

## **Maidstone Borough Local Plan Examination**

**Inspector: Mr. Robert Mellor BSC DIPTRP DIPDBE DMS MRICS MRTPI**

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14th July, 2017

Mr. Rob Jarman,  
Head of Planning & Development,  
Maidstone Borough Council,  
Maidstone House,  
King Street,  
Maidstone ME15 6JQ

Dear Mr. Jarman,

At its meeting on 13 June 2017 the SPST Committee of Maidstone BC considered a Report from the Head of Housing and Community Services: 'Review of Air Quality Management Area and Low Emissions Strategy'. The Committee Minutes record that there would be a public consultation on the Low Emissions Strategy, the associated Air Quality Action Plan and a proposed revision to the Air Quality Management Area. Draft documents were appended to the Report but the Committee also identified some amendments which are not recorded individually in the minutes.

The draft Strategy states in terms that Transport is the most important matter in relation to air quality. It also states that the strategy will complement the Local Plan in relation to Transport matters. However in contrast to the previous Air Quality Action Plan it then appears to set aside modal shift as a measure to address air quality in favour of measures to tackle vehicle emissions and it deletes many of the transport measures that were in the previous action plan. That would appear to contradict relevant modal shift objectives variously of the Local Plan (including the proposed modifications which have already been consulted upon), the Integrated Transport Strategy, the Walking and Cycling Strategy, and the Local Transport Plan. A reduction in vehicle emissions should be seen as additional and complementary to modal shift and not as an alternative. Satisfactory air quality is unlikely to be achieved unless both courses are pursued side by side.

The Action Plan appended to the Strategy includes reference to the preparation of a Local Plan Development Plan Document on air quality to which main modification MM42 also refers. However the timescale for production of such a document is unclear in that the 'Estimated time for delivery' is given as **2** years but the 'Timescale' is then given as **3-5** years.

Were the timescale to adoption be as long 5 years then there would be no point in separating the DPD from the Local Plan Review which MM60 seeks to adopt by April 2021 – less than 4 years from now.

On the other hand the imperative of legal compliance with air quality standards requires that action is urgent and that an earlier adoption of the DPD would be highly desirable.

1. Would the Council please clarify its intended approach to the preparation of the DPD?
2. Would the Council also please clarify when it intends to adopt the Kent and Medway Planning Guidance and whether this would be as a Supplementary Planning Document or in another form?

I would appreciate a response within 7 days.

Yours sincerely,

***Robert Mellor***

Inspector