Parish Office
Staplehurst Village Centre
High Street, Staplehurst
TONBRIDGE, Kent

TN12 0BJ

Parish Clerk
Mr Richard Griffiths

Tel: 01580 891761

Email: clerk@staplehurst-pc.gov.uk

Website: www.staplehurst-pc.gov.uk

AGENDA
PLANNING COMMITTEE
Monday 2nd November 2026 - 7.30pm
South Hall, Staplehurst Community Centre

PUBLIC FORUM – Before and after the meeting the Chairman will invite members of the public to speak for a maximum of 3 minutes each, relating to issues on the agenda or about planning issues of local concern. Please state name and address prior to speaking. Attendees are requested to notify the Chairman of any intention to film, photograph, or record during the meeting **PUBLIC FORUM.**

Civility and Respect - All attendees are reminded that this meeting is to be conducted in a spirit of mutual respect and civility. Please ensure that all comments and contributions are made respectfully and considerately.

APOLOGIES:

APPROVAL OF PLANNING COMMITTEE MINUTES: Minute Pages 1877p – 1878p 12th October 2026 available at: http://www.staplehurst-pc.uk/community/staplehurst-parish-council-13607/planning-committee/ To be signed by the Chairman.

COUNCILLOR DECLARATIONS regarding items on the Agenda: -
1. Declarations of Lobbying.
2. Declarations of Changes to the Register of Interests.
3. Declarations of Interest in Items on the Agenda.
4. Requests for Dispensation

CLERK'S PLANNING VERBAL REPORT:
Draft response to 26/504072/ENVSCR Request for a Screening Opinion – Henhurst Farm

FULL PLANNING APPLICATIONS: (for comment/recommendation)

26/503738 - Merchant House Station Road Staplehurst Kent TN12 0QH
Change of use of an existing dwellinghouse (Use Class C3) to a dental clinic (Use Class E(e)) with associated internal alterations and ancillary internal works, installation of solar PV on roof. Erection of a single storey rear extension on existing garage and widening of existing driveway for the provision of 7 car parking spaces and cycle storage.

26/503896/FULL - Land Rear Of Minton House High Street Staplehurst Kent TN12 0AS
Erection of self-build three bedroom dwelling and part demolition of boundary wall to facilitate new access to Chapel Lane with bike and bin store and associated parking.

26/503876/FUL - Kent Cottage High Street Staplehurst Kent TN12 0AY
Erection of a single storey rear extension with alterations to hard and soft landscaping. Alterations to existing fenestration.

26/503876/FUL - Kent Cottage High Street Staplehurst Kent TN12 0AY
Listed Building Consent for erection of a single storey rear extension with alterations to hard and soft landscaping. Alterations to existing fenestration.

26/503535/FULL - Thorford Hall Farm Goudhurst Road Staplehurst Kent TN12 0HQ
Change of use of land to residential curtilage and installation of ground mounted solar panels (part retrospective).

Lawful Development Certificate – NA

Tree Preservation Orders

DECISIONS: (for noting)
26/502772/FULL -Iden Manor Nursing Home, Cranbrook Road, Staplehurst, Kent, TN12 0ER
Changes to fenerstration including blocking up of existing windows and doors on north and east elevation, installation of new external fire escape door to front elevations, replacement of existing window and door with a larger patio doors from garden room, new raised deck area and access ramp within the courtyard area. Cutting back of eaves overhang and creation of valley gutter, installation of a roof lantern and 6no. sun pipes.
MBC Approved with Conditions/SPC recommended approval

26/503065/FULL - 20 Iden Crescent Staplehurst Kent TN12 0NU
Demolition of existing conservatory. Erection of single story rear extension, removal of 1no. window and addition of 1no. door on side elevation.
MBC Approved with Conditions/SPC recommended approval

26/503101/FULL The Stables High Street Staplehurst Kent TN12 0BH
Erection of single storey detached garage.
MBC refused (due to agricultural location) SPC recommended approval with conditions

26/502858/FULL - 7 Woodford Park Staplehurst Kent TN12 0FX
Erection of a single storey rear extension
MBC Approved with Conditions/SPC recommended

Councillors are respectfully reminded that should they be unable to attend any Parish Council meeting, of which this Agenda is a formal summons, they should notify the Parish Clerk with their apology and reason for non-attendance. Failure to do so for a continuous period of six months will result in automatic disqualification from the Council. Deadline for such notification to the Parish Clerk is 4.00pm on the day of the meeting.
Mr Richard Griffiths, Parish Clerk, 28/10/2026

All planning applications are listed on MBC website at www.maidstone.gov.uk. Follow the links to search for and view any application you choose or check to see what has been registered on a weekly or daily basis. Comment online on individual planning applications too.

Planning Committee	Planning Chairman Margaret Arger	Councillor Richard Ash
Councillor Catherine Farragher	Councillor Bill Mc Laughlin	Parish Councillor Alan Pett
Councillor Adele Sharp	Councillor Mike Wakeford	
Copied also to: -	County Councillor Brian Black	Borough & Parish Councillor John Perry
Borough & Parish Councillor Paddy Riordan		

STAPLEHURST PARISH COUNCIL

PLANNING COMMITTEE MINUTES

12TH OCTOBER 2026

PUBLIC FORUM – 26/503590 – resident spoke against having concerns regarding application. They live in a historical setting with a listed barn as a neighbour and original building they live in was also listed. Risk of flooding as they have a pond and are concerned the water level would be affected, there is no ecological assessment, no information regarding foul water impact, concerned about loss of dark skies due to light pollution and loss of quiet.

Resident spoke in support as the site has been tidied and looks much better.

Owner of the land spoke as seeking comments and concerns from residents, has gone for porous tarmac, area is Flood zone 1and historically this area does not flood, and looking at low lighting. No plan for selling land.

Present Cllrs. Arger, Ash, Hotson, Pett and Sharp.
(Cllr Arger took the minutes as the Clerk was unavailable)

APOLOGIES: Cllrs. Farragher, Mclaughlin and Wakefield.

APPROVAL OF PLANNING COMMITTEE MINUTES: Minute Pages 1874P - 1876P of 21st September 2026 available at: http://www.staplehurst-pc.uk/community/staplehurst-parish-council-13607/planning-committee/

Cllr. Pett proposed and Cllr. Sharp seconded to approve the minutes of the meeting held on the 21st September 2026 – agreed by majority 0f 4, 1 abstained. Duly signed by the chairman of the meeting.

COUNCILLOR DECLARATIONS regarding items on the Agenda: -

1. Declarations of Lobbying – all 26/503590.
2. Declarations of Changes to the Register of Interests- NA
3. Declarations of Interest in Items on the Agenda - NA
4. Requests for Dispensation - NA

CLERK'S PLANNING REPORT:

- 23/502352 – won at appeal. Not clear who is responsible for costs.
- 26/500660 Land south of Marden Road is at MBC Planning Committee on 15th October 2026.
- 26/503738 Merchant House Station Road Staplehurst Kent TN12 0QH - missed the deadline for this meeting but determination date 30th November 2026

Signed by Chairman.....Dated.....

FULL PLANNING APPLICATIONS:

26/503590/FULL – Land at Cross At Hand Chart Hill Road Staplehurst Kent TN12 0RW Change of use from Agricultural to Traveller's site including siting of 4 x day rooms, 4 x touring caravans, 4 x static units and parking.

Following a debate Cllr. Sharp proposed and Cllr. Arger seconded to recommend refusal. This is not an allocated site for Gypsy, Traveller and Show People and is at present agricultural land. Kent Highways has made no comment, but concern is expressed regarding the visual display from the site. The site is not sustainable with limited bus service and road safety issues for cyclists. There is no pavement to the busy road A229 junction. Concerns regarding the flood assessment on the whole site. Drainage and surface water issues not clarified in documents and should the septic tank go beside a pond. This is a rural heritage setting and a Heritage statement is required. An ecology report should also be provided. This site is not in the present MBC LP. MBC – Dark Skies policy ON7. Against LPRSP15, LPRHOU8, LPRSP9, LPRQD4 and LPRSP14(A). Against NPPF – due to flood risk and effect on local properties.

26/503506/FULL - 3 Sergison Crescent Staplehurst Kent TN12 0FP Partial conversion of existing detached garage to a study, with part of the building retained as storage space. Insertion of window and french doors.
Following a debate Cllr. Sharp proposed and Cllr. Pett seconded to approve - agreed unanimously

26/503516/FULL – Hen and Duckhurst Farm The Barn Marden Road Staplehurst Kent TN12 0PD Erection of a single storey double detached garage with carport. Existing outbuildings to be removed.
Following a debate Cllr. Sharp proposed and Cllr. Pett seconded to approve - agreed unanimously.

26/503603/FULL – Oak View Marden Road Staplehurst Kent TN12 0JG Siting of 1no. additional mobile home, 1no. touring caravan, and erection of a day room.
Following a debate Cllr. Pett proposed and Cllr. Hotson seconded to recommend refusal. Assumption this is an allocated site though not in LP. Concern expressed the this is another subdivision of the site and is now over intensification and is not sustainable.

LAWFUL DEVELOPMENT CERTIFICATES – N/A.

TREE PRESERVATION ORDERS – N/A.

DECISIONS: (for noting)
25/504992/FULL Land adjacent to Dane Mead Villas George Street Staplehurst Kent TN12 0RB Demolition of 4no. sheds. Erection of 6no. dwelling house (Use class C3), comprising 4 x 3 bed and 2 x 4 bed with access provided from George Street including

the repositioning of the kerb, provision of 16 car parking places, 20 cycle spaces and associated landscaping and hard standing. MBC granted with 22 conditions – SPC recommended refusal.

26/503066/SUB Copp William Farm Marden Road Staplehurst Kent TN12 0PB Submission of details pursuant to condition 2 (ecological enhancement), 3 (hedgerow planting) and 4 (landscaping scheme) subject to application 25/504250/FULL. MBC discharged a condition.

Meeting closed.....8.15pm

Signed by Chairman.....Dated.....

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Parish Clerk
Richard Griffiths
Tel **01580 891761**

Email **clerk@staplehurst-pc.gov.uk**
Website **www.staplehurst-pc.gov.uk**

By email

28th October 2026

Dear Mr Timms,

RE: 26/504072/ENVSCR

Staplehurst Parish Council have reviewed the 26/504072/ENVSCR Request for a Screening Opinion and are shocked that an international company could submit such an unprofessional document as part of any planning process, let alone a potential application for 300 houses.

The submission is riddle with repeat points and errors that do not relate to the specific item they are raising.

For instance, in relation to MBC Local Plan:

- CBRE mention BNG at 10% - The MBC Local Plan requires 20% BNG
- CBRE mentions Tier 2 Rural Service Centre – MBC local Plan states Rural service centre.
- Housing Density – 300 house exceeds MBC local Plan housing density for Rural Services centre

For further detail our main concern is that the report appears to reach its conclusion before providing sufficient evidence to support it. It proposes up to 300 homes on a 19.2-hectare site, acknowledges several environmental constraints, and repeatedly promises assessments for a future planning application.

Yet it concludes that significant environmental effects requiring an Environmental Impact Assessment (EIA) are unlikely.
That does not automatically mean an EIA is legally required. A screening request can legitimately rely on existing information and proportionate preliminary assessments. The important question is whether the information supplied allows Maidstone Borough Council to make a properly informed decision.

We have examined the document for internal inconsistencies, unsupported assertions, omissions, questionable reasoning and possible errors in the application of the EIA screening framework. I distinguish between demonstrable inconsistencies in the document and matters that require verification against external evidence.

1. The most significant problems

1. A 300-home proposal is assessed largely through promises of future assessments.

Pages 5–7
Air quality, ecology, flooding, heritage, noise and transport are mostly addressed by stating that further reports will accompany a future planning application. This leaves the screening conclusion dependent on information not yet presented or discussed in sufficient detail.
2. The report acknowledges environmental constraints but does not adequately quantify their significance.
Pages 2–7
These include surface-water flooding, veteran trees, Tree Preservation Orders, protected species, listed buildings, landscape effects and traffic. The report offers assurances of mitigation without providing enough results to judge whether that mitigation will be sufficient.
3. The cumulative-effects assessment is particularly narrow.
Pages 8–9
The report describes a search within 1 km and identifies one development, largely built out. It does not show a comprehensive schedule of other relevant developments, their combined effects, or the justification for excluding schemes beyond that radius.
4. The reasoning about natural resources is questionable.
Page 7
The report says the development will not use or deplete natural resources on the site, despite proposing construction over a 19.2-hectare greenfield site. It does not adequately address the permanent loss of agricultural land; soil resources or the materials and water needed to construct and occupy up to 300 homes.
These are substantive issues, not simply matters of spelling or presentation. The detailed analysis below explains what can and cannot be established from the document itself.

2. Detailed inconsistencies and weaknesses, page by page
I would separate these into three categories: factual or numerical contradictions, weaknesses in the reasoning, and omissions that prevent the conclusion from being independently tested.

A. The proposal is five times the stated local-plan allocation
High priority
Pages 2 and 4
The report states that:

- Part of the site is allocated under Maidstone Local Plan Review Policy H1(50) for approximately 60 homes.
- The new proposal is for up to 300 homes across a 19.2-hectare site.
- The allocation establishes the principle of development in this location.

The third statement is too broad unless it is carefully qualified. An allocation for approximately 60 homes on part of a site does not, by itself, establish the principle of developing the entire 19.2 hectares for 300 homes.

External reporting on this specific proposal identifies a potentially important distinction: the existing allocation covers a much smaller area, with a stated access arrangement from Oliver Road, and includes landscape-related restrictions. The new proposal instead identifies Pinnock Lane as its main vehicular access.

Measure	Existing allocation as reported	New proposal
Homes	Approximately 60	Up to 300

Relative number of homes	1×	5×
Site area	Smaller allocated part	19.2 hectares
Main access	Oliver Road, as reported externally	Pinnock Lane

Why this matters: the report does not adequately explain the environmental implications of moving from a small, allocated site to a much larger development. It also does not explain how the wider scheme relates to the allocation's limits or landscape safeguards.
This is not necessarily an error in EIA screening: a development can be unallocated and still not require an EIA. The inconsistency lies in using the existence of the allocation as reassurance without adequately addressing the difference in scale.
Questions to ask the council:

- Does H1(50) allocate the entire site or only a defined part?
- How does the proposed development comply with the allocation's access and landscape provisions?
- Has the environmental assessment considered the full 300-home proposal rather than treating the 60-home allocation as evidence that development is acceptable in principle?

B. The screening threshold is treated almost as a reassurance
Page 5
The report correctly identifies the proposal as Schedule 2, category 10(b), urban development. It also recognises that the proposal exceeds the threshold of 150 dwellings. However, it then says the number of homes is significantly below the 1,000-dwelling example of significant urbanising effects and notes that the development is on the edge of a settlement and partly allocated.
This is weak reasoning if used to support the overall conclusion.
The legal framework does not say that developments below 1,000 dwellings are unlikely to have significant effects. Nor does a development's position on the edge of an existing settlement make its environmental effects insignificant by definition. The screening decision must consider the particular characteristics, location and potential impacts of the scheme.

The report should therefore explain why 300 dwellings, with their associated roads, drainage, construction, traffic and loss of greenfield land, would not have significant environmental effects at this particular location.
The inconsistency: the document acknowledges the need for a site-specific assessment, but its opening rationale relies partly on a comparison with a much larger development rather than demonstrating why the effects of this scheme would not be significant.

C. The report acknowledges surface-water flooding but provides no supporting analysis

Pages 2 and 6
The report says the site is entirely within Flood Zone 1 but also acknowledges that parts of it experience surface-water flooding.
Those statements are not contradictory in themselves. Flood Zone 1 principally concerns river and sea flooding; it does not mean a site is free from surface-water flood risk.
The weakness is what follows. The report says that drainage and sustainable drainage features will be integrated throughout the site, and that a Flood Risk Assessment and Surface Water Drainage Strategy will accompany the planning application.

It does not provide:

- A map of the surface-water flow paths, ponding areas or affected land.
- The extent to which the proposed development overlaps those areas.
- An explanation of how the drainage features fit within the stated 57% green-infrastructure provision.
- Evidence that discharge rates, downstream flood risk and the effects of more intense rainfall have been adequately considered.
- An assessment of the potential interaction between drainage infrastructure and existing ponds, ditches and habitats.

The report's description of flooding as confined to small pockets is not supported by measurements or a cited flood-risk dataset in the text.
Assessment: this is an important evidential gap. Flooding may ultimately be manageable, but the report does not demonstrate that at the screening stage.

D. Veteran trees and protected trees: a promise is not an impact assessment
Pages 5–6
The report states that the site contains three veteran trees and several trees covered by Tree Preservation Orders (TPOs). It says these trees will be protected and retained, while acknowledging that some trees and hedgerows will inevitably be lost.
There is a tension between those statements, although not necessarily a direct contradiction: some trees could be lost while the identified veteran and TPO trees are retained.
The problem is that the report does not identify:

- The trees concerned and their precise locations.
- Their root protection areas and the extent of proposed building, road or drainage works near them.
- Whether indirect effects, including soil compaction, changes in drainage and construction access, could affect their condition.
- How much hedgerow and other tree cover would be removed.
- Whether the proposed layout can actually retain the trees while accommodating up to 300 homes.

The report says the answer will be provided in a future Arboriculturally Impact Assessment and Tree Survey.
That is a commitment to investigate the issue later, not evidence that the effects are already known to be insignificant.

E. The ecological section describes work that has yet to be completed
Pages 6–7
The report refers to potential habitat for great crested newts, hazel dormice, bats and badgers. It says an Ecological Assessment will establish the baseline, with further surveys undertaken where necessary.
It also promises a minimum 10% Biodiversity Net Gain (BNG).

These are not contradictory statements: BNG is a separate requirement from deciding whether significant environmental effects are likely. But the report risks conflating a future biodiversity gain with proof that the development will have no significant ecological effects.
The missing information includes:

- Existing habitat types, their area and ecological condition.
- The location and status of ponds, hedgerows, ditches and ecological corridors.
- Survey results, or an explanation of which surveys have already been undertaken.
- Potential impacts on protected species during construction and after occupation.
- Whether mitigation is feasible within the proposed layout.
- How the BNG target would be achieved without compromising other ecological functions.

A 10% biodiversity gain does not automatically cancel out the destruction or fragmentation of an important habitat. The ecological significance of the baseline and the effects on individual species must be considered separately.
The report itself admits that the ecological baseline has not yet been fully established. That makes its confident conclusion about the absence of significant effects harder to assess.

F. Heritage: the report promises to minimise effects without explaining their magnitude
Pages 2 and 6
The site contains no identified heritage asset within its boundary, according to the report. However, it identifies three Grade II listed buildings at Henhurst Farm and the Grade I Church of All Saints approximately 300 metres away.
The report also says that important views towards the church and the wider Low Weald landscape will be respected.
There is no necessary contradiction here: development outside a listed building's curtilage can still affect its setting, and a building can be protected even where development is some distance away.

The concern is that the report does not explain:

- The extent to which the proposed 300 homes would be visible from the church or listed farm buildings.
- The present character and openness of their surroundings.
- Whether the development would change the experience of approaching or viewing those assets.
- The relationship between building heights, lighting, roads and the claimed protection of key views.
- Whether the heritage assessment is based on a defined illustrative layout or only a general design intention.

A promise that impacts will be minimised is not the same as evidence that they will not be significant.

G. Transport: a strong conclusion rests on unspecified preliminary work
Page 7
The report says that initial assessments do not anticipate a significant residual impact on the road network, including the proposed site access and the A229. It then promises a Transport Assessment, Draft Travel Plan and Parking Stress Survey.
The central weakness is the absence of the preliminary evidence behind that conclusion. For a scheme of up to 300 homes, the report should explain, at least in outline, the anticipated traffic generation, distribution of trips, junction capacity, access constraints and cumulative traffic effects.
It does not provide figures for vehicle movements, junction performance or the assumptions underlying the initial assessment.
It also says there will be separate pedestrian and cycle connections to existing residential areas and local services, but gives no evidence about their exact locations, safety, accessibility or practical connectivity.
The conclusion is premature on the evidence presented. This does not establish that the roads will be unable to accommodate the development; it establishes that the document does not demonstrate why a significant effect can be ruled out.

H. The natural-resources conclusion is the clearest substantive problem
Page 7
The report states:
"As such, we do not consider the development will make use of natural resource or deplete these on site or adversely affect those on adjacent sites."
This is difficult to reconcile with the proposal itself.
The scheme would develop a 19.2-hectare greenfield site, with up to 300 homes, access roads, infrastructure and drainage. Even if 57% of the land were retained as green infrastructure and open space, the remaining land would still be subject to development-related changes.
The report does not adequately address:

- The permanent loss or alteration of agricultural land and soil.
- Soil sealing and changes to the site's ability to absorb and store water.
- Construction materials, water consumption and waste generation.
- The loss of natural land and the interaction between development and existing biodiversity.
- Whether land outside the site could experience indirect effects.

The assertion that the scheme would not use or deplete natural resources is therefore too sweeping. It appears to confuse the retention of some green infrastructure with the absence of natural-resource impacts.
The legal screening criteria expressly require consideration of the use of natural resources, including land, soil, water and biodiversity, as well as waste, pollution, nuisance and risks to human health.

This is one of the most defensible criticisms to raise because it concerns a statement actually made in the report, rather than an assumption about what an omitted assessment might show.

I. Cumulative effects: only one development is identified
High priority
Pages 8–9
CBRE says it reviewed Maidstone's planning portal for relevant developments within a 1 km radius, using 15 October 2026 as the review date.
The table identifies just one scheme: Hen and Duckhurst Farm, Marden Road, for up to 250 homes, described as largely built out and occupied.
The issue is not necessarily that a 1 km search is automatically unlawful. The issue is that the report does not adequately justify why this search area captures the relevant cumulative effects.
For example, the document does not identify whether it considered:

- Other residential allocations and permissions around Staplehurst.
- The effects of other developments on the A229 and the local road network.
- Combined pressure on local services, water resources and drainage infrastructure.
- Ecological effects on connected habitats and wildlife corridors.
- Whether developments just beyond 1 km could contribute to the same environmental effects.

The report itself acknowledges that the EIA framework requires cumulative effects to be considered. Government guidance also says that the planning authority should have regard to possible cumulative effects from existing or approved development.

Our assessment: the cumulative-effects section is too limited to be independently reassuring. It needs either a fuller list of relevant schemes or a reasoned explanation of why the schemes excluded would not contribute to significant cumulative effects.
It does not consider the recently approved 82 dwellings at Lodge Road, 62 dwellings at Land South of Marden Rd or the other two recent ENVSCR (600 dwellings) Therefore with this proposal should consider the cumulative effects 1,044 dwellings.

J. The assessment checklist does not appear to provide a completed audit trail
Pages 9–15
This is a particularly important documentary issue.
The report includes a long reproduction of the Schedule 1 and Schedule 2 development categories, followed by a list of sensitive-area designations. However, in the supplied PDF, the Schedule 1 and Schedule 2 assessment table does not visibly show a completed set of yes/no answers for the individual categories.

The narrative on page 5 identifies the proposal as Schedule 2, category 10(b), but the appended table does not provide a clearly completed, readily auditable assessment against the other categories.
The report also does not present a structured assessment of each relevant Schedule 3 criterion, showing the potential effect, its magnitude, duration, likelihood, geographical extent and proposed mitigation.

This matters because the legal screening test requires the authority to consider the relevant Schedule 3 criteria. Government guidance says that a checklist is not compulsory but can help ensure that relevant issues are considered and provide a clear audit trail.

To be precise, the absence of a completed checklist does not by itself invalidate the request. The substantive assessment could be made through the narrative or other submitted information. The problem is that the narrative also contains significant gaps.

K. The list of environmental topics is not comprehensive
Pages 5–7
The report identifies air quality, arboriculture, ecology, flood risk, heritage, landscape, noise, transport and natural resources as the most relevant considerations.
Those are reasonable topics. But the document does not adequately explain its treatment of several other Schedule 3 matters, including:

- Waste production and waste-management impacts.
- Pollution and nuisance beyond the limited discussion of air quality and noise.
- Risks to human health, including any relevant environmental exposure.
- Major accidents or disasters relevant to the development, including climate-related risks.
- The availability and quality of water resources.
- The duration, reversibility and geographical extent of potentially significant effects.

Not every criterion requires a separate report, and some may be immaterial to this particular scheme. But the report should make clear why relevant criteria can be discounted rather than simply leaving them unaddressed.
The statutory criteria expressly cover these matters.

L. The 57% green-infrastructure figure is not adequately explained
Page 4
The report promises that approximately 57% of the site will be retained as green infrastructure and public open space.
On a 19.2-hectare site, that equates to approximately 10.94 hectares, leaving about 8.26 hectares outside that stated category.
That calculation does not mean the remaining 43% will all be covered by buildings. Roads, footpaths, drainage infrastructure and other land uses may occupy parts of it.

The weakness is that the report does not provide a sufficiently detailed land-use breakdown to explain how the 57% figure has been derived, what it includes, or how it relates to the proposed homes, access roads, drainage and retained habitats.
Nor does the percentage establish that the remaining development would have insignificant effects on landscape, ecology or soil.
It is a potentially positive design commitment, but not a substitute for a site-specific impact assessment.

3. Further inconsistencies and documentary concerns
These are less decisive individually, but they add to the impression that the report needs more rigorous checking.

Location	Issue	Assessment
Page 2	The site is described as being within 400 metres of the village centre, but no	Needs verification; it may be accurate depending on how the distance was measured.

	measurement method or reference point is supplied.	
Pages 2–3	The report presents the location as sustainable because of access to services and rail, but does not quantify walking distances, accessibility or the practicality of the proposed connections.	An unsupported planning assertion rather than a demonstrated environmental conclusion.
Pages 4–5	The proposal is described as landscape-led, with key views protected, but no defined parameters or assessed layout are provided in the letter.	Design intentions are not evidence of impact significance.
Page 6	The report states that no significant landscape effects are expected during either construction or operation, while the actual LVIA is still to be undertaken.	The confidence of the conclusion exceeds the evidence shown.
Page 7	A standalone Transport Assessment is listed after the report has already stated that no significant residual road-network impacts are anticipated.	The conclusion may be correct, but the basis for it is not presented.
Page 7	The natural-resources section says there will be no adverse effect on agricultural uses to the west but does not provide a specific assessment supporting that claim.	The absence of an explanation makes the conclusion difficult to test.
Pages 7–8	The mitigation section lists numerous planning documents, some of which are not themselves environmental mitigation measures.	It confuses a future submission checklist with evidence that environmental effects will be acceptably mitigated.
	Throughout the document contain numerous typographical, spacing and proofreading errors.	These do not invalidate the assessment but are undesirable in a formal technical submission.

One further distinction is important: the statement that the site is not in a statutory "sensitive area" is not contradicted simply because listed buildings or veteran trees are present. Those assets can be highly relevant to the assessment without necessarily bringing the site within the particular statutory definition of a sensitive area used for EIA screening.

4. Overall evaluation

- Tire 2 Rural service Centre repeated out of context throughout the document
- Factual consistency
- Several weaknesses
- The most material issues concern the relationship between the 60-home allocation and the 300-home proposal, and the claim that natural resources will not be depleted.
- EIA screening methodology
- Insufficiently demonstrated
- The report recognises the correct broad framework but does not adequately show how the relevant criteria lead to its conclusion.
- Quality of supporting evidence
- Material gaps

- Several conclusions rely on assessments promised for the future rather than findings presented or summarised in this document.
- Cumulative assessment
- Needs further justification
- The limited list of developments and lack of a transparent account of combined impacts make this one of the most important areas to challenge.

Our overall conclusion is that the report does not adequately demonstrate, on the evidence it presents, why significant environmental effects can be ruled out. That is different from proving that an EIA is legally required. The decision must ultimately be made by Maidstone Borough Council after considering the relevant information and the statutory criteria. Government guidance makes clear that the authority must consider the individual scheme on its merits, have regard to the available information and uncertainty, and explain its reasoning. Where a development is screened out, the authority must identify the relevant features and measures intended to prevent potentially significant adverse effects.

We have grave concerns regarding the quality of this report and ask Maidstone Borough Council to consider the following

1. Evidence base: What evidence supports the conclusion that the proposal is unlikely to have significant environmental effects when several key assessments have not yet been completed or presented?
2. Local-plan allocation: How has the council assessed the difference between the approximately 60-home allocation on part of the site and the proposed development of up to 300 homes across 19.2 hectares?
3. Natural resources: How does the applicant justify the assertion that the development will not use or deplete natural resources, given the proposed development of greenfield land?
4. Cumulative impacts: What other existing, approved and relevant proposed developments have been considered, and why was the 1 km search radius considered adequate for each environmental topic?
5. Flood risk: What evidence supports the description of surface-water flooding as limited to small pockets, and how will the development affect flood risk beyond the site?
6. Ecology and trees: What surveys have already been undertaken, what are their findings, and how can the applicant be confident that the proposed layout can retain the veteran trees, TPO trees and important ecological features?
7. Heritage and landscape: What evidence supports the assertion that there will be no significant landscape effects and that the setting of the Grade I and Grade II listed buildings will be protected?
8. Transport: What preliminary traffic-generation and junction-capacity evidence supports the conclusion that the scheme will have no significant residual impact on the road network?
9. Schedule 3 audit trail: Can the council confirm how every relevant Schedule 3 criterion has been considered, including waste, pollution, natural resources, climate-related risks and human health?
10. Uncertainty and mitigation: How has the council accounted for uncertainty where mitigation is described only in general terms and depends on future assessments?

We do not believe that a Quality Council such as Maidstone Borough Council would accept the submitted request and should seek a full Environmental Assessment.

Kind Regards

R. J Griffiths

Richard Griffiths

Parish Clerk

Staplehurst Parish Council

Draft