

10 October 2016

Dear Sir

Maidstone Borough Council Examination in Public Session 2B Housing Policies DM11-DM15

I write regarding the recent debate on policy DM12 at which I may have mistakenly given you the wrong impression of the CPRE Kent and the Maidstone Committee's view on both this matter, and the south east strategic development location and its allocation sites. As mentioned after the break our position on these matters remains unchanged from that set out in our letter dated 7 April 2016: that is we do not support the allocation of sites H1(7), H1(8), H1(9) or H1(10) nor any intensification of housing density on these sites.

The H1 polices set out approximate average densities for each site. Given this it would appear that whilst DM12 is entitled 'Density of housing development' it is a windfall policy.

We remain very concerned over the wording of DM 12 (2) and as previously submitted consider that the text '*At site adjacent to the urban area*' should be deleted and replaced by '*In*'.

The reason for our stance is as follows:

The Maidstone Local Plan Publication (Regulation 19) document includes a Key Diagram on page 23 which identifies the extent of the Maidstone urban area. The Key Diagram is a small scale diagram that is not on an OS base. It shows strategic locations for housing, marked with an H symbol, and mixed use (Medical Hub and Retail), marked with an M symbol. The Key Diagram does not indicate if these strategic locations are within or outside the Maidstone urban area.

Policy SS1 'Maidstone Borough spatial strategy' at bullet 3 refers to '*an expanded Maidstone urban area*' and goes on to explain that '*strategic locations to the north west and south east of the urban area provide for substantial residential development and junction 7 of the M20 is identified as a strategic location for additional business provision in association with a new medical campus.*'

The maps for policies SP2 and SP3 at pages 28 and 31 respectively set out the urban boundary at the north west and south east strategic development locations and the housing sites H1(1) - H1(10) are shown as being within the urban area.

If found sound, these housing allocations would form part of the Maidstone urban area. In which case the current wording of DM12 (2) would allow windfall development on greenfield land adjoining the urban area.

If on the other hand, the sites are not found sound, and are not included as housing allocations, they would nevertheless be subject to the Policy which would allow windfall housing development on them. Again this would be on greenfield land.

The Natural England Agricultural Land Classification map London and the South East (ALC 007) identifies land on the western, southern and eastern boundaries of the Maidstone urban area as grade 1 and 2 land, which is the best and most versatile land. The NPPF paragraph 109 requires the planning system to protect soils and at paragraph 112 to take into account the benefits of best and most versatile land.

to promote the beauty, tranquility and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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The submitted Regulation 19 Local Plan identifies Landscapes of local value, three of which adjoin the Maidstone urban area; namely: The Loose Valley, Medway Valley and Len Valley.

Not only would the Policy approach in the second bullet point allow development on greenfield land, best and most versatile land, and potentially affect the landscapes of local value, it could also undermine the plan's aim of regenerating the town centre and making best use of available sites within the town centre and other suitable brownfield land.

It may also result in additional traffic on the main routes into the town centre. Such development could occur in the period prior to 2022 and have an adverse impact on the agreed transport principles and mitigation measures set out in the Statement of Common Ground between the Borough and County Councils (SUB019).

Yours faithfully

A handwritten signature in black ink that reads "Paul Buckley". The signature is written in a cursive, slightly slanted style.

Paul Buckley on behalf of CPRE Kent and Maidstone District Committee of CPRE Kent