tenures. It is well enclosed by existing defensible features, notably existing residential development and the highway network. It is currently anticipated that the development will be provided within the eastern part of the site, close to the existing residential development, and allowing a larger area of green space and landscape buffer to be provided to the west. An additional green buffer and SUDS pond would also be provided in the south eastern corner. A total of 4.5 Ha will be developable land with the remaining 2.71 Ha dedicated to open space.
- 2.11. The SUDS pond would be within flood zone 1 but lie adjacent to the higher risk areas. No development would be within this corner of the site due to the higher risk flood zone, but this will provide a greater degree of space and separation between the proposed development of the site and the closest listed building, The Moat (former farmhouse).
- 2.12. The main access into the site will be via a new entrance onto Moat Road, with a range of pedestrian links provided to the wider area and connections to the existing footpath network. An emergency vehicle access would also be provided towards the north, which can also serve as a further pedestrian and cycle link onto Mill Bank and to the surrounding area.
- 2.13. The site, is capable of providing a high quality new residential development in this sustainable, accessible location. The development would be focused on quality of design, with a landscape led approach that incorporates a range of dwelling types, styles, sizes and tenures, including affordable housing, and utilising a range of materials to create visual interest and support place making.
- 2.14. Accordingly, the draft allocation of the Land at Moat Road under Policy LPRSA310 is supported in principle however these representations show that the site is capable of delivering a greater number of houses than stated in the draft policy. We therefore seek an amendment to the draft policy to allow for approximately 150 dwellings.
- 2.15. A Visioning Framework document was submitted with our response to the Regulation 18a consultation. This document provides further details of the opportunities. For ease, this document is submitted again with these representations (Appendix B).
- 2.16. Further technical work has been carried out since the Regulation 18a consultation. This information is summarised in the Design & Technical Response to Reg 18 & SLAA Papers document at Appendix C.

### 3. Policy Position

- 3.1. A presumption in favour of sustainable development is at the heart of the NPPF. To ensure sustainable development comes forward Local Authorities must produce up-to-date plans that positively seek to reflect this and address the needs of the area whilst allowing flexibility to adapt to changes during the Plan period.
- 3.2. The adopted Local Plan was found to be sound in July 2017 and subsequently adopted in October 2017. The adopted Local Plan sets out the planning policies and site allocations between 2011 and 2031. During this period, MBC are required to make provision for 17,660 new homes. This equates to 883 dwellings per annum.
- 3.3. Policy LPR 1 of the adopted Local Plan requires that a review of the Plan takes place shortly after adoption. During this review MBC have reassessed the local housing needs, specific allocations, housing land, employment land and transport infrastructure. The target adoption date for the review is October 2022.
- 3.4. With specific regards to housing needs, the Government's published Standard Method 1 (which will remain the same as confirmed on 17<sup>th</sup> December 2020) indicates a need for 1,186 dwellings per annum (dpa), whereas the current adopted target is for 883dpa. This is a considerable difference, amounting to an increase against the current target of 353 dpa or 40%. The Government have recently consulted on a new standard methodology which saw the housing requirement in Maidstone increase further to 1569 dpa. The outcome of the consultation is uncertain, however, it indicates that the housing requirement in the area could be higher than anticipated. It is understood that MBC has advanced the timetable of the Local Plan Review in order to meet the Governments transition period between the Standard Methods and provide for the figure calculated by Standard Method 1.
- 3.5. It is essential that the Local Plan Review includes sufficient allowance to help address the housing needs and in order to meet and deliver the housing demands of the area.

## 4. Evidence Base

4.1. Since the Regulation 18a consultation, MBC has published several evidence base documents. These comprise:

- **Maidstone Strategic Housing Market Assessment - Comment**
- Maidstone Economic Development Needs Study Stage One
- Maidstone Economic Development Needs Study Stage Two
- Settlement hierarchy matrix
- Infrastructure Capacity
- **Draft Strategic Land Availability Assessment - Comment**
- **Strategic Land Availability Assessment, Appendix A - Green Site Assessments - Comment**
- Strategic Land Availability Assessment, Appendix B - Red Site Assessments
- SFRA Level 1 update and Level 2
- SFRA Level 1 update and Level 2 Appendices
- Integrated Transport Strategy indications
- Transport Modelling Draft Technical Note
- Garden Communities Part 1
- Garden Communities Part 2
- **Sustainability Appraisal/Strategic Environmental Assessment - Comment**
- HRA Scoping
- HRA Screening Report
- Economic Spatial Topic Paper
- Environment Topic paper
- Housing Spatial Topic Paper
- Social Infrastructure Spatial Topic Paper
- Retail and Leisure Spatial Topic Paper
- Transport and Air Quality Spatial Topic Paper
- Sports Facilities Strategy
- Playing Pitch Strategy

### **Strategic Housing Market Assessment (October 2019)**

4.2. Iceni Projects Limited (Iceni) have produced a Draft Strategic Housing Market Assessment on behalf of MBC. It was published in October 2019 before the Covid 19 Pandemic, proposed planning reforms and the negotiations of a Brexit deal (which are yet to be fully determined). Iceni have made 17 recommendations to the Council, of which Catesby would like to comment on: R1, R2, R3, R4 and R12.



R1 & R2 – Cooperation with Neighbouring Authorities and London

- 4.3. IcenI establish that certain settlements within western Tonbridge & Malling Borough fall within the same housing market area. There is also an inter-relationship between the housing markets in other neighbouring authorities including Medway, Swale, Ashford and Tunbridge Wells. R1 sets out that MBC should actively engage with these authorities and produce Statement of Common Ground to be prepared for any cross boundary issues. The SHMA also identifies that there is a housing market relationship between MBC and London. As there is growing uncertainty regarding London meeting its housing need, IcenI have recommended that if this unmet need is certified, MBC consider whether it they are able to accommodate any of this need.
- 4.4. Catesby, fully support this and consider that MBC should ensure effective cooperation is established in order for the LPR to be found legally sound. It is essential that the discussions and agreements between these authorities are implemented from the earliest plan-making stages and incorporated into the Spatial Strategy of the Plan.

R3 – Testing the Standard Method

- 4.5. At the time the SHMA was completed, it did not find any evidence to suggest factors that would lead to a higher housing need than identified by the Standard Method. R3 seeks that MBC test the ability to meet the standard method housing requirement figures, through the plan-making process.
- 4.6. Since the completion of the SHMA, the world has had a unimaginable year. Specifically, the Covid 19 pandemic, planning reforms (including within the '*Planning for the Future Whitepaper*') and we await the final Brexit deal. Whilst the outcome of the Standard Method consultation has resulted in MBC's standard method calculation remaining the same, there are still many factors that are uncertain and could all lead to a higher housing need. Therefore, Catesby consider it absolutely essential that MBC assess whether a higher provision of housing is required in the area.

R4 – Affordable housing

- 4.7. The SHMA has calculated that 464 affordable homes are required per annum and that there is a clear need for MBC to seek affordable housing through new development schemes. IcenI recommend that the MBC have regard to the profile of need at a local level as well as the viability of an individual scheme.
- 4.8. Catesby welcome the consideration of affordable housing at a local level. However, they consider that a policy cannot be too prescriptive in terms of local level requirement. Instead, the policy wording should allow for greater flexibility to adapt to future needs, in accordance with NPPF paragraph 11.

R12 – Housing Mix

- 4.9. Table 10.3 (extract below) identifies the strategic conclusions on the need for different sizes of homes. It is recommended that this mix is used to inform negotiations on individual proposals. Account should be taken of more local level assessments if available. Furthermore, SHMA paragraph 10.26 explains that these figures are not prescriptive figures but can ensure effective monitoring of the housing delivered in the borough.

**Table 10.3 Strategic Conclusions on the Need for Different Sizes of Homes**

	Affordable Rented	Low Cost Home Ownership	Market Housing
1-bed	30%	25%	5%
2-bed	35%	40%	25%
3-bed	25%	25%	45%
4+ bed	10%	10%	25%

- 4.10. A indicative mix is welcomed. However, as recommended, it is important that these figures do not become too rigid and allow for the individual needs of each community to be met. For example, some areas may be more suitable for the provision of family homes and therefore warrant a lower proportion of 1-bed units, and other areas vice versa.

**Draft Strategic Land Availability Assessment and Appendices**

- 4.11. The Land at Moat Road was assessed under within the Draft Strategic Land Availability Assessment (SLAA) under reference SA310. The assessment concluded that the site was available, suitable and achievable. The assessment considered that due to trees, archaeology and an open space requirement the developable area would result in 4.83 Ha. The latest design layout for the site demonstrates that 150 homes can be provided on a developable area of 4.5Ha which equates to 33 dwellings per hectare.
- 4.12. The technical response to these the assessment within the SLAA table are included in the Design & Technical Response to Reg 18 & SLAA Papers at Appendix C. Notably the following observations are made:
- Access to highways network - An indicative design has been produced to demonstrate the enhancements to Moat Road including the appropriate widening and the provision of a footpath. Catesby has also held discussions with Kent County Council (KCC) Highways regarding the access arrangements and new pedestrian links and they consider these to be suitable in principle. It is therefore considered that the assessment of the impact on development within the SLAA table should be updated to reflect these further details;
  - Access to Public Transportation & Services - The site is sustainably located near to public transport links which provide regular services to larger settlements as required. Future residents will be located

within 800m of a bus stop which is the threshold adopted by the DfT within the accessibility planning tool. Thus it is not considered that any further bus enhancements are required as set out in the SLAA table.

- Landscape Character - The design will incorporate landscaping and open space areas along the western edge of the site. This will create a strong defensible boundary to the settlement whilst helping to conserve and enhance the overall landscape character of the area and respond to neighbouring amenity;
- Landscape Character - Development will be offset from the southern boundary to enable a landscape character along Moat Road and enable surface water mitigation;
- Ecology – It is considered that onsite mitigation can be provided. These features include the provision of interlinked open space provides linked corridors which will support biodiversity enhancements. The proposal will also include surface water drainage features which will provide ecology enhancement opportunities;
- Arboriculture - Appropriate development stand-offs can be achieved for the TPO trees and they will be retained within public open spaces. Further tree planting will be incorporated into the landscape scheme;
- Heritage and Archaeology - The design and layout has considered the heritage assets and appropriate buffers and landscaping will protect and enhance the setting of the listed properties;
- Flood Risk – development will be in areas of low flood risk. Access is sought through flood zone 2 and 3. In an extreme event, an emergency dry access is location to the north east.
- Drainage - Surface water drainage features will be incorporated into the southern open space areas (outside the Flood Zones 2 and 3). These will store and attenuate surface water flows to greenfield run off rates.

#### **Sustainability Appraisal/Strategic Environmental Assessment**

- 4.13. MBC has published an Interim Sustainability Appraisal (SA) of Growth Options with the R18b LPR. The Headcorn policy (SP6) and the allocation of the land at Moat Road (policy LPRSA310) has been assessed as part of this. Table 6.9 of the SA details the likely effects of the policies in relation to the sustainability objectives (See extract below).

SA objective	SP6(b): Headcorn	LPRSA310 - Moat Road Headcorn	SA objective	SP6(b): Headcorn	LPRSA310 - Moat Road Headcorn
SA1: Housing	0	0	SA10: Water	0	-
SA2: Services & Facilities	0	-	SA11: Air Quality	N/A	N/A
SA3: Community	+	+	SA12: Flooding	0	-
SA4: Health	+	+	SA13: Climate Change	0	-
SA5: Economy	0	0	SA14: Biodiversity	0	-
SA6: Town Centre	0	+	SA15: Historic Environment	0	--?
SA7: Sustainable Travel	0	+	SA16: Landscape	0	-
SA8: Minerals	0	-			
SA9: Soils	0	--			

Table 6.9 SA findings for policy SP6(b): Headcorn and site allocation policies for this location

++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/- or +/-	Mixed minor or significant effects likely
-	Minor negative effect likely
-/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
0	Negligible effect likely
?	Likely effect uncertain

Key to symbols and colour coding used in the SA of the Maidstone Local Plan

- 4.14. Objective SA1 seeks “*To ensure that everyone has the opportunity to live in a decent, well-designed, sustainably constructed and affordable home*”. Paragraph 6.218 of the SA (*SA findings for spatial strategic policies and detailed site allocation policies*) explains that the site has a negligible impact on this objective because the policy does not specify the type or quality of housing. Whilst there are no specific housing requirements set out in Policy LPRSA310, any development coming forward on the site will need to meet the specific policy requirements of the Local Plan Review including Draft Policies:
- SP10(a) - housing mix;
  - SP10(b) – affordable housing;
  - SP15 – Design;
  - Q&D 1 – Sustainable design;
  - Q&D 6 – technical standards; and
  - Q&D 7 – private open space.
- 4.15. Consequently, it is considered that any residential development on the Land at Moat Road will deliver well-designed, sustainable and affordable housing. Furthermore, Catesby has a track record for working closely with councils, local residents and community groups to design high quality developments which deliver significant and lasting benefits. It is therefore considered that the land at Moat Road will have positive effects on SA objective 1.
- 4.16. In terms of SA Objective 3 (community), it is agreed that any development coming forward on the site will provide a positive effect on community cohesion.
- 4.17. SA Objective 4 aims to “*To improve the population's health and wellbeing and reduce health inequalities*” and the allocation of the Land at Moat Road is considered to provide minor positive effects. It is agreed that this will result in a positive effect. However, Catesby consider that this would actually be a significant positive effect due to policy SA310 requirements for design, layout, landscape and public open space requirements.
- 4.18. There are no major comments on SA Objective 5 – Economy but it should be noted that the development of the Land at Moat Road will provide employment opportunities during the construction stage of the proposal.
- 4.19. Catesby are in agreement with the comments on SA Objective 6 – Town Centre.
- 4.20. SA objective 7 seeks to reduce the need for travel whilst promoting sustainable and active methods of transport. As explained in paragraph 6.225 of the SA, the Land at Moat Road is situated in a sustainable location, near to public transport nodes. The allocation requires the pavements on Moat Road to be addressed and Public Rights of Way to be maintained. Further to this, any development proposal would need to adhere to the NPPF transport requirements and Draft R18b LPR policy TRA2. Thus, it is agreed that the development will result in a positive effect.

- 4.21. A minor negligible effect has been identified for SA objective 8. This is due to the northern half of the sites' location within a Minerals Safeguarding Area. It should be noted that this will result in a small percentage of loss to the safeguarded area.
- 4.22. In terms of SA Objective 9, it should be noted that the development of the Land at Moat Road will be on small percentage of Grade 3 land. Headcorn is significantly constraint by flooding and this site is located mainly outside of this. It is sustainable location and is the only identified site for development in the village.
- 4.23. There are no comments on SA objective 10 – Water.
- 4.24. SA objective 12 relates to flooding. Flood modelling assessments will be undertaken on the site and SUDS will be incorporated into any development proposal. In accordance with Policy LPRSA310, the flood safety measures will be agreed with the EA. Furthermore, no inappropriate development (i.e. residential) will take place in the areas of flood zone. Thus the effects of the flood zone are considered to be very minor if not negligible.
- 4.25. SA objective 13 seeks to “*minimise the borough’s contribution to climate change*”. The allocation at Moat Road has been identified to cause minor negative impacts due to “*the relatively poor accessibility to some key services and employment and consequent travel-related carbon emissions*”. However, the SA also identifies that the site to have a positive effect in terms of sustainable transport. Therefore, whilst some services may not be located directly in Headcorn, it is considered that they are reachable with sustainable transport options. It should also be noted that the development coming forward will need to be sustainable construction criteria listed at draft policy SP14(c). Consequently, the site should have negligible effects on climate change.
- 4.26. SA objective 14 relates to biodiversity, in which the site was identified to have a minor negative effect due to its proximity to nearby SSSIs. Paragraph 6.321 states that the “*provisions within the site-specific policies do not affect this score*”. Whilst the site specific policy do not mention the need to mitigate against the impacts of development on the SSSI, it will be implemented within any proposal coming forward on the site in accordance with NPPF paragraph 170.
- 4.27. SA Objective 15 relates to Historic Environment and the site has been assessed to have an uncertain significant effect. Whilst there are no policy specific heritage requirements, the proposed development will take into account the historic environment. A Heritage Assessment will be undertaken to establish any impact any proposal. It is considered there is sufficient separation between the site and any heritage asset to avoid any harmful impact. Any impact will be further reduced by careful masterplanning and design detailing.
- 4.28. There are no significant comments on SA objective 16. It is acknowledged that the site is situated within a sensitive landscape area the proposal will seek to contribute positively to the enhancement and conservation of protected landscape.
- 4.29. Catesby and Savills reserve the right to comment on any further evidence base documents or updated documents as and when they are made available.

## 5. Observations on the Regulation 18b Local Plan

5.1. The Local Plan Review will cover the period from 2022 to 2037 and will replace the MBC Local Plan 2017. The purpose of the plan is to deliver the social, economic and environmental needs of Maidstone and the wider area. Catesby are generally in support of the R18b LPR. However, the section below will provide observations into areas where it is felt the Council are at risk of failing the NPPF's test of soundness:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs<sup>19</sup>; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

### **Spatial Strategy**

5.2. MBC set out 4 spatial strategy options for housing growth within their Regulation 18a draft Local Plan. The current consultation document confirm the strategy via Draft Policy SS1 – Maidstone Borough Spatial Strategy. This sets out that Maidstone Urban Area will continue to be the main focus for development along with new garden settlements at Lenham Heath and Lidsing. A secondary focus will be within Rural Service Centres which are recognised for providing services to the rural hinterland and some larger villages. Paragraph 6.101 explains that development in these centres is more sustainable than smaller settlements.

5.3. Catesby fully support the delivery of housing outside of Maidstone Urban Area and the new Garden Settlements. Whilst it is acknowledged that the new settlements can provide a larger amount of MBC's housing requirement, it should be recognised that these types of development can often be constrained and have long build out rates. Consequently, MBC must plan for smaller development sites to come forward in the earlier stages of the Plan Period. In all alternative spatial strategies tested by the Council, development in rural locations was always required.

5.4. Draft Policy SP6 confirms that Headcorn is classified as a Rural Service Centres. The focus of development in these centres will be via allocated sites within the 2017 Local Plan or Local Plan Review. With regard to Headcorn, paragraph 6.104 explains the sustainable nature of the existing village due to its 'diverse range of services and community facilities which are easily accessible on foot or by cycle'. Furthermore, there is

access to local employment opportunities. Draft Policy SP6B sets out that 402 new homes will be delivered via these allocation. Of which, includes the Land at Moat Road. Key infrastructure within Headcorn is listed at point 3 of the policy and includes:

- Highways/transport improvements;
- A one form entry extension to the primary school;
- 3.6 Ha of public open space;
- Sewer and wastewater improvements;
- Health infrastructure improvements.

5.5. In accordance with NPPF paragraph 92, these infrastructure improvements are recognised as essential requirements within the local area. Catesby fully support the delivery and implementation of these in order to support a sustainable and balanced community. It is important that the obligations for the delivery of these are equally distributed among the housing developments within the village in accordance with the tests set out in NPPF paragraph 56.

### Housing

#### Housing Need

- 5.6. MBC has calculated the objectively assessed need (OAN) to be 1,214 dwellings per annum using Standard Method 1. Following the Governments announcements on 17<sup>th</sup> December 2020, the new Standard Methodology does not change this calculation. However, the delivery of the housing need relies on 6,917 dwellings via extant planning permissions, 1,088 via allocations without planning permissions and 2,284 in broad locations without planning permissions which is a large proportion of the overall need. This OAN is to be reviewed prior to the Regulation 19 Local Plan Consultation with more up to date figures as stated in paragraph 5.7 of the R18b LPR. Further to this, R18b LPR paragraph 7.1 explains that MBC have not included a contingency due to the uncertainties around planning reforms (within the Planning for the Future White paper), Covid 19 impacts and Brexit.
- 5.7. Whilst it is accepted that MBC are currently planning for their objectively assessed needs (Standard Method), it is fundamental to recognise that the figure is a minimum and not a ceiling. Early delivery will be essential to achieving the required level of growth over the plan period. It is essential to ensure that the Council allows for sufficient flexibility in the Plan to accommodate housing needs and allow for choice in the market through delivery of a higher number of homes than the minimum expected. It is considered that the plan has not allowed for any flexibility in this requirement and therefore not in accordance with NPPF paragraph 11. Furthermore, it relies on a larger proportion of the need being delivered via extant planning permission and other previous allocations. It is considered that in light of the planning reforms, Brexit and possible Covid 19 impacts, MBC certainly should include a contingency within the early development of their plan.
- 5.8. To ensure the LPR is positively prepared, there is a duty to cooperate with other authorities to ensure that any unmet need is accommodated. It is acknowledged that MBC have made progress with neighbouring



Local Authorities (Ashford Borough Council, Tunbridge Wells Borough Council, Tonbridge & Malling Borough Council, Medway Council and Swale Borough Council). Given the recent issues in the South East regarding the failings of emerging Local Plans on this point, it is essential that MBC fully establish if there is an unmet need of neighbouring authorities. It is noted that MBC has not considered the outcomes of the unmet housing need in London despite the recommendation of this within paragraph 10.5 of the SHMA. It is understood that London will struggle to deliver the required 52,000 homes per annum given the low delivery of housing over recent years. Given MBC's proximity to London, it is likely that they will need to consider if they can accommodate any of the unmet need so that they do not fail their duty to cooperate.

#### Housing Mix - Draft Policy SP10A

- 5.9. NPPF paragraph 61 requires the size, type and tenure of housing need to be assessed and reflected in Policy. MBC have acknowledged at paragraph 7.8 of the consultation document that a specific housing mix target has not been set to allow for flexibility over time. Instead, Draft Policy SP10A requires development proposals to consider the latest SHMA (currently 2019). Our observations on the SHMA are located at paragraphs 4.2-4.10 of this document.

#### Affordable Housing - Draft Policy SP10C

- 5.10. The affordable housing need in the area should be assessed and reflected into planning policies whereby the type should be specified, as set out in NPPF paragraphs 61-62. Paragraph 7.12 of the R18b LPR explains that there is a net affordable housing need of 5,800 homes between 2013-2031 which equates to 322 homes a year. It is important to note, that these figures have not been updated with the latest SHMA 2019 figure which identifies a need of 464 affordable homes a year.
- 5.11. Draft Policy SP10C requires the provision of affordable housing on developments of over 10 dwellings or over 0.5 ha in size. Specifically, this policy requires a 30% provision in Maidstone Urban Area and 40% on residential developments in the countryside, rural service centres and larger villages.
- 5.12. The principle of affordable housing on residential development on development larger than 10 dwellings or larger than 0.5 ha is fully endorsed by Catesby as well as being a national requirement. However, the disparity between the percentage requirement in urban areas and the countryside, rural service centres and larger villages is questioned.
- 5.13. Firstly, paragraph 7.14 of the R18b LPR identifies that the percentage split is derived from the Local Plan viability testing. However, this testing has not yet been updated to reflect the current market conditions. Thus, these percentage requirements maybe considered out of date.
- 5.14. It should also be noted, that the affordable housing requirement within the newly proposed garden settlements has not been included within this policy and thus, their important contribution toward the affordable housing need in the borough should not be lost.
- 5.15. Table 5.18 (extract below) of the SHMA 2019 identifies the estimated gross need for affordable housing across the three sub-areas within MBC (Urban, Rural Centre & North and Rural South). 65% of the

affordable need is required in the Urban Area, 26% in Rural Centre & North and 8% within Rural South. This demonstrates that the Urban Area has the largest affordable housing requirement. Consequently, it seems illogical that developments within the Urban area would be subject to less affordable housing.

**Table 5.18 Estimated Gross Need for Affordable Home (per annum) – 2019-37**

	Urban	Rural (C&N)	Rural South	Borough
Current need	16	5	2	23
Newly forming households	223	94	31	348
Existing households falling into need	48	15	6	70
<b>Total Gross Need</b>	<b>287</b>	<b>115</b>	<b>39</b>	<b>441</b>

*Source: Census (2011)/Projection Modelling and affordability analysis*

- 5.16. The Local Plan should set a base line for all areas of the borough. Viability of this affordability should clearly still be tested on a case by case basis to allow for flexibility within the future housing market.
- 5.17. It should be noted that the proposed development at the Land at Moat Road seeks to deliver 40% affordable which is in accordance with the proposed policy. However, in order to meet the tests of soundness, it is important that the evidence for the amount of affordable housing is available.

**Sustainable Transport – Draft Policy SP12**

- 5.18. Catesby welcomes the introduction of an enhanced sustainable transport system and the proposal set out in part 3 of Draft Policy SP12. Section 9 of the NPPF is dedicated to the promotion of such transport, requiring consideration to be given to transport issue from the earliest stages of plan making.
- 5.19. However, it is considered that MBC have only considered the wider sustainable transport strategy and how this relates to development proposals has not yet been fully considered. It is recognised that all landowners/developer will be required to work collaboratively with the Council and their partners to ensure that this sustainable transport strategy comes forward. However, greater certainty on specific transport requirements at major developments should be provided via the policy to allow developers to adequately prepare proposals. Finer details, such as the provision of a new bus route, can be discussed and achieved via pre-application meetings.
- 5.20. This policy also only appears to focus on enabling new infrastructure rather than improving the existing. A mixture of both will be required. It is also does not provide details on how the suggested transport measures will be funded and so further analysis on this will be required.
- 5.21. The Land North of Moat Road presents an opportunity deliver a highly sustainable development providing easy access to services, school and work by non-car modes of transport. This promotes the principles set out in section 9 of the NPPF.

**Land at Moat Road, Headcorn, Allocation - Policy LPRSA310**

- 5.22. For the avoidance of doubt, the road name 'Mote' has been spelt incorrectly throughout the policy, instead it should read 'Moat'.
- 5.23. Catesby support the allocation of the land at Moat Road for residential development in principle and consider the site to be a suitable and developable and deliverable development site which will contribute towards the housing need of the borough. However, the allocation does not allow the land to be used in the most effective way in accordance with NPPF paragraph 117. Currently, the allocation is for approximately 127 dwellings at an average density of 30 dwellings per hectare. Catesby have undertaken technical analysis and a range of masterplanning options which indicate the site is suitable for the delivery of circa 150 units at a density of only 33 dph whilst providing a generous amount of functional open space and landscaping. As discussed in paragraphs 5.6-5.8 of this document, the housing need that the R18b LPR has set out is considered to be inflexible and without a contingency plan with regards to the recent planning reforms, Brexit and Covid 19. Furthermore, the housing need is set at a minimum and MBC should be striving to maximise their development opportunities to allow for greater housing certainty. The technical assessments of the site have demonstrated that the Land at Moat Road is capable of delivering 150 homes. Therefore it would be more effective and sustainable to make the best use of this site to allow for greater flexibility with the housing delivery in the Borough. Page 5 of Appendix C provides the design response to the indicative masterplan setting out how the requirements of the policy can be achieved.

**Design and Layout**

- 5.24. The draft allocation sets out several conditions for a development proposal to abide by. Under the design and layout conditions, it is explained that the density should reflect the site's semi-rural setting. NPPF paragraph 122 seeks efficient use of land whilst taking in account *'the desirability of maintaining an area's prevailing character and setting'*. It is understood that the character of the village should be maintained in development proposals. However, given the housing need in the borough and that 402 new dwellings will be delivered in the Headcorn, it is considered that the character of the area will evolve over time. Draft Policy SP15 (Principles of good Design) requires development to *'Respond positively to, and where possible enhance, the local, natural or historic character of the area'*. Moreover, Draft Policy Hou 5 seeks a net density of 30 dwellings per hectare in rural service centres where it is appropriate to the setting. It is considered that in Headcorn that a slightly higher density could be achieved with good design and layout.
- 5.25. These policies should be consistent with each other and NPPF paragraph 122. Draft Policy LPRSA310 should not depict the current character as 'semi-rural'. Instead, the condition should require the density and typology of a new development to be approximately 30 dwellings per hectare whilst being sensitive to the existing character of the village whilst not artificially restricting important new development.
- 5.26. The indicative layout in Appendix C demonstrates how a density of 33dph can be achieved whilst being sensitive to the character of the village.

Landscape / Ecology

- 5.27. The conditions under the landscape / ecology section of the policy are broadly agreed with. However, it is important to note that to achieve safe highways access into the site, some of the hedgerow fronting Moat Road will need to be removed. Whilst Catesby will ensure that the minimum amount is lost, it is essential that this access is safe for all users.

Access, Highways and Transportation

- 5.28. Catesby acknowledge the requirement to address the fact that there is currently no pavement within 200m of the site boundary on Moat Road. It is proposed that a new 1.5m footway is provided along Moat Road which allows pedestrian access to the village centre. The design of these enhancements is included in Appendix C. Discussions regarding the access arrangements at the site have already taken place with KCC Highways and are agreed in principle. These discussions will be continued through the evolution of the proposal and via detailed pre-application discussions with the both the Local Planning Authority and the KCC Highways.

Flood Risk / Drainage

- 5.29. Access is proposed in the south west corner of the site, whereas the south east corner falls within Flood Zone 2 and 3. In the event of flooding of Moat Road, the proposal also includes a secondary access to the north east. The NPPF sets out strict policy regarding flood risk, stating at paragraph 155 that inappropriate development in areas at risk of flood should be avoided and therefore, inappropriate to plan for dwellings in this area. It is understood that further assessment into this will be required and thus a Flood Risk Assessment will be completed as part of the development.
- 5.30. Additionally, the proposed development will incorporate sustainable drainage systems (SUDs) as required by NPPF paragraph 165.

Open Space

- 5.31. The policy requires a minimum of 1.28 Ha of open space to be delivered within the site as well as further on/off site provision and/or contributions towards off-site provision/improvements. Catesby understand the requirement for open space to be delivered at the development and the proposal currently plans for 2.71Ha. However, it is not clear where the specific requirements of this policy have come from and why additional provision/contributions (unknown in quantum) will be required in addition to on site provision. In addition to this, Draft Policy INF1 sets out specific quantity standards for new housing or mixed-use development sites. It is not clear if the requirements set out in Draft Policy LPRSA310 reflect these quantity standards and if they do not, there is no explanation as to why. Furthermore, point 6 of this policy allows a flexible approach to the provision and typologies of open space so that the needs of a relevant area can be taken into account. It is important that this approach is extended across draft allocations policies.

- 5.32. There does not seem to be appropriate evidence to support this policy. Therefore, to meet the tests of soundness in terms of it being justified, further information should form part of the evidence base for the Local Plan.

Utilities Infrastructure

- 5.33. Utilities infrastructure will be need to be installed on the site and so this condition is accepted. Confirmation will be sought from each network operator to determine whether reinforcement to existing infrastructure will be required to serve the site.

**Draft Development Management Policies**

Policy INF1: Publicly accessible open space and recreation

- 5.34. Draft Policy INF1 sets out standards and requirements for public open space. As explained in paragraph 5.30 of this representation, it is not considered that the requirements of this policy are reflected within Draft Policy LPRSA310.
- 5.35. It is not clear if the requirements set out at point 1 are required on-site. The delivery of allotments and outdoor sports facilities on every housing development site is unlikely. However, point 3 suggests that this is proposed unless site constraints, housing delivery expectations on allocated sites or location restrict this. This does not meet NPPF paragraph 11 to allow for plans to be sufficiently flexible. It is considered that an overall strategy for open space should be established and then each development proposal should be considered on its merits.
- 5.36. Finally, the open space quantities are very specific and there does not seem to be an evidence base document leading to these figures. Therefore, to meet the tests of soundness in terms of it being justified, further information should form part of the evidence base for the Local Plan.

Policy Q&D 1: Sustainable design

- 5.37. Policy Q&D 1 requires all new developments to adopt a fabric first approach as well as consideration into incorporating on-site renewable or low carbon energy production. Whilst the importance of tackling the climate change emergency is fully supported, viability testing for delivering such measures on site is required to ensure the deliverability of the site. It is recognised that MBC have acknowledged that further viability testing is required.

## 6. Summary

- 6.1. These representations have been formulated on behalf of Catesby Estates PLC in relation to the Land at Moat Road, Headcorn. They are written in response to the consultation on the Maidstone Borough Council Regulation 18b Local Plan Review.
- 6.2. This consultation response has sought to provide observations on the R18b LPR and relevant evidence base in relation to the proposals for the Land North of Moat Road, Headcorn, demonstrating both the value and opportunity that the site brings to meeting housing needs in the borough, and suggesting the approach that MBC should take to ensure a positively prepared plan is progressed.
- 6.3. The Land North of Moat Road was submitted to the Council during the 'call for sites' and has a draft allocation (Policy LPRSA310) within the Reg18b LPR for 127 dwellings. Catesby fully support the allocation of this site, but firmly believe that the allocation quantum should be increased to make best use of this available land resource and provide greater flexibility in housing delivery overall.
- 6.4. Further technical documents have been provided as part of this representation regarding the Land at Moat Road. These studies demonstrate:
- The indicative layout which responds to the policy requirements set out in Draft Policy LPRSA310;
  - A developable area of 4.5 Ha with the remaining 2.71 Ha as open space;
  - The development can deliver 150 dwellings at a density of 33dph;
  - Detailed design response to the SLAA Assessment;
  - Indicative site access and improvements to Moat Road.
- 6.5. Catesby would be pleased to meet with policy officers at MBC to discuss the opportunities at the site and how a collaborative approach can be taken to ensure the most appropriate development comes forward.



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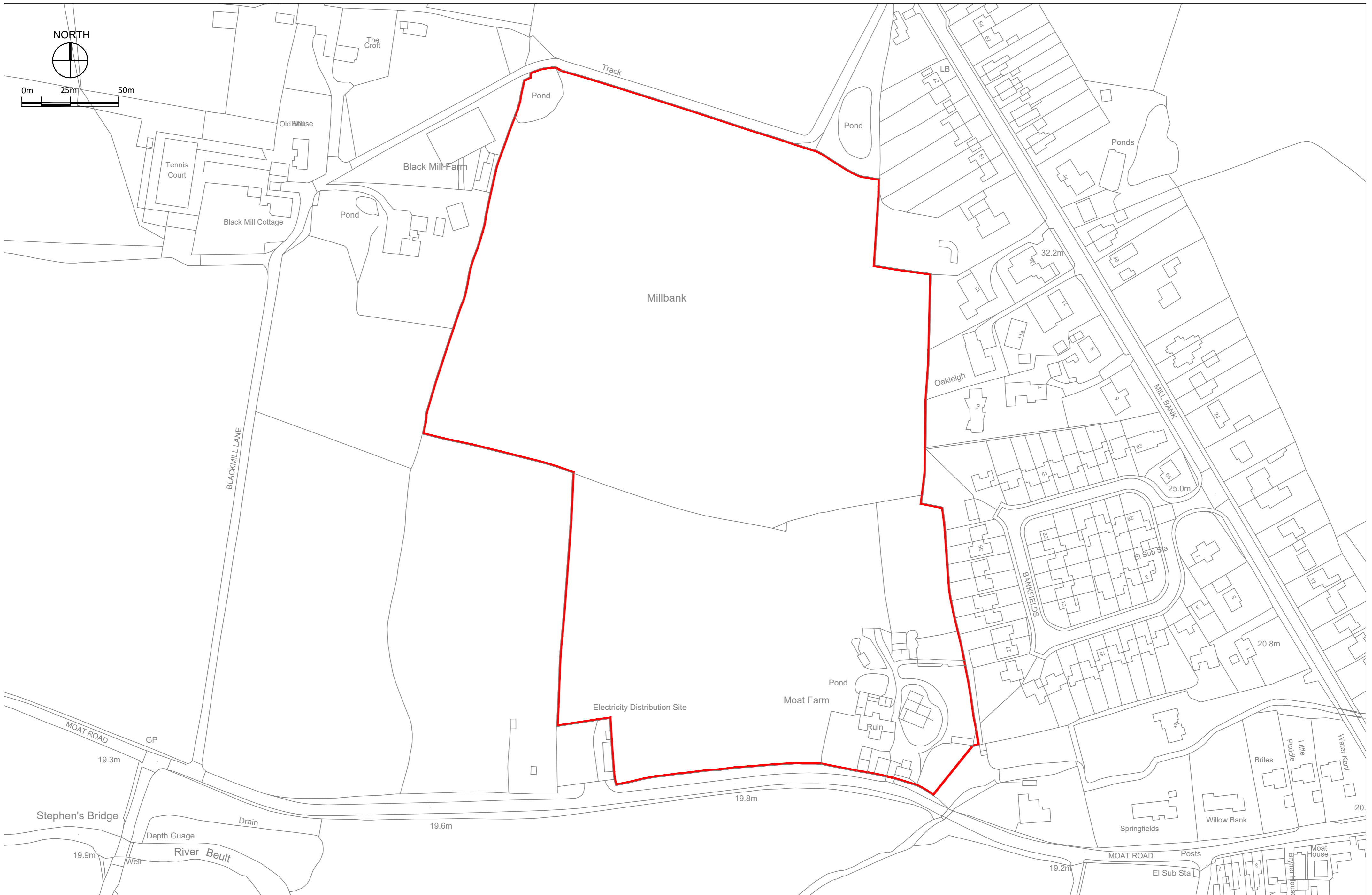
## Appendix A Site Location Plan

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NORTH



0m 25m 50m



Catesby Estates plc

part of Urban&Civic

Project Name:

LAND NORTH OF MOAT ROAD  
HEADCORN, KENT

Drawing Title:

RED LINE PLAN

O:\Current Sites\All Viability Sites Only\Headcorn, Kent\Technical Drawings\LC\_004 Red Line Plan

Scale: 1:1250	Media/Orientation: A2L	Drawn: LA	Checked: -	Day/Month/Year: 20/05/19
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Project No.:	Drawing No.:
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LC/004

Suffix:	Date:	Description:	Drawn:	Checked:
Revisions:				





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## Appendix B Vision Document

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Catesby Estates plc  
part of Urban&Civic

# Land North of Moat Road

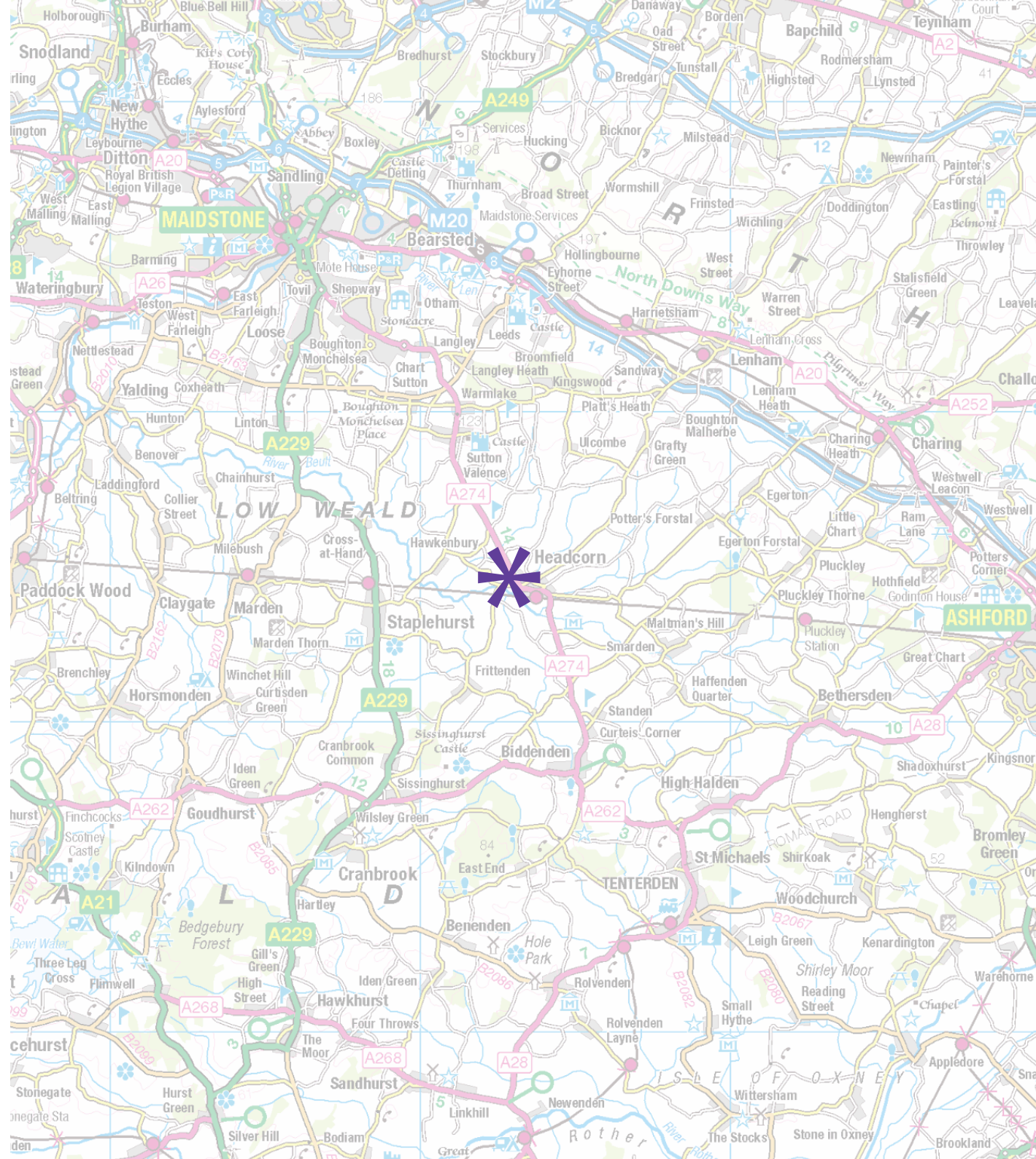
Headcorn, Kent

Vision Framework

May 2019

# Contents

1. Introduction
2. Planning Context
3. Site Context
4. Local Context
5. Why this location?
6. Site Considerations
7. Illustrative Masterplan
8. Summary
9. Land Promoters & Developers Federation (LPDF)





View towards the south east from the west

# 1. Introduction

This Vision Framework and supporting Transport and Landscape technical assessments have been prepared to accompany representations to the emerging Maidstone Borough Council Draft Local Plan. It presents Catesby Estates vision for a new residential allocation on land north of Moat Road, Headcorn.

Catesby Estates is a specialist strategic land promotion and infrastructure business, focusing on the delivery of residential planning consents and their onward sale to housebuilders. Catesby work closely with councils, local residents and community groups to design high quality developments which deliver significant and lasting benefits.

Catesby Estates forms part of the Urban&Civic Group - a market leader in the delivery of strategic sites. Urban&Civic own and direct eight major strategic projects that are expected to deliver over 33,000 residential homes, 6 million sq ft of associated commercial accommodation, 626 hectares of open space, 11 primary schools and 3 secondary schools.

Catesby and Urban&Civic's approach is one of detailed engagement with local communities and stakeholders alike to ensure that development is sustainable and meets community requirements.

This document describes the site and its surroundings and presents a masterplan concept for the proposed development.





## 2. Planning Context

The site is located within the administrative boundary of Maidstone Borough Council.

Policy LPR1 of the adopted Local Plan requires an early review of the plan, this will include a review of housing needs and identification of additional housing land to maintain a suitable supply. The aim is to have the plan adopted by April 2021.

The existing spatial strategy for the Borough is to focus the majority of new development in and around Maidstone as the county town. The Rural Service Centres, which include Harrietsham, Headcorn, Lenham, Marden and Staplehurst will be the secondary focus for housing development with the emphasis on maintaining and enhancing their role and the provision of services to meet the needs of the local community.

Headcorn provides an excellent range of facilities which both serve the village and the surrounding area. There is both a nursery and a primary school, a range of shops, a doctor's surgery, pub, restaurants and community hall. Headcorn has a thriving local economy with 143 businesses operating out of the settlement. It is also served by a good public transport network including regular bus services to Maidstone and a main line train station running between Ashford and London. Whilst the village lies within a landscape of local importance where proposals should seek to contribute positively to the conservation and enhancement of the landscape, unlike Lenham and Harrietsham, the settlement is not within the AONB.

The site is located close to the village centre and contained by existing development on its eastern and northern boundaries. There is also the ability to strengthen the existing hedgerows and tree belts on the western

and eastern edges of the site to provide strong defensible boundaries which can positively contribute to the conservation and enhancement of the landscape.

### Deliverability

The NPPF and the Government's growth agenda seek to ensure that sufficient land is available in the most appropriate locations to increase housing supply, support growth and boost home ownership. Importantly this land is deliverable, to ensure that Maidstone Borough Council can meet their housing need.

To be considered deliverable sites should meet the following tests:

- Be Available
- Be Suitable
- Be Achievable

The land at Moat Road satisfies each of the NPPF criteria as follows:

### Availability

Catesby Estates has agreed terms with the owners of the land to promote for residential development. Catesby Estates is committed to the development and will ensure permission is obtained for residential development to help meet the Council's housing need.

## Suitable

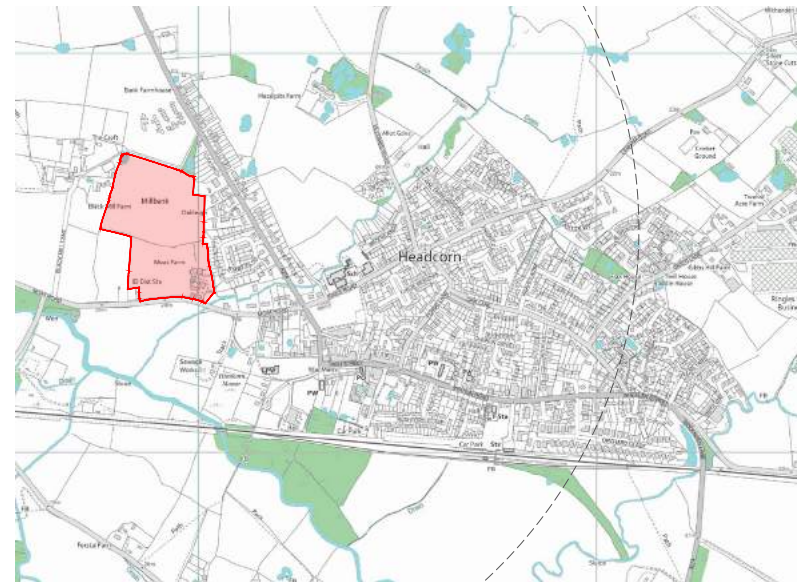
The site is suitable for housing development because it:

- Offers a suitable location adjacent to Headcorn and is immediately adjacent to existing and committed development;
- Can be developed immediately;
- Has no identified environmental constraints that would prevent it from coming forward for residential development;
- Will deliver public benefit in addition to new housing, including much needed affordable housing; and
- Is highly sustainable as it is within walking distance to local services and facilities located in Headcorn.

## Achievable

The concept masterplan illustrates that the site could deliver in the region of 150 dwellings, which would make a significant contribution towards meeting the housing needs of the Borough. This Vision Document and the accompanying supporting technical documentation identifies that the site has no restricting constraints for development.

The Vision Framework proposals confirms that the site is sustainably located, available and capable of delivering a residential development scheme of 150 homes. It is considered that this site should be included in the Council's Local Plan as an allocated site for a residential led development.



*“So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.”*

The NPPF (February 2019)



### 3. Site Context

The site under promotion adjoins the built up edge of Headcorn, a village in the borough of Maidstone, Kent.

The site lies approximately 7 miles north east of Cranbrook, 9.3 miles south east of Maidstone and 14 miles north west of Ashford. Locally the site lies 2.5 miles north east of Frittenden, 3.8 miles south of Sutton Valence and 3.8 miles east of Staplehurst. In terms of the local motorway network, Junction 8 of the M20 is 8 miles north of the site and Junction 2A of the M26 is 20 miles north west.

The site itself takes the form of agricultural land situated to the north of Moat Road. The site is accessed via an area of hardstanding off Moat Road which accommodates former farm sheds. A second access is in the form of a field gate to the north west corner of the site which links onto the track connecting Millbank to Black Mill Lane. A public footpath provides pedestrian access into the site from Moat Road. All boundaries are defined by hedges and trees; in addition a central hedgerow partially crosses the site from east to west, visually dissecting the land into two parcels.

Existing dwellings and rear gardens belonging to properties off Millbank and Bankfields border the eastern boundary and the Catkin Gardens development (under construction by Bovis Homes) borders the site to the north. A small collection of dwellings and farm buildings are situated to the north west (off Black Mill Lane) and an electricity sub station sits to the south west corner of the site off Moat Road. Grassed fields border the remaining western edges.

Key facilities closest to the site include a primary school, library and dental practice - each situated within 550 meters of the site at Kings Road. The majority of other local amenities in Headcorn can be found along the High Street (A274) which is less than 800 meters from the site - equivalent to a ten minute walk or 7 minute cycle. Additional education and retail facilities can be found in the nearby towns of Maidstone and Ashford.

In terms of public transport, a regular bus service operates between Maidstone and Tenterden via Headcorn Railway Station. A school bus also operates from Headcorn to the Cornwallis Academy, Maidstone.

Headcorn Railway Station is 0.6 miles south east of the site and operates direct journeys to destinations such as London Charing Cross, London Cannon Street, Dover Priory and Ramsgate.

Nearby local facilities and public transport connections make the site a sustainable location for future development. The site boundary is shown in red on the opposite page. The gross site area extends to approximately 7.26 hectares / 17.93 acres.



Catkin Gardens  
(Bovis Homes)  
Development under construction

A274

Housing Allocation H1 (36)  
for 220 units

The  
Site

Black Mill Lane

Millbank

Bankfields

Kings Road

Moat Road

A274

High Street

Aerial view of the site

## Site Viewpoints



Aerial view of the site



1.View towards the south east from the north west corner



2.View towards the south from the northern boundary



3. View towards the western boundary from the north eastern corner of the site



5. View across the southern boundary from the central trees and hedgerow



4. View across part of the eastern boundary from the west



6. View north towards the internal tree boundary

## 5. Why this location?

### Local Facilities and Services

Our approach involves understanding the local facilities near to the site in order to determine whether or not additional services are required to benefit both new and existing residents.

As previously highlighted, a range of local amenities are found in Headcorn which includes: a nursery, primary school, library, village hall, post office, supermarket, convenience store, eateries and pubs, sports clubs, recreation grounds, churches, allotments, a doctors surgery, pharmacy and railway station offering excellent train links to various towns and cities. Additional facilities can be found in the nearby towns of Maidstone or Ashford.

In terms of healthcare provision, Headcorn Surgery and Pharmacy is 1 mile east of the site at Grigg Lane. The nearest dentist is Orchard House Dental Practice, 0.3 miles east of the site at Kings Road. Regarding educational facilities, Headcorn Primary School is situated opposite the Dental Practice and adjacent to Headcorn Library which at 0.3 miles equates to just a 7 minute walk from the centre of the site. There are three secondary schools within eight miles of the site: Cranbrook School (6.9 miles south west), Lenham School (7.1 miles north east) and Cornwallis Academy in Maidstone (8 miles north west).

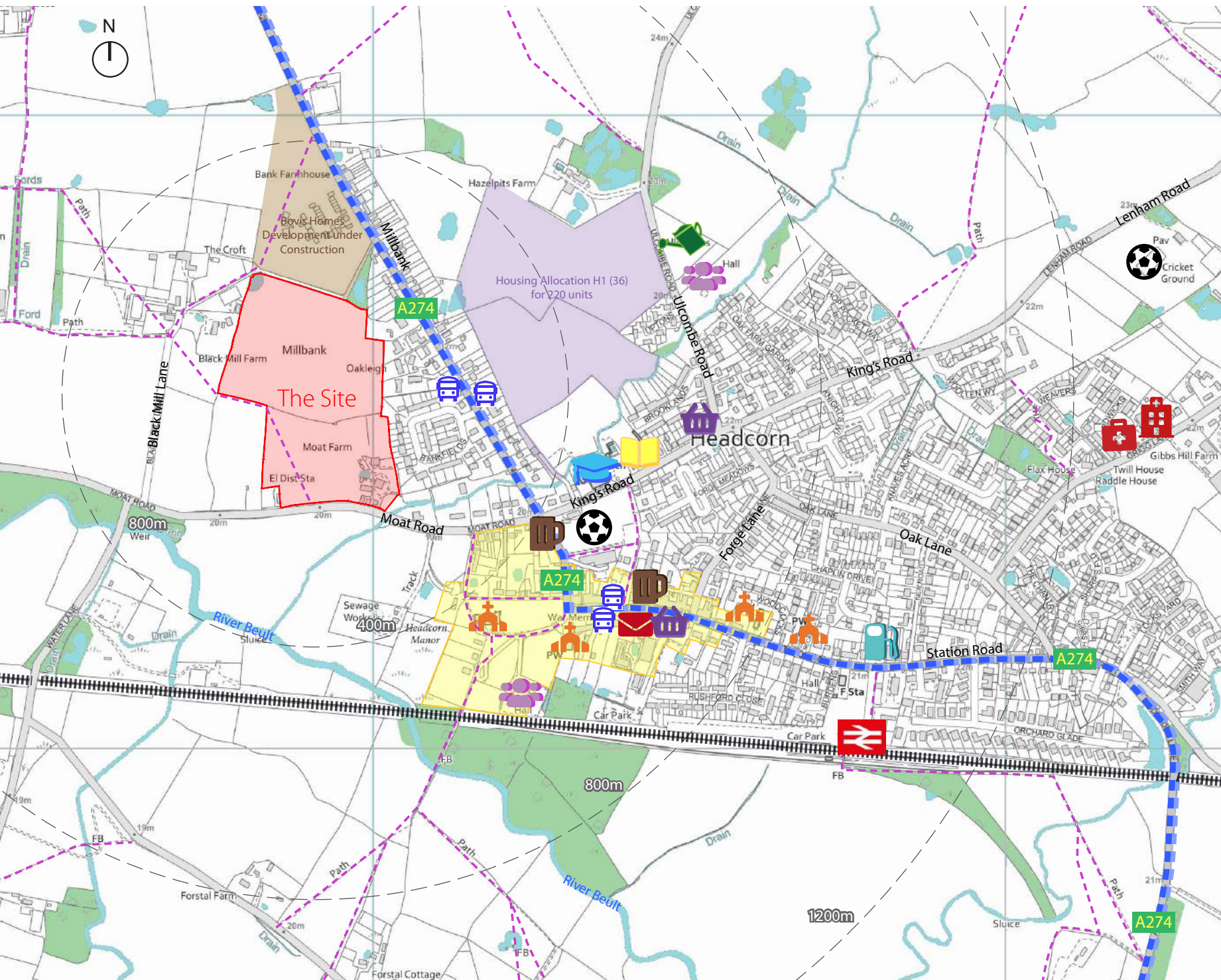
### Accessible Location

Moat Road runs parallel to the site's southern boundary and connects the Kings Road / A274 priority crossroads to the east with Hawkenbury Road (via Summerhill and Four Oaks Road) to the north west. The road is subject to a 30mph speed limit from the east (by the A247) and increases to the national speed limit upon approaching the south east corner of the site, adjacent to the farm sheds.

In terms of local buses, the nearest stops are along the A274 at both Millbank (550m from the site) and the High Street (670m from the site). The stops are served by the Arriva South East 12 bus which runs every 30 minutes during weekdays and hourly at weekends between Maidstone and Tenterden (via Headcorn Railway Station). The Nu-Venture 66 bus also serves both stops and operates a school service to the Cornwallis Academy.



















Headcorn Railway Station is 0.6 miles south east of the site and operates twice hourly services to London Charing Cross (a 1 hour 10 minute journey). At peak times trains also serve London Cannon Street (a 1 hour journey). Additional trains operate separate hourly services to both Dover Priory (a 50 minute journey) and Ramsgate (a 1 hour 17 minute journey) via Canterbury West (a 40 minute journey).

Public Rights of Way connect the village to neighbouring settlements and beyond. A public footpath diagonally runs from the southern site boundary (off Moat Road) to the western boundary (adjacent to Black Mill Farm) before joining onto Black Mill Lane and spurring west towards Summerhill, and north east towards Millbank (via the Catkin Gardens development under construction).



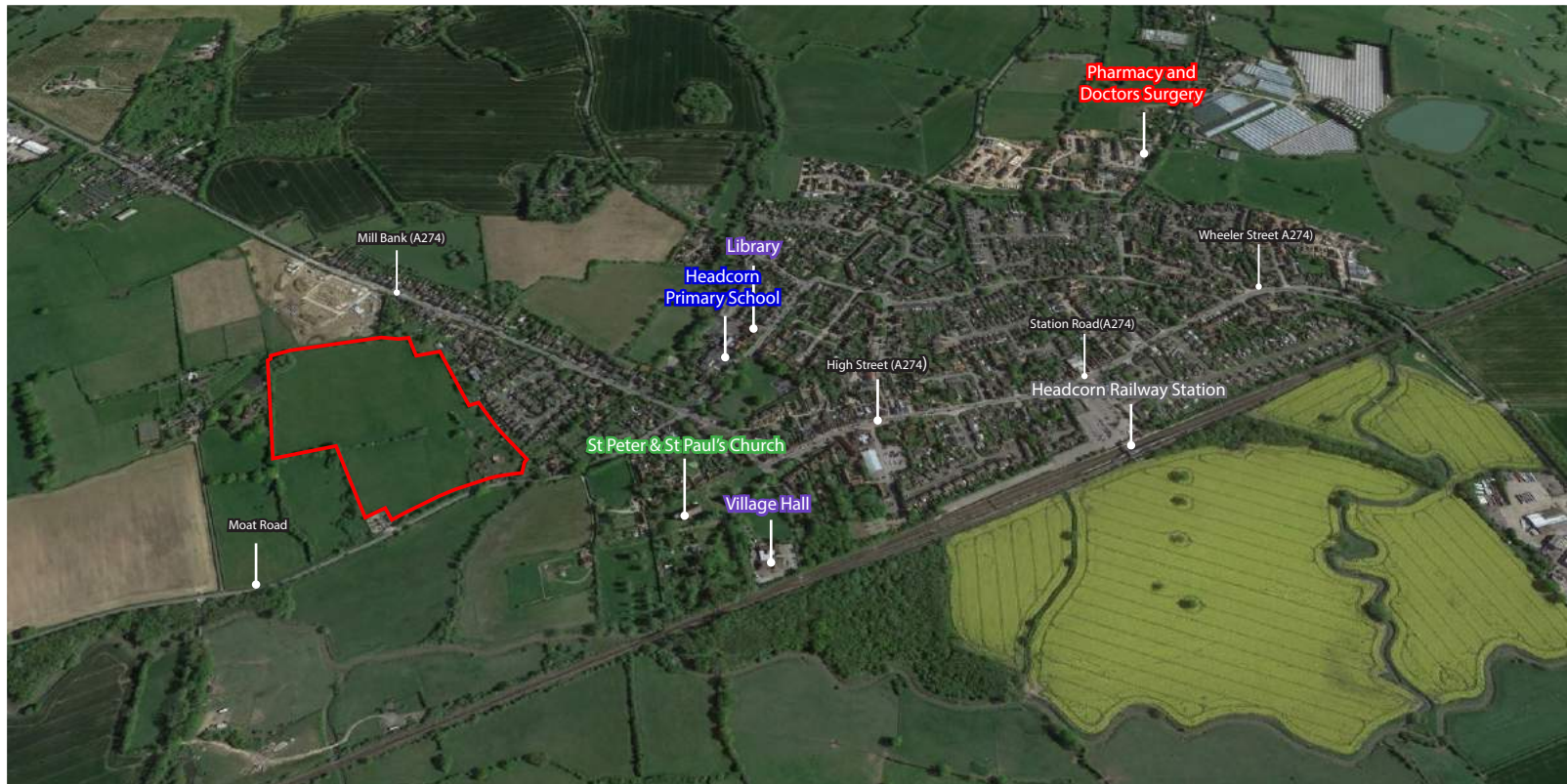
Local Facilities Plan

Key

-  The Site
-  Closest Bus Stops
-  Bus routes
-  Public rights of way
-  Headcorn Railway Station
-  Headcorn Conservation Area
-  School
-  Local supermarkets / convenience stores
-  Filling Station
-  Pharmacy
-  Doctors Surgery
-  Post Office
-  Places of Worship
-  Community Facilities
-  Library
-  Public Houses
-  Recreation Grounds / Sports Facilities
-  Allotments

## 6. Site Considerations

This section provides an overview of the site's characteristics and all environmental and technical matters. It confirms there are no significant physical, environmental or technical constraints to developing the site for residential use. The plan featured at the end of this section shows some of the site's constraints and opportunities for development.



Aerial view across the site

## Landscape\*

Headcorn lies within a landscape of local importance and therefore proposals will seek to contribute positively to the enhancement and conservation of protected landscape. The village is also surrounded by the River Beult which is designated as a Site of Special Scientific Interest (SSSI). At closest, the river lies 160m south of the site.

At present, there are some limited views into the site from the west through gaps in the hedgerow. A sensitively designed landscape scheme featuring visual mitigation measures (for example, lower ridge heights to the north and a landscaped buffer to the west) would create strong defensible boundaries which help to conserve and enhance the landscape. This would ensure the development would respect its edge of settlement location as well as neighbouring amenity. It would also provide new public open space and areas for biodiversity enhancement.

With mitigation, any potential landscape and visual effects resulting from developing the site would be limited to views from pedestrians using Moat Road, those using the public footpath network and from buildings in close proximity to the site - such as the dwellings situated off Black Mill Lane, Catkin Gardens and those backing on to the eastern boundary. Views would be seen in the context of neighbouring residential development to the north, east and north west and can be seen as a natural extension to the western edge of Headcorn.

\*For more detailed information, please refer to the accompanying Technical Note produced by The Environmental Dimension Partnership Ltd.

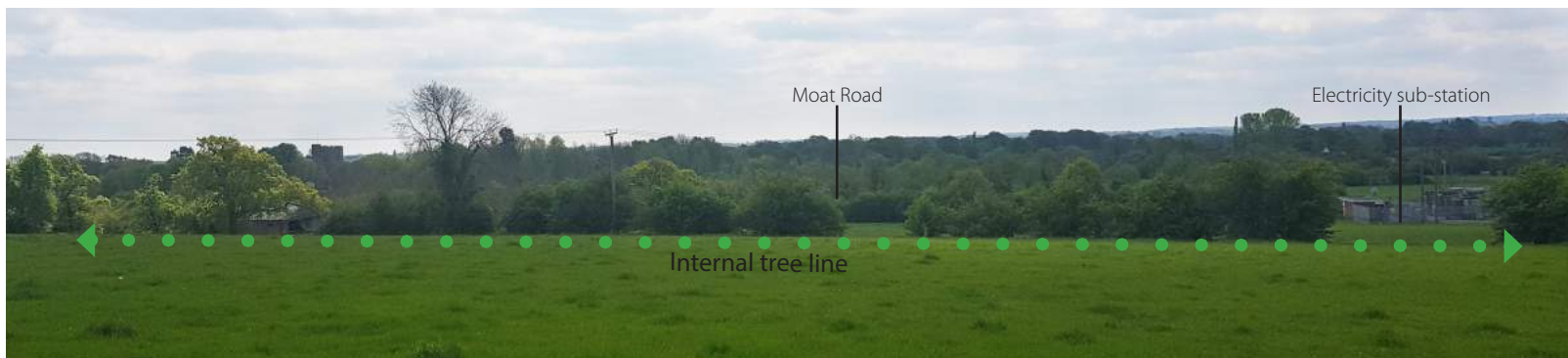
## Heritage

There are forty listed buildings in Headcorn which includes the Grade I Listed Church of St Peter and St Paul - approximately 240m from the sites south east corner. The site itself does not contain any listed buildings however The Moat - a Grade II Listed former farmhouse, sits approximately 35m east of the existing farmsheds on site.

The majority of listed buildings are set within the historic core of the village which is designated as a Conservation Area. The Conservation Area (as highlighted on the Facilities Plan) surrounds the Church of St Peter, the southern side of Moat Road and the High Street - the closest part of the area being 140m from the site.

A Heritage Assessment will be undertaken to establish any impact this proposal would have on the setting of the Conservation Area and listed buildings. However it is considered there is sufficient separation between the site and any heritage asset to avoid any harmful impact. In addition, there are no direct views into the site from the Church of St Peter and St Paul or from within the Conservation Area. Through a careful masterplanning process, the deliverability and capacity of the site for development should not be constrained.





View towards the southern boundary from the north

### Arboriculture

The site is defined by hedgerow and trees to all perimeters with an internal tree line (albeit with gaps) visually dissecting the site into two parts. Maidstone Borough Councils 1986 Tree Preservation Order (TPO) Plan identifies TPO's set amongst five Oak and Ash trees within the internal tree line, within a cluster of trees on the central western boundary and to the north west and north east corners. Appropriate development stand-offs will be proposed to ensure protection.

Tree and hedge clearance will be required in order to facilitate both the vehicular and emergency access into the site however every effort will be made to preserve all other significant trees and hedgerows within the proposal. Large densities of new tree planting will be proposed throughout the site to offset tree loss and soften development.

Detailed investigation will determine the significance of vegetation on site and will include the completion of a BS5837:2012 compliant tree survey.

### Ecology

The site is largely pasture which has a low ecological value. Habitats of elevated value within the site, including hedgerows, established trees and the pond to the north west corner will be retained unless they are required to be removed in order to facilitate access.

Overall, the site is considered to provide only minor opportunities for protected species however ecological surveys would be undertaken to confirm this. The proposals will include any appropriate mitigation to ensure that existing habitats are sufficiently protected and opportunities for biodiversity enhancement are incorporated. This could include the reinforcement of green infrastructure, introduction of wetland features and installation of bat and bird boxes.

### Ground Conditions

BGS mapping shows bedrock of the Weald Clay Formation which comprises Mudstone and Limestone. No superficial deposits have been recorded and the site is not affected by coal mining. The site is within the 3-5% radon potential which requires basic gas protection (radon proof membrane).

The site has been used for agriculture since at least 1875. Given the current and former uses, the risk of significant contamination being present is low across the majority of the site, however prior to development a ground investigation will be required. Existing buildings and hardstanding areas to the south east corner of the site will need to be assessed for asbestos and contamination due to the sites previous uses.

### Air and Odour

Sewage Works are situated approximately 180m south east of the site and therefore shouldn't impact proposed development. However an Odour Assessment could be undertaken to confirm this should it be required.

### Flood Risk and Drainage

The Environment Agency's Flood Map shows that the majority of the site is located in Flood Zone 1. This comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding <0.1%>.

The south east corner of the site is located in Flood Zone 2 and 3 (due to close proximity to the River Beult and its tributary situated to the south east of the site) so must therefore be exempt from development.

GOV.UK surface water flood mapping has been investigated and low risk surface water flooding has been identified to the south east. Surface water outfalls into an existing culvert on Moat Road which connects onto the south east tributary before joining the River Beult. In order to alleviate any potential risk (albeit low risk) additional flood modelling assessments will be undertaken.

A surface water attenuation and disposal strategy utilising SUDS features will also be prepared to inform proposals.

Foul drainage will outfall into the existing sewer identified on Moat Road. Capacity checks will however be required to confirm that the sewer can accommodate the proposed flows with a potential requirement for improvement works.

### Utilities

Mains gas, water, electricity and BT (fibre) will all need to be installed to serve the site all of which are available in Headcorn. Confirmation will be sought from each network operator to determine whether reinforcement to existing infrastructure will be required to serve the site.

At present, 33kv Overhead Power Cables diagonally cross the site however these are due to be removed and replaced with a high voltage underground cable running parallel to the sites western boundary as part of the proposals.

### Noise and Vibration

The surrounding uses of the site are largely residential therefore noise is unlikely to be an issue for either existing or future residents.

It is recognised that the electricity sub-station in the south west corner of the site could have a localised impact. A baseline noise level survey and an assessment of the site to examine the extent of the current noise environment will be carried out based on the guidance contained within British Standard (BS) 8233:2014 "Guidance on sound insulation and noise reduction for buildings".

The results of the assessment will include any requirements for mitigation measures to ensure that internal and external noise levels are within guideline values. Due to the localised nature of the noise source it is considered that simple mitigation measures such as fencing or building fabric would be sufficient.



Ordnance Mapping



View south towards the electricity sub station

## Highways and Access

The site is currently accessed via an area of hardstanding off Moat Road which accommodates former farm sheds. A second access is in the form of a field gate to the north west corner which links onto the track connecting Millbank to Black Mill Lane.

Primary vehicular access into the site is proposed off Moat Road, approximately 28m east of the electricity sub station entrance and would take the form of a 5.5m wide priority t-junction. An emergency access is also proposed to the north of the site which would connect onto Millbank (A247) via the existing track.

Internal access around the site will be along secondary roads, shared surface areas and private drives. Parking will be provided in accordance with Supplementary Planning Guidance.

An existing pedestrian link into the site is in the form of a public footpath which diagonally runs from the southern boundary (off Moat Road) to the western boundary (adjacent to Black Mill Farm). In order to achieve a suitable access into the site, the footpath will need to be diverted along the western boundary. This can be carefully designed to link in to the proposed open space and landscape areas to retain a high quality environment for its users. All remaining footpath links on site shall be retained and enhanced.

Proposed pedestrian access will be provided by a 1.5m wide footway adjacent to the primary vehicular access into the site. The emergency access plus the existing access to the north west would be utilised as pedestrian accesses and link around all development perimeters, strengthening the choice of route within the site.



View west along Moat Road



View east along Moat Road, adjacent to the public footpath entrance into the site



View west along Moat Road

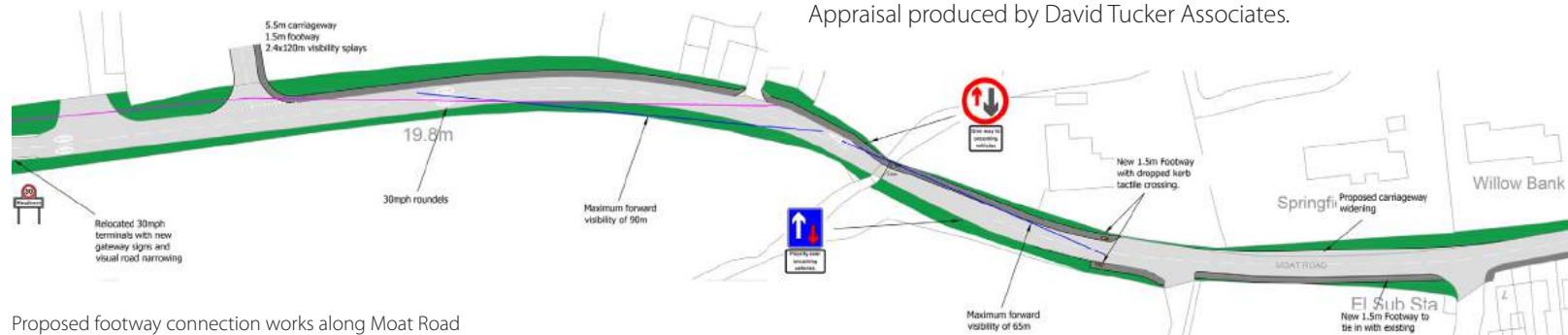
### Additional Highways Improvements\*

In order to improve road safety and pedestrian connections into the village centre, new 1.5m footways are proposed along Moat Road which would tie in with existing footpaths to the east which connect to the village centre.

The carriageway would also be widened and feature signage at the existing bridge; warning drivers coming into the village to give way to traffic, and giving priority to those travelling west (heading away from the village). This will automatically reduce the speed of vehicle entering the village.

In addition the existing 30mph speed limit would be relocated further west (adjacent to the electricity sub station entrance) and feature new gateway signs, roundels and visual road narrowing.

Further assessments and consultation with the Local Highway Authority will be undertaken to ensure that any impact from the development on the local highway network is sufficiently mitigated.





















Proposed footway connection works along Moat Road

\*For more detailed information, please refer to the accompanying Transport Appraisal produced by David Tucker Associates.

# Constraints and Opportunities

## Key

-  Gross site boundary  
= approx. 7.26 ha / 17.93 acres
-  -30m- Site contours
-  Existing ponds / watercourses
-  Public Rights of Way
-  Existing road network
-  Existing bus stops
-  Existing Overhead Power Lines  
to be diverted / undergrounded
-  Extent of Flood Zone 2 within the site
-  Extent of Flood Zone 3 within the site
-  Catkin Gardens - Bovis Homes  
Development under construction
-  Housing Allocation H1 (36) for 220 units
-  Existing Sewage Works with 150m isochrone
-  Grade I Listed Church of St Peter and St Paul
-  Grade II Listed Buildings
-  Grade II\* Listed Buildings
-  Proposed enhancements to Moat Road  
inc. widened carriageway and new footpaths
-  Proposed vehicular access - all modes
-  Proposed vehicular emergency link
-  Proposed pedestrian access points
-  Public Footpath to be diverted
-  Existing outbuildings to be demolished
-  Proposed HV Underground Cable
-  Proposed play spaces (LAP and LEAP)
-  Existing and proposed tree planting
-  Proposed acoustic fencing and structural planting to  
mitigate noise and views to Electricity Sub Station
-  Proposed surface water attenuation
-  Proposed residential development
-  Retained and enhanced open space



## 7. Illustrative Masterplan

Following site visits, technical assessments and current and emerging planning policy requirements, we have developed an Illustrative Masterplan.

The key opportunities for new development include:

- the potential to create a high-quality sustainable residential development with a strong emphasis on good design and “place-making”
- the potential to integrate the development proposals within the existing village fabric and public right of way network.
- the potential to provide new homes with a mix of typology, scale, mass and size, contributing towards an interesting street scene avoiding repetition, echoing the character and identity of the local area while meeting the needs of local people
- the opportunity to provide much needed affordable housing
- the opportunities to create appropriate and accessible public open space and green networks through the site
- the opportunity to create new pedestrian links to the north (towards the Bovis Homes development and Mill Bank) which will connect onto retained and enhanced public footpath links via new routes.
- the opportunity to provide improvements to the local highway infrastructure network within the surrounding context
- providing attenuation features on the site to control the discharge of surface water run-off from the development offering betterment to the surrounding area.

The adjacent masterplan illustrates residential development comprising 150 units. The configuration of housing blocks can be planned to reflect the local setting so the development integrates seamlessly into the site and local area.


















The indicative proposals are underpinned by key design principles:

- an achievable, well-structured housing layout which uses the site’s natural features with key character areas throughout, creating a positive ‘sense of place’
- an easy-to-read street hierarchy (to include a primary loop road, secondary routes and tertiary movement corridors) is proposed to maximise connectivity and aid permeability.
- the majority of dwellings are two storeys high with occasional two and a half storey units to the lower parts of the site. Dwellings comprising lower ridge heights shall be at the highest parts of the site to the north. Development is of a higher density at the central core and to a lower density along the peripheries. At the development edge, the majority of units are detached houses or maisonettes which are set at varying orientations whereas central areas feature a more formal pattern which comprises a larger number of terraced, semi-detached blocks.
- tree/hedgerow retention will be maximised wherever possible and enhanced through new planting which will soften the street scene. Retained trees, hedgerows and enhanced boundaries contribute to the scheme while helping to integrate the development within its surroundings. In addition, densely landscaped buffers are proposed along the western edge acting as both visual and acoustic mitigation.
- Publicly accessible open space will help the health and welfare needs of future occupants. A large quantum of green space is situated to the west which includes space for play whilst acting as a softer transition between built form and neighbouring countryside. Additional open space is situated to the south east which can accommodate attenuation.



# Illustrative Masterplan

## Key

-  Gross site boundary
-  Existing ponds / watercourses
-  Public Rights of Way (excluding public footpath on site to be diverted)
-  Existing road network
-  Catkin Gardens - Bovis Homes Development under construction
-  Existing farm buildings to be demolished
-  Principle street with footways
-  Emergency vehicular access
-  Secondary roads
-  Shared surfaces and nodes
-  Private drives
-  Development blocks
-  Proposed play spaces (LAP and LEAP)
-  Existing and proposed tree planting
-  Proposed pedestrian links
-  Proposed surface water attenuation
-  Retained and enhanced open space





## 8. Summary

The planning, environmental and physical context of the land north of Moat Road, Headcorn has been robustly assessed.

The analysis of the site and the illustrative proposal presented within this document demonstrates how a well-designed, high-quality development of 150 homes can be delivered.

This Vision Framework positively confirms that the site is sustainably located, available and capable of delivering a residential scheme.





Land north of Moat Road, Headcorn represents an opportunity to deliver a well designed scheme, responding to the local context.

View towards the east from the southern boundary

# 9. Land Promoters and Developers Federation

Catesby Estates are members of the Land Promoters and Developers Federation (LPDF).

## Who are the LPDF?

The Land Promoters & Developers Federation (LPDF) is a collection of the UK's leading land promotion and development businesses. LPDF members specialise in the promotion and development of predominantly strategic land across the UK, delivering from circa 30 new home sites to larger scale sites of up to 10,000 new homes alongside associated community facilities, employment and supporting infrastructure.

The perceived opacity, complicated and lengthy nature of the planning system is commonly blamed for the supply of housing not meeting the demand for new homes. Within this, the role land promoters play in the delivery of housing, infrastructure and entire new communities is often misunderstood. We want to dispense with some of the myths and misconceptions around the role of land promoters and developers by highlighting the expertise and track record of our members as well as through research relating to the sector as a whole.

By coming together, despite our competing interests, our ambition is to enhance the current debate on housing supply and be part of the process of finding solutions that makes the future for those still searching for a home of their own a brighter one.

## What we do

LPDF members support the housebuilding sector providing "oven ready" land with planning permission that can easily be acquired and built out by national and regional housebuilders, helping bring homes to the market in a timely manner to meet local need.

Land sites include both greenfield and brownfield land, often requiring significant investment in infrastructure and decontamination.

Approaches to engaging with housebuilders varies depending on the scale of development. Some land promoters and developers will sell land once consented to housebuilders, with some acting as Master Developers providing infrastructure such as schools and sports facilities, before selling serviced land parcels to multiple housebuilders, therefore enabling faster delivery and bringing new homes to the market quickly.

## Our goals

- To achieve planning permission and provide housebuilders with a supply of consented land for the delivery of homes in a timely manner to help address the undersupply of housing in the UK.
- Dispel the myths and misconceptions of the role of land promoters and developers in housing delivery.
- Enhance the current debate on housing supply and be part of the process for finding solutions to solve the housing crisis.





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## Appendix C

### Design & Technical Response to Reg 18 & SLAA Papers

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Catesby Estates plc  
part of Urban&Civic

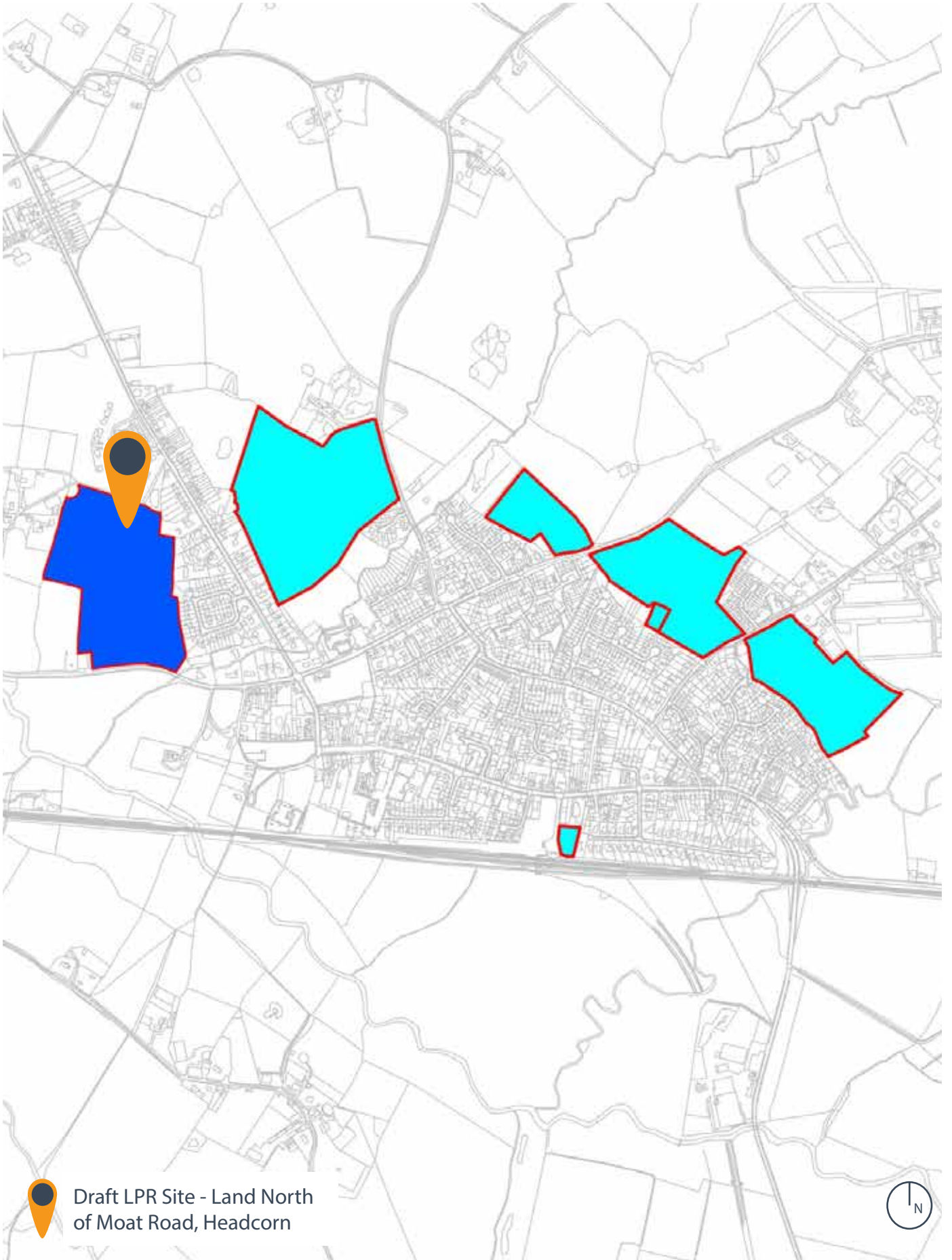
# Design & Technical Response to Reg 18 & SLAA Papers



## Land at Moat Road

Headcorn, Kent

December 2020



Draft LPR Site - Land North of Moat Road, Headcorn







## DOCUMENT PURPOSE

This document has been prepared to support the draft allocation of the 'Land north of Moat Road, Headcorn' for residential development in the Maidstone Borough Council's Local Plan Review: Regulation 18b Preferred Approach (December 2020).

This document seeks to provide additional design evidence to support the allocation alongside some suggested amendments to the emerging draft Policy LPRSA310 - Moat Road Headcorn.

This document also provides further supporting technical evidence submitted in response to queries raised in the SLAA papers, again positively supporting the selection and allocation of the Site.

This document should be read with the accompanying planning representations submitted under separate cover.

# DESIGN RESPONSE TO DRAFT POLICY LPRSA310





## Design and Layout

- 1 The existing Public Right of Way (PRoW) passing through the site can be incorporated into new and attractive public open spaces.
- 2 A series of new footways can also be created linking with the PRoW network and north to Millbank.
- 3 The western development edge will have a more spacious, lower density appearance to provide a transition towards the semi-rural setting to the west.
- 4 Dwellings will back on to the eastern boundary to complete the perimeter block and to respect the amenities and setting of adjacent residential properties.
- 5 A landscape and open space buffer will be provided to the west of the site to reflect the site's adjacency to the open countryside.
- 6 A landscape buffer and off set will be provided to the south west corner of the site around the electricity substation and to protect the amenity of the future residents of the site.

## Landscape / Ecology

- 7 The TPO trees will be retained within new public open spaces and will be supplemented by new tree planting and landscape.
- 8 The existing hedgerow fronting Moat Road will be retained and enhanced by new open space areas. The impacts of any access junction will be minimised.
- 9 The main streets can incorporate tree planting to create attractive streets through the site.
- 10 The proposed open spaces will be multi-functional and comprise areas of landscape, ecology enhancements, surface water drainage ponds, children's play and informal open space areas.

## Access, Highways and Transportation

- 11 A pavement will be provided along Moat Road connecting east to provide access to the services and facilities of Headcorn village.
- 12 Pedestrian connections will also be available to the north of the site out on to Millbank, facilitating access to services and facilities.

## Flood Risk/ Drainage

- 13 The primary access will be from Moat Road. An emergency access and pedestrian/cycle link will be provided to the north accessing onto Millbank.

## Open Space

- 14 Areas of attractive equipped and informal open space can be accommodated on site in accordance with planning policy. Additional areas of green landscaping, ecology and drainage areas can be incorporated providing a green environment to future residents and a transition from edge of settlement to the wider countryside.

# LAND USE AND DENSITY





## LAND USE AND AVERAGE DEVELOPMENT DENSITY

The illustrative layout shows how the site has capacity to accommodate around 150 dwellings set within a high quality landscape, open space, and movement network, alongside accommodating access and surface water drainage requirements.

As illustrated adjacent and underpinning the illustrative masterplan on pages 4 and 5, a developable area (Yellow Land) of around 4.50 Ha (11.12 ac) supports the accommodation of up to 150 dwellings creating an average density of 33dph.

Within this average density, and responding to the Council's draft policy objectives, the western development edge will adopt a lower more spacious density transitioning to the countryside beyond.

The remaining site area of 2.71 Ha (6.70 ac) will comprise landscape, ecology, open space and children's play areas. This confirms the council's policy objectives are achievable while also accommodating an increased number of dwellings.

The illustrative masterplan accommodates a mix of 1, 2, 3 and 4 bed dwellings reflecting an appropriate mix. The scheme will also accommodate 40% affordable housing.

# TECHNICAL RESPONSES TO SLAA

The following Table and text provides a summary of responses to particular matters raised in the SLAA Site Assessment Table.

ISSUE/ CONSTRAINT	TECHNICAL RESPONSE
ACCESS TO HIGHWAY NETWORK	<ul style="list-style-type: none"> <li>Pages 10 and 11 illustrate the potential enhancements that can be made to Moat Road to support the provision of a footpath link into Headcorn.</li> <li>See text on page 9 'Suitability of Moat Road' for more information.</li> </ul>
ACCESS TO PUBLIC TRANSPORTATION & SERVICES	<ul style="list-style-type: none"> <li>See text on page 9 'Access to Services' for more information</li> </ul>
LANDSCAPE CHARACTER	<ul style="list-style-type: none"> <li>As shown by the illustrative masterplan at pages 4 and 5, a sensitively designed landscape scheme can be accommodated within the open space areas of the masterplan.</li> <li>In particular the incorporation of landscape and open space areas along the western edge of the site creates a strong defensible boundary to the settlement and helps to conserve and enhance the overall landscape character of the area, while also responding to neighbouring amenity.</li> <li>The offset of proposed development from the southern site boundary and removal of derelict farm buildings from the site enables the enhancement of landscape character along the Moat Road frontage.</li> <li>This offset also enables the mitigation of surface water drainage from the site as well as accommodating areas of EA flood zone 2 and 3.</li> <li>The creation of a linked central open space within the development incorporating the existing trees (including the TPOs) further supplements the landscape character and maturity of the scheme itself.</li> </ul>
ECOLOGY	<ul style="list-style-type: none"> <li>The combination of open spaces and landscape areas supports the provision of public leisure space as well as linked corridors suitable for substantial biodiversity enhancements.</li> <li>The inclusion of surface water drainage features within open spaces also offer a range of biodiversity enhancement opportunities.</li> </ul>
ARBORICULTURE	<ul style="list-style-type: none"> <li>Maidstone Borough Councils 1986 Tree Preservation Order (TPO) Plan identifies five Oak and Ash trees within the site's central tree line, and a group of trees on the western boundary. Appropriate development stand-offs can be achieved alongside retention of these trees within public open spaces.</li> <li>New tree planting throughout the open spaces and streets will enhance the existing tree planting providing an attractive and green environment.</li> </ul>
HERITAGE AND ARCHAEOLOGY	<ul style="list-style-type: none"> <li>The setting of the closest listed building "The Moat" (approx 35m to the east of the site) has been carefully considered. The proposals include the removal of the derelict agricultural buildings and appropriate off set and landscaping to help protect and enhance the setting of this listed property.</li> </ul>
FLOOD RISK	<ul style="list-style-type: none"> <li>See text on page 9 'Flooding' for more information</li> </ul>
DRAINAGE	<ul style="list-style-type: none"> <li>Surface water drainage features will be incorporated into the southern open space areas (outside the flood Zones 2 and 3. These will store and attenuate surface water flows to greenfield run off rates.</li> <li>In terms of Foul drainage, this will outfall into the existing sewer network located on Moat Road.</li> </ul>

## TRANSPORT & SUSTAINABILITY

### *Suitability of Moat Road:*

A development of approximately 150 dwellings will only create a modest increase in traffic. Any planning application will be supported by a full Transport Assessment which will show that the modest increase in traffic generated by this proposal can safely be accommodated and will not materially affect the operation of the road network.

### *Access to Services:*

A new footway is proposed from the site access on Moat Road including additional highway measures to assist with slowing traffic speeds on entry to the village. A scheme has been agreed with Kent County Council as Local Highway Authority which provides a lit footway between the site access and the existing footway/ footpath network therefore providing a continuous pedestrian route between the site and the centre of the village.

The junction of Moat Road and Kings Road has recently been signalled and has the potential to be further improved to provide pedestrian crossing points if required.

Bus Stops are located on Mill Bank and North Street. The two pedestrian access points proposed provide easy and safe access to these bus stops by future residents. These bus stops provide access to the 12 and 24 services. The 12 offers a 30 min - hourly service to Maidstone taking approximately 30 mins which is suitable to provide a realistic alternative travel choice for residents of Headcorn.

The thresholds adopted by the DfT accessibility planning tool assumes a typical walk distance of up to 800m to bus stops. Future residents will be located within 800m of a bus stop and within 1.3km of the train station. It is generally considered that for distances under 2km walking offers the greatest potential to replace short car trips. For distances under 5km, cycling also has the potential to substitute for short car trips.

Paragraph 4.4.1 of Manual for Streets (Dft, 2007) confirms that:

*“Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes’ (up to about 800m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPS13 states that walking offers the greatest potential to replace short car trips, particularly those under 2 km. MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents.”*

It is clear the site is well situated in terms of access to sustainable modes of travel and local facilities. The train station provides direct services to London and other main urban centres such as Tonbridge, Sevenoaks and Ashford. This is supported by the findings of the 2011 census where 14% of local residents travel to work by train.

## FLOODING

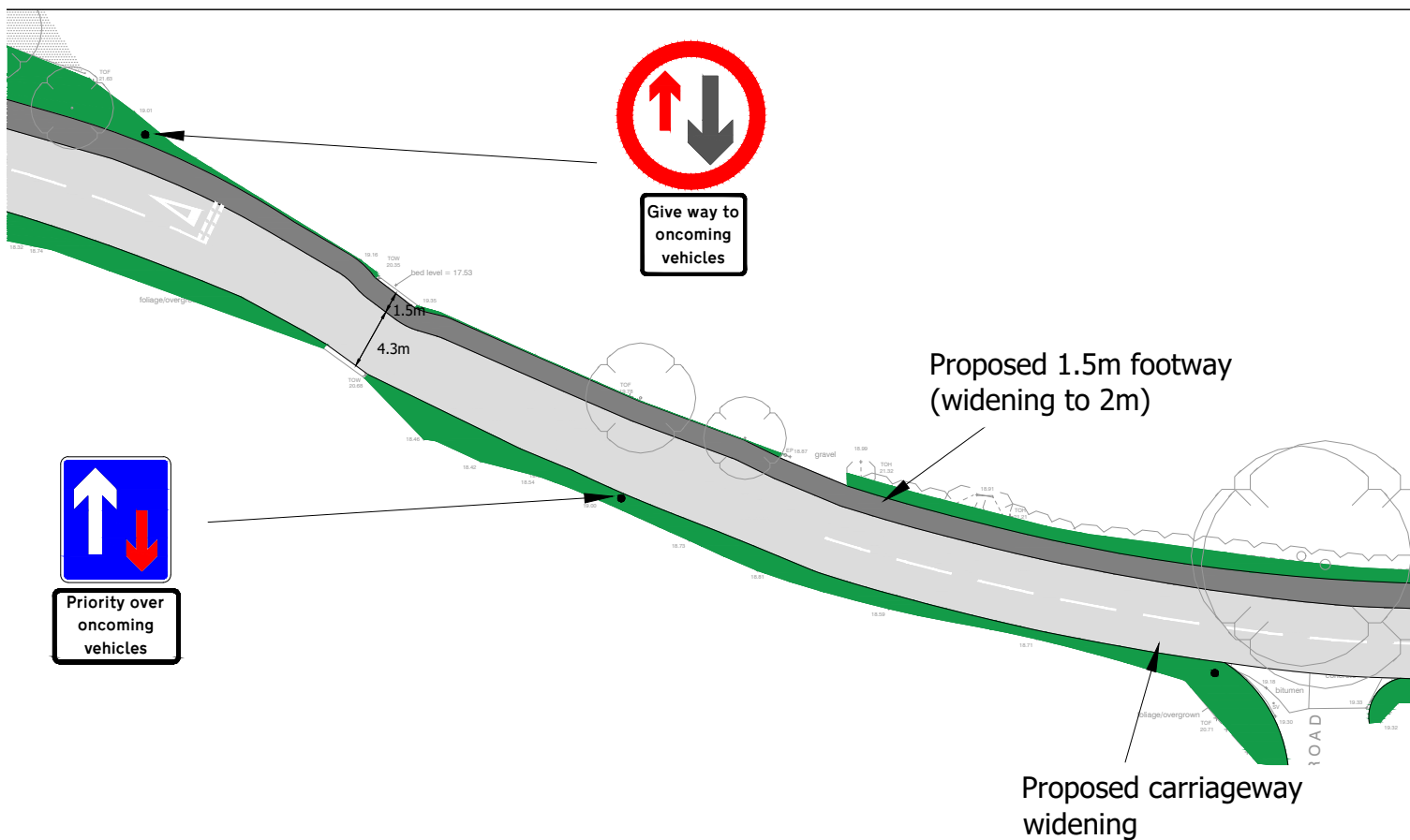
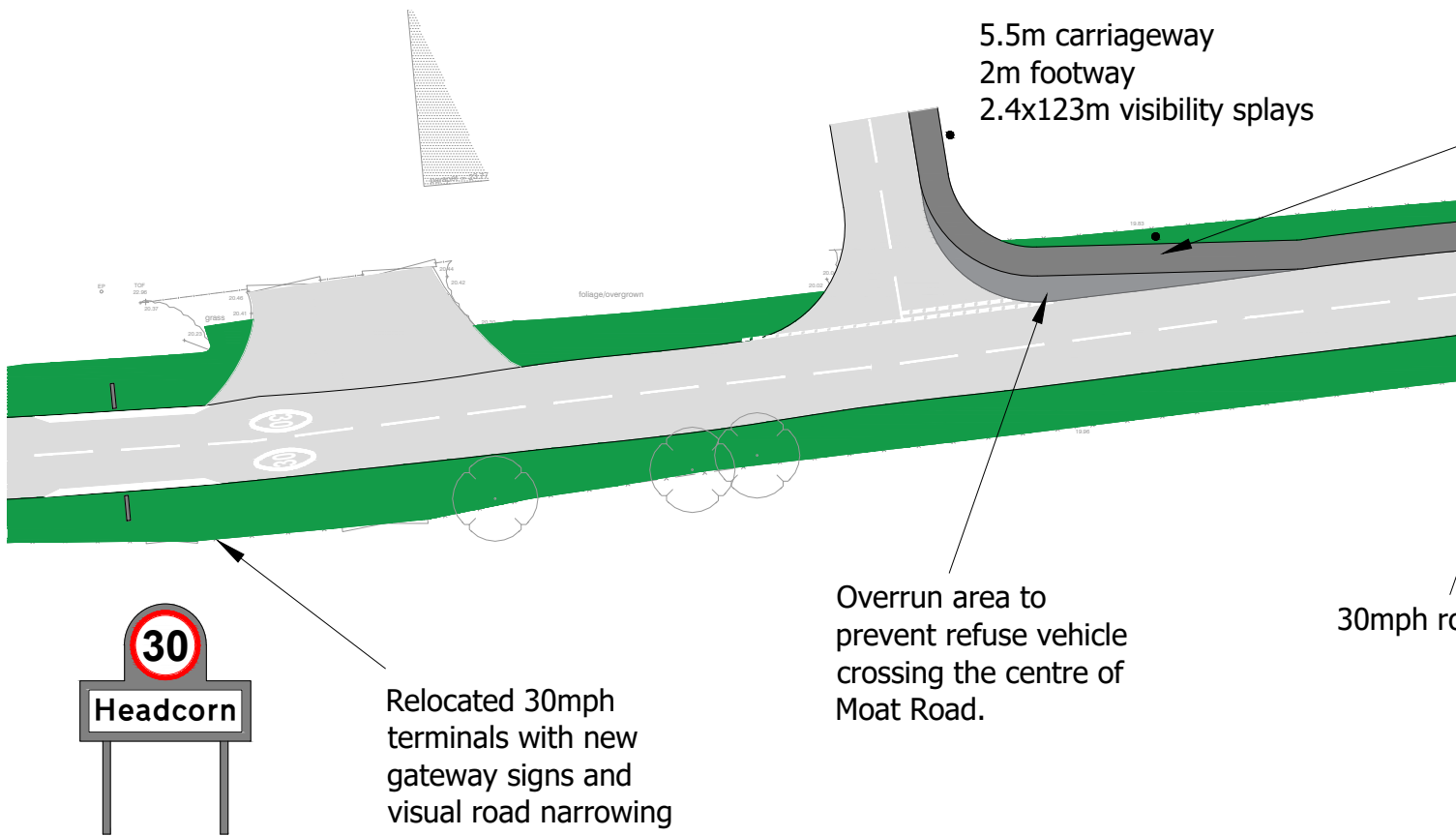
The site lies to the north-west of an Environment Agency (EA) Main River which outfalls into the River Beult (located approximately 200m from the southern site boundary). The current EA published flood zone map shows that much of the site is classified as Flood Zone 1 and therefore the overall risk of fluvial Flooding is considered low.

The south-eastern corner of the site lies within Flood Zone 3. This represents a greater than 1 in 100 year probability of flooding from fluvial sources and development has been appropriately positioned outside of this area.

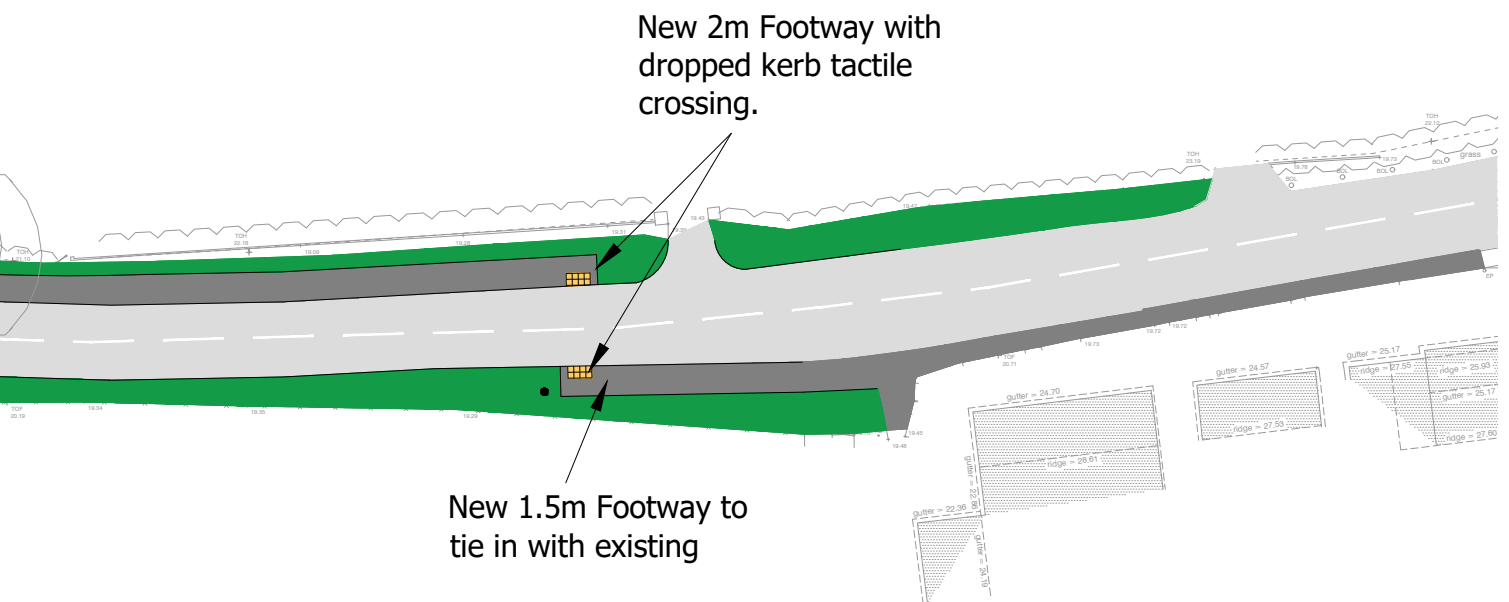
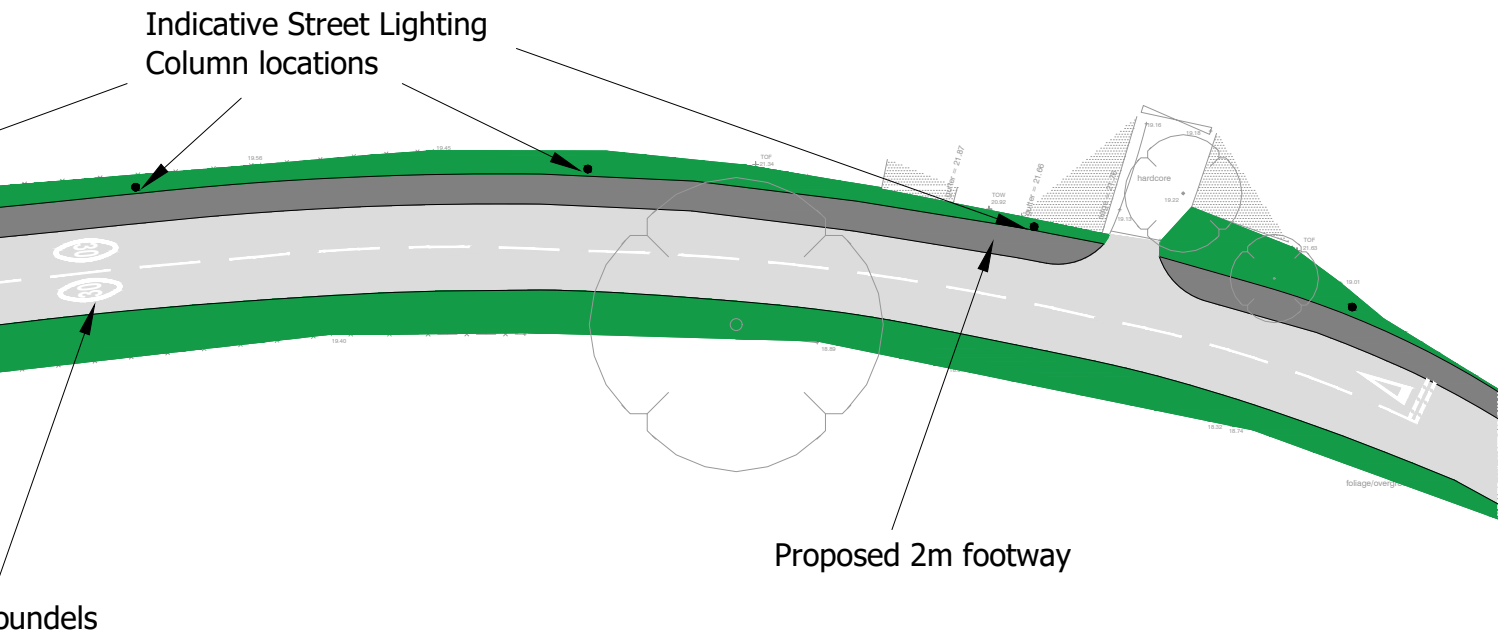
Part of the Moat Road frontage is classified as Flood Zones 2 and 3, representing a medium and high risk of flooding to these areas, therefore further consideration is required with respect to the impacts of fluvial flood risk in relation to access and egress. Fluvial modeling of the watercourse will be undertaken as part of the planning submission to establish the likely extents and depth of the flooding along Moat Road.

Should the depth of floodwater prove unsuitable for traffic to pass in an extreme event, the development benefits from an existing right of access from the site to the north east which connects onto A274 and this would be suitable as an emergency access to and from the development. This approach is generally considered acceptable by the Environment Agency.

# MOAT ROAD SITE ACCESS AND FOOTPATH







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