**MAIDSTONE BOROUGH COUNCIL ‘CALL FOR SITES’ 2019 – LARGE-SCALE HOUSING PROPOSALS**

The following summarises the formal response from Marden Parish Council regarding the major housing development sites 226, 309 and 318. The Parish Council reserves the right to make additional comments.

The Parish Council will also be responding further on the remaining smaller sites put forward under the Maidstone Borough Council (MBC) 2019 Call for Sites exercise but being beyond the scope of this response should not be taken as meaning that any, or all, of the other sites are suitable for development.

The following comments have been formulated as a result of public meetings held on 3rd and 17th December 2019 and a workshop held on 11th January 2020. Comments were also received during, and after, the Parish Council Open Days held on Friday 15th and Saturday 16th November 2019.

A summary of all the responses received by the Parish Council including those from the Open Days is attached.

Overall Conclusion

The specific site constraints identified below demonstrates the range of challenges that each of the large-scale sites cannot plausibly overcome in order to meet the tests of ‘sustainable development’ in accordance with the National Planning Policy Framework and compliance with the relevant Local Plan policies. The Council is also firmly of the opinion that the identified problems at all three sites are such that deliverability is uncertain and therefore their inclusion as allocated sites in the updated Maidstone Local Plan is inappropriate as the risk of non-deliverability is too great.

| **226: Land north of Staplehurst** |
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| Principle of development | New development in this area of open countryside would result in an isolated community with limited services and community facilities, few local employment opportunities, poor transport links with restricted prospects for improvement and various flood-related issues and an unacceptable merging of Marden and Staplehurst in a ribbon-like development along the A229. It would also be in an unsustainable location dependant on car usage. | NPPF paragraphs 72, 78, 79, 84, 91, 92, 94,98, 102-105, 127, 155, 158, 163, 165, 170, 175, 181, 182, 189, 199 | Local Plan policies SP5, SP9, SP17, SP18, SP23, DM1, DM2, DM3, DM4, DM6, DM20, DM21, DM30 |
| Physical and social connectivity | No pedestrian links to Marden or Staplehurst exist, and this would result in a self-contained and inevitably inward-looking housing estate suffering an absence of social cohesion. Given its difficult-to-reach location, any new-build facilities on the site would also be unlikely to appeal to residents of the existing villages.There are only two public footpaths in the vicinity of the site, both located at the east end near Cross-at-Hand in Flood Zone 3, and these also cross an area prone to surface-water flooding.There are no bridleways in the area, and Summerhill Road is unlikely to remain suitable for cycling during the daytime with any increase in vehicular traffic beyond the existing limited use (and not at all during the hours of darkness). The cycle route towards Maidstone proposed by the applicants via the Roman road is already fast and busy road at peak times, and the route up the Greensand Ridge via the steep, unsurfaced ‘sunken lane’ is completely implausible since any “improvements” would destroy its historic character. The only feasible cycleway to Maidstone would be via Chart Hill Road, a 13% gradient. Bus route 5 between Staplehurst and Maidstone passes along the northern edge of the site, but this has a very limited service in the evenings and on Sunday. Bus routes 23, 27 and 28 connect Maidstone and Marden, but there is only a limited Monday to Saturday daytime service (and nothing in the evenings or on Sunday) and the bus stops at Stilebridge cannot be safely reached on foot from the site. |
| Highway considerations | This part of the A229 is dangerous and would need improvements beyond the scope of the site. Over 20 accidents have been recorded along the stretch between Stilebridge and Cross-at-Hand over the last five years (source: [www.crashmap.co.uk](http://www.crashmap.co.uk)), including two fatal and three serious.The increase in traffic will exacerbate the air quality issues on the A229.The main roads to the south-west towards Marden (via the B2079) and south-east towards Staplehurst (via the A229) are both inadequate and any redevelopment of these existing links (both historic turnpike roads) would result in serious harm to the character of the countryside (through loss of mature hedgerows, for example).There are no suitable pedestrian links between the site and the villages of Marden, Staplehurst, Linton, Boughton Monchelsea and Chart Sutton, and any introduction of roadside footways would create the appearance of suburbanising the surrounding countryside.The A229 to the north of Linton and into Maidstone is also inadequate and already heavily congested, and constraints mean that the planned improvements to the Wheatsheaf roundabout and Linton Crossroads are unlikely to be sufficient to accommodate the additional traffic over the longer term.None of the rural routes south of the B2163 Heath Road have street lighting, and any introduction of lamp columns would be visually harmful during both daylight and night-time hours.Road connections to the west of Marden and Staplehurst to amongst others Paddock Wood, Tonbridge, Tunbridge Wells and Kings Hill are along narrow, minor country roads. Road connections to the east towards Headcorn and Ashford are equally poor.Connectivity to the motorway network, in whichever direction, is slow and poor along country lanes.This is an unsustainable location as everyone will be car dependent. |
| Character and setting | The site lies to the south of the Greensand Ridge. Although this is not designated as an Area of Outstanding Natural Beauty, it is understood that the area has been put forward by MBC for inclusion. It is the views from the ridge that contribute to the special setting of the area.Hedgerows, single mature trees and shaws are predominant boundary features of the site, the majority of which have been present since the Agricultural Survey of the Parish 1817-1819, and is characteristic of the Low Weald, see National Area Character Profile 121.The historic importance of these views is demonstrated in the siting of Linton House. Linton House is a Grade I listed building and its associated parkland is Grade II\*. As such there is a legal duty on the LPA in decision making to give the setting of these heritage assets great weight. The views to the south from the heritage assets form part of their wider setting – it is said that Lord Cornwallis could stand on the terrace and survey all the land in his ownership. It is understood that any new development could be landscaped but owing to the land levels this would not visually screen development from the Grade I and Grade II\* listed heritage assets.More widely, any development of the site would also be visible from the popular public footpath running along the Greensand Ridge between Linton and Chart Hill via Loddington and Wierton, with spectacular views towards the site across the Grade II deer park south of the Grade I listed Boughton Monchelsea Place and from the Grade II\* St Peter’s Church.The site is adjacent to Home Farm House – a Grade II listed building.  |
| Fluvial and surface water flooding | A significant part of the site is located in Flood Zone 3 and is also an area prone to surface-water flooding. The corridor along the small stream running diagonally through the site is also in Flood Zone 3 and again suffers from surface water flooding, as happened on 20th December 2019 *(see photos at Annex 12).*The site is adjacent to the SSSI River Beult.The area around the River Beult bridge at Stilebridge is also in Flood Zone 3, and in severe flood events the site would become marooned with the A229 being closed on both sides (as has happened previously).Any mitigation needed to overcome surface water drainage issues would be huge and costly and the ongoing maintenance and effectiveness of the scheme would be questionable with a potential risk of contamination to adjoining SSSI.As an example the severe rain experienced in December 2019 caused flooding in Grave Lane, Summerhill Road and Battle Lane *(see photos at Annex 12).* |
| Ecological considerations | The Site has been in a stewardship agreement with Natural England for 15 years.The site has four areas of ancient woodland (see map in Marden Parish Council folder at Annex 5(b). There is potential ancient hedgerow in Grave Lane and evidence of protected species. (RSPB and The British Trust for Ornithology (BTO) evidence of red listed bird species on the site and surrounding farmland. BTO ringing data indicate the immediate area holds a significant proportion of two of Kent’s scarcest red-listed breeding farmland species.)Whilst harm could potentially be mitigated uplift cannot be envisaged.As noted under “Character and Setting” above, hedgerows, single mature trees and shaws are predominant boundary features of the site, the majority of which have been present for more than 200 years, and many are likely to meet the importance criteria of the Hedgerow Regulations 1997 and fail other biodiversity tests. |
| Education and Health | There are no pedestrian links to Marden or Staplehurst primary schools, and the site is unlikely to generate sufficient demand for a new two form entry primary school. The medical centre and dental surgery in Staplehurst would be difficult to reach on public transport, with residents needing to travel by car to reach the Marden equivalents.There are already difficulties reaching Maidstone and Pembury Hospitals and the county town’s secondary schools, especially during peak hours and on public transport, and any large-scale development south of the Greensand Ridge can only worsen the existing situation and prove increasingly unattractive to potential residents of the site when combined with the ‘baseline’ development allocations in the current local plan.The cumulative impact of sites already designated, but not yet built out, along with new allocations in the existing Local Plan mean that the wider infrastructure for education and health have not yet been realised. |
| Employment | There are limited local employment opportunities in Marden and Staplehurst, and as noted above both car and public transport options for those seeking to work in Maidstone are likely to remain poor. Sustainable travel options to most other large towns in Kent are effectively non-existent, and this means that commuting to London is likely to be the only choice for many.Both Marden and Staplehurst have railway stations on the Kent Coast route between Tonbridge and Ashford. Direct services are available to Charing Cross (and also Cannon Street at peak times) but these are already at or near ‘standing room only’ during peak hours with no possibility to extend or run more frequent trains because the line and station capacity limits have been reached.Marden station already has severe parking problems in a very constrained area, and there is no feasible walking or public transport options from/to the proposed development site (and in practice any cycling would probably be restricted to the summertime period).Although more parking is available at Staplehurst station and bus route 5 is a theoretical option, it is implausible to see either being attractive alternatives to potential residents of the site because of the longer and more expensive train journey in addition to the other daily costs incurred in making the connection.The road congestion and extra commuting distances mean that use of Maidstone East or Barming stations are wholly unrealistic propositions for long-distance commuters originating from anywhere south of Loose or Park Wood. |
| Retail and leisure | The retail and leisure options available to residents of the villages of Marden and Staplehurst or the town of Maidstone would be similarly difficult for potential residents of the site to access except by car, and even then, increasingly so during peak periods when the combined impacts of current and future developments in the locality add to existing pressures.However, this isolated site is also unlikely to have the ‘critical mass’ to support many retail or leisure options within the development itself.From known experience a site with 1275 dwellings would be unable to sustain a local shop. |
| **Conclusion** | **The site is of a size and in a location that would not allow for suitable mitigation schemes to be physically or financially implemented which would adequately mitigate and, in areas, enhance the impacts as identified above. The site is therefore neither sustainable development nor deliverable within the timescale of the revised Maidstone Local Plan and should not therefore be included.** |

| **309: Strategic expansion of Marden** |
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| Principle of development | This site is being promoted as a new ‘garden community’ but its nature and location fails to meet the requirements in MBC’s prospectus for “urban extensions” or “new settlements”.It is demonstrably neither an extension to the urban area (which in the local plan means the town of Maidstone) or a new settlement separate from an existing village.Instead, it would rapidly become a ‘cuckoo’s nest’ development, overpowering and fundamentally altering the character of Marden in a way wholly incompatible with the ‘Garden City’ principles it purports to adopt and being the complete opposite of the clear intention of the Marden Neighbourhood Plan that will shortly reach the referendum stage. | NPPF paragraphs 72, 78, 79, 84, 91, 92, 94, 98, 102-105, 127, 155, 158, 163, 165, 170, 175, 181, 182, 189, 199 | Local Plan policies SP5, SP9, SP17, SP18, SP23, DM1, DM2, DM3, DM4, DM6, DM20, DM21, DM30 |
| Physical and social connectivity | No pedestrian or cycle links to Marden’s village centre – would result in a self-contained and inevitably inward-looking housing estate with no facilities resulting in an absence of social cohesion. The indicative pedestrian link over the railway is not feasible as the PROW constrained as it crosses the church yard and would not provide fully accessible access and this is confirmed by South Eastern Railways. (see MPC folder Annex 4(b). The footways across the B2079 Maidstone Road bridge and through the Pattenden Lane bridge cannot be widened or converted into combined footways/cycleways. |
| Highway considerations | The main roads between Marden and Maidstone, the B2079, and A229 (the latter with a very poor accident record between Stilebridge and Linton) are inadequate and any redevelopment of the existing links (both historic turnpike roads) would result in serious harm to the character of the countryside (through loss of mature hedgerows, for example). The B2079 is further constrained by the narrowness of the road bridge over the railway and the T-junction with Marden High Street. Pattenden Lane is also a constraint because of the height of the railway bridge. Hunton Road, again is constrained by the narrowness of the river bridge. The only access for HGVs to Pattenden Lane is via Underlyn Lane which is indicated as one of the access points to the site.The A229 to the north or Linton and into Maidstone is also inadequate and already heavily congested, and constraints mean that the planned improvements to the Wheatsheaf roundabout and Linton Crossroads are unlikely to be sufficient to accommodate the additional traffic over the longer term.None of the rural routes south of the B2163 Heath Road have street lighting, and any introduction of lamp columns would be visually harmful during both daylight and night-time hours.Road connections to the west of Marden to amongst others Paddock Wood, Tonbridge, Tunbridge Wells and Kings Hill are along narrow, minor country roads. Road connections to the east towards Headcorn and Ashford are equally poor.Connectivity to the motorway network, in whichever direction, is slow and poor along country lanes. |
| Character and setting | The site lies to the south of the Greensand Ridge. Although this is not designated as an Area of Outstanding Natural Beauty, it is understood that the area has been put forward by MBC for inclusion. It is the views from the Ridge that contribute to the special setting of the area.Hedgerows, single mature trees and shaws are predominant boundary features of the site, the majority of which have been present since the Agricultural Survey of the Parish 1817-1819, and is characteristic of the Low Weald, se National Area Character Profile 121.There are a number of listed buildings in close proximity to the site including Marden Church (Grade I), Church Farmhouse, The Oast House and The Old Vicarage (all Grade II).The historic importance of these views is demonstrated in the siting of Linton House. Linton House is a Grade I listed building and its associated parkland is Grade II\*. As such there is a legal duty on the LPA in decision making to give the setting of these heritage assets great weight. The views to the south from the heritage assets form part of their wider setting – it is said that Lord Cornwallis could stand on the terrace and survey all the land in his ownership. It is understood that any new development could be landscaped but owing to the land levels this would not visually screen development from the Grade I and Grade II\* listed heritage assets.More widely, any development of the site would also be visible from the popular public footpath running along the Greensand Ridge around Linton.The development would fundamentally harm the local character of the landscape which is characterised by non-designated heritage assets such as oast houses and ancient farmsteads which are intrinsic to the landscape and specifically the low weald panorama. |
| Fluvial and surface water flooding | The area is low lying and on heavy clay. The disposal of surface water therefore presents a challenge as infiltration of surface water is not necessarily a satisfactory solution. Discharge, even if attenuated by a SuDS scheme, is still likely to increase surface water run-off into the existing drainage network and increase the risk of surface water and fluvial flooding elsewhere.Surface water mitigation measures to the east side of the site would be problematic because the land falls naturally away from Maidstone Road and drains down towards the River Beult. There is an existing network of ditches and surface water drainage that drains the land to the east of the site that is already under strain. Surface water flooding on the site occurred on 20th December 2019 *(see photos at Annex 12)* |

| **309: Strategic expansion of Marden** |
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| Ecological considerations | A recent RSPB report highlights the existence of a number of red listed bird species (including yellowhammers and linnets) *(see MPC Folder Annex 4(c))*. RSPB and The British Trust for Ornithology (BTO) evidence of red listed bird species on the site and surrounding farmland. BTO ringing data indicate the immediate area holds a significant proportion of two of Kent’s scarcest red-listed breeding farmland species.The site contains part of an area of ancient woodland, Bridgehurst Woods, and abuts the remainder.As noted under “Character and Setting” above, hedgerows, single mature trees and shaws are predominant boundary features of the site, the majority of which have been present for more than 200 years, and many are likely to meet the importance criteria of the Hedgerow Regulations 1997 and fail other biodiversity tests. |
| Education and Health | As noted under “Physical and Social Connectivity” above, there is very limited pedestrian and cycle access to the site from the village centre. Therefore, pedestrian access to the proposed health hub or schools from the existing settlement would be almost impossible.There are already difficulties reaching Maidstone and Pembury Hospitals and the county town’s secondary schools, especially during peak hours and on public transport, and any large-scale development south of the Greensand Ridge can only worsen the existing situation and prove increasingly unattractive to potential residents of the site when combined with the ‘baseline’ development allocations in the current local plan. |
| Employment | There are limited local employment opportunities in Marden, and as noted above both car and public transport options for those seeking to work in Maidstone are likely to remain poor. Sustainable travel options to most other large towns in Kent are effectively non-existent, and this means that commuting to London is likely to be the only choice for many.Marden railway station is on the Kent Coast route between Tonbridge and Ashford. Direct services are available to Charing Cross (and also Cannon Street at peak times) but these are already at or near ‘standing room only’ during peak hours with no possibility to extend or run more frequent trains because the line and station capacity limits have been reached. |
| Retail and leisure | The retail and leisure options available to residents of the village of Marden or the town of Maidstone would be similarly difficult for potential residents of the site to access except by car, and even then, increasingly so during peak periods when the combined impacts of current and future developments in the locality add to existing pressures.Any retail or leisure provision north of the railway would be equally difficult to access by foot or cycle from the village due to constraints for the reasons given above.However, this site is also unlikely to have the ‘critical mass’ to support many retail or leisure options within the development itself. |
| Other | Even if this site is not ultimately promoted as a new ‘garden community’ (see “Principle of Development” above), it would still overpower and fundamentally alter the character of Marden in a way wholly incompatible with the National Planning Policy Framework due to it being unable to support a sustainable community with sufficient access to services and employment opportunities within the development itself or in Marden village, Maidstone or other larger towns due to fundamental access problems. It would also be contrary to the clear intention of the Marden Neighbourhood Plan that will shortly reach the referendum stage. |
| **Conclusion** | **The site is of a size and location that would not allow for suitable mitigation schemes to be physically or financially implemented which would adequately mitigate the impacts as identified above. The site is therefore neither sustainable development nor deliverable within the timescale of the revised Maidstone Local Plan and should not therefore be included.** |

| **318: Pagehurst Farm** |
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| Principle of development | New development in this area of open countryside would result in the merging of the existing settlements of Marden and Staplehurst in an unacceptable way, with access to services, community facilities and local employment opportunities restricted by poor transport links that – if “improved” – would cause further creeping suburbanisation of the countryside between the historically distinct communities. It would also be in an unsustainable location dependent on car usage. | NPPF paragraphs 72, 78, 79, 84, 91, 92, 94, 98, 102-105, 127, 155, 158, 163, 165, 170, 175, 181, 182, 189, 199 | Local Plan policies SP5, SP9, SP17, SP18, SP23, DM1, DM2, DM3, DM4, DM6, DM20, DM21, DM30 |
| Physical and social connectivity | No pedestrian links to Marden or Staplehurst – would result in a self-contained and inevitably inward-looking housing estate with no facilities resulting in an absence of social cohesion. There are no public footpaths across the site and the minor roads, in the vicinity of the site are narrow, unlit and unsuitable for cycling.There is also no prospect of a bus service between Marden and Staplehurst due to the train link which is of no use as a connection between this site and the adjacent villages. |
| Highway considerations | The site is accessed by two very minor and narrow country lanes.The nearest main road the A229 is dangerous and would need improvements. Over 20 accidents have been recorded along the stretch between Stilebridge and Cross-at-Hand over the last five years (source: [www.crashmap.co.uk](http://www.crashmap.co.uk)), including two fatal and three serious. A similar number of accidents have occurred between Linton crossroads and Stilebridge.The direct route towards Marden from the site is constrained by the substandard junction by the railway bridge at Bunches Lake, the sharp bends at Bridgehurst (Howland Road), and the narrowness of Howland Road at the Old Rose and Crown Cottages.The route to the north of the site towards Maidstone is constrained by the narrowness of the railway bridge at Bunches Lane and passes through the tranquil hamlet of St Annes Green. The A229 to the north of Linton and into Maidstone is also inadequate and already heavily congested, and constraints mean that the planned improvements to the Wheatsheaf roundabout and Linton Crossroads are unlikely to be sufficient to accommodate the additional traffic over the longer term.None of the rural routes south of the B2163 Heath Road have street lighting, and any introduction of lamp columns would be visually harmful during both daylight and night-time hours.Road connections to the west of Marden to amongst others Paddock Wood, Tonbridge, Tunbridge Wells and Kings Hill are along narrow, minor country roads. Road connections to the east towards Headcorn and Ashford are equally poor.Connectivity to the motorway network, in whichever direction, is slow and poor along country lanes. |
| Character and setting | The site lies to the south of the Greensand Ridge. Although this is not designated as an Area of Outstanding Natural Beauty, it is understood that the area has been put forward by MBC for inclusion. It is the views from the ridge that contribute to the special setting of the area.Hedgerows, single mature trees and shaws are predominant boundary features of the site and is characteristic of the Low Weald, se National Area Character Profile 121.In the Marden part of the site there are two Grade II listed buildings: Mountain Farm and Barn, and there are other nearby listed buildings in the Staplehurst part of the site.The historic importance of these views is demonstrated in the siting of Linton House. Linton House is a Grade I listed building and its associated parkland is grade II\*. As such there is a legal duty on the LPA in decision making to give the setting of these heritage assets great weight. The views to the south from the heritage assets form part of their wider setting – it is said that Lord Cornwallis could stand on the terrace and survey all the land in his ownership. It is understood that any new development could be landscaped but owing to the land levels this would not visually screen development from the Grade I and Grade II\* listed heritage assets.More widely, any development of the site would also be visible from the popular public footpath running along the Greensand Ridge between Linton and Chart Hill via Loddington and Wierton, with spectacular views towards the site across the Grade II deer park south of the Grade I listed Boughton Monchelsea Place and from the grade II\* St Peter’s church.The Appeal Decision (Ref: APP/U2235/W/16/3146969) dated 10th April 2017 for Great Pagehurst Farm (para 31) states: “However, the harms to the intrinsic and visual qualities of the landscape are substantial, both in significance and scale, and would not be mitigated by the landscape proposals”. This would be an even more important consideration for more substantial development on this site than a solar farm. |
| Fluvial and surface water flooding | The Environment Agency Surface Water Flood Map shows evidence of the surface water flooding on site include the road network, Park Road and Marden Road, as evidenced in December 2019 (*See photos at Annex 12).* |
| Ecological considerations | Hedgerows, single mature trees and shaws are predominant boundary features of the site, and many are likely to meet the importance criteria of the Hedgerow Regulations 1997 and fail other biodiversity tests. The site abuts the SSSI, which is both north and south of Marden Road and which includes Marden Meadow and even small changes to surface run off patterns have the potential to detrimentally affect the SSSI.The Maidstone Local Plan 2017, Map 49, refers to a local wildlife site crossing the north part of the site and adjoining the SSSI. |
| Infrastructure: Education and Health | There are no pedestrian links to Marden or Staplehurst primary schools, and the site is unlikely to generate sufficient demand for a new two form entry primary school. The medical centres and dental surgeries in Marden and Staplehurst would be impossible to reach on public transport.There are already difficulties reaching Maidstone and Pembury Hospitals and the county town’s secondary schools, especially during peak hours and on public transport, and any large-scale development south of the Greensand Ridge can only worsen the existing situation and prove increasingly unattractive to potential residents of the site when combined with the ‘baseline’ development allocations in the current local plan. |
| Employment  | There are limited local employment opportunities in Marden and Staplehurst, and as noted above both car and public transport options for those seeking to work in Maidstone are likely to remain poor. Sustainable travel options to most other large towns in Kent are effectively non-existent, and this means that commuting to London is likely to be the only choice for many.Marden railway station is on the Kent Coast route between Tonbridge and Ashford. Direct services are available to Charing Cross (and also Cannon Street at peak times) but these are already at or near ‘standing room only’ during peak hours with no possibility to extend or run more frequent trains because the line and station capacity limits have been reached.Marden station already has severe parking problems in a very constrained area, and there is no feasible walking or public transport options from/to the proposed development site (and in practice any cycling would probably be restricted to the summertime period).Although more parking is available at Staplehurst station, it is implausible to see this being an attractive alternative to potential residents of the site because of the longer and more expensive train journey in addition to the other daily costs incurred in making the connection. |
| Retail and leisure | The retail and leisure options available to residents of the villages of Marden and Staplehurst or the town of Maidstone would be similarly difficult for potential residents of the site to access except by car, and even then, increasingly so during peak periods when the combined impacts of current and future developments in the locality add to existing pressures.However, this site is also unlikely to have the ‘critical mass’ to support many retail or leisure options within the development itself. |
| Other | Maidstone Local Plan 2017, SP17, point 7, specifically states “Development in the countryside will retain the separation of individual settlements”. This proposal is entirely contrary to that policy since it would largely fill the historic gap between Marden and Staplehurst. |
| **Conclusion** | **The site is of a size and location that would not allow for suitable mitigation schemes to be physically or financially implemented which would adequately mitigate the impacts as identified above. The site is therefore neither sustainable development nor deliverable within the timescale of the revised Maidstone Local Plan and should not therefore be included.** |