

Maidstone Borough Local Plan

Duty to Cooperate Compliance Statement





Affordable housing,
Armstrong Road, Maidstone



Scania Depot, Brooklyn Yard



Lenham Village Square



Kent Institute of Medicine
and Surgery, Maidstone



Langley Park, Maidstone



Sandling Lane, Penenden
Heath, Maidstone



Captain Nolan Sculpture,
Old Ophthalmic Hospital



Mote Park, Maidstone



Marden



Fremlin Walk

Duty to Co-operate Compliance Statement

Contents

1.	Introduction	Page 1
2.	Maidstone Borough Local Plan and the Duty to Co-operate	Page 3
3.	Summary and outcomes of co-operation on NPPF strategic priorities	
	(1) The provision of homes	Page 16
	(2) The provision of employment, retail and commercial development	Page 28
	(3) The provision of infrastructure, minerals and energy	Page 35
	(4) Natural and historic environment	Page 49

Appendix 1: Schedule of Duty to Co-operate Engagements

1. Introduction

- 1.1. The Duty to Co-operate (DtC) in section 33A of the Planning and Compulsory Purchase Act 2004 (inserted by section 110 of the Localism Act 2011) ("the 2004 Act") is a legal requirement imposed on certain persons, including local planning authorities, county councils in England (that are not local planning authorities) and other prescribed bodies. Each person subject to the Duty under section 33A(1) of the 2004 Act must co-operate with every other person also subject to the DtC in maximising the plan-making activities specified within section 33A(3) so far as they relate to a strategic matter. The DtC requires a person subject to the duty to engage constructively, actively and on an ongoing basis in any process by means of which the specified activities are undertaken.
- 1.2. In practice, following the abolition of regional planning, all local planning authorities preparing a local plan must work effectively with neighbouring authorities and other prescribed statutory bodies (such as Historic England (formerly English Heritage); Natural England; and Highways England (formerly the Highways Agency)) in relation to planning of sustainable development, including infrastructure, that that has, or would have, a significant impact on at least two planning areas.
- 1.3. The purpose of this Compliance Statement is to identify and explain how Maidstone Borough Council ("the Council") has collaborated, engaged and co-operated with public bodies, stakeholders, and neighbouring authorities in accordance with the DtC throughout the preparation of the Maidstone Borough Local Plan (MBLP). The primary aim of this Statement is to provide a comprehensive account of the collaboration and engagement undertaken by the Council and an explanation of that co-operation has led to the shaping of the strategies and policies within the MBLP, which the Council has submitted to the Secretary of State for independent examination under section 20 of the 2004 Act and Part 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 ("the Regulations").
- 1.4. Chapter 2 of this Statement explains how the DtC applied to the preparation of the MBLP; identifies the authorities, bodies and other persons with whom the Council has co-operated; and describes how the Council has complied with the DtC.
- 1.5. Chapter 3 focuses in greater detail on each of the strategic priorities identified in the National Planning Policy Framework (NPPF), explaining how, in respect of each of those priorities, the Council has complied with the DtC and the way in which the the co-operation undertaken has informed the preparation of the MBLP.
- 1.6. The attached Schedule of Duty to Co-operate Engagements (Appendix 1) sets out the dates of each engagement, with whom the Council officers engaged, and the purpose and/or outcome of the activity.
- 1.7. As the collaboration and engagement required by the DtC is additional to all other forms of statutory consultation, this Statement should be read in conjunction with

the other documents submitted with the MBLP, including the Consultation Statement, which sets out how and with whom the Council has consulted at each stage of preparing the Plan and the Topic Papers on housing, employment and retail, gypsies and transport each provide further technical and evidential detail in respect of specific strategic matters.

2. Maidstone Borough Local Plan and the Duty to Co-operate

- 2.1. The NPPF states that public bodies have a duty to co-operate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out below¹. In accordance with the statutory DtC, national policy also requires local planning authorities to work collaboratively with other bodies to ensure that the cross-boundary strategic priorities are properly co-ordinated and clearly reflected within their local plans, and to make every effort to secure the necessary co-operation on strategic matters before submitting their local plans for independent examination.
- 2.2. The strategic priorities identified in the NPPF are:
- The homes and jobs needed in the area;
 - The provision of retail, leisure and other commercial development;
 - The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - The provision of health, security, community and cultural infrastructure and other local facilities; and
 - Climate change mitigation and adaption, conservation and enhancement of the natural and historic environment, including landscape.
- 2.3. The Government's online Planning Practice Guidance (PPG) on the DtC states that there is no definitive list of actions constituting effective co-operation under the DtC, as these will depend on local needs, which will differ. Therefore, LPAs should focus on co-operation that should produce effective policies on cross boundary strategic matters.²
- 2.4. The local planning authorities, county council and other bodies prescribed by the Regulations that are relevant to the Council's DtC are listed below.

County Council

- Kent County Council (KCC)

Neighbouring Local Planning Authorities

- Tonbridge and Malling Borough Council (TMBC)
- Ashford Borough Council (ABC)
- Tunbridge Wells Borough Council (TWBC)

¹ NPPF, paragraph 156

² PPG, Ref ID: 9, paragraph 011

- Medway Council
- Swale Borough Council (SBC)

Other Prescribed Bodies

- Environment Agency (EA)
- Historic England
- Natural England (NE)
- Highways England (HE)
- Civil Aviation Authority
- Network Rail
- NHS West Kent Clinical Commissioning Group (CCG)
- NHS England
- Homes and Communities Agency
- South East Local Enterprise Partnership
- Kent Nature Partnership

- 2.5. The inception of the MBLP in the mid-2000s was originally as a Core Strategy, in line with the national and regional planning policy context at the time. Accordingly, co-operation on strategic planning issues took place in the context of the South East Plan, which addressed many of the strategic priorities now covered by the DtC. During this period a series of established groups for co-operation, such as the Kent Planning Policy Forum, and Kent Planning Officers Group, provided the basis for discussion and co-operation on strategic issues to inform early iterations of the MBLP. In addition, the Council actively engaged with key infrastructure providers to determine existing infrastructure capacity and the need for infrastructure improvements to support growth.
- 2.6. The legislative and policy framework for strategic planning has changed fundamentally during the preparation of the MBLP. Consequently, in 2012 the Council resolved to cease work on its Core Strategy and begin work to prepare a comprehensive Local Plan. Responding to the requirements of the DtC, as revealed gradually by successive judicial decisions, the experience of independent examination and, belatedly, by the Government publishing PPG, the Council adopted an increasingly proactive and structured approach to co-operation with neighbouring authorities and prescribed bodies to discuss strategic issues and to explore opportunities for joint working.
- 2.7. Throughout 2012 and 2013, the Council engaged constructively with its neighbouring authorities through a series of DtC meetings and key outputs of this engagement

include joint working on a Mid-Kent Strategic Housing Market Assessment (SHMA) with Tonbridge and Malling Borough Council (TMBC) and Ashford Borough Council (ABC) and joint working with Swale Borough Council (SBC) on a Viability Study. Though this period, the Council continued to engage with key infrastructure providers, including the County Council, and other statutory consultees through ongoing discussions and collaborative working on the MBLP evidence base, such as the Strategic Housing Land Availability Assessment (SHLAA) and the Infrastructure Delivery Plan (IDP). Additionally, the Council worked collaboratively with KCC in its capacity as Highway Authority to develop a draft Integrated Transport Strategy for Maidstone, with input at both officer and member level. Engagement throughout this period therefore shaped the 2014 MBLP (Regulation 18) document significantly, to address strategic issues such as housing need and infrastructure provision in a coordinated and joined-up manner.

- 2.8. This structured approach has continued through the remainder of the MBLP's development, and the Council has met with its neighbouring authorities at regular intervals, often aligned with milestones in the plan making process. DtC meetings with each of the adjoining LPAs took place in April 2014, January/February 2015, October/November 2015 and March 2016 to ensure ongoing dialogue and to provide opportunities to discuss and address strategic issues. Where specific issues have been raised that required further engagement, the Council has engaged constructively with its neighbouring authorities; for instance, through continued collaborative work with colleagues at TMBC and ABC on the SHMA update reports published in late 2014 and summer 2015.
- 2.9. At Publication stage in March 2016, SBC, TWBC and Medway Council all confirmed in their Regulation 20 representations that the Council has complied with the DtC. ABC and TMBC confirmed their support for the Maidstone SHMA and did not raise any concerns or objections in relation to the Council's compliance with the DtC. Further, none of the prescribed bodies raised concerns or objections regarding Council's compliance with the DtC in their Regulation 20 representations.
- 2.10. Engagement with infrastructure providers and statutory consultees also has been an ongoing process, in particular as the shifting picture of housing need and supply through 2014 to 2015 has created the need for regular updates to the SHLAA and ongoing review of the IDP and other evidence base. The Council hosted a Local Plan workshop in April 2014, to which representatives of all the prescribed bodies were invited and many attended. The Council and KCC officers have met on a monthly basis to progress the ITS and to discuss Local Plan matters, including KCC infrastructure requirements. Given that different bodies have varying levels of interest in the MBLP, the Council has used a variety of methods, in addition to formal consultation, to ensure ongoing and constructive engagement with infrastructure

providers and statutory consultees. The outcomes of this co-operation have therefore shaped the MBLP and its supporting evidence.

2.11. The forms and methods of co-operation undertaken to shape the development of the MBLP therefore include:

- Joint evidence base studies;
- DtC meetings with officers from adjoining Local Planning Authorities;
- Regular meetings with officers from Kent County Council;
- DtC workshops and project specific workshops;
- Formal consultation on the Local Plan and ITS;
- Regular meetings of the Kent Leaders Group which provides connectivity to the South East Local Enterprise Partnership. The DtC is a standing item on the agenda;
- Regular meetings with officers from neighbouring authorities and with stakeholders e.g. infrastructure providers;
- Meetings of the Maidstone Joint Transportation Board;
- Kent wide officer level meetings such as Kent Planning Officers Group and Kent Planning Policy Forum;
- Meetings of the Kent Downs AONB Joint Advisory Committee;
- Ongoing meetings, email, letters and telephone correspondence with neighbouring authorities and key stakeholders to discuss and progress strategic issues.

2.12. Table 1 provides a summary of the groups, bodies and other key organisations which have been involved in the development of the MBLP.

Summary of the Council's approach to the DtC

2.13. The Council has adopted a proactive and structured approach to engagement with neighbouring authorities and other prescribed bodies through a variety of means, and on an ongoing basis to discuss and address the strategic priorities set out in the NPPF. Although the timetables of neighbouring authorities' own emerging plans has not synchronised well with that of the MBLP, and joint plans and policies have not been pursued, a series of joint evidence studies and strategies provide an effective framework for the MBLP to respond to strategic matters in a joined-up and coordinated manner, and ongoing dialogue with DtC bodies has ensured effective cooperation throughout the development of the MBLP which will continue as the MBLP is delivered. The MBLP proposes to meet the objectively assessed needs for development within the borough and the Council's neighbouring authorities have

either confirmed their support for this approach, or have not raised any concerns in their Regulation 20 representations. Further, in their Regulation 20 representations, the Council's neighbouring authorities have either confirmed that they are satisfied that the Council has complied with the DtC, or have raised no concerns or objections regarding the Council's compliance with the DtC.

Table 1: Summary of Duty to Co-operate Groups or Bodies involved in Maidstone Local Plan

Group/Body	Members	Format	Subject Matter
Environment Agency	Ongoing involvement of officers and members in numerous environmental groups and initiatives covering the Borough.	Continuous dialogue and involvement in specific topics, evidence base and consultation throughout the plan making process.	Input to key Local Plan evidence documents including the SHLAA, SFRA and IDP. Liaison on matters relating to water quality, waste water and flooding. Key stakeholder in the development of the GBI Strategy and key contributor on environmental policies. the Council/EA working together to deliver the Medway Flood Storage Areas project.
Historic England	Maidstone BC and HE officers	Dialogue on specific elements of the Local Plan and consultation phases.	Historic environment policies and ongoing input to periodic reviews of Conservation Area Appraisals and Management Plans.
Natural England	Maidstone BC and NE officers	Dialogue on specific elements of the Local Plan and consultation phases.	Natural environment policies and input to HRA and GBI Strategy.
Highways England	Maidstone BC, Highways England and KCC officers.	Regular meetings and continuous dialogue and involvement in specific topics, evidence base and consultation throughout the plan making process.	Input to Local Plan evidence documents including ITS and IDP. Liaison on matters relating to the strategic road network through bi-annual meetings. Key contributor on transport policies.

Group/Body	Members	Format	Subject Matter
Civil Aviation Authority	Maidstone BC and CAA officers	No comments received at consultation stages of the Local Plan.	Aviation matters. the Council has also considered consultations on CAA proposals. CAA is a statutory consultee on development which may affect aviation facilities.
Network Rail	Maidstone BC officers, Network Rail, South Eastern Trains and KCC	Dialogue on specific elements of the Local Plan evidence base and consultation phases. Project working on delivery of infrastructure schemes.	Input to Local Plan evidence documents including ITS and IDP. Key stakeholder in the delivery of rail infrastructure schemes e.g. Maidstone East.
West Kent Clinical Commissioning Group and NHS England	Maidstone BC officers, CCG and NHS.	Dialogue, meetings and collaborative working on specific elements of the Local Plan evidence base.	Input to Local Plan evidence base documents including the IDP on health infrastructure matters. Key contributor on health infrastructure policies.
Homes and Communities Agency	Maidstone BC and HCA officers	No comments received at consultation stages of the Local Plan. the Council holds regular meetings and continuous dialogue on affordable housing delivery.	Affordable housing policies and ongoing input on the delivery of affordable housing.

Group/Body	Members	Format	Subject Matter
South East Local Enterprise Partnership (SELEP)	The LEP is governed by a board of 27 members, representing County and District Councils and organisations throughout the LEP area.	Meets 3-4 times a year.	Formal decision making is made through the SELEP Accountability Board which approves all major funding decisions and monitors and manages SELEP's capital programme which is informed by local area management information (KMEP).
Kent and Medway Economic Partnership (KMEP)	<p>The group is composed of Kent Districts, Kent County Council, and Medway Council, in addition to representatives from local businesses and education.</p> <p>The leader of Maidstone Borough Council is a member of KMEP and is supported by a local business representative who in addition chairs Maidstone's Business Partnership (MEBP)</p>	Meets bi-monthly.	<p>The KMEP is responsible for the management of funding devolved from the accountability board (SELEP) taking all local decisions on investment within defined thresholds.</p> <p>KCC and the district councils are responsible for generating projects which require funding to enable them to be delivered.</p> <p>the Council therefore works with KCC, KMEP and the LEP in the delivery of key infrastructure schemes e.g. Bridges Gyratory.</p>

Group/Body	Members	Format	Subject Matter
Kent Nature Partnership	The Partnership Board comprises members from a wide range of groups and organisations including the AONB Unit, KMEP and representatives of Kent Districts. KCC provides officer support.	Partnership Board supported by a Management Working Group and three delivery groups.	<p>KNP takes a strategic view of the challenges and opportunities involved in managing the natural environment as a system benefitting biodiversity, people and the local economy.</p> <p>Key strategic planning issues reported to and discussed at Kent Planning Policy Forum.</p>
Kent Planning Officers Group (KPOG)	Kent County Council, all Kent Districts plus Medway Council	Meets bi monthly. Chairmanship rotates around Heads of Planning service.	To discuss planning issues of concern at a high level and recommend appropriate additional research and/or a course of action to member authorities.

Group/Body	Members	Format	Subject Matter
<p>Kent Planning Policy Officers Forum (PPF)</p>	<p>PPF is an officer sub group of KPOG for discussions around major policy and practice issues. Corresponding groups of conservation and development management officers also feed into the main KPOG group.</p>	<p>Bi monthly meetings hosted by Kent County Council Planning Policy Team.</p> <p>Anyone may raise topics to be discussed as an agenda item.</p>	<p>The group discusses planning issues of concern: national planning policy, joint approach to research and policy formulation, task and finish groups are sometimes formed for the group to look at specific issues such as Commercial Information Audit, demographic projections.</p> <p>The group also has a standing item at every meeting for the DtC where members each discuss work programmes and any issues that need to be raised under the DTC.</p> <p>The group has two allocated representatives on the London Plan: Strategic Spatial Planning Officer Liaison Group (SSPOLG) who provide feedback to officers on the London Plan. The London Plan is also a standing item on the PPF agenda.</p>

Group/Body	Members	Format	Subject Matter
<p>GLA Strategic Spatial Planning Officer Liaison Group (SSPOLG).</p>	<p>The group comprises representatives from a range of district and county councils and organisations across the South East of England.</p> <p>The two Kent members were approved by all Kent Districts through Planning Policy Forum (PPF).</p>	<p>Meets every 1 – 2 months.</p>	<p>Strategic Spatial Planning Officer Liaison Group (SSPOLG) discusses the Further Alterations to the London Plan and the next London Plan. Topics include: Demography, Employment, Transport and Environment.</p> <p>The two Kent representatives provide feedback to all other Kent Districts through PPF and KPOG in which it is a standing item. The two representatives are also required to raise any issues and topics as requested through KPOG and PPF.</p>
<p>Maidstone Borough Local Plan Working Group</p>	<p>Maidstone Borough Council / Kent County Council</p>	<p>Meets monthly</p>	<p>Regular point of liaison between the Council and KCC on matters relating to the MBLP and ITS including transport, education and other KCC infrastructure.</p>

Group/Body	Members	Format	Subject Matter
Maidstone Joint Transport Board	<p>Membership of the group consists of 9 Councillors from Maidstone Borough Council and 9 Councillors from Kent County Council representing divisions in Maidstone Borough area, and a representative of the Parish Councils in the District.</p> <p>The group is support by officers from both Kent County Council Highways & Transportation and Maidstone Borough Council.</p>	The JTB will generally meet four times a year on dates and at times and venues to be specified by the Council in accordance with the normal arrangements in consultation with KCC.	<p>The purpose of JTB is to collaborate on the delivery of highways functions where Kent County Council is Highway authority, in the interests of Maidstone residents.</p> <p>The JTB considers:</p> <ol style="list-style-type: none"> 1. Capital and revenue funded works programmes 2. Traffic regulation orders 3. Street management proposals <p>And also provides advice on these matters to the relevant Committee as appropriate.</p> <p>In regards to planning, the group received updates in regards to VISUM modelling and recommendations on appropriate mitigation measures from officers which were subsequently included in the Draft Integrated Transport Strategy.</p>

Group/Body	Members	Format	Subject Matter
Maidstone Health and Wellbeing Board (HWB)	Councillors and officers of Maidstone Borough Council, Kent County Council, Local Clinical Commissioning Group and community based focus groups for health.	Meets quarterly	<p>The group raises awareness of key local health issues and needs with a community focus.</p> <p>There are 3 subgroups which feed into this group. Officers attend when necessary and there is crossover and communication on projects, including the Local Plan.</p>
Kent Downs AONB Joint Advisory Committee	The Committee comprises members and officers from all local planning authorities with the AONB area and other key stakeholders.	Meets 3-4 times a year plus an Annual Forum. All local authority members contribute to running costs.	Production of AONB Management Plan and any supporting evidence and policy documents. The AONB Unit provides support to local authorities through Local Plan and development management processes.

3. Engagement on Strategic Priorities

3.1. Strategic Issue 1: The homes needed in the area

Assessing the need for housing

- 3.1.1. The Council recognises that the scale and distribution of housing development is one of the key strategic issues for the Borough and its neighbouring authorities. Housing Market Areas (HMAs) do not always follow administrative boundaries and it is important to consider issues of housing need and supply at a wider spatial scale. The NPPF is clear that local authorities should work together at HMA level, to plan strategically for housing provision at the relevant geography.
- 3.1.2. The Council adopted a collaborative approach to the production of a Strategic Housing Market Assessment (SHMA) and jointly commissioned the Mid-Kent SHMA in 2013 with two of its neighbouring authorities: Ashford Borough Council (ABC); and Tonbridge and Malling Borough Council (TMBC). A wider scope was considered for the study, however, Medway Council had undertaken a joint SHMA with Gravesham Borough Council (GBC) and its Core Strategy had been submitted for and was undergoing independent examination. Swale Borough Council (SBC) had recently undertaken a SHMA update and also decided not to take part in a further assessment.
- 3.1.3. The SHMA therefore sought to define the extent of the HMAs operating across the three local authority areas, using a consistent methodology, and to assess the objectively assessed housing need (OAHN) for each of the authorities. Based upon existing evidence in respect of local housing markets it was considered that joint working with ABC and TMBC would provide a sound basis for the consideration of strategic housing issues affecting the Borough.
- 3.1.4. It was agreed from the outset that a separate report would be prepared for each local authority, to complement individual local plan preparation timetables, and to provide more detailed information on matters specific to each authority area as required. This was of particular importance to the Council, as work on the emerging MBLP had reached a relatively advanced stage, and it was intended to progress the Plan quickly towards submission. Both ABC and TMBC were at the very earliest of stages in the preparation of their local plans, and it was not considered practicable or appropriate to delay the progression of the MBLP by pursuing a joint local plan.
- 3.1.5. Given the strategic importance of the SHMA to all of the authorities involved, a series of meetings between officers of the three authorities and the consultants, GL Hearn, took place between May and December 2013 in order to discuss and progress the SHMA. Officer discussions were supplemented with Member level meetings and together these meetings facilitated detailed discussions between the local authorities involved in the SHMA, and enabled consensus and agreement on the

methodology in order that a consistent approach could be adopted across the study area. A stakeholder workshop was also organised which provided the opportunity for a wider number of local authorities to input to the process however no significant concerns were raised in respect of the methodology or findings.

- 3.1.6. The Maidstone SHMA Report was published in January 2014 and identifies the boundaries of the Maidstone HMA extending into much of the eastern parts of Tonbridge and Malling Borough, encompassing the settlements of Aylesford, Snodland and Kings Hill, and extensive rural areas. The south-eastern most wards of Maidstone Borough - Harrietsham and Lenham and Headcorn - are identified as on the periphery of the Ashford HMA. Although the study recognises strong commuting flows between Maidstone/Medway and Maidstone/Swale, the SHMA identifies fundamental distinctions between the Maidstone HMA and HMAs operating within the north Kent authorities; in particular, the significant differences in average house prices between these areas. The SHMA reports published for ABC and TMBC confirm these geographies and therefore provide a consistent understanding of the HMAs operating across the three local authority areas.
- 3.1.7. The Council's SHMA Report (January 2014) sets out the identified housing need within the Borough; again complemented by the equivalent reports for ABC and TMBC to establish the overall need for housing across the three local authority areas. Subsequent updates to the SHMA in August 2014 and June 2015 were jointly commissioned and were produced as a single report reviewing housing needs for all three authorities. Again, other neighbouring authorities were kept informed of progress with the SHMA updates however no concerns were raised regarding the methodology or findings of the studies. Through formal representations on the MBLP both ABC and TMBC have confirmed their support for the robust methodology and findings of the SHMA, whilst the other neighbouring authorities have not raised concerns regarding either the geography of the identified HMAs or the OAHN.

SHMAs undertaken across the wider area

- 3.1.8. Whilst there is clearly firm agreement between the three joint commissioning authorities on the definition of the HMAs affecting the administrative areas of the Council, ABC and TMBC, it is prudent also to consider SHMA work undertaken across the wider area; both in terms of any potential impact on the MBLP and in respect of the Council's mutual DtC with other neighbouring authorities.
- 3.1.9. Since the 2014 SHMA was published, the West Kent authorities of Tunbridge Wells Borough Council (TWBC) and Sevenoaks District Council (SDC) have themselves progressed new SHMAs, which provides further understanding of the HMAs operational within the wider area. Maidstone officers engaged constructively with TWBC and SDC through the development of the West Kent SHMA, and verbal feedback was provided during SHMA workshops. Using the same consultants, GL

Hearn, the West Kent SHMA (2015) re-confirms the HMA geographies identified in the Mid-Kent SHMA, taking account of the 2011 Census data on Travel to Work Areas, and therefore supports the Council's assessment that neither of these authorities fall within the HMAs operating across Maidstone Borough.

- 3.1.10. Medway Council has also recently published a new SHMA to support its emerging local plan. The study draws somewhat different conclusions regarding the local HMA geographies to those reached as part of the Mid-Kent and West-Kent SHMAs, which may be explained by the approach adopted by a different SHMA consultant. The SHMA Report asserts that sub-authority variations cannot be accurately captured and therefore defines the Medway HMA to include the full extent of neighbouring local authorities Gravesham, Swale, Maidstone and Tonbridge and Malling.
- 3.1.11. Following attendance at the Medway SHMA workshop in summer 2015, Maidstone officers discussed this issue directly with Medway officers during a DtC meeting in September 2015. Concerns were raised that the proposed HMA geography was inconsistent with the findings of the Mid-Kent SHMA, and Medway officers confirmed their intention to review the boundary with the consultants before publishing a final report. Subsequently, when a full draft SHMA was circulated to Maidstone for comment in October, officers set out these concerns in writing; drawing particular attention to what was considered to be a lack of weight applied to market factors which show a clear distinction between the housing markets in the two local authority areas.
- 3.1.12. The Medway SHMA was published in early 2016 during the Medway Issues and Options consultation and, although the overall geography of the HMA remains as per the draft, this definition has been qualified to an extent. The final report recognises that the strength of these relationships are not consistent across full local authority areas, and concludes that the strongest relationships between Maidstone/Tonbridge and Malling and Medway, relate to those areas considered in the Mid-Kent SHMA to be at the northern periphery of the Maidstone HMA. Maidstone's response to the Issues and Options consultation welcomed this qualification, however it also confirms that the Council does not agree with the proposed Medway HMA definition as it remains inconsistent with the findings of the Mid-Kent SHMA.
- 3.1.13. SBC has prepared its own SHMA evidence, and the Swale Local Plan is currently at examination. Swale's position remains that the Swale housing market area is relatively self-contained which supports the conclusions of the Mid-Kent SHMA that there is little practical overlap in terms of the housing markets operating within the two local authority areas.
- 3.1.14. Taken together, the above demonstrates that there is broad agreement on the definition of the HMAs across Maidstone and the wider area and no challenge from neighbouring authorities to the OAHN identified through the assessment work.

Collaborative working with those authorities which have the strongest functional relationships with Maidstone Borough has provided a sound basis on which the Borough Council can plan to meet housing needs.

Housing supply within the HMAs and across the wider area

- 3.1.15. The NPPF sets out a clear requirement for local authorities to undertake a Strategic Housing Land Availability Assessment (SHLAA) to provide realistic assumptions about the availability, suitability and viability of land to meet the identified need for housing over the plan period. The Council produced its first SHLAA in 2009, under the previous national planning framework, to provide evidence to support the development of the intended Core Strategy. The study took account of the agreed Kent Planning Policy Officer Group (KPOG) SHLAA Protocol (2008) which sought to achieve consistency in the approach to SHLAAs across the County; however, the assessment covered only the administrative area of Maidstone Borough.
- 3.1.16. Given the detailed work that had gone into the 2009 SHLAA, the update study in 2013 – the Strategic Housing and Economic Development Land Availability Assessment (SHEDLAA) – maintained the geographical scope of the previous assessment and considered/re-considered new and existing sites within the Borough boundary. The results of the SHEDLAA provided evidence to support the Regulation 18 version of the MBLP, and were published alongside the consultation document in March 2014 which identified a housing supply of 17,100 dwellings, against an OAHN of 19,600.
- 3.1.17. To facilitate discussion and constructive input to the plan making process, the Council arranged a series of meetings with neighbouring local authorities under the DtC, at the very outset of the consultation period. These meetings provided opportunities for detailed discussion around the evidence base supporting the proposed scale and distribution of housing development, and helped to draw out both areas of agreement between authorities, and specific areas of concern where further work would be helpful. These areas of discussion were then formalised through the Regulation 18 consultation responses received from Maidstone's neighbouring authorities.
- 3.1.18. It became clear both through the DtC meetings and formal consultation responses that Maidstone's neighbouring authorities were concerned at the proposed undersupply and the implications this may have for their own emerging local plans. Whilst the Council acknowledged the shortfall, officers were able to reassure neighbouring authorities that a further Call for Sites was being undertaken concurrently with the consultation exercise with a view to finding the requisite sites to meet the OAHN.
- 3.1.19. Following further SHLAA work and Committee consideration of a series of additional sites, the Council officers again met with neighbouring authorities in

September/October 2015, during the targeted consultation under Regulation 18. Having entered the consultation period with some uncertainty regarding the final level of housing supply, over the following weeks it became clear that, at the point of submission in summer 2016, the MBLP would be able to meet the OAHN through the additional allocations and newly granted planning permissions. This improved position was therefore discussed with neighbouring authorities who were supportive of the general approach to meet the OAHN within Maidstone's administrative boundary.

- 3.1.20. The Regulation 19 Publication version of the MBLP set out that the Local Plan will meet the identified OAHN in full, through a combination of existing planning permissions, local plan allocations, broad locations and windfall allowance. An up-to-date assessment of supply is included in the Housing Topic Paper which demonstrates a supply figure in excess of the 18,560.
- 3.1.21. Given this housing supply position, the Council has not needed to request any assistance from other authorities to meet the identified OAHN under the DtC. Indeed, through both formal consultation responses and another set of DtC meetings during the Publication stage in February/March 2016, Maidstone's neighbouring authorities have made clear their support for the Council's position that the MBLP will meet the full OAHN.
- 3.1.22. The other authorities with overlapping HMAs, namely TMBC and ABC, are also preparing their own local plans and Maidstone officers have held regular meetings under the DtC to discuss progress on the resolution of key strategic issues, including housing supply. ABC is due to publish its local plan for Regulation 19 consultation in June 2016, and confirmed at a Duty meeting in March 2016 that the emerging plan will meet the OAHN in full. Accordingly, ABC has not requested that the Council accommodate any unmet housing needs from its area.
- 3.1.23. TMBC has undertaken an extensive Call for Sites exercise, the results of which are timetabled for publication in May 2016. At a Duty meeting in March 2016, TMBC officers outlined that the emerging local plan would be subject to a series of consultations through 2016 and 2017, with submission anticipated in late 2017 or early 2018. Although the timing of the TMBC Local Plan does not synchronise well with the MBLP, TMBC officers confirmed that the TMBC Local Plan will aim to meet the OAHN in full within the administrative boundaries. An Issues and Options consultation is timetabled for September 2016, seeking views on a series of spatial strategies to meet the OAHN. Given this position, TMBC has not requested that the Council accommodate any unmet housing needs from its area and it is not anticipated that such a scenario is likely to arise. The Council and TMBC will of course continue to engage on this and other strategic issues.

- 3.1.24. Outside of the identified HMAs, the Council's other neighbouring authorities are at a variety of stages in the development of their local plans. SBC is currently at examination and, having submitted a plan which did not meet the identified OAHN, a suite of new evidence documents has been prepared. SBC officers confirmed at a Duty meeting in April 2016 that they were confident that the SBC Local Plan would ultimately meet the identified OAHN within Swale Borough. In response to the Regulation 18 consultation on the MBLP in March 2014, SBC asserted that the MBLP should include a windfall allowance in its housing supply calculation and requested that the Council consider allowing SBC to use some or all of this allowance towards its housing supply. At the time however, the MBLP was not providing sufficient supply to meet Maidstone's own identified needs and therefore, when a windfall allowance was calculated and included in the supply figures, the supply was used to reduce Maidstone's own shortfall. Since this time both Local Plans have progressed significantly and there is no suggestion that SBC will need to repeat this historic request given the anticipated supply position outlined recently by SBC officers.
- 3.1.25. Medway Council is at a much earlier stage in the preparation of its Local Plan, having withdrawn its Core Strategy from examination in 2013. The SHMA published alongside its Issues and Options consultation in early 2016 identified a need for some 29,000 new dwellings over the period 2012 – 2035. At the DtC meeting in March 2016, Medway officers outlined a Local Plan timetable to consult on a series of spatial strategy options in early 2017 however the timing of its Publication version is likely to be dependent upon the timing and outcome of the Lodge Hill Public Inquiry. Again, the timetable for the Medway Local Plan does not synchronise well with that of the MBLP and it will be some time until a clear picture emerges regarding how Medway intends to meet its OAHN. Notwithstanding, Medway officers confirmed at the DtC meeting in March 2016 that the intention will be to meet the identified OAHN in full through the new Local Plan; a continuation of the position confirmed at the Swale Local Plan examination. Accordingly, Medway Council has not requested that the Council accommodate any unmet housing needs from its area however the Council and Medway Council will continue to engage on this and other strategic issues.
- 3.1.26. TWBC is now in the final stages of the examination of its Site Allocations DPD and has begun work on evidence gathering for a new, post-NPPF local plan. The SHMA, published in September 2015, identifies an OAHN figure of almost 13,000 new homes over the period 2013 – 2033 however consultation on an Issues and Options paper is not anticipated until mid-2017. At a Duty meeting in March 2016, MWBC officers advised that the Call for Sites exercise was recently commenced and would be ongoing through the summer. Accordingly, it is simply too early to establish how TWBC intends to meet its OAHN and there is no suggestion at present that TWBC will

be looking to other authorities within the Tunbridge Wells HMA, or indeed outside of the HMA, to accommodate any unmet housing needs.

- 3.1.27. Together Maidstone's neighbouring authorities cover much of west, mid and northern Kent, and the SHMA demonstrates that any functional housing market relationships Maidstone shares with authorities outside of this area are significantly weaker. The SHMA Report (2014) recognises however that London exerts, to a greater or lesser extent, some influence on housing markets across this area. Although London clearly lies beyond the boundaries of the HMAs identified in the SHMA, the SHMA Update (2015) sought to quantify the potential increase in demand for housing that could arise if, as predicted by the Greater London Authority, migration from London is higher than projected by the ONS. A full review of the London Plan is expected to commence this year and therefore there is considerable uncertainty regarding the overall need for housing and any solutions to meeting that need. Given the uncertainty, the MBLP does not include an uplift for the impacts of additional migration from London, although it should be noted that the OAHN of 928 dpa already accounts for migration from London in line with the ONS projections.
- 3.1.28. As one of the "Wider South East" authorities, the Council has been involved in the strategic planning discussions led by the GLA either directly through attendance or more indirectly through representation at the regular meetings of the GLA Strategic Spatial Planning Officer Liaison Group. This will continue as the review of the London Plan develops. To date however there has been no suggestion that Maidstone will be expected to accommodate any unmet needs from London, and no formalised requests under the DtC have been received.
- 3.1.29. Taken together, the above demonstrates that the Council has engaged constructively and on an ongoing basis with neighbouring planning authorities both within and adjacent to the identified HMAs in respect of meeting housing needs. Council officers have met with neighbouring authorities at key milestone stages in the development of the MBLP and early concerns regarding undersupply have been overcome. Other than an historic request from SBC, whose own local plan has now moved forward significantly with an expectation that Swale Borough's OAHN can be met in full, none of the Borough's neighbouring authorities have requested any assistance from Maidstone in meeting housing needs under the DtC. Accordingly, there is broad support for the MBLP approach to meet the OAHN within the Borough which has been confirmed both through regular DtC meetings and through formal consultation responses.

Spatial distribution of housing development

- 3.1.30. The overall pattern and distribution of housing development identified within the MBLP looks to accommodate significant growth within and adjacent to the Maidstone Urban Area, with proportionate growth at the Borough's Rural Service

Centres and Larger Villages. As such, the spatial strategy seeks to maintain the existing balance and structure of the settlement hierarchy within the Borough, whilst delivering significant growth. In itself this strategy reduces the potential for cross boundary impacts as new residents will be located in sustainable locations, and able to access existing as well as new employment and services opportunities within these settlements.

3.1.31. Officers have discussed the spatial distribution of housing growth with neighbouring authorities at numerous DtC meetings and there is broad support for the strategy to maintain the existing settlement hierarchy. Furthermore, no concerns have been raised on this issue as part of representations received from neighbouring authorities.

3.1.32. Given that a number of proposed housing allocations are located in close proximity to the administrative boundary of Tonbridge and Malling Borough, the Council and TMBC have engaged on a regular basis to discuss arising issues. The following sites adjoin the administrative boundary:

- H1(1) Bridge Nursery, London Road
- H1(2) East of Hermitage Lane
- H1(3) West of Hermitage Lane
- H1(4) Oakapple Lane, Barming

3.1.33. Although TMBC has not raised any 'in principle' objections to the allocation of these sites, specific issues including transport mitigation and open space have been discussed on numerous occasions. During the March 2014 Regulation 18 consultation the draft MBLP, the Council met with TMBC to outline the key issues arising from the draft MBLP and it was agreed to arrange further meetings to discuss, in particular, the transport implications of growth in north west Maidstone. In the interim, TMBC's formal response to the MBLP consultation did not raise objections to the proposed allocations, but noted the concerns regarding transport impacts on Hermitage Lane and the A20, and sought clarification that the MBLP was not seeking to assert policy objectives within the TMBC area.

3.1.34. These issues were discussed further at a DtC meeting in June 2014, where it was noted that the largest site H1(2) was due to be considered by the Council Planning Committee in July. Following Committee's refusal of the application, and the concerns set out in TMBC Statement of Case, the Council and TMBC met again in January 2015 to discuss the current position on the transport evidence and the justification for a country park to be provided on land within Tonbridge and Malling Borough as part of the development. With KCC also present, there was general agreement that a modified proposal to provide a filter lane at the Coldharbour roundabout, together with a new bus loop and improvements at the junction of

Hermitage Lane with the A20, secured through a development within Tonbridge and Malling, should provide adequate mitigation for the identified development in north western Maidstone. The Council agreed to forward the technical report to KCC and TMBC for formal comment, and all agreed to review the need for a more substantial scheme alongside the development of the TMBC Local Plan.

- 3.1.35. TMBC and the Council discussed differing views on the potential need for a new country park, and whether the conceived mechanism for securing the park would be legitimate. The Council resolved to review its position with additional legal input and, by the time of the Public Inquiry in July 2015, the non-provision of a country park was withdrawn as a reason for refusal. When the Council and TMBC met again in October 2015, the Council confirmed that the country park proposal would not be included in the next iteration of the MBLP. The Regulation 19 version of the MBLP published in January 2016 therefore reflected this updated position.
- 3.1.36. The Council and TMBC met again in March 2016 to discuss progress on both local plans and specifically any issues arising for TMBC out of the Regulation 19 version of the MBLP. TMBC officers did not raise any specific concerns at the meeting and advised that any outstanding concerns would be set out in the representation to the MBLP. Subsequently, when TMBC raised a small number of specific concerns relating to site criteria which TMBC considered affected land within Tonbridge and Malling Borough, the Council reviewed the criteria and these modifications are included within the schedule of proposed changes to be submitted alongside the MBLP.
- 3.1.37. Given the proximity of the Lenham Broad Location to the Ashford Borough boundary, the Council and ABC officers have discussed progress on the policy at a number of DtC meetings. ABC has not however raised any concerns regarding the broad location policy, either through DtC meetings or through formal consultation responses. The Council have resolved however to keep ABC informed of further developments, including the outcome of the masterplanning exercise currently underway.

Development Viability

- 3.1.38. The Council took a collaborative approach to the development of viability evidence and jointly commissioned Local Plan Viability Testing with SBC in 2012. Officers from the Council met with colleagues at SBC to progress the work and the Council hosted a wider stakeholder workshop in August 2012 which was attended by officers from both authorities, and KCC, in addition to representatives from the development industry. The outputs of this collaborative study therefore directly informed policies in the March 2014 MBLP (Regulation 18) document, including policies on affordable housing. As the timetables for the MBLP and the Swale Local Plan did not synchronise well through 2015, the Council's update in July 2015 was commissioned

separately by the Council however the initial joint study provided the context for this further work and therefore the submission version of the MBLP.

Current position and outcomes of co-operation

- 3.1.39. Cooperation between the Council, ABC and TMBC on the Mid-Kent SHMA has facilitated a comprehensive understanding of the HMAs operating within the three local authority areas, to the mutual benefit of all three authorities. Given that the geography of the Maidstone HMA encroaches into large areas of Tonbridge and Malling Borough, and the overlap of the far south eastern wards within Maidstone Borough with the Ashford HMA, it is of particular importance that a joined-up, consistent approach to defining the geographic extent of HMAs across the three Boroughs has been adopted.
- 3.1.40. The HMA geographies identified in the Mid-Kent SHMA are further supported by the West Kent SHMA, the Swale SHMA and, to a lesser extent, by the Medway SHMA. Through both regular DtC meetings and formal consultation responses, none of the Council's neighbouring authorities have disputed the HMA geographies identified or the OAHN figure, and there are no outstanding requests for Maidstone to accommodate any unmet housing need from authorities either within or outside of the identified HMAs.
- 3.1.41. The Council has engaged constructively with those authorities most directly affected through the spatial distribution of housing growth and has, over time, resolved the concerns raised by TMBC regarding the issues arising through development in north western Maidstone. Joint working with SBC on viability issues has also directly informed policies in the MBLP.
- 3.1.42. Taken together the above demonstrates that, on the key strategic issues of housing need and supply, there is broad agreement with local planning authorities across a wide area that the MBLP, supported by the Maidstone SHMA, provide a sound basis on which to plan for meeting housing needs. The Council has engaged constructively and on an ongoing basis with its neighbouring authorities on these issues and TWBC, SBC and Medway Council have all confirmed in their representations to the Regulation 19 MBLP that they consider that the Council has complied with the DtC in developing the MBLP. ABC and TMBC meanwhile did not raise any concerns at Publication stage regarding the Council's compliance with the DtC.

Assessing Gypsy and Traveller and Travelling Showpeople Accommodation Needs

- 3.1.43. The evidence base for the MBLP is provided by the Gypsy & Traveller and Travelling Showpeople Accommodation Assessment (January 2012) undertaken by the University of Salford. The University was jointly commissioned by the Council and Sevenoaks District Council to produce an assessment of accommodation needs for each authority following a common methodology. During the development of the

assessment work, officers from the Council worked constructively with colleagues at Sevenoaks to discuss and progress the work.

- 3.1.44. Maidstone has the highest number of Gypsy pitches in Kent and Sevenoaks also a relatively high level of provision. An outcome of the Maidstone and Sevenoaks studies was that the University was subsequently appointed to complete assessments for Medway and each of the Kent Districts and Boroughs, with the exception of TWBC. This has resulted in a consistent and Kent-wide approach to the evidential assessment of traveller needs.

Implications of the evidence

- 3.1.45. In March 2014, the Regulation 18 draft of the MBLP proposed 7 allocated sites which would provide an additional 23 pitches to the stock of Gypsy sites in the borough. The Plan acknowledged that this represented a shortfall against the identified requirement and included a commitment that further site identification work would be undertaken prior to the next stage of the MBLP's preparation. This work was done and the MBLP (Regulation 18) produced in October 2015 included allocations for a further 18 pitches on 9 sites. Nonetheless, despite the extensive search that had been undertaken, sufficient specific sites had not be identified to fully bridge the gap between evidenced needs and supply.
- 3.1.46. This being the case, the Council formally wrote to each of the adjoining authorities in December 2015 asking the extent to which they could help meet the shortfall in planned provision through the identification of sites in their local authority area. Responses were received from each of the authorities but none were able to offer help meeting Maidstone's need.
- 3.1.47. Officers from the Kent Districts/Boroughs, Medway and the Salford University met on 23rd October 2015 to discuss the implications of the Government's changes to the definition of Travellers made in August 2015 for the councils' assessments of needs. It was confirmed through this meeting that Salford University would not be undertaking a further analysis of the original survey data in the light of the new definition. This stemmed from the concern that such a retrospective analysis would not be sufficiently robust. The group met again on 15th March 2016 where the Swale Inspector's interim findings on Swale's Gypsy needs were discussed. There was also some agreement on the appropriateness of including an allowance from unidentified sites when pitch supply is calculated.

Current position and outcomes of co-operation

- 3.1.48. The MBLP (Regulation 19) March 2016 makes full provision for Gypsy and Traveller needs. It does this through specific site allocations and by also making an allowance for the pitches which will come forward on unidentified sites in the future. Neighbouring authorities have not dissented from this approach and indeed Medway Council specifically supported it in its formal representation to the Plan.

3.1.49. The Council has also engaged recently and actively with local planning authorities across Kent to understand the implications for local plans' preparation of the Government changes to Planning for Traveller Sites.

3.2. **Strategic Issue 2: The provision of employment, retail and commercial development**

Meeting employment needs

- 3.2.1. The Council has commissioned a sequence of employment land forecasts in 2008, 2009, 2011 and 2013 as the process of preparing the Core Strategy, and then the MBLP, had progressed. These were all prepared by the same team of economic consultants, GVA, who have established a sound understanding of the local economy over this period. The Economic Sensitivity Testing and Employment Land Forecast report ('the Forecast Report') was published in January 2014 and provided a forecast of economic growth to 2031 under a number of scenarios.
- 3.2.2. At the time the Forecast Report was commissioned, in September 2013, the position of the neighbouring authorities' economic evidence was as follows;
- TMBC had just commissioned its own single-borough forecast report (Economic Futures Forecasting Study) in June 2013. The final report was published in January 2014.
 - ABC had single-borough Strategic Employment Options Report (March 2012) in place which was updated with an additional scenario in 2013
 - SBC had a complete employment evidence base in the form of a single-borough Employment Land Review dated 2010.
 - Medway's Core Strategy was at Examination.
 - TWBC had an adopted Core Strategy (2010). A single-borough Employment Land Review Update had been completed in October 2010 to support the planned Core Strategy Review and site allocation Development Plan Documents.
- 3.2.3. The timetables of the adjoining authorities meant that there was not a realistic opportunity at this point to jointly commission the economic evidence that the Council needed. In common with the council's neighbours, the Forecast Report provides a borough-level requirement for employment land.
- 3.2.4. As part of the analysis, the Forecast Report considers the position in adjoining authorities (section 2) and the characteristics of supply in those areas. The report also considers commuting links (section 2) as does the SHMA (2014). Based on a high level assessment of both commuting links and the nature of businesses in the borough, the Forecast Report concludes that the functional economic area is focused on the immediately surrounding districts. The more detailed analysis of commuting flows in the SHMA (2014) identifies the highest flows between Maidstone and Medway and Maidstone and Tonbridge & Malling, giving some evidence of where the stronger functional economic relationships are. This is consistent with the analysis of commuting data in Tonbridge & Malling's Economic

Forecasting evidence (January/November 2014) and Medway's Strategic Housing and Economic Needs Assessment (2015).

- 3.2.5. Following the receipt of the Forecast Report, the Council needed to commission additional work in the form of a qualitative employment sites assessment to complete its evidence base on economic matters. Routes to commission this jointly with ABC were explored, including sharing the draft of the commissioning brief with ABC, however as both Councils had historically used different consultants, the overriding value for both consistency and background knowledge of retaining the same consultant team meant that a joint assessment was not pursued. In the circumstances, the Council commissioned GVA to undertake a Qualitative Employment Site Assessment (the 'Qualitative Assessment') for the borough. This Qualitative Assessment was completed in September 2014.
- 3.2.6. During the preparation of the Qualitative Assessment, a Stakeholder event was held to ensure the analysis was informed by a wider understanding of the local and wider Kent employment market. A representative from KCC's economic development team participated in this event. A representative from the South East LEP was invited but unfortunately could not attend and did not take up the offer of a follow up discussion.
- 3.2.7. Prior to the production of the Forecast Report in 2014, the existing employment evidence had indicated there would be a shortfall in office and warehousing supply. In July/August 2013, the Council's officers therefore contacted counterparts at TMBC, TWBC, SBC, ABC and Medway Council to explore options for meeting the Council's emerging employment land needs outside of the Council's administrative boundary. Specifically, the Council sought information in respect of the adjoining authorities' capacity to accommodate Maidstone's emerging unmet needs for office and/or warehousing floorspace outside the borough, subject to this proving to be an appropriate and sound way forward. With one exception, the authorities who responded did not foresee any prospect of accommodating any of Maidstone's needs for these uses. SBC's officer level response, without giving any form of commitment, did not discount co-operation for warehouse/industrial uses.
- 3.2.8. With the publication of the Forecast Report however, the Council's position had changed and this provided the evidence base for the March 2014 MBLP (Regulation 18) document. In this iteration of the MBLP it was envisaged that the forecast need for industrial and warehousing floorspace would be met through a dispersed pattern of development; allocating additional land in the form of extensions to existing employment areas in the rural parts of the borough. For office uses it was judged that there was sufficient pipeline supply to respond to demand as it arose, albeit there would be a numerical shortfall in supply for the whole of the MBLP plan period compared with the total forecast requirement.

- 3.2.9. As this iteration of the MBLP included sufficient site allocations to enable warehousing needs to be met (based on the evidence in place at the time) within Maidstone borough, and therein planned positively to meet identified needs, the earlier approach to adjoining authorities was not repeated.
- 3.2.10. DtC meetings were held with the adjoining authorities in April 2014, linked to the Regulation 18 consultation. These meetings gave the opportunity to discuss the MBLP's overall approach and to air any areas of concern. The positions of the individual neighbouring authorities were confirmed through their specific consultation responses to the March 2014 MBLP (Regulation 18) consultation as follows:
- TMBC highlighted the apparent shortfall in office provision and observed that this should be resolved following further work.
 - ABC did not raise any issues on the Local Plan's approach to employment matters
 - SBC did not raise any issues on the Local Plan's approach to employment matters
 - Medway Council welcomed the continued designation of Lordswood Industrial Estate as an economic development area.
 - TWBC did not submit a response at this stage
- 3.2.11. As part of the engagement process during the Regulation 18 consultation period, the Council's officers gave a specific presentation to Maidstone Economic Business Partnership (MEBP) on the employment proposals in the MBLP and responded to questions from the members of the Partnership. The MEBP is an industry led partnership, administered by the Council, to ensure that the plans and strategies of central Government reflect the needs of local businesses. The board has representatives from a cross section of key sectors in the Borough and is one of the four sub county partnerships that inform both the Kent & Medway Economic Partnership and the South East Local Enterprise Partnership.
- 3.2.12. The additional work on Qualitative Assessment was completed in September 2014. This evidence identified a gap in the Council's portfolio of employment sites for a mixed employment site well located on the strategic road network. This qualitative gap would not be met by the package of sites proposed in the March 2014 MBLP (Regulation 18) document. Following consideration of the evidence at a meeting in October 2014, the relevant Overview and Scrutiny Committee decided that it wanted to consider a policy for an employment allocation at Junction 8 of M20 to address this identified shortfall. In response, the Council's Cabinet Member for Planning, Transport and Development subsequently requested outline work to explore options and mitigation strategies for Junction 8.
- 3.2.13. In August 2015, Maidstone Borough Councillors agreed the inclusion of a site allocation policy for Woodcut Farm at Junction 8 M20 for incorporation into the

Regulation 18 MBLP consultation document dated October 2015. The inclusion of this site in the MBLP would address the qualitative 'gap' and also the numerical shortfall in office floorspace provision and enable the borough to meet the anticipated needs in full.

3.2.14. Further DtC meetings were held with adjoining authorities to coincide with the October 2015 consultation. With respect to employment matters, no specific concerns were raised by neighbours during these meetings about the Council's emerging proposals. Further, the neighbouring authorities did not signal any likely intention to request Maidstone's help in accommodating their employment land needs.

3.2.15. In the event, only TWBC chose to formally respond to the consultation at this stage, stating that it did not have specific comments to make on the allocations proposed in the consultation version of the MBLP.

3.2.16. The MBLP (Regulation 19 version) was published for public consultation in February 2016. The employment land strategy of the MBLP is sufficient to meet anticipated needs over the MBLP plan period. Given this position, the Council has not needed to ask for assistance from neighbouring authorities to meet the identified needs under the DtC.

3.2.17. A further round of DtC meetings was held during February and March 2016 to coincide with the consultation period. Consistent with the content and outcomes of the earlier meetings, no specific concerns about the Council's employment land strategy were raised. The aspects of the authorities' formal consultation responses which are relevant to the Plan's overall employment strategy are summarised below:

- TMBC did not raise any issues or concerns about the Local Plan's employment strategy;
- ABC did not raise any issues or concerns about the Local Plan's employment strategy;
- SBC did not raise any issues or concerns about the Local Plan's employment strategy and confirmed that there has been on-going dialogue and co-operation on cross boundary issues;
- Medway Council did not raise any issues or concerns about the Local Plan's employment strategy and confirmed that there has been on-going dialogue and co-operation on cross boundary issues; and
- TWBC did not raise any issues or concerns about the Local Plan's employment strategy and confirmed that there has been on-going dialogue and co-operation on cross boundary issues.

3.2.18. Joint working with the LEP on site delivery is evidenced by the bid to Government for the North Kent Innovation Zone, incorporating the Maidstone Medical Campus proposals at junction 7 of the M20 (MBLP Policy RMX1(1)), to gain Enterprise Zone status. The bid was supported and sent to Government on behalf of the Council, Ebbsfleet Development Corporation, Medway Council and other partners, by the South East Local Enterprise Partnership (SELEP) and Thames Gateway Kent Partnership. The success of the bid was confirmed in November 2015.

Current Position and Outcomes of co-operation

3.2.19. The policies and site allocations in the submission version of the MBLP are sufficient to meet anticipated economic needs up to 2031. In aiming to meet the borough's own needs as identified through the evidence, albeit at an ambitious level, the Plan does not over-provide employment land. In this respect, the Local Plan does not provide for the economic needs of neighbouring authorities and indeed the Council has not been asked to do so through evolution of the Plan and the on-going engagement through the DtC.

3.2.20. There are no outstanding objections from neighbouring authorities at the Regulation 19 publication stage. There is broad agreement on the acceptability of the MBLP's overall approach to employment provision. The Council has engaged constructively and on an on-going basis with neighbouring authorities in respect of meeting employment land needs and indeed this is affirmed in the Regulation 20 representations made by Medway Council, SBC and TWBC.

Assessing Retail Needs

3.2.21. The Council completed its Retail Capacity Study in June 2013. The Maidstone Retail Capacity Study provides the evidence of the expected future demand for additional comparison and convenience retail floorspace to the end of the Plan period. This demand is presented in the study in 5 year tranches.

3.2.22. Maidstone town centre is the principal shopping destination in the borough. There are also a range of district and local centres within the urban area and serving the larger rural villages. On the western outskirts of Maidstone, within Tonbridge and Malling but close to the borough boundary, is the South Aylesford Retail Park which has an influence on the shopping patterns within Maidstone borough. In recognition of this cross-boundary inter-relationship, officers liaised with TMBC officers during the preparation of the Retail Capacity Study. In November 2012, information on the proposed number and geographical extent of retail catchment zones was shared with TMBC officers so that they could provide comments or suggest changes before the household surveys went ahead. No alterations were suggested.

3.2.23. The Retail Capacity Study includes a specific retail capacity forecast for the Aylesford Retail Park as a shopping destination on its own to provide an indication for both councils of how much retail expenditure it attracts and the potential retail capacity arising from its market share. Accordingly, TMBC officers were sent a confidential draft of the Retail Capacity Study in May 2013 and invited to give feedback before the report was finalised. TMBC officers welcomed the opportunity to comment but decided, in the end, not to provide comments.

Evolution of retail allocations in the MBLP

3.2.24. The Core Strategy Strategic Site Allocations (2012) identified Newnham Park at Junction 7 of the M20 as the location for a medical campus and replacement retail facilities centred on the existing footprint of the existing shopping village at Newnham Park. The policy contained a ceiling on the amount of additional retail floorspace at 500sqm. The site allocation plan accompanying the policy showed the full extent of the site (approximately 28ha) identified for 'a medical campus and redevelopment of the retail park'.

3.2.25. SBC's response to this consultation advised that the retail allocation at Newnham Park should not be carried forward until an assessment of retail impacts, including on centres outside the borough had been undertaken.

3.2.26. The March 2014 MBLP (Regulation 18) document was prepared after the completion of the Retail Capacity Study (2013). To meet the retail needs identified in the evidence base, the MBLP allocated two town centre sites at Maidstone East/Royal Mail Sorting office and on King Street. Longer term demand would be through the redevelopment of The Mall, also in Maidstone town centre. The MBLP also carried forward the strategic allocation at Newnham Court and specified more clearly on the site plan the limited area appropriate for retail redevelopment.

3.2.27. DtC meetings were held with the adjoining authorities in March 2014, linked to the Regulation 18 consultation. In its formal response to the Regulation 18 consultation on the MBLP in March 2014, SBC repeated its concerns that there was no retail impact assessment for Sittingbourne town centre and highlighted the potential highways impacts of the combined medical campus and retail allocation on A249 and strategic highways junctions. Medway's representation observed that the MBLP's retail provision is focussed on out-of-town locations as opposed town centre. There was concern that the overall scale of development proposed at Newnham Court was too high and would be detrimental to existing town centres. Also, it was asserted that the development of Newnham Court would be harmful to the functioning of a major strategic highway route, and be likely to cause unacceptable levels of congestion at and around junction 7 of the M20.

3.2.28. The Council responded to the concerns about town centre impacts by amending the site allocation policy to clarify that a retail impact assessment should assess the

impact on town centres to confirm that this requirement did not relate to Maidstone town centre alone. Medway's representation appeared to be based on some misunderstanding of requirement in the policy to limit the amount of net additional floorspace to just 500sqm. Subsequently, in April 2014, the Maidstone Medical Campus scheme gained outline consent with a package of highways mitigation measures secured through a legal agreement.

3.2.29. These specific issues aside, the adjoining authorities did not raise any wider concerns about the MBLP's approach to meeting retail needs. The overall retail strategy was carried forward into the Regulation 19 version of the MBLP (March 2016). At the DtC meeting held to coincide with the Regulation 19 publication of the MBLP, Medway Council indicated that it was unlikely to raise any substantive issues. Indeed, in its formal response, Medway Council confirmed its support for the MBLP's strategy to promote town centres.

3.2.30. SBC's Regulation 20 representation confirmed that concerns over the retail proposals at Newnham Court had been discussed at the regular DtC meetings and the potential for updating the evidence base to include a specific retail impact assessment for the Newnham Court proposal. In the absence of such an impact assessment, Swale sought a revision to confirm that the impact on centres which may be located outside Maidstone Borough will be tested as part of an application.

3.2.31. In the light of SBC's Regulation 20 representation, the Council proposes a change to Policy RMX1(1) Newnham Court, to explicitly confirm that a retail impact assessment must address the impact on centres outside, as well as within, the Borough.

Current position and outcomes of co-operation

3.2.32. The policies and site allocations of the MBLP do not alter the existing hierarchy of retail centres in the adjoining district and boroughs. The content of the MBLP has been amended in response to issues raised by neighbouring authorities about the retail redevelopment of Newnham Court shopping village. This specific site aside, the adjoining authorities have not raised concerns about the quantum of new shopping floorspace being planned for and the MBLP's overall spatial approach to the meeting these needs. Officers have met counterparts from the neighbouring authorities at key milestones points during the MBLP preparation and also proactively engaged with TMBC during the preparation of the supporting evidence.

3.3. Strategic Issue 3: The provision of infrastructure

- 3.3.1. The Council has worked constructively with key infrastructure providers throughout the development of the MBLP to assess the impacts of planned growth on the delivery of their services, and to identify effective solutions to respond or create additional infrastructure capacity. Where the identified need for infrastructure raises cross-boundary issues, the Council has worked constructively with neighbouring authorities to address these.
- 3.3.2. The primary means by which collaboration with infrastructure providers has been undertaken is through joint working on the Infrastructure Delivery Plan (IDP), which supports the MBLP, and sets out the infrastructure schemes required to support growth. The content of the IDP has been shaped by the outcomes of this process and takes account of infrastructure providers' own plans and strategies for the delivery of infrastructure.
- 3.3.3. In addition to the IDP, the Council and KCC as Highway Authority have worked collaboratively to develop a joint Integrated Transport Strategy (ITS) to sit alongside the MBLP. The ITS has been developed over a number of years and is expected to be finalised during summer 2016. Alongside other available transport evidence base, the outputs of this joint working have informed the MBLP and, in particular, the transport infrastructure requirements included within key policies.
- 3.3.4. Despite the scale of growth proposed in the MBLP and the dispersed pattern of distribution, only a limited number of cross-boundary infrastructure schemes have been identified. The most significant schemes relate to the transport improvements identified as necessary to mitigate the impact of development in north western Maidstone, which include the need for improvements to junctions within Tonbridge and Malling Borough. the Council has therefore worked closely with TMBC, as well as with KCC, in the development of mitigation strategies for this area.

Transport infrastructure

- 3.3.5. In planning for transport infrastructure, the Council has worked constructively with a range of infrastructure providers and stakeholders including KCC in its role as Highways Authority, Highways England (HE), Network Rail, South Eastern Trains, the South East LEP and neighbouring planning authorities. Given the iterative nature of plan making, and the changing picture regarding housing requirements, the Council has undertaken regular and constructive engagement with these bodies, throughout the development of the MBLP, to address transport issues in a coordinated and strategic manner.
- 3.3.6. The Highway Authority has been a key stakeholder in the development of the MBLP and has been closely involved in numerous elements of the evidence base. the Council and KCC undertook to prepare a joint ITS to inform and support the MBLP in 2011, and officers worked collaboratively to prepare a draft for consultation in

autumn 2012. Through consideration of the emerging ITS at the Maidstone Joint Transportation Board (JTB), this collaborative approach was also adopted at member level.

- 3.3.7. As the MBLP and its evidence base evolved throughout 2013 and 2014, the Council continued to engage with KCC on transport matters and the Highway Authority provided key input to the SHLAA exercise undertaken in 2013 to inform the 2014 draft MBLP (Regulation 18) document. Information provided by the Highway Authority in respect of potential development sites has therefore informed decisions made by the Council on the inclusion/exclusion of sites and the need for policy criteria for sites affected by transport issues, many of which are also reflected in the IDP.
- 3.3.8. Through this period, KCC and the Council continued to engage on the emerging ITS and, in 2014, resolved to undertake strategic transport modelling to assess the impacts of the higher levels of growth proposed in the 2014 draft MBLP. KCC and the Council officers therefore met usually on a monthly basis throughout 2014 and 2015 to discuss and progress the various VISUM forecast model scenarios and the mitigation packages to be applied through the modelling work. The JTB were kept regularly informed of progress through a series of reports and, in December 2015, the Maidstone JTB agreed a set of key highways schemes and public transport improvements for inclusion in the emerging ITS. The agreed schemes are fully reflected in the submission versions of the MBLP and the IDP.
- 3.3.9. Following the concerns raised by KCC in its Regulation 20 representations on the pre-submission draft of the MBLP and the draft ITS made in March 2016, the Council/KCC officers and members met later in March, and again in April, to discuss the way forward for the ITS. Although it is recognised that, currently, there is some disagreement on the nature of mitigation measures required to support development in the south east of Maidstone, and specifically with respect to bus prioritisation measures, there is generally mutual agreement on the package of mitigation measures elsewhere in the Borough. The Council and KCC officers met again in May 2016 to discuss a full list of highway and public transportation schemes proposed in the MBLP with a view to reaching agreement on the package of measures. Subject to minor changes to the descriptions of two individual schemes, both of which affect the south east of Maidstone, and the inclusion of another scheme, KCC did not raise any additional concerns regarding the package of measures and the Council is satisfied that the overwhelming majority of schemes has support from the Highway Authority. The list has subsequently been updated to reflect these changes and was circulated to KCC on 13 May 2016 for written agreement. Both the Council and KCC are working towards agreement on a final version of the ITS, and also on a joint Walking and Cycling Strategy, both of which are due to be considered for agreement by the Maidstone JTB in July and by the

Maidstone Borough Council Strategic Planning, Sustainability and Transportation Committee in August.

- 3.3.10. Alongside development of the ITS, the Council and KCC have worked constructively on a series of projects which support delivery of the MBLP. Key infrastructure schemes such as the Bridges Gyratory improvements and the River Medway Towpath improvements are the outcome of joint working between the Council, KCC and the LEP and together these measures will support the growth proposed in the MBLP. The Council has also worked with Network Rail, South Eastern Trains, the LEP and the KCC successfully to secure funding for works to improve the Maidstone East rail station. The Council continues to work constructively with KCC on projects such as the Local Transport Plan, Local Sustainable Growth Fund, the Maidstone Integrated Transport Package (Local Growth Fund) and the emerging Kent and Growth and Infrastructure Framework. In addition to working together on evidence gathering and strategy development therefore, the Council and KCC have also adopted this collaborative approach to the delivery of key infrastructure projects.
- 3.3.11. HE has been a key stakeholder through the development of both the ITS and MBLP, and the Council has maintained regular contact with HE, in addition to formal consultation. Following concerns raised at Regulation 18 stage in October 2015, the Council met with HE in December 2015 to discuss how the Council might provide the technical evidence HE were seeking. Unfortunately, it was not possible to obtain the technical information requested from the VISUM consultants Amey prior to the Publication stage in March 2016. Therefore, following an objection from HE at Regulation 19, the Council met with HE, KCC Highways and consultants Amey in April to discuss an appropriate response. At the meeting all present agreed to undertake additional junction capacity assessment work at the motorway junctions (M20, Jns 5-8) to provide HE with the evidence they require. At a meeting on 18 May 2016, the Council, HE and KCC discussed the scope and timetable for this work and all parties are working towards an agreed methodology, and completion of the work in the August 2016. The Council and HE officers have agreed to prepare a Statement of Common Ground through the MBLP examination following completion of this work.
- 3.3.12. The transport evidence work to date has not identified the need for any regionally significant infrastructure schemes. Key schemes in nearby authorities are being progressed however such as the Lower Thames Crossing, the new M20 J10a and the proposed lorry park to mitigate the impacts of Operation Stack. The Council has therefore engaged constructively with HE in responding to such consultations.
- 3.3.13. As referenced (at paragraphs 3.1.33-36 above) in relation to housing, the Council and TMBC engaged in discussions regarding the need for transport mitigation to serve development in the north west of Maidstone. Over a number of meetings, and through both the appeals process and through modifications to the MBLP, schemes acceptable to both authorities, and the Highways Authority, have been agreed.

3.3.14. In its Regulation 20 representation made in March 2016, SBC confirmed it is undertaking further work to assess the impacts of its higher development target on traffic conditions on the A249 between M2 J5 and M20 J7, and suggested that the MBLP transport evidence should be updated to align with its own. The Council discussed this issue with HE and KCC at the meeting on 18 May and has resolved to liaise with SBC and KCC to ensure that the correct information can be incorporated into the M20 junction capacity assessment work. To date however, none of the Council's neighbouring authorities have raised the prospect that additional transport infrastructure capacity will be required within Maidstone Borough to accommodate the needs generated by development within their emerging Local Plans.

Current position and outcomes of co-operation

3.3.15. The Council has worked constructively and on an ongoing basis with key transport infrastructure providers and stakeholders to inform and provide supporting evidence for the MBLP. Though the development of the emerging ITS, the Council and KCC have adopted a collaborative approach to the development of a strategy to support the growth proposed in the MBLP, which itself takes account of the comments received from stakeholders and other infrastructure providers. Although work is continuing, there is broad agreement on the strategy and the overwhelming majority of the key highway and public transport measures and it is anticipated that the ITS can be agreed for adoption over the summer.

3.3.16. The Council has also engaged with KCC and other transport infrastructure providers through the development of the IDP, and the submission version takes account of the latest input; including the rail infrastructure schemes identified for Marden, Staplehurst and Maidstone East rail stations. Collaboration will continue on the delivery phase of these schemes, and it is understood that funding for the improvements at Maidstone East – through the LEP and Network Rail – is now secured.

3.3.17. The Council will continue to work constructively with HE, through the development of further transport evidence, in order to address the concerns raised in March 2016. Whilst the timing of the HE objection is regrettable, the Council has taken proactive steps to ensure that work is in train to overcome the issues raised, and is working collaboratively with HE and KCC to agree a brief and detailed timetable for the work. In doing so, the Council will engage with SBC and KCC to take account of SBC's recent representations.

Community and cultural infrastructure

3.3.18. The key point of co-operation for community and cultural infrastructure is with KCC, which holds responsibilities for primary and secondary education as Local Education Authority and also for key services such as libraries and social care. The Council has held regular meetings with KCC throughout the development of the MBLP, which

have enabled continuous and constructive dialogue on issues arising, including on infrastructure matters. Through these meetings, and through additional officer communication, the Council developed a draft IDP to support the MBLP Regulation 18 consultation in March 2014 setting out the anticipated requirements for education and community infrastructure.

- 3.3.19. As the Local Plan and its evidence base moved forward through 2014, these discussions continued and the IDP was kept under review through periodic updating, in discussion with KCC. It was only as the Council approached readiness for the further Regulation 18 consultation in October 2015 however that the overall quantum and distribution of development began to be clarified, firstly through the SHMA Update (2015) and then through the Council Committee approval of the Regulation 18 document. Accordingly, the Council and KCC engaged on a full review of the IDP and in October 2015 met to discuss the potential implications of the emerging strategy and the need for any additional information to ensure a robust IDP for Publication stage in early 2016.
- 3.3.20. Following a further meeting to specifically discuss IDP matters in November, KCC provided detailed input in respect of education requirements in December 2015, which were incorporated into the IDP and MBLP for publication stage in January 2016. The Council and KCC met again in March 2016 to discuss any outstanding issues on education, and to confirm the position on other community infrastructure provision. At the meeting KCC officers outlined broad agreement with the education schedule, but queried a small number of issues. Both the Council and KCC agreed the need for new primary schools to serve the Broad Locations at Lenham and Invicta Barracks was clear, and that the schemes should be referenced within the IDP education schedules. The need for additional education capacity to serve sites H1(8) and H1(10) was also discussed, and it was agreed that the IDP should identify the requirement for an additional 0.5FE to serve H1(8) and at least 1FE to serve H1(10). KCC also outlined a flexible and high level approach to the delivery of improvements for other community infrastructure, including libraries, youth services, community learning and adult social care, confirming that no significant infrastructure schemes were likely to be required, and that additional capacity would be provided through small scale improvements.
- 3.3.21. These comments were formalised in KCC's Regulation 20 Representation in response to the Regulation 19 publication draft of the MBLP. The IDP has been updated subsequently to reflect the specific education infrastructure requirements discussed, and the generic approach to other community infrastructure. The schedule of proposed changes submitted alongside the MBLP provides some clarity on the need for new primary schools to serve the two Broad Locations.
- 3.3.22. The need for new or improved education and community infrastructure has been discussed periodically with neighbouring authorities through regular DtC meetings.

There has been no suggestion that any of the proposed education schemes are likely to have significant cross boundary implication. Further, none of the Council's neighbouring authorities have raised the prospect that additional infrastructure capacity will be required within Maidstone Borough to accommodate the needs generated by development within their emerging Local Plans.

Current position and outcomes of co-operation

3.3.23. the Council and KCC have worked collaboratively and on an ongoing basis to inform the development of the education and community infrastructure schemes required to support the MBLP. The IDP provides a comprehensive set of schemes which have been subject to regular discussion and review and the MBLP provides the policy basis to deliver these in a timely manner to support growth. The need for community and cultural infrastructure has been discussed with neighbouring authorities however it is considered that the provision of these infrastructure types does not raise any significant cross boundary issues, and no representations have been received on this matter from Maidstone's neighbouring authorities though the formal consultation exercises.

Health infrastructure

3.3.24. Similarly, to community infrastructure, the Council has engaged with key health infrastructure providers throughout the development of the MBLP with the outputs of this work informing both the IDP and the MBLP. In particular, the Council has had regular contact with NHS Property Services (South East) who have, until recently, held responsibility for primary care infrastructure planning across Kent. In providing written input to the IDP, NHS Property Services themselves liaised with the West Kent Clinical Commissioning Group (CCG) to ensure that detailed submissions to the Council took account of CCG strategies. Much of this responsibility passed to the CCG in April 2016 and the Council officers have worked directly with the CCG more recently, given that the CCG and its partners will be central to the delivery of the identified schemes.

3.3.25. To inform the draft IDP published in March 2014, alongside the Regulation 18 draft of the MBLP, the Council and NHS Property Services worked together to understand the impacts of planned growth on the delivery of primary care services, and to develop an initial set of infrastructure schemes to provide additional primary care capacity within the Borough. As the Local Plan and supporting evidence base moved forwards, further discussions and email correspondence took place though 2014 and into early 2015, and the schemes were kept under review, with further input from the CCG via NHS Property Services.

3.3.26. As the quantum and distribution of proposed development began to be clarified, the Council officers met with both NHS Property Services and the CCG in October 2015 to instigate a full review of the IDP schemes in preparation for Publication stage in

early 2016. The updated list of infrastructure requirements was received in early February, too late for inclusion in the Regulation 19 MBLP, however the Council continued to engage directly with the CCG through February and March to discuss and agree the schemes for inclusion in the submission version of the IDP. The key health infrastructure requirements outlined in the updated IDP are also included within the schedule of proposed changes to be submitted alongside the MBLP.

- 3.3.27. The IDP outlines also the Council's commitment to continue to work constructively with the CCG through the development of their emerging strategies and the implementation of the IDP schemes. The Council has already provided a series of datasets to the CCG to inform its initial work on strategy development and has established working group which meets to discuss health matters on a monthly basis.
- 3.3.28. The Council officers have also liaised with the Maidstone and Tunbridge Wells NHS Trust, who is responsible for strategic planning at Maidstone Hospital. Although no infrastructure schemes were identified through early iterations of the IDP, the Council officers met with the Trust in January 2016 to confirm the Trust's position in advance of the Publication MBLP. A further meeting took place in April 2016 and the submission version of the IDP makes reference to the Trust's plans to update the Maidstone campus and to provide additional capacity and services.
- 3.3.29. The health infrastructure schemes identified in the IDP are, by their nature, localised to new development and do not generally present any cross boundary issues. The one exception to this is the scheme to provide additional capacity at Aylesford Medical Centre, which has been identified as part of the NHS/CCG response to growth in north western Maidstone. TMBC have been aware of the scheme through multiple iterations of the IDP and through a series of planning permissions for the North West SDA and have raised no concerns either through DtC meetings or formal consultation responses. None of the Council's neighbouring authorities have raised the prospect that additional health infrastructure capacity will be required within Maidstone Borough to accommodate the needs generated by development within their emerging Local Plans.

Current position and outcomes of co-operation

- 3.3.30. The Council has worked collaboratively and on an ongoing basis with health infrastructure providers to inform the development of the health infrastructure schemes required to support the MBLP. The IDP provides a comprehensive set of schemes which have been subject to regular discussion and review and the MBLP provides the policy basis to deliver these in a timely manner to support growth. It is considered that the provision of health infrastructure to support the MBLP does not raise any significant cross boundary issues, and no representations have been

received on this matter from the Council's neighbouring authorities though the formal consultation exercises.

Security and public services

- 3.3.31. Kent Police, Kent Fire and Rescue Service and the South East Coast Ambulance Service have all be actively involved in the development of the MBLP, principally through input to the IDP. The Council's officers have been in regular contact with Kent Police and, following early input to the IDP in 2012, the Council and Kent Police engaged through the summer of 2014 to establish an up-to-date picture of police infrastructure requirements to support the MBLP. As the MBLP and supporting evidence moved forwards, the Council officers met with Kent Police again in October 2015 to seek input to the Publication version of the IDP and, although the discussions were constructive, Kent Police has not since provided any up-to-date assessment of the need for new police infrastructure in response to the MBLP growth. the Council officers made numerous attempts to confirm the Police's position through winter 2015/2016 but it is understood that an ongoing strategic review of its services may have restricted the Police's ability to respond to the requests for input to the MBLP. Kent Police did formally respond to the Regulation 19 MBLP to confirm that they have no comments to make on the Plan.
- 3.3.32. Similarly, to police infrastructure, the Council officers have been in regular contact with the Fire and Rescue Service to ensure that the IDP is kept up-to-date through the development of the MBLP. Following input to early iterations of the IDP, the Council officers engaged again with the Service in summer 2014, and again in October 2015, with the response on each occasion that the MBLP did not generate the need for additional Fire and Rescue Service infrastructure.
- 3.3.33. In respect of ambulance infrastructure, the South East Coast Ambulance Service have also provided periodic input to the IDP, most recently in October 2015, when the Service identified a series of Community First Responder schemes in areas not currently covered by the service. These schemes are now included in the submission version of the IDP.
- 3.3.34. One of the most significant pieces of security infrastructure within the Borough is the Ministry of Defence's (MOD) Invicta Barracks base in northern Maidstone. This site is identified as a Broad Location for housing development within the latter part of the Local Plan period, and the Council officers have worked closely with the MOD to establish its potential availability and suitability for housing development. Following a SHLAA assessment and inclusion in the Regulation 18 version of the MBLP in March 2014, the Council officers and members undertook a site visit with MOD staff in summer 2015. The MOD confirmed its position at Publication stage and the Council will continue to engage with the MOD through the implementation and review of the MBLP.

3.3.35. Given the position of the Kent Police and Kent Fire and Rescue Service, no infrastructure schemes have been identified in the submission version of the IDP. The schemes identified to support delivery of the ambulance service are, by their nature, very localised and do not raise any cross boundary issues. Whilst the loss of security infrastructure at Invicta Barracks has the potential to have a wider impact, the MOD are clearly considering disposal of this site in a strategic manner and, despite the proposed Broad Location being included in the MBLP from early 2014 to present, no concerns have been raised by neighbouring authorities in respect of the loss of this infrastructure either through regular DtC meetings or formal consultation responses. None of the Council's neighbouring authorities have raised the prospect that additional security or public services infrastructure capacity will be required within Maidstone Borough to accommodate the needs generated by development within their emerging Local Plans.

Current position and outcomes of co-operation

3.3.36. The Council has worked collaboratively and on an ongoing basis with security and public service infrastructure providers to inform the development of the infrastructure schemes required to support the MBLP. It is considered that the provision of security and public service infrastructure does not raise any significant cross boundary issues, and no representations have been received on this matter from Maidstone's neighbouring authorities though the formal consultation exercises. The Council will continue to work constructively with Kent Police as it finalises its strategic review to ascertain whether there are any arising implications for the MBLP or the CIL.

Utilities infrastructure

3.3.37. In planning for utilities infrastructure, the Council has worked closely with a range of providers including Southern Water, South East Water, Southern Gas, National Grid and BT Openreach to understand the implications of growth proposed in the MBLP and to consider how this relates to utilities companies' own existing and emerging plans and strategies. Again, the outcome of this work has shaped the IDP and has informed policies within the MBLP.

3.3.38. The need for waste water infrastructure and, in particular, sewerage infrastructure, has featured heavily throughout the development of the MBLP and the Council has worked constructively with Southern Water over a sustained period to ensure that the MBLP provides an appropriate policy basis to secure the requisite infrastructure capacity. Following engagement on early iterations of the MBLP and IDP, it became clear that Southern Water's consistent position was that the provision of waste water and sewerage infrastructure was not a constraint to new development, provided that infrastructure was planned and delivered in a timely and coordinated manner. Southern Water formalised this position in its representation to the

Regulation 18 MBLP in March 2014 and the IDP was reviewed and updated to outline both specific and general requirements. The Council and Southern Water engaged again on the content of the IDP between October and December 2015, in readiness for Publication of the MBLP, and Southern Water confirmed it was satisfied with the content of the IDP in its representation to the Regulation 19 MBLP. Southern Water did however raise some concerns regarding the need to strengthen the wording of policies to clarify, in particular, the requirement for development to connect to the sewerage system at the nearest point of adequate capacity. Following further engagement during March 2016, these concerns have been addressed as part of the schedule of proposed changes to be submitted alongside the MBLP.

3.3.39. Through consultation on early iterations MBLP it became clear that residents in the southern part of the Borough and specifically in Headcorn, Staplehurst and Marden, were experiencing what was perceived as sewer flooding in cases of wet weather. The Council therefore worked closely with Southern Water, to understand the causes of these events, the potential for resolution and the implications for future development. The outputs of this work will be a series of Surface Water Management Plans (SWMPs), prepared by KCC, and Drainage Area Plans (DAPs), prepared by Southern Water, which will look to resolve existing issues, not necessarily related to new development. The Council officers have been actively involved in the development of these strategies, as a key stakeholder, and have provided information and data to inform the findings and input at various meetings. The final versions of the strategies are anticipated later in 2016, and the Council will continue to work constructively through the development and implementation of the SWMPs and DAPs.

3.3.40. In respect of fresh water infrastructure, the Council has engaged with South East Water throughout the development of the MBLP, to ensure that the IDP reflects the infrastructure requirements generated by new development, and takes full account of the Water Resources Management Plan (WRMP). Following input to early iterations of the MBLP and IDP, and South East Water's support for the MBLP at Regulation 18 stage in March 2014, the Council officers continued to engage with South East Water through 2014 and 2015 to ensure the IDP was reviewed and kept up to date. In preparation for publication stage, the Council officers sought South East Water's assistance in a review of the IDP through October and November 2015, to take account of the progression of the MBLP. The Council and South East Water have therefore worked collaboratively and on an ongoing basis to develop the submission version of the IDP.

3.3.41. Through the development of the IDP, the Council officers have also worked constructively with energy and telecoms infrastructure providers to inform the development of the MBLP. The Council engaged with National Grid, UK Power Networks, EDF Energy Networks and Southern Gas Networks through early iterations

of the IDP and MBLP and the need for supporting energy infrastructure was reviewed in 2015 in preparation for Publication stage. The submission version of the IDP has therefore been updated to outline the outputs of this engagement and it is noted that neither Southern Gas Networks nor UK Power Networks have raised any objections in response to the Regulation 19 version of the MBLP. BT Openreach are working with KCC to improve broadband provision across Kent and Medway and the Council officers have been actively involved in this process; working collaboratively to share information and to discuss priorities and progress. Most recently, the Council officers met with BT Openreach and KCC in February 2016 to discuss progress of the new project and to confirm that the MBLP provides policy support to the provision of new telecoms infrastructure. The Council will continue to work collaboratively with BT Openreach and KCC through the implementation of the project.

- 3.3.42. The majority of the utilities infrastructure schemes identified, such as connectivity to existing networks, are very localised to new development and do not raise any cross boundary issues. A small number of the schemes identified by South East Water relate to infrastructure which crosses local authority boundaries however no concerns have been raised by neighbouring authorities in respect of utilities infrastructure through regular DtC meetings or formal consultation representations. None of the Council's neighbouring authorities have raised the prospect that additional utilities infrastructure capacity will be required within Maidstone Borough to accommodate the needs generated by development within their emerging Local Plans.

Current position and outcomes of co-operation

- 3.3.43. The Council has worked collaboratively and on an ongoing basis with utilities infrastructure providers to inform the development of the infrastructure schemes required to support the MBLP. It is considered that the provision of utilities infrastructure does not raise any significant cross boundary issues, and no representations have been received on this matter from Maidstone's neighbouring authorities through the formal consultation exercises. The Council will continue to work constructively with utilities providers through the delivery of infrastructure required to support the MBLP.

Flood Risk Infrastructure

- 3.3.44. Although Maidstone does not have any coastline, the borough is affected by a number of waterways and large parts of the borough lies within flood zones. The Council's officers have therefore worked constructively with the Environment Agency (EA) throughout the development of the MBLP - from early evidence gathering to the delivery of strategic infrastructure – and the EA's input has shaped policies within the MBLP.

- 3.3.45. Following early engagement on the development of the Strategic Flood Risk Assessment (SFRA) in 2008, the EA provided valuable input to various iterations of the SHLAA and has been a key stakeholder in this process. Information provided by the EA in respect of potential development sites has informed decisions made by the Council on the inclusion/exclusion of sites and the need for policy criteria for sites affected by flood risk. The Council and the EA also worked constructively through 2014 to ensure that the IDP took account of the need for flood risk infrastructure and this position was reviewed in October 2015 to inform the submission version of the IDP.
- 3.3.46. The key flood risk scheme identified by the EA is to provide flood management improvements along the River Medway, through the Flood Storage Areas project, which crosses into Tonbridge and Malling Borough. The Council is therefore working constructively with TMBC, KCC and the EA to develop and deliver the scheme within the short to medium term. Key decisions are expected during 2016 with regards to the funding of the scheme, and it is anticipated that a business case will be submitted to Defra in 2018. The Council will therefore continue to work collaboratively with its partners as the scheme progresses.
- 3.3.47. Given that the SFRA is now somewhat dated, the Council has been looking to refresh the study for some time. Following concerns raised by the EA in response to the Regulation 18 MBLP consultation in March 2014, the Council's officers met with the EA to discuss the need to update to SFRA and the implications for sites potentially affected by the Medway. The EA advised during 2014 however that revised modelling of the Medway, taking account of the December 2013 flood data, would not be completed until early 2015. The Council, TMBC, KCC and the EA therefore met in early January 2015 to discuss the potential for a joint the Council/TMBC SFRA however it became clear that the modelling results were still some way from being finalised. Following further delay though 2015, the Council's officers met again with TMBC in December 2015 to discuss interim findings presented to TMBC and to confirm the approach to an SFRA update. During the meeting the Council's officers and TMBC officers agreed that the timetables of the respective Local Plans made a joint SFRA infeasible, and resolved to pursue individual assessments tailored to the timescales required for each authority.
- 3.3.48. The Medway modelling work was finalised in early 2016, and the Council's officers met with the EA in March to discuss the findings and agree the scope of the SFRA update. The Council resolved to commence a refresh of the SFRA, together with specific assessments for a number of proposed development sites, and to work constructively with the EA throughout the process. Amendments to the PPG in February 2016 meant that additional modelling work would be required to account for an increased buffer for climate change, and the EA confirmed it would share this data at the earliest opportunity. The remodelled data will ensure that the findings of

the SFRA take full account of the potential impacts of climate change, in accordance with the updated PPG. Both the EA and the Council confirmed an intention to develop a Statement of Common Ground through the examination to explain the agreed position.

Current position and outcomes of co-operation

3.3.49. The Council has engaged constructively and on an ongoing basis with the EA through the development of the MBLP, and the EA has been a key stakeholder and source of expertise on matters relating to flood risk. EA input has shaped decisions and policies in the submission version of the MBLP. Despite the delays experienced in obtaining updated flood modelling data, the Council and the EA continue to engage on the SFRA update and have reached an agreed position on the way forward. The Council continues to work constructively with TMBC, KCC and the EA to develop and deliver the key strategic flood risk infrastructure scheme at the River Medway with a view to delivery within the short to medium term. Flood risk infrastructure has not been identified as major strategic issue at regular DtC meetings or through neighbouring authorities' representations to the MBLP, and there is no suggestion that flood risk infrastructure will be required within Maidstone Borough to accommodate the needs generated by development within other emerging Local Plans.

The provision of minerals and infrastructure for waste management

3.3.50. The Council has been actively involved in the development of the Kent Minerals and Waste Local Plan (KMWLP) and has provided constructive comments at various stages of its development. Though the regular liaison meetings held between the Council and KCC over the course of the MBLP development however, the relationship between the KMWLP and the MBLP has not been raised as a significant strategic issue. The KWMLP examination concluded recently, following a series of consultations on modifications through 2015 and early 2016, and the Minerals Planning Authority (MPA) made representations to the Regulation 19 MBLP to assert that the MBLP does not take account of the mineral safeguarding policies in the KMWLP.

3.3.51. The Council therefore met with the MPA on 22 April 2016 to discuss the comments, and to establish how the MBLP might respond in order to overcome these concerns. The Council and the MPA agreed during the meeting that the MBLP should make reference to the KMWLP and specifically to the minerals safeguarding issues affecting Maidstone, and that the MBLP Policies Map should be updated to show the extent of the minerals safeguarding areas. KCC agreed to provide background data to inform these updates.

3.3.52. The KWMLP Inspector's Report was published the following week however and the Council met with the MPA on 11 May to discuss the implications. At the meeting both the Council and KCC officers agreed that, in order to ensure that the thrust and

purpose of the safeguarding policies applied to development proposed in the MBLP, there was a need for include additional policy criteria in the MBLP to ensure that development sites which fall within the Minerals Safeguarding Areas are required to undertake a minerals assessment. The MPA confirmed on 18 May that these changes would overcome the concerns raised at Regulation 19 stage in respect of minerals safeguarding matters, and there is also broad agreement on the wording of the additional policy criteria. The Council and KCC have agreed to draw up a Joint Position Statement, setting out these agreed changes, to be submitted to the Planning Inspectorate as part of the MBLP examination process, and the Council will continue to work constructively with KCC on this issue, and the development of its forthcoming Safeguarding SPD.

- 3.3.53. In respect of waste management infrastructure, KCC Waste Operations have been actively involved in the development of the IDP and provided input to early iterations of the IDP which included a scheme to provide an additional Household Waste Recycling Centre in north western Maidstone, to be funded by KCC. This scheme was not taken forward by KCC however through updates to the IDP in 2014 and 2015 and KCC were invited to review this position in October 2015 in preparation for Publication of the MBLP. The matter was discussed at the Council/KCC meetings in October and November 2015 however no further information has been provided on the need for waste management infrastructure. At a meeting between the Council and KCC in March 2016, however, KCC advised that an internal review of the need for waste management infrastructure has now commenced. KCC confirmed this position in its representation to the Regulation 19 MBLP and the Council will continue to work constructively with KCC as this work progresses.

Current position and outcomes of co-operation

- 3.3.54. The Council has engaged constructively and on an ongoing basis with KCC in its capacity as Waste and Minerals Planning Authority and as Waste Disposal Authority through the development of both the KMWLP and the MBLP. The submission version of the IDP sets out KCC's latest position in respect of the need for waste management infrastructure, and there is no suggestion that this raises any significant cross boundary issues. The Council has reached agreement with KCC on the steps required to overcome the concerns raised in respect of minerals safeguarding issues and will work constructively with the MPA to ensure a comprehensive Joint Position Statement can be submitted to the Planning Inspectorate through the MBLP examination.

3.4. **Strategic Issue 4: The natural and historic environment**

- 3.4.1. The Council has engaged with a range of bodies and stakeholders on natural and historic environment topics, throughout the development of the MBLP, to inform policy development and evidence base work, and to provide input to other plans and strategies. In addition to the Council's own Heritage, Landscape and Design Team, the Council sought the views of KCC's Ecology and Archaeology Teams, and also the Environment Agency, through repeated iterations of the SHLAA through 2013 – 2015 to ensure that the assessment work took account of the expert views of these specialist teams. Input from these partners has therefore informed decision making on the selection of sites and the inclusion of specific policy criteria to address issues identified through the SHLAA.
- 3.4.2. The nationally designated Kent Downs Area of Outstanding Natural Beauty (AONB) occupies a large area within the northern and eastern parts of the borough, and the Council has a statutory duty to conserve and enhance this valued landscape. Maidstone Borough Councillors and officers sit on the Kent Downs AONB Joint Advisory Committee, which meets regularly, and the Council plays a key role in the development and implementation of the AONB Management Plan. The latest Management Plan was adopted by the Council in May 2014 and the submission version of the MBLP sets out that the document should be taken into account as part of the development management process. Collaboration with key partners across the AONB area has therefore directly influenced policies in the MBLP and will influence the outcomes of development management decisions in the MBLP plan period.
- 3.4.3. The submission version of the MBLP also proposes to designate a number of Landscapes of Local Value (LLVs), based on the findings of the Landscape Character Assessment and the outcomes of engagement on the MBLP over a number of years. Of the LLVs identified, the Greensand Ridge and the three river valleys are all clearly contained within the borough and it is not considered that these LLVs raise any significant cross boundary issues. The exception however is the Low Weald LLV, where the southern boundary of the designation is contiguous with the Maidstone and Ashford administrative boundary. LLVs were discussed with ABC at a DtC meeting in March 2014 however the Low Weald LLV was first proposed for inclusion in the MBLP as part of the Regulation 18 consultation exercise in 2015. At the DtC meeting in October 2015, the Council discussed the specific approach with ABC and sought ABC's view on whether a similar approach might be adopted in the emerging ABC Local Plan. ABC confirmed however that it was not looking to designate local landscape areas, and instead its Landscape Character Assessment would be taken into account as part of the development management process.
- 3.4.4. As set out in the Flood Risk Infrastructure section, the Council has worked constructively with the EA throughout the development of the MBLP and the EA has

provided key input to various elements of the MBLP. One such area is the identification of schemes for river management and biodiversity, necessary to meet the requirements of the Water Framework Directive. The Council and the EA have therefore engaged on multiple iterations of the IDP to ensure the document reflects the identified requirements for blue infrastructure schemes, and the submission version of the IDP sets out the outcomes of further engagement which took place between October 2015 and January 2016. The identified schemes are very localised and it is not considered that they raise any significant cross boundary issues. The Council will continue to work constructively with the EA to support the delivery of these improvements.

- 3.4.5. Alongside the development of the MBLP, the Council is also developing a Green and Blue Infrastructure (GBI) Strategy, which sets out a strategy to improve the quality, function and accessibility of green and blue infrastructure within the borough. Recognising the need to consider these issues in a coordinated and strategic manner, the Council has adopted a wholly collaborative approach to the development of the GBI Strategy and has involved a wide range of stakeholders in its development. In addition to a consultation exercise in 2014, a series of workshops with a variety of stakeholders took place in 2013 and 2015 to ensure full and proper engagement, and this input has shaped the development of the Strategy. Neighbouring planning authorities, KCC representatives, parish councils, local organisations, and key community and voluntary groups attended these workshops to provide input to the process and the GBI Strategy is due to be finalised during summer 2016 for adoption by the Council. Alongside publication of the GBI Strategy the Council will set out how stakeholder engagement, including that of neighbouring authorities and other Duty bodies, has shaped the Strategy and its development. Collaborative work undertaken to develop the GBI Strategy has informed policies in the MBLP, and will continue to shape development management decisions, as the Local Plan requires that the Strategy is taken into account through the development management process.
- 3.4.6. One of the initial outputs of work on the GBI Strategy is a series of studies assessing the quality and quantity of publically accessible open space in the borough. These studies have informed the development of proposed open space standards, which are reflected in the submission version of the MBLP. Recognising the concerns raised in October 2015 by Sport England in regards of the need for additional evidence on sports pitches and facilities, the Council is working constructively with Sport England to commission further assessment work. The Council has liaised with Sport England through winter 2015 and is in the process of agreeing a brief for the work which is expected to be completed in autumn 2016.
- 3.4.7. The Council has engaged constructively with Natural England (NE) during the development of the MBLP and NE did not raise any objections regarding Council's compliance with the DtC in their Regulation 20 representations. NE's comments

regarding the need for the MBLP to establish a hierarchical approach to designated sites of biodiversity interest were taken on board, and modifications to MBLP Policy DM3 are included within the schedule of proposed changes to be submitted alongside the MBLP, to respond to these concerns.

- 3.4.8. NE's representation also addresses the conclusions of the Habitat Regulations Assessment (HRA) (February 2016), which assesses the potential for likely significant effects arising from the MBLP on the North Kent Marshes SPA and Ramsar Sites. The HRA concludes that, with only two allocations comprising a total of seven gypsy and traveller pitches located within 6km of the Medway Estuary and Marshes SPA and Ramsar Site, and these sites located below the M2/A2 corridor, the MBLP is unlikely to result in likely significant effects due to increased recreational pressure. NE has suggested that these conclusions should be considered by LPAs within the North Kent Environmental Planning Group (NKEPG) however the representation does not directly dispute the conclusions. Further, although this issue has been considered by the NKEPG over a number of years, there has been no suggestion to date that the Council should be involved in the Group or its mitigation package, and the issue has not been raised by neighbouring authorities either through regular DtC meetings or through formal representations to the MBLP/HRA. Notwithstanding, to ensure NE's point is addressed, the Council wrote to each of the LPAs within the NKEPG on 17 May 2016 to establish whether they are content with the conclusions of the HRA. As of 19 May, Gravesham Borough Council has confirmed it has no objections to the assessment in the HRA and responses are still awaited from the other LPAs involved in the NKEPG. The outcome of this exercise will be shared with the Planning Inspectorate and NE at the earliest opportunity.
- 3.4.9. It is not considered that the MBLP raises any significant cross boundary issues in respect of heritage matters and no concerns have been raised by neighbouring authorities either through regular DtC meetings or through formal representations to the MBLP. The consideration of heritage issues has been integral to various elements of the MBLP evidence base however, including through the SHLAA and through the Sustainability Appraisal. Historic England did not submit complete representations on the MBLP at Regulation 19 stage, and it is understood that this is due to an internal technical issue at Historic England. Given Historic England's status as a prescribed body under the DtC, the Council officers have subsequently exchanged correspondence with Historic England through April and May 2016 to ascertain whether or not there are any outstanding issues, and the Council currently await further comments from Historic England.

Current position and outcomes of co-operation

- 3.4.10. The Council has engaged constructively and on an ongoing basis to address issues in respect of the natural and historic environment, including through the development

of key evidence documents such as the SHLAA and the IDP, and through the development of MBLP policies.

- 3.4.11. Collaborative working on the AONB Management Plan and the emerging GBI Strategy has also informed the MBLP, and will guide development management decision making through the plan period. The Council's neighbouring authorities have not raised any specific cross boundary concerns in regards to natural and historic environment matters through representations at Regulation 19 stage however the Council is proactively exploring the views of the NKEPG LPA members, as suggested by NE. The Council will continue to work constructively with the EA, KCC and other key partners on the implementation of the GBI Strategy and IDP.

4. Conclusion

- 4.1. This statement demonstrates that the Council has taken a proactive and structured approach to compliance with the DtC through the development of the MBLP. The Council has undertaken collaborative working on joint evidence base documents and strategies, ongoing engagement with infrastructure providers and key stakeholders and regular, structured discussions with neighbouring authorities, the outcomes of which have shaped and informed the development of the MBLP, and are reflected in the submission version of the MBLP. Cooperation with the Council's neighbouring authorities and with prescribed bodies has therefore facilitated a coordinated and joined-up approach to the strategic priorities set out in the NPPF, in accordance with the requirements of the DtC.
- 4.2. The MBLP proposes a strategy to meet the identified development needs for Maidstone within the Council's administrative boundary, and in accordance with the settlement hierarchy. There is general support from the Council's neighbouring authorities for the MBLP strategy and Medway Council, SBC and TWBC have all confirmed in their Regulation 20 representations that they consider that the Council has complied with the DtC. TMBC and ABC have not raised any concerns or objections in their Regulation 20 representations regarding the Council's compliance with the DtC, or in respect of the MBLP strategy. There are no outstanding or anticipated requests from the Council's neighbouring authorities for the Council to meet any unmet development needs and none of the DtC prescribed bodies have raised concerns or objections regarding Council's compliance with the DtC in their Regulation 20 representations.
- 4.3. The Council recognises that the DtC is an ongoing requirement and will continue to engage with neighbouring authorities in the development of their own emerging Local Plans, and with key infrastructure providers and stakeholders through the delivery of the MBLP, and the development of their own plans and strategies. Through the structured approach to cooperating with DtC bodies to address strategic issues, the Council has established an effective framework for ongoing cooperation and the Council is committed to maintaining ongoing cooperation into the future.

Appendix 1: Schedule of Duty to Co-operate Engagements

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
KCC service/infrastructure providers	County Council and various infrastructure providers	18/11/2009	Meeting	Initial exploratory meeting about information required for the IDP.
West Kent PCT	Health care provider	30/11/2009	Meeting	To discuss initial IDP information request and feedback, distribution of development and timescales.
West Kent PCT	Health care provider	01/02/2010	Meeting	Discussed the Healthy Urban Development Unit Health and Urban Planning Toolkit, requested existing NHS strategic plans, resolving the scale, location and phasing of future health facilities, limitations of HUDU S106 model and SHAPE model, capital infrastructure costs, timescales.
Representative for UCA and Director of Estate Services at UCA	Education provider	03/02/2010	Meeting	Meeting to discuss the information required for the IDP. The progress of the UCA project was discussed, its funding and the contributions UCA require.
Environment Agency and Southern Water	Statutory consultees / Infrastructure provider	15/02/2010	Meeting	Meeting to discuss the information required for the IDP. Chris Kneale will prepare a table illustrating sewage treatment capacity with additional information. This should be agreed with EA and take account of information contained in the Water Cycle Strategy. MBC will supply confidential figures for sites that may be allocated in the CS before the MUE comes forward. Chris Kneale will find out an approx cost of a new sewer connecting the MUE to the Aylesford works. MBC will be circulating infrastructure tables to service providers for comment.
Kent Adult Social Services (KASS)	Infrastructure provider	17/02/2010	Meeting	Meeting to discuss the information required for the IDP and the methodology to be used.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
Maidstone and Tunbridge Wells NHS Trust	Health care provider	07/04/2010	Meeting	Meeting to discuss the information required for the IDP. The new Pembury hospital is being built and Maidstone Hospital is being refurbished to bring it up to modern standards, which means a lower density of beds. An increase in population may mean Maidstone Hospital needs an extension. Services will be reorganised once the new hospital nears completion. Supplied additional population information.
Kent & Medway NHS & Social Care Partnership Trust (KMPT)	Health care provider	14/04/2010	Meeting	Meeting to discuss the information required for the IDP.
Kent Adult Social Services (KASS) - Nicola McLeish (KASS) and representative from KCC Regeneration and Economy Team	County Council and Infrastructure provider	25/08/2010	Meeting	Meeting to discuss how the table of KASS schemes for the IDP was derived.
Kent Adult Social Services (KASS)	Infrastructure provider	06/10/2010	Meeting	Further meeting to discuss KASS schemes for the IDP.
Kent Police	Infrastructure provider	08/11/2010	Meeting	Meeting to discuss the information required for the IDP.
Southern Water	Infrastructure provider	18/11/2011	Meeting	Meeting to discuss the information required for an updated iteration of the IDP.
KCC service and infrastructure providers	County Council/	07/12/2011	Meeting	Meeting to discuss the information required for an updated iteration of the IDP and progress with the Core Strategy.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
	Infrastructure provider			
KCC Highways	County Council/ Infrastructure provider	9/12/2011	Meeting	Meeting to discuss the information required for an updated iteration of the IDP and possible transport schemes (in LTP) to include in the IDP.
Initial contact with West Kent PCT, Kent Police, Kent Ambulance, Kent Fire and Rescue, KCC Waste Operations, National Grid, SE Water, Southern Gas, EDF	Infrastructure providers	01/05/2012	Email and phone	Correspondence to request information required for an updated iteration of the IDP.
Southern Water	Infrastructure provider	15/06/2012	Email and phone	Correspondence to further refine infrastructure requirements
KCC Service Providers - Education/Transport/Communities	County Council	26/06/2012	Meeting	Meeting to discuss the County Council's IIFM - Infrastructure Investment Finance Model
West Kent PCT and KCC Waste Team	Health care provider	28/06/2012	Email	Correspondence to further refine infrastructure requirements
KCC Service Providers (education and Economic development representatives)	County Council	03/07/2012	Meeting	Meeting to discuss the IIFM and the results of modelling
Swale BC and Peter Brett Associates	Neighbouring authority and consultants	09/07/2012	Meeting	Meeting to discuss Local Plan Viability Study - initial meeting - consultant brief
NHS Primary Care Estates	Infrastructure provider	24/07/2012	Email and phone	Correspondence to further refine infrastructure requirements
Swale BC Peter Brett Associates Also representatives from	Neighbouring authority and consultants	15/08/2012	Workshop	Viability workshop to discuss the objectives and methodology of the study, describe assumptions, and invite feedback. Also to identify what CIL and other policies will

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
developers and agents				mean for developers working within Maidstone and Swale in the future.
NHS Primary Care Estates	Infrastructure provider	29/07/2012	Email and phone	Correspondence to further refine infrastructure requirements
Tonbridge and Malling Borough Council and KCC	Neighbouring authority and County Council	17/08/2012	Meeting	To discuss cross-boundary strategic issues impacting Maidstone and Tonbridge and Malling Borough.
SE Water	Service provider	11/09/2012	email	Correspondence to further refine infrastructure requirements
Primary Care Estates	Infrastructure provider	12/09/2012	Meeting	Meeting to discuss PCT infrastructure requirements
KCC	County Council	20/09/2012	Meeting	Meeting to discuss Cash Flow analysis - regarding S.106/CIL contributions, establishing infrastructure funding gap/prioritisation of infrastructure
SE Water	Service provider	27/09/2012	Email and phone	Correspondence to discuss SE Water infrastructure requirements
Kent Ambulance	Service provider	27/09/2012	Email and phone	Correspondence to finalise infrastructure requirements
Kent Fire and Rescue	Service provider	28/09/2012	Email and phone	Correspondence to finalise infrastructure requirements

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
KCC Ecology	County Council	15/10/2012	Meeting	Meeting to discuss ecological issues at potential strategic sites
KCC	County Council / Infrastructure provider	16/10/2012	Meeting	Meeting to further discuss infrastructure requirements/infrastructure funding/infrastructure priorities
Medway Council	Neighbouring authority	06/11/2012	Meeting	Meeting to provide an update on progress for each Authority's respective Core Strategy and identify strategic cross boundary priorities across the two authorities.
KCC Education and Mouchel representative (consultants)	County Council and Consultants	12/11/2012	Meeting	Meeting to discuss education at strategic sites
South East Water	Service provider	30/11/2012	Briefing	Meeting To discuss the Water Resource Management Plan 2014 for a period of 5 years thereafter, and the next steps in the process that will involve Maidstone BC.
Ashford Borough Council, Tonbridge and Malling Borough Council, Swale Borough Council	Adjacent Local Authorities	29/01/2013	Meeting	SHMA brief preparation. Outcome – agreed to prepare brief for Council, Swale SHMA, based on Borough Council local circumstances and SHMA guidance. Brief would incorporate and seek to address areas of cross boundary policy issues. Swale agreed not to take part in project.
Kent Downs AONB Unit	Stakeholder	13/02/2013	Meeting	Meeting to discuss the Unit's views on potential development at junctions 7 and 8 of the M20 motorway.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
Kent County Council	County County/ Infrastructure provider	11/03/2013	Meeting	Meeting to discuss CIL progress. update
Tonbridge & Malling Borough Council	Adjacent local authority - political engagement	11/03/2013	Meeting	Meeting to discuss Local Plan progress, explore the opportunity for joint working and sharing resources, to see if we agree a common market area and consider spatial distribution and constraints / issues
Kent County Council	Education Authority	26/03/2013	Meeting	Meeting to discuss infrastructure planning and specifically RSCs
Essex County Council / Chelmsford City Council	Local authorities	16/04/2013	Workshop	Park and Ride best practice sharing to influence development of the Maidstone Integrated Transport Strategy.
Ashford Borough Council and Tonbridge and Malling Borough Council	Adjacent Local Authority	15/05/2013	Meeting	SHMA interviews pre-meeting. All LPAs reached agreement of what was being sought from potential SHMA consultants.
Ashford Borough Council and Tonbridge and Malling Borough Council and GL Hearn	Adjacent Local Authorities and consultant	23/05/2013	Meeting	SHMA inception meeting. Outcome – GL Hearn agreed to prioritise Maidstone aspect of SHMA due to tight deadlines. Maidstone and other authorities to provide information to consultants.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
Medway Council	Adjacent Local Authority	18/06/2013		Meeting to discuss Local Plan progress. Offered assistance to Medway as they were about to begin NP process in Medway
Ashford Borough Council, Tonbridge and Malling Borough and GL Hearn	Adjacent local authorities and consultants	12/07/2013	Meeting – presentation by consultant followed by Q&A	Meeting to discuss SHMA progress/outputs.
Environment Agency, Highways Agency, Kent County Council, KCC Education, SE Water, Southern Water	Infrastructure service providers	Email circulated on 12/07/13 and responses received subsequently	Emails	Correspondence to communicate draft growth options and spatial distribution for housing and employment, and seek input to updated version of the IDP.
Kent County Council	County Council	15/07/2013	Meeting	To discuss the local plan housing and employment strategies.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
Tonbridge & Malling Borough Council, and Kent County Council Highways	Adjacent local authority and County Council	17/07/2013	Meeting	Meeting to identify and discuss cross-boundary issues.
Kent County Council	County Council / Infrastructure providers	19/07/2013	Meeting	Meeting to discuss infrastructure capacity with respect to SHLAA sites at RSCs/urban area
Various	Local authorities, development industry, planning agents, estate agents, and registered housing providers.	26/07/2013	Meeting – presentation by consultant followed by Q&A, and workshop	Stakeholder workshop to inform the SHMA.
Tonbridge & Malling Borough Council	Adjacent local authority	29/07/2013	Email	Information exchange on employment land position.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
Tonbridge & Malling Borough Council	Adjacent local authority	31/07/2013	Meeting	Meeting to discuss SHMA progress/outputs.
Tonbridge & Malling Borough Council, and GL Hearn	Adjacent local authority and consultant	7/8/2013	Meeting	Meeting to discuss SHMA progress/outputs.
Environment Agency	Statutory Consultee	8/8/2013	Meeting	Meeting to discuss flooding/ drainage issues and mitigation relating to SHLAA sites and a strategic look at RSCs to determine if strategic approach to drainage required
Swale Borough Council, Medway Council, Tunbridge Wells Borough Council and Ashford Borough Council	Adjacent local authorities	12/8/2013	Emails	Information exchange on employment land position.
Swale Borough Council	Adjacent local authority	15/8/2013	Email	Information exchange on employment land position.
Tunbridge Wells Borough Council	Adjacent local authority	28/8/2013	Email	Information exchange on employment land position

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
Tonbridge & Malling Borough Council, and GL Hearn representative	Adjacent local authority and consultant appointed to undertake the SHMA	4/9/2013	Meeting	Meeting to discuss SHMA progress/outputs.
Tonbridge & Malling Borough Council	Adjacent local authority - political engagement	4/9/2013	Meeting	Meeting to discuss housing market areas, the timing of local plans, need for gypsy and traveller sites, constraints, and possible joint working / sharing of expertise, common infrastructure requirements around J5
Highways Agency	Strategic highway authority	25/9/2013	Workshop	Stakeholder input to emerging Route Based Strategy for M20 corridor.
Kent County Council	County Council / Infrastructure provider	27/9/2013	Meeting	Meeting to discuss CIL/infrastructure planning. Information shared, it was agreed that KCC would provide further assistance in the preparation and analysis of the Maidstone CIL and infrastructure work.
Tonbridge and Malling Borough Council	Adjacent local authority - Political Engagement	14/10/2013	Email	Meeting to review discussions between respective leaders and confirm a common timetable for SHMA work

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
Medway Council	Adjacent local authority	7/11/2013	Meeting	Meeting to identify and discuss cross-boundary issues.
Southern Water	Infrastructure provider	15/11/2013	Meeting	Meeting to discuss potential cumulative impact of development at RSCs in infrastructure terms. Helped in understanding Southern Water's approach to assessing infrastructure need and how to mitigate for effects of new development.
Ashford Borough Council	Adjacent local authority	18/11/2013	Email	Information exchange on employment land position.
Ashford Borough Council, and Tonbridge & Malling Borough Council	Adjacent local authorities	2/12/2013	Meeting	Meeting to discuss SHMA progress/outputs.
Kent County Council	County Authority	9/12/2013	Meeting	Meeting to share the objectively assessed needs figure resulting from the SHMA and to discuss future information inputs from KCC regarding infrastructure requirements.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
Tonbridge & Malling Borough Council	Adjacent local authority	9/12/2013	Telephone call	It was confirmed that the Metropolitan Green Belt (MGB) boundary of Maidstone Borough and Tonbridge and Malling align. Tonbridge and Malling BC adopted their Core Strategy in 2007 and at this time there was no change to the MGB boundary. Sites promoted by developers around Waterringbury were rejected and there were also no changes at East Peckham. Tonbridge and Malling are in the early stages of writing their new local plan and will be carrying out a review of their MGB as part of this process.
Various	Adjacent local authorities, Parish councillors, Resident groups, Environment groups	16/12/2013	Presentation by consultant followed by Q&A, and workshop	Stakeholder workshop to inform the Green & Blue Infrastructure Strategy.
Swale Borough Council and Ashford Borough Council	Adjacent local authorities	17/12/2013	Meeting	Meeting to discuss local plan progress and to identify and discuss cross-boundary issues.
There were 6 KPOG (Kent Planning Officers Group) meetings in 2013, attended by all Kent LPAs and KCC.	Heads of Planning from all Kent Local	6 meetings held during 2013	Meeting	The group meets to discuss planning (and wider) issues in Kent and the southeast, to share best practice for example, and often invites guest speakers to the meetings. KPOG oversees several other Kent-wide groups, namely KPPF (Kent

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
	Authorities			Planning Policy Forum) and KDMOG (Kent Development Management Officers Group), who report to KPOG on an annual basis.
Arriva	Bus operator	30/01/2013 10/04/2013 31/07/2013 30/10/2013	Quality Bus Partnership meeting	Commercial bus operator input to development of Integrated Transport Strategy.
Network Rail	Rail infrastructure provider	05/03/2013 19/06/2013 21/08/2013 17/09/2013	Liaison meeting	Rail asset owner (track and stations) input to development of Integrated Transport Strategy
Tonbridge and Malling Borough Council	Adjacent local authority	31/3/2014	Meeting	Hermitage Lane – arrange a meeting to discuss cross-boundary local and strategic planning matters before the end of July, ideally by mid-June M20, Junction 7 Retail application – TMBC to support MBC’s opposition to this proposal Retail application (including an Aldi store) on the A20 in T&M near the junction with Hermitage Lane – MBC to review objection Integrated Transport Strategy for Maidstone – arrange a meeting to discuss cross-boundary issues that need to be considered and addressed
Swale Borough Council and Tunbridge Wells Borough Council	Adjacent local authority	1/4/2014	Meeting	Understanding the rationale behind MBC’s adopted approach in its consultation draft Local Plan (Reg. 18). Discussion around MBC evidence used to support the selected development strategy. MBC approach to latest call for sites. Meeting objectively assessed needs. Areas of Local Landscape Value

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
				MBC's Integrated Transport Strategy MBC's retail strategy
Ashford Borough Council	Adjacent local authority	3/4/2014	Meeting	Understanding the rationale behind MBC's adopted approach in its consultation draft Local Plan (Reg. 18). Discussion around MBC evidence used to support the selected development strategy. MBC approach to latest call for sites. Meeting objectively assessed needs. Areas of Local Landscape Value MBC's Integrated Transport Strategy MBC's retail strategy
Medway Council	Adjacent local authority	4/4/2014	Meeting	Understanding the rationale behind MBC's adopted approach in its consultation draft Local Plan (Reg. 18). Discussion around MBC evidence used to support the selected development strategy. MBC approach to latest call for sites. Meeting objectively assessed needs. Areas of Local Landscape Value MBC's Integrated Transport Strategy MBC's retail strategy
Highways England	Infrastructure provider	17/6/2014	Meeting	Meeting to discuss draft MBLP. The HA raised concern over the balance of jobs and housing and the potential impact on the M20 arising from the proposals in the Maidstone Local Plan. HA argues that even with planned improvements to Junctions 5, 6 and 7, there remain issues with capacity. It is expected that motorists will opt to do a one-junction hop to avoid the town centre. The VISUM model-based data is being updated to 2014

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
				(from 2007) by the end of June and this will be reviewed by the HA.
Tonbridge and Malling Borough Council	Adjacent local authority	19/6/2014	Meeting	To discuss Local Plan Progress and timetable, including SHMA updates and Integrated Transport Strategy. Hermitage Lane – Major planning applications being considered in July. KCC contractors Amey preparing highway transport modelling. Air quality issues will be dealt with via a service sharing arrangement between TMBC and Tunbridge Wells. The Hawkhurst Sec78 appeal decision referred to C2 contributing to housing targets.
Highways England	Infrastructure provider	2/12/2016	Meeting	Maidstone employment allocations around J8 are met by firm proposals to address capacity along this section of the M20 with an estimated scheme start of 2021. J7 has benefited from a pinch-point scheme though signing issues are still to be resolved. HA encouraged to investigate Park and Share as an alternative to Park and Ride.
Tonbridge & Malling Borough Council (TMBC), KCC Surface water drainage and the Environment Agency (EA)	Adjacent local authority and Environment Agency	26/1/2015	Meeting	To discuss joint working for a new Strategic Flood Risk Assessment (SFRA). Action: To investigating the options before a best way forward is agreed.
Maidstone Borough Council (MBC), Tonbridge & Malling Borough Council (TMBC) and Kent County Council Highways (KCC)	Adjacent local authority and County Highways	26/1/2015	Meeting	Draft Maidstone Borough Local Plan 2014 Policy H1(2) – East of Hermitage Lane – residential development and associated country park Highway Improvements - Coldharbour Lane junction, signals at Hermitage Lane. Agreed to prepare a joint strategy for air

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
	authority			quality.
Tunbridge Wells Borough Council	Adjacent local authority	5/2/2015	Workshop	Site Allocations Development Plan Document (DPD) Submission Draft Workshop for Statutory Consultees and Neighbouring Authorities
Kent County Council (KCC)	County Highways Authority	12/2/2015	Meeting	Discussion with KCC relating to Local Plan and transport modelling progress
Swale Borough Council	Adjacent local authority	27/2/2015	Meeting	Meeting Objectively Assessed Housing Need – Swale BC and Maidstone BC. Constraints to meeting housing need. Objections to Swale’s Local Plan. Pitch provision for Gypsies and Travellers. Swale Borough Council’s response to the Maidstone Borough Local Plan. (Regulation 18 consultation draft 2014) - Windfall allowance. Objection to the retail allocation at Newnham Court. Drafting of a Statement of Common Ground.
Kent County Council (KCC)	County Highways Authority	2/3/2015	Meeting	Discussion with KCC relating to Local Plan and transport modelling progress

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
GVA, Gravesham BC, Medway Council and other neighbouring and proximate local authorities	Neighbouring and nearby local authorities	11/3/2015	Meeting	<p>GVA have been commissioned jointly by Gravesham Borough and Medway Councils to prepare a Strategic Housing and Economic Needs Assessment (SHENA) which relates to the housing, retail and economic catchments (markets) in which they operate.</p> <p>The SHENA will provide a comprehensive evidence base to support the next stages of policy development for both Council's and includes updating evidence relating to housing, employment, retail and commercial leisure and development viability.</p> <p>The purpose of the meeting was to investigate the close inter-relationship between Gravesham, Medway and other neighbouring and proximate local authorities, to develop an understanding and relationship with the wider housing, economic and infrastructure context.</p>
Environment Agency (EA)	Environment Agency (EA)	25 March 2015	Meeting	<p>EA Summarised progress on Medway Flood Storage Project (The project will hopefully go to tender 2018 and construction 2019 -22) including an update on the Strengthening Pot and Strengthening Programme. The scheme will also make contributions to economic development and there is the potential to improve the River Beult site of special scientific interest.</p> <p>Potential alternative approaches were discussed, including potential storage solutions, potential channel improvements and contribution of walls. Options and costs will be considered in finding the best solution. Potential funding solutions and additional benefits of works will also be considered, including potential for High Level Stewardship</p>

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
				<p>Payments and improvements to SSSI.</p> <p>Discussion also around Local plan progress, and EA to advise of the potential benefits of the emerging project in terms of surface water drainage at settlements. EA expressed ability to assist with any flood storage queries and drainage benefits in the settlements.</p>
Kent County Council (KCC)	County Highways Authority	2/3/2015	Meeting	Discussion with KCC relating to Local Plan and transport modelling progress
Highways England	Infrastructure provider	11/6/2015	Meeting	Meeting to discuss Third River Thames Crossing consultation, HE Route Based strategy and MBLP employment proposals for M20 J8.
Kent County Council	County Highways Authority	10/7/2015	Meeting	Meeting between officers and members of both authorities to discuss and progress the transport modelling work.
Kent County Council	County Highways Authority	11/8/2015	Meeting	Meeting to discuss outputs of the modelling work.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
Kent County Council	County Highways Authority	8/9/2015	Meeting	Discussion with KCC relating to Local Plan and transport modelling progress
Medway Council	Neighbouring authority	17/9/2015	Meeting	Meeting to discuss Local Plan progress and the emerging work on the Medway SHENA. MBC raised concerns re the proposed HMA geography and Medway agreed to forward full draft for comment. Discussed proposed M20 J8 employment allocation and no immediate concerns raised by Medway. Discussed urban boundary review and Medway to update MBC when further work has been completed. Discussed implications of G&T PPG changes.
Swale Borough Council	Neighbouring authority	23/9/2015	Meeting	Meeting to discuss Local Plan progress, mutual support for the HMA geographies identified through the Maidstone and Swale SHMAs. Discussion on the need for retail impact work to assess impact of RMX1 (1). Discussion on LLVs and updated PPG on G&T studies.
Key infrastructure providers: Kent County Council, Kent Ambulance, Kent Fire and Rescue, Kent Police, NHW Property Services, West Kent CCG, South East Water, southern Water, UK Power Networks, Southern Gas Networks, South Eastern Trains, University of the Creative Arts, Mid Kent College, Environment Agency	Infrastructure providers	Initial email 6/10/2015 with subsequent follow ups via email and phone	Emails and telephone calls	To provide updated information on scale and distribution of proposed growth and seek updated input to the IDP.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
Tonbridge and Malling Borough Council	Neighbouring authority	9/10/2015	Meeting	Meeting to discuss Local Plan progress. MBC confirmed it is confident of meeting OAN for housing. TMBC to commission transport study on A20 corridor. Discussion on G&T requirements in light of PPG changes.
Kent County Council	County Council / Infrastructure provider	13/10/2015	Meeting	Meeting to discuss information requirements for IDP refresh. KCC to provide information in coming weeks.
Kent County Council	County Highways Authority	13/10/2015	Meeting	Meeting to discuss progress on the ITS and additional modelling work.
Kent Police	Infrastructure provider	13/10/2015	Meeting	Meeting to discuss information requirements for IDP refresh. Kent Police to provide information in coming weeks.
NHS Property Services and West Kent CCG	Infrastructure provider	19/10/2015	Meeting	Meeting to discuss information requirements for IDP refresh. NHS/CCG to provide information in coming weeks.
Ashford Borough Council	Neighbouring authority	21/10/2015	Meeting	Meeting to discuss Local Plan progress. ABC confirmed they expect to meet their OAN for housing. ABC confirmed they had no issues with proposed employment allocation at M20 J8. Discussed potential for LLV approach in ABC but ABC confirmed it would be taking a different approach. MBC confirmed it would be writing to ABC to request assistance in meeting Maidstone's unmet G&T needs. Discussed broad

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
				location at Lenham and ABC confirmed it is unlikely to raise any objections to this proposal.
Tunbridge Wells Borough Council	Neighbouring authority	23/10/2015	Meeting	Meeting to discuss Local Plan progress. MBC confirmed it is confident of meeting OAN for housing. Discussion on LLVs and G&T requirements. update from TWBC on the West Kent SHMA
Kent District/Borough Planning Authorities and Salford University	Neighbouring authorities	23/10/2015	Meeting	Meeting to discuss implications of the changes to the PPG for G&T evidence base
Medway Council	Local planning authority	27/10/2016	Email	Email to set out MBC concerns regarding emerging Medway SHMA
Kent County Council	County Highways Authority	9/11/2015	Meeting	Meeting to discuss outcome of recent JTB meeting and actions for additional modelling work.
Kent County Council	County Council / infrastructure provider	10/11/2015	Meeting	Meeting to discuss progress information requirements for IDP refresh. Information likely to be delayed. KCC will try to provide before R19 publication.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
Highways England	Infrastructure provider	11/11/2015	Email	To seek updated input to the IDP.
Kent County Council	County Highways Authority	18/11/2015	Meeting	Meeting to discuss updates the ITS and progression with the modelling work.
Tonbridge and Malling borough Council (EA invited but did not attend)	Neighbouring local authority	9/12/2015	Meeting	Meeting to discuss the latest EA flood modelling for TMBC and each council's position on updating SFRA work. Both councils agreed that due to local plan timescales a joint SFRA would not be feasible at this stage.
Highways England	Infrastructure provider	10/12/2015	Meeting	To discuss requirements for further transport evidence. MBC to obtain validation report from Amey.
Kent County Council	County Highways Authority	18/01/2016	Meeting	Meeting to discuss implications of the December JTB resolution and joint working on future modelling.
East Kent DtC Group	Local Planning Authorities and DtC Prescribed Bodies	19/01/2016	Meeting	Meeting to discuss cross boundary and strategic issues with East Kent DtC Group.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
Kent County Council / Arriva	County Council / Infrastructure provider	26/1/2016	Meeting	Meeting to discuss the ITS and public transport proposals for radial routes into Maidstone town centre.
Maidstone and Tunbridge Wells Hospital Trust	Infrastructure provider	29/1/2016	Meeting	Meeting to discuss Trust input to IDP process and Trust's infrastructure plans.
Bt Openreach and Kent County Council	Infrastructure provider	2/2/2016	Meeting	Meeting to discuss MBLP support for broadband infrastructure and relationship with KCC roll out programme.
Medway Council	Neighbouring authority	2/3/2016	Meeting	Meeting to discuss Local Plan progress and in particular any issues arising from the R19 MBLP consultation. Medway Council confirmed there are unlikely to be any significant issues raised in response to the MBLP. Medway Council confirmed its intention will be to meet its OAN for housing within the Medway boundary.
Tunbridge Wells Borough Council	Neighbouring authority	4/3/16	Meeting	Meeting to discuss Local Plan progress and in particular any issues arising from the R19 MBLP consultation. TWBC confirmed it is unlikely to raise any significant issues in response to the MBLP.
West Kent CCG	Infrastructure provider	8/3/2016	Meeting	Meeting to discuss CCG input to submission version of the MBLP and IDP.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
Ashford Borough Council	Neighbouring authority	11/3/2016	Meeting	Meeting to discuss Local Plan progress and in particular any issues arising from the R19 MBLP consultation. ABC confirmed it is unlikely to raise any major issues in respect of the MBLP. ABC confirmed its expectation that the Ashford Plan will meet the identified OAN for housing.
Tonbridge and Malling Borough Council	Neighbouring authority	11/3/2016	Meeting	Meeting to discuss Local Plan progress and in particular any issues arising from the R19 MBLP consultation. TMBC confirmed its response would focus on specific cross boundary issues. TMBC confirmed the A20 modelling work now underway.
Environment Agency	Infrastructure provider / consultee	14/3/2016	Meeting	Meeting to discuss latest available modelling data and implications of new PPG for updates to the MBC SFRA. MBC agreed to share a draft brief for the SFRA refresh with EA and KCC before finalising. EA and MBC agreed to prepare a Statement of Common Ground for the MBLP examination.
Kent District/Borough Planning Authorities and Salford University	Neighbouring authorities	15/3/2016	Meeting	Meeting to discuss implications of the changes to the PPG for G&T evidence base following the Swale Local Plan Inspector's interim findings.
Kent County Council	County Council / Infrastructure provider	15/3/2016	Meeting	Meeting to discuss KCC comments on the draft ITS and draft Walking and Cycling Strategy.
Kent County Council	County Council / Infrastructure provider	16/3/2016	Meeting	Meeting to discuss infrastructure implications of KCC representation to MBLP R19 consultation. Discussed education requirements for key sites, approach to broad locations, and also outstanding information regarding social and community infrastructure. KCC to provide detailed comments through formal representation.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
West Kent CCG	Infrastructure provider	18/3/2016	Meeting	Meeting to discuss how MBC and CCG can work effectively on the delivery of health infrastructure and to finalise CCG input to MBLP/IDP.
Kent County Council	County Highways Authority	22/03/2016	Meeting	Meeting between MBC/KCC officers and members to discuss the way forward for the ITS and Walking and Cycling. Agreed to remove the WCS from the ITS and produce as a separate document and to prepare a joint report for JTB to set out the agreement on the technical points. KCC to obtain technical reports and latest modelling work from Amey.
Swale Borough Council	Neighbouring authority	12/4/2016	Meeting	Meeting to discuss Swale's experiences at examination and any arising implications for MBC.
Highways England / Kent County Council	Infrastructure provider / Kent County Council	12/4/2016	Meeting	Meeting to discuss implications of HE representation to the R19 MBLP and establish a way forward. MBC agreed to explore options to undertake further modelling work.
Kent County Council	Minerals and Waste Planning Authority	22/4/2016	Meeting	Meeting to discuss KCC representation to R19 MBLP in regards to mineral safeguarding issues. MBC and KCC agreed to propose changes to the MBLP to show the safeguarded areas on the Policies Map and include some text to explain the relationship between the MBLP and the KMWLP, including the safeguarding policies.
Kent County Council	Minerals and Waste Planning Authority	11/5/2016	Meeting	Meeting to discuss mineral safeguarding issues following receipt of the KMWLP Inspectors Report. MBC and KCC agreed an additional proposed change to require minerals assessments for sites located within the safeguarded areas.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
				KCC confirmed by email on 18 that the suite of proposed changes would overcome the KCC concerns in regards to mineral safeguarding issues. KCC and MBC agreed to prepare a Joint Position Statement to assist the MBLP Inspector and that the changes would be proposed through the MBLP examination process.
Kent County Council	County Council / Infrastructure provider	12/5/2016	Meeting	<p>Meeting to establish a firm list of highway and public transport schemes/measure on which there is agreement between MBC and KCC officers. The agreed list is as below:</p> <p>Highway improvement schemes and junction capacity improvements</p> <ul style="list-style-type: none"> • Traffic signalisation of the M20 Junction 7 roundabout, widening of the coast bound off-slip and creation of a new signal controlled pedestrian route through the junction. • Capacity improvements and signalisation of A249 Bearsted Road roundabout and capacity improvements at New Cut Road roundabout. • Provision of a new signal pedestrian crossing and the provision of a combined foot/cycle way between these two roundabouts. • Upgrading of Bearsted Road to a dual carriageway between Bearsted Road roundabout and New Cut Road roundabout. • Interim improvement to M20 junction 5 roundabout including a white lining scheme. • Traffic signalisation of M20 junction 5 roundabout and localised widening of slip roads and circulatory carriageway.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
				<ul style="list-style-type: none"> • Provision of an additional lane at the A20 Coldharbour roundabout. • A20 London Road/B2246 Hermitage Lane junction: Capacity improvements. • A26 Tonbridge Road/Fountain Lane junction: Capacity improvements. • Improvements to capacity at the junctions of Willington Street/Wallis Avenue and Sutton Road. • Package of measures to significantly relieve traffic congestion on Sutton Road and Willington Street. • A229/A274 Wheatsheaf junction: Capacity improvements. • A229 Loose Road/Armstrong Road junction: Capacity improvements. • A229 Loose Road/Boughton Lane/Cripple Street Junction: Capacity improvements. • A20 Ashford Rd/Willington Street Junction: capacity improvements. • A229/B2163 Linton Crossroads: Junction capacity improvements. • A20 Ashford Road, Harrietsham: Highway improvements to include carriageway narrowing, reduction of the speed limit and pedestrian crossing facilities. • A274 Mill Bank/Kings Road junction Headcorn: Junction signalisation. • A229 Station Road/Headcorn Road/Marden Road junction, Staplehurst: Capacity improvements. • B2015 Maidstone Road/B2162 Hampstead Lane junction, Yalding: Capacity improvements.

Organisation/s engaged with	Type of organisation	Date of engagement	Type of engagement	Purpose/Outcome of engagement
				<p>Public Transport Committed Improvements</p> <ul style="list-style-type: none"> • Redevelopment of Maidstone East railway station to provide significant improvements in passenger access and facilities and improved interchange with public transport. • Improvement/replacement of Maidstone Bus station. • Bus improvement measures on the A274 Sutton Road from the Willington Street junction to the Wheatsheaf junction. • An objective of a typical 10 minute bus frequency on main radial routes into Maidstone Town centre
Medway Council, Swale Borough Council, Canterbury City Council, Dartford Borough Council and Gravesham Borough Council.	Local Planning Authorities within the North Kent Environmental Planning Group	17/5/2016	Email	Email to NKEPG LPAs to seek views on the conclusions of the MBLP HRA (February 2016), as suggested by Natural England. Gravesham BC responded on 18 May to confirm it has no objections to the conclusions. Outstanding responses still awaited and will be provided to the MBLP Inspector and Natural England at the earliest opportunity.
Highways England and Kent County Council	Infrastructure providers	18/5/2016	Meeting	Meeting to discuss scope for additional transport evidence work to meet HE evidence requirements. MBC agreed to draw up a brief and share with HE for agreement before commencing work.