

Maidstone Borough Local Plan: Core Strategy (2011) and Strategic Site Allocations (2012) Interim Consultation Statement 13 March 2013

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Key issues Arising from Representations	Responses and Plan Changes
Policy NPPF1: Presumption in favour of sustainable development	
<p><u>Policy NPPF1 Issue 1: General</u></p> <ol style="list-style-type: none"> 1. The balance between development and protecting the environment has not been achieved, in particular there is no reference to ecological importance in the policy. 2. The policy should take account of the views of local communities when considering proposals. 3. Definitions are required for sustainable development and material considerations. 4. The inclusion of the policy is not required because compliance with the NPPF is a matter for the local plan as a whole. 	<p>The government produced this 'model' policy with regard to the NPPF, for local authorities to include in their local plans.</p> <p><u>Plan changes</u> None.</p>
Policy CS5: Countryside	
<p><u>Policy CS5 Issue 1: Kent Downs Area of Outstanding Natural Beauty (AONB)</u></p> <ol style="list-style-type: none"> 1. The Kent Downs AONB designation should be extended to encompass all the land contained within the former Kent International Gateway planning application as well as land surrounding M20-J8. 2. The policy does not do enough to protect the AONB from inappropriate development vs. the policy is too protective of the AONB, leaving the rest of the countryside at 	<ol style="list-style-type: none"> 1. Maidstone Borough Council has no power to designate land as being an AONB. Only Natural England, the government's advisor on the natural environment, has the power to designate land as AONB under the provisions of the 1949 National Parks and Access to the Countryside Act. 2. The local plan must have specific policy reference to the AONB. Equally the level of detail provided within policy needs to strike a balance between providing enough of a high level direction without being caught up with too

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<p>exposed to risk of inappropriate development.</p> <p>3. The Kent Downs AONB Unit raised concern that whilst overall support for the local rural economy is welcome, the policy needs to do more to address impacts of inappropriate development on the AONB arising from agricultural diversification.</p> <p>4. The Kent Downs AONB Unit emphasised the need for a positive planning approach within the AONB. Monitoring the number of refusals in the AONB conveys the wrong message: delivery better monitored through the level of partnership working.</p> <p>5. The importance of the role played by land in forming the setting to the AONB should be supported by the Core Strategy, where this supports the purposes of the AONB.</p>	<p>much detail.</p> <p>3. The way in which the local plan approaches the matter of rural diversification in the Kent Downs AONB would benefit from further clarification.</p> <p>4. It is agreed that the local plan should take a more positive approach to monitoring the impact of policy CS5 on planning in the AONB.</p> <p>5. The open countryside to the south of the AONB boundary forms the setting for this designation. It is a sensitive landscape and is of strategic importance and as such merits a clearer policy lead in the local plan.</p> <p>Plan changes</p> <p>Provide additional guidance in the supporting text to clarify the approach to rural diversification in the Kent Downs AONB.</p> <p>Amend monitoring measures to better reflect a positive partnership approach to influencing planning in the AONB.</p> <p>Add new text to policy CS5 and its supporting text highlighting the important role played by the setting to the AONB designation.</p>
<p><u>Policy CS5 Issue 2: Special Landscape Area (SLA) designation</u></p> <p>The Special Landscape Area local landscape designation should be retained.</p>	<p>The NPPF states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes. It encourages the use of criteria-based policies rather than the continued use of local landscape designations. Together policies CS5 (countryside) and CS13 (historic and natural environment) will provide a strong policy framework by which to protect</p>

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	<p>the borough's landscapes, and ensure their diversity is maintained.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy CS5 Issue 3: High quality agricultural land</u></p> <p>The Core Strategy does not recognise the importance of the high quality agricultural land in the Borough, or the need to recognise the increasing European and national focus on food security, food miles and climate change impact.</p>	<p>The borough contains a significant proportion of high quality agricultural land which should be viewed as being of strategic importance and as such should be specifically addressed by the local plan.</p> <p><u>Plan changes</u> Add a new section added to the policy and the supporting text encouraging the efficient use of high grade agricultural land.</p>
<p><u>Policy CS5 Issue 4: Metropolitan Green Belt (MGB)</u></p> <p>The Core Strategy makes no mention of to protecting Metropolitan Green Belt in the Borough.</p>	<p>The omission of any reference to the Metropolitan Green Belt (MGB) and its protection is one that requires rectifying.</p> <p><u>Plan changes</u> Add specific reference as to how the local plan will tackle planning matters affecting the MGB to policy CS5 and its supporting text.</p>
<p><u>Policy CS5 Issue 5: Definition of the Countryside</u></p> <p>A clearer definition of 'countryside' required.</p>	<p>The local plan should provide a clear definition of 'the countryside' to avoid confusion over its spatial extent. The precise boundary will be identified in the Proposals Map accompanying the local plan.</p>

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	<p><u>Plan changes</u> Amend policy CS5 to include a definition of what the local plan deems to be 'the countryside'.</p>
<p><u>Policy CS5 Issue 6: Separation of settlements</u></p> <p>The policy is not strong enough to protect settlements from sprawling into one, particularly those settlements surrounding Maidstone. The policy does not do enough to prevent the suburbanisation of the rural landscape. The policy does not do enough to protect the character and quality of the rural settings to villages.</p>	<p>The individual identity of settlements has been highlighted as an important issue by respondents. In view of the particular pattern of settlement dispersal which characterises the borough, it is agreed that the local plan should be more explicit as to how it will protect settlement identities.</p> <p><u>Plan changes</u> Amend the supporting text to emphasise the importance of settlement separation and identity to the local plan. Add a new section to policy requiring the setting and separation of settlements to be retained.</p>
<p><u>Policy CS5 Issue 7: Level of detail in policy</u></p> <p>The policy is not robust enough to provide adequately high protection of the countryside. The policy wording is too imprecise to be of any practical use. There is not enough explanation or guidance given as to how the landscape character approach will be used to implement policy. Any criteria-based policies intended to replace the Special Landscape Area (SLA) designation should be prepared in parallel with the Core Strategy and adopted in advance of the SLAs being deleted. Landscape character should be listed as a natural asset under CS13 rather than just being considered in the context of rural development under CS5.</p>	<p>Landscape character would be better placed under policy CS13 (historic and natural environment) and expanded to include more detail on the issues being addressed by the local plan and how it will meet the requirements of the NPPF. Further guidance on issues regarding landscape character and settlement characteristics will be provided in the forthcoming Landscape Character Guidelines Supplementary Planning Document, which will be adopted at the same time as the local plan to prevent a policy vacuum.</p> <p><u>Plan changes</u> Move landscape character to CS13 (historic and natural environment). Broaden policy criteria and supporting text to include further detail setting out the local plan approach to</p>

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	landscape character.
<p><u>Policy CS5 Issue 8: Public Rights of Way Network (PRoW)</u></p> <p>The policy does not mention the importance of the public rights of way network to the countryside as an asset and key landscape feature.</p>	<p>The supporting text to CS5 should recognise the importance of the PRoW network in contributing to high quality countryside across the borough. However, given that the PRoW network is a vital element in borough’s green and blue infrastructure, policy CS13 (historic and natural environment) is considered to be the better policy vehicle to deal with PRoW issues.</p> <p><u>Plan changes</u> Provide additional text outlining the importance of the PRoW network to the countryside.</p>
<p><u>Policy CS5 Issue 9: Distinctive landscapes within the Borough</u></p> <p>The Core Strategy does not refer to other distinctive natural/landscape areas within the borough, such as the Greensand Ridge or Low Weald.</p>	<p>In broad terms, the borough can be subdivided into 4 distinct physical areas, namely the North Downs, the Greensand Ridge, the Low Weald and the Medway Valley. These broad landscape areas are taken into account by the Maidstone Landscape Character Assessment 2012 and help to form the basis upon which the landscape character areas have been identified across the borough. However, the local plan should more clearly recognise the strength in which these areas form a sense of place within the borough.</p> <p><u>Plan changes</u> Add additional wording to supporting text of policy CS13 (historic and natural environment) describing the landscapes important to the borough and setting out the local plan approach to landscape character.</p>

Key issues Arising from Representations	Responses and Plan Changes
Policy SS1: Strategic housing location to the north west of the urban area	
<p><u>Policy SS1 Issue 1: Proposed circulatory scheme at the southern end of Hermitage Lane</u></p> <p>Residents are opposed to the circulatory scheme and fear adverse effects on community, safety and existing community facilities.</p>	<p>The proposed circulatory scheme at the southern end of Hermitage Lane has not been illustrated in full detail so residents are not fully aware of the proposals. This is a recognised issue that will be addressed. Residents’ assertions cannot at this stage be borne out by evidence in the form of traffic modelling.</p> <p>The Maidstone Joint Transportation Board has raised concerns relating to this proposal. There is a wider need to improve the road infrastructure on this approach to/exit from town. The proposed circulatory is being tested against all other proposed transport solutions for this area to determine if there are alternative schemes which can deliver equivalent transport improvements.</p> <p><u>Plan changes</u></p> <p>Amend policy to be less specific about the junction improvements for the southern end of Hermitage Lane at the Fountain Lane junction with the A26 Tonbridge Road, in order to allow for other transport improvements if shown to be achievable and feasible.</p>
<p><u>Policy SS1 Issue 2: Wider traffic issues</u></p> <p>Numbers of car movements resulting from proposed new developments is more than can be accommodated.</p>	<p>The measures proposed in the Integrated Transport Strategy (ITS) address the fears that extra car movements cannot be accommodated. Inevitably there is also an element of lifestyle change that needs to occur so that people use private transport less.</p>

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	<p><u>Plan changes</u> None.</p>
<p><u>Policy SS1 Issue 3: Housing number</u></p> <p>Reduce the housing number in each of the proposed north west strategic site allocations – Bridge Nursery, East of Hermitage Lane, West of Hermitage Lane.</p>	<p>At this moment no evidence has been provided to support assertions that housing numbers should be reduced. Infrastructure evidence details how further housing development in these locations can be incorporated. It is the duty of the council to efficiently use sites for development and not waste land. In addition to the proposed junction improvements at the northern and southern ends of Hermitage Lane, the proposed bus gate in the East of Hermitage Lane site would allow a bus loop service to be operated enabling more flexible public transport access to the hospital and town centre.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy SS1 Issue 4: Infrastructure</u></p> <p>How can necessary infrastructure be paid for? There are concerns among consultees that the infrastructure required to support these developments cannot be afforded.</p>	<p>The infrastructure that has been identified as necessary is listed in the infrastructure delivery plan (IDP). Viability work is ongoing to determine the appropriate level of community infrastructure levy (CIL) contributions married to a realistic affordable housing target. Not all funding for infrastructure will come from CIL and s106 legal agreements: separate government funding may be available for specific infrastructure, which the finalised IDP will identify.</p> <p><u>Plan changes</u> None.</p>

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<p><u>Policy SS1 Issue 5: Duty to cooperate</u></p> <p>No confidence that cross border issues have been addressed with Tonbridge and Malling.</p>	<p>Duty to co-operate meetings with Tonbridge and Malling are ongoing and have been since before the consultation. Where there are areas of disagreement or concern, the two authorities are working to find appropriate solutions.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy SS1 Issue 6: Hospital</u></p> <p>The traffic resulting from the proposed developments will block access to the hospital.</p>	<p>Maidstone Borough Council has consulted the relevant health authorities and no concerns have been raised regarding access to the hospital. Hermitage Lane, while busy at peak times, is still accessible to emergency vehicles.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy SS1 Issue 7: Rural character</u></p> <p>The semi-rural character of this area should be maintained.</p>	<p>The semi-rural character of this area of the borough has changed with development over the years. Development on both sides of the boundary has caused this. Proposals would not fully develop all land in the north west and the Borough Council needs to be able to positively manage the change in this area to provide residents with the facilities that they need. Even with development, the council will require that development in the gap between Allington and Medway Gap does not contradict the purpose of the Strategic Gap policy that is being phased out (Policy ENV31 of the Maidstone Borough-Wide Local Plan 2000) (the reasoning of which still applies).</p>

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	<p><u>Plan changes</u> Address rural character issues in the reasoned justification for the policy, relating specifically to the coalescence of settlements.</p>
<p><u>Policy SS1 Issue 8: Loss of best and most versatile agricultural land</u></p> <p>Some of the land in this area is currently used for agricultural purposes.</p>	<p>Best and most versatile agricultural land (BMV) is one feature of many that is reviewed when considering which land to develop. Where the proposed development sites are proposed on BMV other factors have outweighed this in the wider analysis of site suitability.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy SS1 Issue 9: Previously developed land first</u></p> <p>No greenfield land should be developed until all previously developed land (PDL) has been used.</p>	<p>Based on a former definition, development on PDL accounted for the following;</p> <ul style="list-style-type: none"> • 2006/07 – 96.6% • 2007/08 – 86.8% • 2008/09 – 88.9% • 2009/10 – 86.2% <p>Partially as a result of the changed definition of PDL, the figure fell in 2010/11;</p> <ul style="list-style-type: none"> • 2010/11 – 79.2% <p>Maidstone Borough Council has permitted many developments on PDL. The council cannot now maintain a five year land supply without allocating greenfield sites. This does not mean that PDL developments will cease.</p>

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	<p><u>Plan changes</u> None.</p>
<p><u>Policy SS1 Issue 10: Transport focus</u></p> <p>This policy is too focused on transport measures and neglects the wider aspects of what will be needed to bring development forward.</p>	<p>The policy does focus on transport, but transport infrastructure will be the biggest cost and it is important to ensure that the necessary elements will be delivered to support development. Each of the sites will need to contribute strategically to the development of the north west in more than just transport. Other strategic elements will need to be considered in the policy also.</p> <p><u>Plan changes</u> Amend policy to consider the wider range of planning topics, taking issues that could be addressed in policy SS1 out of the individual policies, such as general open space provision.</p>
<p>Policy SS1a: Bridge Nursery</p>	
<p><u>Policy SS1a Issue 1: Biodiversity</u></p> <p>The site is home to a number of species of flora and fauna, including some protected by law. Development of this site should either be avoided or reduced.</p>	<p>The advice from Kent County Council (KCC) has not changed from that given as part of the preparation of the consultation document – appropriate ecological surveys would need to be undertaken on site. A preliminary ecological survey has identified the types of further detailed ecological surveys that are required. Information from these surveys will allow detailed mitigation measures to be determined. Natural England is not concerned specifically regarding the ecological status of Bridge Nursery, welcoming the general approach to evidence seeking and providing appropriate mitigation measures based on that. The Kent Wildlife Trust has no</p>

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	<p>objection to the principle of development on this site, subject to the appropriate mitigation measures being undertaken and there being recognition of the need to address ecological issues in the policy text. There is no indication that the ecology on site is an absolute constraint to development.</p> <p>Plan changes Policy to address biodiversity concerns through appropriate measures. Reference to updated ecological surveys and any development will be subject to these.</p>
<p><u>Policy SS1a Issue 2: Community asset</u></p> <p>Many local people use this site, as a community asset, for activities such as walking dogs and riding BMXs.</p>	<p>Presently people do use the site as an informal community asset. As part of the preparation of the consultation document and the ongoing development of the allocation policy for this site, the parks and open spaces team at Maidstone Borough Council has been consulted. This input will be used in consultation with the developer to ensure that community facilities remain available in this area.</p> <p>Plan changes Policy to incorporate natural open space measures.</p>
<p><u>Policy SS1a Issue 3: Heritage asset</u></p> <p>There is a World War II pill box on site that consultees are concerned may be damaged as part of the proposed development.</p>	<p>The pillbox is located in the Tonbridge and Malling section of the site and as such is not subject to the control of the Maidstone Borough Council planning department. The council will, however, work with the developer and Tonbridge and Malling to ensure that the pillbox is assessed for its condition and importance, and any decisions regarding its future will be based on evidence.</p>

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	<p><u>Plan changes</u> None.</p>
<p><u>Policy SS1a Issue 4: Transport</u></p> <p>Residents are concerned generally regarding how the new development will affect roads in the area, including the bottleneck going under the railway bridge.</p>	<p>The railway bridge cannot be moved, but a number of transport improvements are suggested for the area in the ITS, the required degree of which will be determined in individual transport assessments for each site. There may be scope for junction improvements associated with the access to the site, which could help traffic flows travelling under the railway bridge.</p> <p><u>Plan changes</u> None.</p>
<p>Policy SS1b: East of Hermitage Lane</p>	
<p><u>Policy SS1b Issue 1: Bus gate</u></p> <p>Residents are concerned that the bus gate will not work and will be used for general traffic as well. They would prefer a locked gate.</p>	<p>Bus gates are proven technology. There will need to be a maintenance agreement to ensure that the gate continues to function correctly. By having a bus gate, this allows for a bus loop to be created that serves passengers travelling to the hospital and destinations along the A20 London Road and A26 Tonbridge Road, as well as into the centre of Maidstone. This service could offer a significant improvement over existing provision. The bus gate will operate in a clearly defined location designed for bus access, rather than being designed as a barrier across an otherwise general purpose highway.</p>

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	<p><u>Plan changes</u> Bus gate to be relocated into site, allowing access to around 200 dwellings from Howard Drive (based on Kent County Council advice). Purpose and type of bus gate (rising bollards) to be retained. Specify how bus gate should operate, in terms of separation from general purpose road space.</p>
<p><u>Policy SS1b Issue 2: Amenity for existing residents</u></p> <p>Residents are concerned that there will not be a buffer between the existing houses on Howard Drive and the new houses developed in the field to their rear.</p>	<p>A buffer will be maintained behind the existing Howard Drive properties except for where the eastern access will be made. The required site layout will be such that the amenity of existing residents will be considered equal to those inhabiting the new development.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy SS1b Issue 3: School provision</u></p> <p>There is concern regarding traffic movements if a school is built on site, or if contributions are used to extend/improve existing schools.</p>	<p>The exact nature of school provision in the north west, whether it is on this site or off of this site, it still being determined. Travel plans will be required as part of any new school development to ensure that sustainable transport options are used where possible, causing as minimal disturbance to local residents as possible. If the improvement/expansion of existing schools is seen as an appropriate solution, then similar travel plan measures will be sought. School provision is subject to final confirmation from Kent County Council Education.</p> <p><u>Plan changes</u> None.</p>

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<p><u>Policy SS1b Issue 4: Developer concern – more houses achievable on site</u></p> <p>The developer does not consider that the best use of the site is currently being made and would like to build homes on the south west field and possibly on the land north west of the restricted byway.</p>	<p>The developer is particularly concerned with the field to the south west of the site, stating that there is no justification for this field to be saved from development. These issues are being addressed through further dialogue with the developer and ecology/archaeology sections at KCC. At this stage no evidence has been presented to support the development of the area north west of the footpath/byway for housing. This land is currently an existing pear orchard and can be seen from Hermitage Lane. The council is concerned that residential development of any form north west of the restricted byway/footpath will be too dense and will not maintain the open character of this area.</p> <p><u>Plan changes</u> Appropriate development of south west field will be included in the policy, subject to ecological and archaeological provisions, to be agreed with the appropriate sections of KCC.</p>
<p><u>Policy SS1b Issue 5: Developer concern – evidence for contributions</u></p> <p>The developer would like to see the evidence justifying the need for proposed transport improvements such as the cycle lane extending north along Hermitage Lane to the A20 London Road.</p>	<p>Individual transport assessments will be required for each site, but the cumulative impact of development across all sites will need to be considered. Improvements to cycling in the district are required to offer a sustainable alternative to travelling by car. New developments will need to contribute to these improvements to mitigate their impact on the transport network.</p> <p><u>Plan changes</u> None.</p>

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Policy SS1c: West of Hermitage Lane	
<p><u>Policy SS1c Issue 1: Cumulative effect of development</u></p> <p>Taken with the East of Hermitage Lane site the effect of new development in the north west of Maidstone is too much to be accommodated. Residents are talking about the general range of infrastructure requirements, with specific concern relating to transport.</p>	<p>Infrastructure providers have been consulted as part of the preparation of the consultation document and as part of the consultation itself. Infrastructure measures have been identified in the Infrastructure Delivery Plan (IDP) and it is for the council to understand how these measures can be delivered, in part through viability testing. The Integrated Transport Strategy (ITS) has identified transport improvements for the area, which will be further explored in individual transport assessments for the proposed allocations. Transport is not considered an absolute constraint to development – the council will continue to work with Kent County Council and the developers in this area to ensure that effective solutions are delivered.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy SS1c Issue 2: Amenity for existing residents</u></p> <p>There is general concern regarding the effect of the proposed development on existing residential areas, such as the residents in Broomshaw Road and the roads surrounding it.</p>	<p>No road access is proposed through Broomshaw Road or the roads surrounding it. Primary access will be taken from Hermitage Lane with emergency, pedestrian and cycling access taken from Oakapple Lane.</p> <p><u>Plan changes</u> None.</p>

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<p><u>Policy SS1c Issue 3: Open/rural character of Barming area</u></p> <p>Some consultees were concerned that the cumulative effect of developing sites around Hermitage Lane would change the character of the area from one that is rural to one that is urban.</p>	<p>The strategic gap (Maidstone Borough-Wide Local Plan – policy ENV31), which has acted as a bar against development in this area, is intended to be superseded by the Maidstone Borough Local Plan. The essence of the policy does remain, however, in that development which would result in the coalescence of Maidstone with the Medway Gap should in itself be resisted – these are separate settlements. This site has been judged in terms of how it affects the gap between Barming and the Medway Gap in Tonbridge and Malling. Although the site abuts the administrative boundary, in the Tonbridge and Malling area there is still a significant distance before any noticeable settlement is reached, and views are screened by landscape features.</p> <p><u>Plan changes</u> Amend supporting to text to address this matter.</p>
Policy SS2: Strategic housing location to the south east of the urban area	
<p><u>Policy SS2 Issue 1: Site allocation/alternative site(s)</u></p> <p>Alternative sites have been suggested. Most notably, land south of Downswood residential estate and Bicknor Farm, which is adjacent to the eastern edge of the proposed allocation Land North of Sutton Road. The main argument made for considering these sites is that they are a better alternative to the proposed allocation Land North of Bicknor Wood.</p> <p>1. Land south of Downswood (adjacent to Otham Church) is</p>	<p>1. Willington Street already experiences high levels of congestion during peak periods and although locating a development here would likely spread the load between the A20 Ashford Road and the A274 Sutton Road, when considered with other development sites proposed for the south-east, the Sutton Road bus lane has the potential to relieve congestion through the Wheatsheaf junction. It is far more difficult to mitigate for congestion on Willington Street. Concentrating development near Sutton Road has the potential to make best use of the proposed Sutton Road in-bound bus lane and to connect with the existing</p>

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<p>proposed as an alternative site because it could make good use of existing infrastructure such as nearby shops, surgery and bus services. It is expected the majority of traffic would use Willington Street when travelling north to access the A20 Ashford Road and the M20. This would potentially minimise additional pressure on Sutton Road and the Wheatsheaf Junction and may also help to prevent rat running on rural roads in the area.</p> <p>2. For Bicknor Farm, the argument is made that the site has a frontage onto Sutton Road and would obviate the need to reconfigure Gore Court Road as a single access road could serve both the Land North of Sutton Road and Bicknor Farm sites (possibly from the roundabout that would serve the Langley Park development). It is also proposed that development on Bicknor Farm would reduce the potential for rat running in the area and would make good use of a bus lane if this scheme goes ahead.</p>	<p>services and facilities in nearby Senacre and Parkwood, not to mention the new facilities and infrastructure on the proposed sites.</p> <p>2. The Bicknor Farm site is removed from the urban edge of Maidstone (particularly the eastern section of the site) and development of this site would extend the urban edge of Maidstone in linear form further east than Langley Park. It is considered that a linear type development extending this far into the open countryside is not desirable, nor does it make best use of local services and facilities from an accessibility perspective. Development at Bicknor Farm would detract from the rural nature of this area and would compromise the setting of at least two listed buildings. Bicknor Farm (particularly the eastern section) has far less urban influence than sites in closer proximity to the urban fringe (north and south of A274 Sutton Road).</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy SS2 Issue 2: Highways ('rat running')</u></p> <p>1. There are concerns that strategic sites in the south east will generate a significant increase in traffic levels which will result in traffic congestion on the main arterial routes. Delays caused on these routes will mean that motorists will choose to use smaller residential roads or rural lanes to the north and south – 'rat running'. This will have an impact on local residential amenity.</p>	<p>1. The measures proposed in the Integrated Transport Strategy (ITS) are intended to address the fears that extra car movements cannot be accommodated. Inevitably there is also an element of lifestyle change that needs to occur so that people use private transport less. Highway improvements, the proposed bus lane in particular, set out in the policies will help to ease congestion on local roads and will help to mitigate the impacts of existing and proposed development on air quality.</p>

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<p>2. Further concerns for areas south of the proposed sites (e.g. Boughton Monchelsea) where rat running through Brishing Road/Brishing Lane is considered problematic. This is in contrast to calls that have also been made for widening Brishing Road (or at least to have passing areas) and to allow access from Brishing Road to the Langley Park site. It is suggested that such measures would alleviate pressure on the Five Wents junction, which vehicles use to access Heath Road, Cornwallis Academy, Linton Crossroads and rural areas to the south.</p>	<p>The council accepts there will be significant increases in traffic generation and that this will have the effect of causing more 'rat-running'. Whilst this is an important consideration and should be stated as an issue to be dealt with in the ITS, it is not a strategic issue. However, targeted impacts of rat-running will be required to be identified by Transport Assessments (submitted as part of future planning applications) and will need to be dealt with through mitigation measures included in the Transport Assessments.</p> <p>2. The costs of widening Brishing Road/Brishing Lane or even creating passing points would be significant, and it is considered that the costs would far outweigh the benefits for a route that is only used by a small percentage of vehicles. Vehicular traffic currently uses both the Five Wents crossroads and Brishing Lane to access Heath Road. This splits the volume of traffic using both roads, which is better than a majority of vehicles using the same route.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy SS2 Issue 3: Extending existing bus services to serve strategic sites</u></p> <p>Arriva state that whilst the abandonment of the proposed Park & Ride site at Langley Park Farm is disappointing, the</p>	<p>Arriva are very supportive of the bus lane proposal which they say will create a 'step change' in the attractiveness of bus services in this sector of Maidstone. It is agreed that an extension to the existing bus network to serve the strategic sites at an early stage in their development is important to</p>

Key issues Arising from Representations	Responses and Plan Changes
<p>opportunity must be taken to facilitate the integration of any new bus services in this area into the existing bus network, and into and through the outlined developments. This is seen as vital to maximise the benefits of this concentrated area of growth.</p>	<p>serve a growing population in the south east. This will also create potential to establish a modal shift to the use of public transport to access the town centre, making best use of the proposed bus lane on the Sutton Road.</p> <p><u>Plan changes</u> Include the need for extensions to existing bus routes to serve the strategic sites in the supporting text for each policy (SS2a, SS2b & SS2c).</p>
<p><u>Policy SS2 Issue 4: Infrastructure</u></p> <p>How can necessary infrastructure be paid for?</p>	<p>The infrastructure that has been identified as necessary is listed in the Infrastructure Delivery Plan (IDP). Viability work is ongoing to determine the appropriate level of community infrastructure levy (CIL) contributions to a realistic affordable housing target.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy SS2 Issue 5: Develop brownfield land first</u></p> <p>The rural character of this area should be maintained. Greenfield sites of high agricultural and landscape value should not be developed when there are PDL sites available.</p>	<p>Based on a former definition, development on previously developed land (PDL) accounted for the following:</p> <ul style="list-style-type: none"> • 2006/07 – 96.6% • 2007/08 – 86.8% • 2008/09 – 88.9% • 2009/10 – 86.2% <p>Partially as a result of the changed definition of PDL, the figure fell in 2010/11:</p>

Key issues Arising from Representations	Responses and Plan Changes
	<ul style="list-style-type: none"> • 2010/11 – 79.2% <p>Maidstone Borough Council has permitted many developments on PDL. The council cannot now maintain a five year land supply without allocating greenfield sites. This does not mean that PDL developments will cease.</p> <p>Although the south east strategic sites are greenfield sites and rural in character, they are still considered the most appropriate sites for development in this area. There are a number of reasons for this:</p> <ul style="list-style-type: none"> • Two of the sites are already allocated for housing development in the Local Plan 2000 • The sites lie on the edge of Maidstone’s urban area, thus making best use of existing and proposed facilities, like the bus lane • Development on the urban edge, as proposed, limits the spread of development in linear form along Sutton Road • A better, more visually attractive and landscaped gateway to the town can be created along the urban periphery on Sutton Road, which at the moment is dominated by the Parkwood Industrial Estate. <p><u>Plan changes</u> None.</p>

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Policy SS2a: Langley Park	
<p><u>Policy SS2a Issue 1: Site density</u></p> <p>The housing density should be amended to include a range of 30–40 dwellings (net) per hectare.</p>	<p>As this is a large site adjacent to Parkwood Industrial Estate it is considered acceptable to include a range of development densities. This will allow for more flexibility on site. The details on site design and density will be set out in the development brief that will be agreed with the council prior to the submission of a planning application.</p> <p><u>Plan changes</u> Amend policy SS2a and include a density range of 30-40 dwellings (net) per hectare.</p>
Policy SS2b: North of Sutton Road	
<p><u>Policy SS2b Issue 1: Ecology/biodiversity/green infrastructure</u></p> <p>The county ecologist advises that the eastern section of the site appears to have the most potential for ecological interest. Kent Wildlife Trust (KWT) agrees and states there should be flexibility regarding housing numbers until the biodiversity value of the site is known.</p>	<p>Discussions have progressed with KCC on the subject of ecology. If sites are allocated, KCC advises that at application stage, as a minimum, a preliminary ecological assessment is sought. Any recommended additional surveys would need to be undertaken and the results, and any mitigation proposals, submitted with the planning application.</p> <p>In the development brief, measures will need to be in place to minimise the potential for development to impact on the woodlands around the site. Mitigation measures will be put in place to ensure Bicknor Wood is itself protected and Bicknor Hole to the west of the site will also remain protected by a landscape buffer along the site’s western boundary.</p>

Key issues Arising from Representations	Responses and Plan Changes
	<p>Plan changes Amend policy SS2b and supporting text to include the need for an ecological assessment to be submitted with any planning application and to strengthen commentary on protection and mitigation for ecology and biodiversity. Highlighting the importance of creating green linkages/corridors is also important.</p>
<p>Policy SS2c: North of Bicknor Wood</p>	
<p><u>Policy SS2c Issue 1: Ecology/biodiversity/green infrastructure</u></p> <p>Kent Wildlife Trust advises that the strategic sites north of Sutton Road need to be linked to provide maximum ecological gains and a green network for new residents.</p>	<p>In the development brief, measures will be put in place to minimise the potential for development to impact on the woodlands around the site. This will be achieved using landscape buffers.</p> <p>It is planned to link Bicknor Wood to East Wood (north of White Horse Lane), which will not only screen development from the village of Otham to the east but will also act as a wildlife and ecology corridor.</p> <p>Plan changes Amend policy SS2c and supporting text to include the need for an ecological assessment to be submitted with any planning application and to strengthen commentary on protection and mitigation for ecology and biodiversity. Highlighting the importance of creating green linkages/corridors is also important.</p>

Key issues Arising from Representations	Responses and Plan Changes
<p><u>Policy SS2c Issue 2: Width of landscape belt/woodland buffer</u></p> <p>The developer recognises the need for a landscape/woodland buffer along the eastern boundary of the site to visually contain development and to provide additional habitat and improved habitat connectivity. However, the developer makes the point that a woodland belt of a minimum of 80m width is not considered necessary to achieve these objectives as it would unnecessarily constrain the development of the site. A woodland belt of 30m is put forward as more appropriate, still allowing sufficient space for woodland trees to fully establish and including adequate space for dense woodland edge and hedgerows to provide improved screening.</p>	<p>The 30m woodland belt proposed by the developer is considered inadequate to visually contain development from the eastern boundary of the site, which is rural in character. However, it is agreed that a woodland belt of at least 80m is unwarranted, and could compromise the provision of other open space requirements on site (such as a football pitch and allotments). A woodland belt of 40m would be more appropriate to act as an effective buffer between the site and the rural landscape to the east and as an effective wildlife and ecology corridor between the sites north of Sutton Road and the wider rural area. It is not intended that the reduction in width of the woodland buffer should provide additional land for increasing the proposed number of residential units on site.</p> <p><u>Plan changes</u> Amend policy SS2c to include the provision of a woodland belt of a minimum of 40m in width (reduced from 80m) to link the eastern section of Bicknor Wood to East Wood.</p>
Policy SS4: Newnham Park	
<p><u>Policy SS4 Issue 1: Demonstration of need and alternative sites</u></p> <ol style="list-style-type: none"> 1. The need for commercial development in this location has not been demonstrated, and there are objections to offices, general industrial and warehousing proposals. 2. There is general support for the development of KIMS 	<ol style="list-style-type: none"> 1. The proposals include medical facilities and replacement retail facilities. There will be some associated office development, but there are no proposals for general industry or warehousing. 2. Support for medical campus is welcomed. Newnham Court is an existing retail area so redevelopment through the development management process is acceptable.

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<p>(Kent Institute of Medicine and Surgery) with associated development, but objections to an out-of-town retail complex.</p> <p>3. The site is considered a suitable location for a variety of employment uses that will offer increased job opportunities.</p> <p>4. Alternative sites proposed include:</p> <ul style="list-style-type: none"> • Aylesford Paper Site (Tonbridge & Malling Borough Council) • Larkfield (Tonbridge & Malling Borough Council) • Eclipse Park (to the west of development site) • Former Army & Navy Stores (town centre) • Maidstone East Railway Station (town centre). 	<p>There will be greater control over the type of development and the provision of supporting infrastructure through an allocation.</p> <p>3. The site is allocated for medical and retail use, and land for other employment uses is being provided elsewhere. The medical campus and replacement retail facilities are estimated to provide for over 3,800 new jobs.</p> <p>4. New medical facilities are associated with KIMS so alternative sites are not appropriate, and Newnham Court provides for replacement facilities on an existing retail site.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy SS4 Issue 2: Extent of retail proposals and impact of development on town centre uses</u></p> <p>1. There is confusion over the extent of the retail area to be developed, and concerns about the loss of the garden centre.</p> <p>2. Eclipse Park remains undeveloped so could accommodate retail development.</p> <p>3. There is opposition to out-of-town retailing. The proposals conflict with the NPPF “town centre first” approach and will undermine the economic viability of the town centre. Empty units in the town centre should be utilised first, rather than releasing greenfield sites.</p> <p>4. It will be difficult to control the type of retailing.</p> <p>5. Retail development in this location is unsustainable.</p>	<p>1. The site plan needs to be amended to clearly mark the division between the retail area and the medical campus. The amended site plan takes into account the need for existing retail tenants (including the garden centre) to continue trading, and provides for structural landscaping to be incorporated into the site layout. The northernmost section of the existing retail site (2.1 ha) will be allocated for medical use; and either retail or medical will be appropriate uses on land between the retail site and the new access road to the east of the retail area (2.9ha). The supporting text and policy will need to clarify this point.</p> <p>2. Eclipse Park provides for office development.</p> <p>3. Proposals are for the redevelopment of an existing retail site with measures in place to restrict competition with</p>

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<p>6. There is also support for replacement retail facilities as part of proposals, provided redevelopment is confined to the existing footprint and there is no increase in floorspace over and above that existing.</p>	<p>the town centre through a retail impact assessment.</p> <p>4. The Borough Council can control first occupant through planning conditions.</p> <p>5. The retail redevelopment area is located on one of the main approaches to the town, is sited in the vicinity of office and medical developments, and is close to residential areas. Public transport measures, including a bus interchange, will improve sustainability.</p> <p>6. The support is noted. The retail redevelopment will be confined to the vicinity of existing uses, as shown on the revised site plan. Restricting redevelopment to the footprint of current uses does not allow for continued trading and does not provide adequate flexibility to introduce structural landscaping and other on-site obligations. The policy must introduce some flexibility in terms of floorspace to allow for redesign. The policy currently restricts the cumulative quantum of floorspace to 500m² above that existing (14,300m²) before the need for a retail impact assessment is triggered, and any additional floorspace will be subject to a sequential test and a demonstration of need for an out-of-town location. To allay concerns over the impact of proposals on town centre uses, the threshold should be reduced to 300m² above that existing to trigger need for retail impact assessment.</p> <p><u>Plan changes</u> Amend the site plan to clearly show areas appropriate for new medical and/or retail uses; and amend the policy and supporting text to make clear where retail and/or medical</p>

Key issues Arising from Representations	Responses and Plan Changes
	<p>uses are acceptable.</p> <p>Reduce the threshold that triggers the need for a retail impact assessment from 500m² to 300m².</p>
<p><u>Policy SS4 Issue 3: Mitigation measures (landscape)</u></p> <ol style="list-style-type: none"> 1. There will be an adverse impact on the setting of the Kent Downs AONB. Policy LLC8 of the Kent Downs AONB Management Plan states “proposals which negatively impact on the distinctive landform, landscape character and identified special components of natural beauty, the setting and views to and from the AONB will be opposed and resisted”. 2. Loss of a “green lung” that provides for leisure activities (walking, horse riding, running and cycling). 3. Proposals will destroy the rural setting of the area, and development will erode the strategic gap between Maidstone and Detling and Thurnham parishes. 4. Medical development should be well related to KIMS and landform, and not extend to land to the east of the existing stream running north-south through the proposed development site, which is a tributary of the River Len. 5. The width of the landscape buffers should be increased. 6. A landscape buffer should be provided to protect Gidds Pond Cottages from development proposal. 	<ol style="list-style-type: none"> 1. The AONB Unit has been consulted on the proposals and concludes that the allocation can be developed with only modest impact on the AONB, although development should be avoided at the site’s north east end, and height restrictions are recommended for buildings at other higher elevations within the site. Detailed mapping will be required to identify the most sensitive landscape areas of the site in order to guide development. These safeguards are already in place in the policy and its reasoned justification. 2. There are no public footpaths through the site. 3. The strategic gap is a tool for assisting place shaping: it is not a landscape constraint. The site is well contained, bounded by roads (including the M20 motorway) and ancient woodland. Development will not unduly erode the function of the strategic gap in this location. 4. Medical development will be related to the landform, and the policy phases land to the west of the stream in advance of land to the east. In respect of development to the east of the stream, the southern part of the site is considerably lower than the land to the north, which the policy protects from development, and the southern section can accommodate development. This view is supported by the AONB Unit. 5. Agreed to increase the landscape buffers either side of the

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	<p>stream from 10m to 15m on the advice of the Kent Wildlife Trust.</p> <p>6. Structural landscaping to rear of Gidds Ponds Cottages will be provided as part of the first phase of development. The policy should make clear that structural landscaping must be in place before development proceeds.</p> <p><u>Plan changes</u> Increase the landscape buffer from 10m to 15m width either side of the existing stream, totalling 30m width.</p> <p>Make clear in the policy that structural landscaping will be phased in advance of development.</p>
<p><u>Policy SS4 Issue 4: Mitigation measures (ecology)</u></p> <ol style="list-style-type: none"> 1. The site is located within the Mid Kent Greensand and Gault Biodiversity Opportunity Area (BOA). 2. There will be adverse impacts of development on the adjacent Local Wildlife Site/ancient woodland and the existing stream, which flows into the Vinters Park Local Nature Reserve. 3. Impact on protected wildlife and their habitats. Proposals would result in a net loss of biodiversity (on and off site) and would make no contribution to the natural environment. 4. Proposals are contrary to the NPPF which seeks to contribute to and enhance the natural and local environment, and directs local authorities to allocate land with the least environmental amenity value (paragraphs 	<ol style="list-style-type: none"> 1. The BOA is not a constraint to development, but is an opportunity for habitat enhancement, restoration or creation, which the policy provides for. Detailed mapping will be required to identify the most sensitive areas of the site in terms of biodiversity in order to guide development. 2. The policy provides for the protection of ancient woodland and the stream, through 30m buffers along boundaries abutting ancient woodland and 15m buffers either side of the stream. The buffer widths are acceptable to the environment organisations. 3. Kent Wildlife Trust welcomes the aims of the policy for development design, nature conservation and buffering, provided mitigation measures are in place to protect ancient woodland and the Local Wildlife Site, and safeguards are in place during construction to safeguard

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<p>109-110).</p> <p>5. Various proposals are put forward for inclusion in the development brief, including the need to consider a framework for the integrated development of landscape and habitats components across the site and the coordination of their ongoing management (Natural England).</p> <p>6. Kent Wildlife Trust, the Environment Agency, Natural England and the Kent Downs AONB Unit do not raise objection to the principle of development provided mitigation measures are in place.</p>	<p>hydrology. These will be important issues for the development brief and planning conditions to address.</p> <p>4. Part of the site is previously developed land, which will accommodate replacement retail facilities, and the medical campus will complement the facilities provided by KIMS. The benefits of the medical campus to the borough in terms of facilities and jobs are clear, and the impact of development on the landscape and ecology can be mitigated and carefully managed to the satisfaction of the statutory and local environment groups.</p> <p>5. Agreed these are matters for the development brief.</p> <p>6. Mitigation measures are in place in the policy and the development brief will set out more detailed measures, to be implemented through planning conditions and legal agreements.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy SS4 Issue 5: Congestion and transport</u></p> <p>1. There are concerns about the impact of proposals on local roads, particularly during the rush hour, and the unsuitability of current roads to cope with proposed development.</p> <p>2. The proposed widening of Bearsted Road will increase danger to wildlife and pedestrians; damage the local landscape, tree cover and biodiversity; and will not mitigate the effects of extra traffic generated.</p> <p>3. Any increase in the width of Bearsted Road should not</p>	<p>1. Development will be subject to a detailed Transport Assessment and this should be made clear in the policy. The highway improvements set out in the policy will help to ease congestion on local roads.</p> <p>2. Pedestrian safety is built in to new highway proposals. Transport modelling has demonstrated that off-site highway works associated with development will mitigate the effects of the extra traffic generated. The highway schemes will have some impact on the local landscape and potentially on biodiversity, but they will not directly affect protected landscape areas and species, and</p>

Key issues Arising from Representations	Responses and Plan Changes
<p>involve land take from the south of the road.</p> <ol style="list-style-type: none"> 4. Development will impact on air quality and increased noise and light pollution, and changes to local hydrology. 5. Existing public transport in the area is poor. 6. There will be a reliance on the car so the development site is an unsustainable location, and there is a lack of connectivity to the town centre. 7. There is also support for the transport infrastructure measures associated with Newnham Park. 	<p>measures will be in place to prevent potential indirect effects.</p> <ol style="list-style-type: none"> 3. Land take to dual Bearsted Road will be confined to the area to the north of the road. Make clear in the policy. 4. Highway improvements and other transport measures will help to mitigate the impacts of existing and proposed development on air quality. Noise pollution will be maintained at acceptable levels, and light pollution will be mitigated through the use of low level lighting where practical. 5. The policy includes proposals to improve public transport, including a bus interchange and improved links to local residential areas. 6. The policy contains alternatives for the use of the car, including improved public transport to the town and local residential areas as well as other measures such as enhanced pedestrian and cycle links. The allocated site is adjacent to a designated employment area, thus providing for mixed use development in this area, and is located by a motorway junction and within reasonable access from residential areas. 7. The support is noted. <p><u>Plan changes</u></p> <p>Make clear in the policy that the land take to dual Bearsted Road will be confined to the north of the road.</p> <p>Make clear in the policy that a Transport Assessment for off-site highway improvements to serve the development will be required.</p>

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Policy CS6: Sustainable construction standards	
<p><u>Policy CS6 Issue 1: Design detail</u></p> <p>Consultees required that more detail be included in CS6, relating primarily to pure design and aesthetics, rather than sustainable construction.</p>	<p>CS6 was originally written as a sustainable construction policy, rather than a design policy. The design element of this policy is difficult to address with the policy in its current form as there are two distinct elements that each need to be addressed appropriately without the policy becoming exhaustive. The policy is intended to provide a strategic overview.</p> <p><u>Plan changes</u> Relocate design elements of policies to spatial policies and strategic site allocations.</p>
<p><u>Policy CS6 Issue 2: Parish and neighbourhood plans</u></p> <p>Neighbourhood plans/local vernacular/local context. Consultees, in particular parish councils, would like the design element of the policy to account for any information that has been adopted in parish and neighbourhood plans.</p>	<p>The design elements of this policy are better placed in individual spatial policies relating to specific areas of the borough.</p> <p><u>Plan changes</u> Relocate design elements of policies to spatial policies.</p>
<p><u>Policy CS6 Issue 3: Viability</u></p> <p>Viability (in relation to sustainable construction). Consultees requested both sides of the viability argument to be taken into consideration i.e. some requested that no allowances for viability should be made because it would allow developers to avoid the council's standards. Some developers thought that this policy was too stringent and did not allow for viability</p>	<p>Since the 2011 public consultation, the council has undertaken viability assessments which inform the policy. The policy as consulted on does incorporate allowances for viability. This needs to be the case because policies that are not flexible are potentially at risk of being considered unreasonable. The council allows for flexibility in the application of policies if the appropriate evidence is presented.</p>

Key issues Arising from Representations	Responses and Plan Changes
<p>considerations to be incorporated.</p>	<p><u>Plan changes</u> None.</p>
<p><u>Policy CS6 Issue 4: Construction standards</u></p> <p>Construction standards/building regulations. Some developers consider that Building Regulations are the only appropriate means for determining building standards.</p>	<p>The relationship between building regulations and the equivalent standard Code for Sustainable Homes (CSH) or Building Research Establishment Environmental Assessment Method (BREEAM) can be fraught. Part L of the Building Regulations has not maintained a planned trajectory of increasing its standards on a route to zero carbon homes in 2016. The council will maintain its requirement for CSH level 4 and BREEAM very good on the basis of the Climate Change Act 2008, the Kent Environment Strategy 2011 and the fact that it is more cost and energy intensive to retrofit buildings to a higher standard than to build to that standard initially.</p> <p><u>Plan changes</u> Require CSH level 4 and BREEAM very good. Delete planned step up in requirements intended for 2016 and 2019 respectively as there is no present justification for these. Support increased standards (beyond council requirements) in schemes where the developer proposes them.</p>
<p><u>Policy CS6 Issue 5: Community safety/crime prevention</u></p> <p>Community safety/crime prevention. Some consultees considered that meeting Secured by Design should be mandatory.</p>	<p>The design element of this policy, including Secured by Design, is better located in a different part of the plan. Addressing Secured by Design itself, the council does not believe that enforcing minimum standards will enhance the plan.</p>

Key issues Arising from Representations	Responses and Plan Changes
	<p>Plan changes Relocate design elements of policies to spatial policies.</p>
<p>Policy CS7: Sustainable transport</p>	
<p><u>Policy CS7 Issue 1: Traffic congestion</u></p> <p>Respondents are concerned that traffic congestion is at a level where the borough's roads cannot support any further development. Areas with high congestion include the bridge gyratory; Fountain Lane /Tonbridge Rd Junction and the Wheatsheaf Junction.</p>	<p>The council accepts that traffic congestion will increase in the years to come however it recognises this increase needs to be appropriately managed. This will be achieved through the Integrated Transport Strategy (ITS). Given the spatial constraints of the existing transport network, it is proposed to increase the 'people-moving' capacity of this network by providing additional infrastructure for the improvement of bus services. This will be implemented alongside various improvements to road junctions at strategic locations; measures to manage demand for private vehicle travel; and measures to support more sustainable modes of travel such as use of public transport, cycling and walking.</p> <p>Plan changes Strengthen references to measures for the mitigation of traffic congestion.</p>
<p><u>Policy CS7 Issue 2: Improved rail links</u></p> <p>Rail links to London are poor given Maidstone is meant to be the county capital for Kent. Services are too infrequent, and take too long to reach London.</p>	<p>The council will be promoting and lobbying for the enhancement of strategic transport links to and from Maidstone, in particular the improvement of rail links to London. Thameslink Ltd. has committed to extending its rail service from London to Maidstone from 2018 linking Maidstone to London Bridge Station. This will improve train frequencies and will also reduce journey times to London.</p>

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	<p><u>Plan changes</u> Strengthen references to improved rail links in supporting text.</p>
<p><u>Policy CS7 Issue 3: Improved bus services</u></p> <p>Maidstone buses are too expensive and do not sufficiently serve the rural service centres. People are deterred from using them as the service ends too early in the evening and because they are not frequent enough.</p>	<p>The draft Integrated Transport Strategy proposes the construction of a bus lane on the A274/A229 to improve journey times from the south east into the town centre. This will improve bus access from the south east of Maidstone, but will also provide benefits to services running from Linton, Marden, Staplehurst and Headcorn. The ITS also proposes to re-introduce the Maidstone Quality Bus Partnership which is working towards facilitating the improvement of bus frequencies to 7mins from the outer limits of the urban area of Maidstone on the majority of main arterial routes.</p> <p><u>Plan changes</u> Strengthen text references to improved bus services and access.</p>
<p><u>Policy CS7 Issue 4: Car sharing</u></p> <p>Maidstone is very reliant on the private car and should make a better use of the roads by moving more people through car sharing.</p>	<p>The council is investigating the viability of car sharing lanes, however it is expected the best way to achieve this is through the securing and implementing of Travel Plans.</p> <p><u>Plan changes</u> Include references in the text to car sharing.</p>

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<p><u>Policy CS7 Issue 5: Sustainable modes of travel</u></p> <p>Maidstone is too reliant on private vehicles that are not sustainable. More needs to be done to promote sustainable travel.</p>	<p>Measures will be introduced by the draft Integrated Transport Strategy to promote more walking, cycling, and other sustainable modes of travel. These include securing pedestrian environmental improvements for new development; the construction of public realm improvement schemes in the town centre; developing the Maidstone Cycling Strategy; facilitating the introduction of Plug In Vehicle technology; promoting more public transport use; and encouraging greater use of car clubs.</p> <p><u>Plan changes</u> Strengthen references to sustainable modes of travel.</p>
<p><u>Policy CS7 Issue 6: Walking and cycling targets</u></p> <p>A target of 12% for this is too low. The Council should be encouraging more walking and cycling and so should be more ambitious with these targets.</p>	<p>The council accepts that the walking and cycling target is too low and should be more ambitious. The council believes it can achieve an increase to 22.5% of total mode share for walking and cycling by 2031, combined through the introduction of measures included in the ITS and the development of the Maidstone Cycling Strategy.</p> <p><u>Plan changes</u> Amend text to increase the walking and cycling target to 22.5% by 2031.</p>
<p><u>Policy CS7 Issue 7: Poor access to the south of the borough</u></p> <p>Public transport options to the south of Maidstone are limited. The road network is insufficient to meet the needs of the south and significant traffic congestion results. Heavy</p>	<p>The council accepts more needs to be done to improve access to the south of the borough. Various improvements are proposed through the draft Integrated Transport Strategy to improve transport infrastructure in some of the rural service centres, and more improvements will be delivered when new</p>

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<p>goods vehicles accessing industrial uses in the south are reliant on small rural lanes to access the motorway; this needs to be solved. The impact of these lorries on rural roads is unacceptable.</p>	<p>development comes forward in these areas. Bus access from the south east of Maidstone will be improved through the delivery of the A274/A229 bus lane and will also provide benefits to services running from Linton, Marden, Staplehurst and Headcorn.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy CS7 Issue 8: Park & Ride</u></p> <p>The council should have never closed the Park and Ride site at Armstrong Road. Another Park and Ride site needs to be built in the south to improve access.</p>	<p>The council has thoroughly investigated proposals for the constructing of a new Park and Ride site to the south of the urban area of Maidstone. However, an assessment relating to the landscape impacts, affordability and deliverability with relation to the securing of land required meant that these proposals could not be progressed any further (refer to <i>Chapter 6: Policy Evolution Narrative</i> of the draft ITS for further information). As a result, the council has decided to rely on the improvement of bus services to improve access to the south of the borough.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy CS7 Issue 9: Southern ring road</u></p> <p>The only way to solve the problems of access to the south is to build a ring road from near Leeds through to the M20 motorway near Junction 8.</p>	<p>Extensive investigation has been undertaken by the council regarding the construction of the Leeds / Langley Bypass proposal and the South East Maidstone Strategic Link. It was concluded that such a link did have a strong potential for handling traffic from the south and east of Maidstone, however overcapacity was still flagged on some key routes. Therefore it is unlikely to reduce the traffic congestion on the</p>

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	<p>scale that was initially hoped to be achieved. Further, cost estimates for an acceptable route in planning terms ranged as high as £75million which is unviable to the council economically.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy CS7 Issue 10: Parking</u></p> <p>There is not enough parking in the town centre. There is not enough parking at new developments either with vehicles being parked illegally on footways as a result.</p>	<p>There is significant capacity available both in private and public car parks in that there is a surplus of parking in the town centre. However, the council acknowledges that parking at new developments can sometimes be insufficient to reasonably meet the needs of these developments. Therefore the council intends to introduce its own Parking Standards Supplementary Planning Document (SPD) to ensure new development has the parking it needs.</p> <p><u>Plan changes</u> Include reference to the council’s intention to prepare a Parking Standards SPD.</p>
<p><u>Policy CS7 Issue 11: Poor wording of policy and supporting text</u></p> <p>Both the policy text and supporting text does not read well and does not address all the transport issues that should be addressed by this policy. Reference to ‘cycle-counters’ should be removed as this is in too much detail for a ‘high-level’ document</p>	<p>The plan would benefit from better policy wording to improve readability. This policy will be re-written so it is clear and concise.</p> <p><u>Plan changes</u> Re-write policy in plain English and remove references to cycle counters.</p>

Key issues Arising from Representations	Responses and Plan Changes
<p><u>Policy CS7 Issue 12: Air quality</u></p> <p>The town centre has poor air quality as a result of traffic congestion on the gyratory network.</p>	<p>The council is committed to reducing air pollution. Several areas have been identified as having air quality issues in the Maidstone Air Quality Management Action Plan, and it is through this plan that the air quality issues of Maidstone will be addressed.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy CS7 Issue 13: Transport Impact Assessment</u></p> <p>More clarification needs to be included as to when a Transport Impact Assessment is required. The policy wording is too vague at present.</p>	<p>Further clarification could be provided as to when a Transport Impact Assessment is required. Reference will be made to threshold levels set by Kent County Council's (KCC) Guidance on Transport Assessments and to the importance of mitigating trips generated by new development.</p> <p><u>Plan changes</u> Include references to KCC Guidance on Transport Assessments and required thresholds for new developments.</p>
<p><u>Policy CS7 Issue 14: Distribution of development and transport provision</u></p> <p>The number of trips generated by development should be minimised through the careful positioning of development to existing transport infrastructure and through the mix use of development.</p>	<p>The distribution of development will support existing and proposed transport infrastructure provision. Development contributions through legal agreements and Community Infrastructure Levy will secure funding from new development to implement necessary improvements.</p> <p><u>Plan changes</u> None.</p>

Key issues Arising from Representations	Responses and Plan Changes
<p><u>Policy CS7 Issue 15: Measures to promote sustainable travel</u></p> <p>Parking charges in the town centre should be raised to force people out of their cars and onto more sustainable forms of travel.</p>	<p>The council proposes to introduce travel demand measures to encourage a shift to more sustainable modes of travel. The level of parking charges is not a matter for the local plan to address.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy CS7 Issue 16: New transport infrastructure</u></p> <p>The existing road network is insufficient to support the new development proposed. New transport infrastructure is needed to support this</p>	<p>The draft Integrated Transport Strategy includes provision for the transport infrastructure necessary to support the development proposed in the local plan. This is further supported through the Strategic Site Allocations (2012) document that sets out the infrastructure requirements for each of the strategic development sites.</p> <p><u>Plan changes</u> None.</p>
Policy CS8: Economic development	
<p><u>Policy CS8 Issue 1: Should the council plan for the maximum requirement set out in the Employment Land Review (ELR)</u></p> <p>A few representations have questioned whether the Core Strategy should be planning for the 'maximum' figures reported in the ELR. An argument is made that in the face of the recession, the approach risks the over-supply of land which will not be taken up</p>	<p>Since the 2011 draft Core Strategy was published, the estimates of the amount of B use class employment land that will be needed have been updated. The update was required because of the continuing impacts of the recession since the last estimate was prepared and the changes in the economic active population that would result from the interim draft housing target of 14,800 dwellings (2011-31). The resulting Employment Land Review (2013) report presents the land requirements in the form of a range and further recommends</p>

Key issues Arising from Representations	Responses and Plan Changes
	<p>that provision toward the mid-low end of the range be planned for, in recognition of the local characteristics of employment land demand in the borough.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy CS8 Issue 2: Approach to existing employment sites</u></p> <p>Some representations propose that the expansion of existing employment sites should be permitted and that a more flexible approach to changes of use where the existing site does not meet modern business requirements and/or is better suited to alternative uses. The protection of employment land is contrary to paragraph 75 of the draft NPPF.</p>	<p>The objective of criterion 1 of policy CS8 is to help ensure the continued availability of the existing stock of sites and premises in economic use and in particular in the more sustainable larger settlements in the borough.</p> <p>The Local Plan will include a specific policy which will identify existing Economic Development Areas, safeguard their continued economic use and provide for their appropriate expansion. For clarity this approach should be set out in a dedicated criterion in the policy.</p> <p>Outside the identified Economic Development Areas covered above, it is considered that expansion of existing business premises in Maidstone and the rural service centres should be allowed for provided the site is in an appropriate location and suited to the use. In addition, the blanket restriction on changes of use to non-economic uses in the current policy does not provide any flexibility if, for example, there is no prospect of the premises being suitable for business needs. It is therefore recommended that the retention of such sites should also be subject to suitability and economic viability considerations.</p>

Key issues Arising from Representations	Responses and Plan Changes
	<p><u>Plan changes</u></p> <p>Add a criterion to refer to the identification and planned expansion of existing Economic Development Areas at Maidstone and the rural service centres.</p> <p>Revise criterion 1 to set out the approach to the retention and expansion of existing premises (outside the identified Economic Development Areas) in Maidstone and the rural service centres including the omission of the blanket restriction on changes of use.</p> <p>Delete criterion 2 which duplicates criterion 1.</p>
<p><u>Policy CS8 Issue 3: The 10,000 jobs target</u></p> <p>Representations variously query the basis for the target, and states that it is too high or too low. Some state that the target should be increased relative to the housing target because each home will have more than one person who is economically active. One respondent states that it should be increased in line with representations elsewhere seeking an increased housing target. It is additionally stated that the jobs target cannot be achieved with the housing target of 10,080 dwellings.</p>	<p>The Local Plan will be revised to include targets for the provision of office, industrial, warehousing and retail floorspace rather than a jobs target as agreed at Cabinet on 26 July 2012. These revisions will be made under policy CS1 (borough wide strategy) of the draft Core Strategy 2011. The planning system directly impacts on the amount of development that takes place whereas jobs created/lost is impacted upon by a wider range of factors which planning policy does not influence.</p> <p><u>Plan changes</u></p> <p>Delete reference to 10,000 jobs in the policy and supporting text.</p>

Key issues Arising from Representations	Responses and Plan Changes
<p><u>Policy CS8 Issue 4: Sequential test</u></p> <p>The sequential test in CS8 should not relate to all employment development (including B8, B2 and all B1)</p>	<p>Agreed. The sequential test applies to retail, leisure and office uses only.</p> <p><u>Plan changes</u> Amend wording of CS8 criterion 5 to refer to retail, leisure and office uses only and move the requirement to a separate section at the end of the policy.</p>
<p><u>Policy CS8 Issue 5: New employment at villages not classed as rural service centres</u></p> <p>Representations additionally suggest that the 'local needs' requirement for rural economic development be omitted.</p>	<p>The local plan's overall spatial approach is to limit development in the countryside and to direct development to the borough's more sustainable settlements. It should also be recognised that a strong rural economy can contribute to the overall economic health of the borough and the NPPF promotes the sustainable growth and expansion of all types of business in rural areas (paragraph 28). In this regard, criterion 8 should be amended to omit the term 'local needs', which is not defined, and to allow for the expansion of existing economic development sites in the countryside with the recognition that the scale and impact of such development should be appropriate for a rural location.</p> <p><u>Plan changes</u> Amend criterion 8 to omit the term 'local needs' and to support proposals for the expansion of existing economic development sites in the countryside provided the scale and impact of development is consistent with the site's rural location and that the terms of Policy CS5 (countryside) are met.</p>

Key issues Arising from Representations	Responses and Plan Changes
<p><u>Policy CS8 Issue 6: Warehouse provision</u></p> <p>Representations state that warehousing should not be a priority. Jobs are low skilled and not of the high quality that are being sought.</p>	<p>The employment from warehousing can contribute to the overall range of types of jobs offered in the borough.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy CS8 Issue 7: Distribution of employment land</u></p> <p>It would be better to distribute the entire employment land requirement across the borough with emphasis on brownfield sites within the urban area first. Mixed use development should be promoted close to settlement centres.</p>	<p>The local plan's overall spatial approach is to direct new development to the most sustainable settlements, namely Maidstone and the 5 Rural Service Centres. The employment land requirements take account of the supply from existing vacant premises. The requirements are for <u>additional</u> employment land and the strategic economic land availability assessment will help reveal what additional suitable sites are available both within the urban area and elsewhere. Criterion 8 of Policy CS8 specifically allows for employment use outside these locations where this can be appropriately justified.</p> <p><u>Plan changes</u> None.</p>
Policy CS9: Housing mix	
<p><u>Policy CS9 Issue 1: Strategic Housing Market Assessment (SHMA)</u></p> <p>House builders should determine mix/market/flexibility. Some developers think that the housing market will automatically meet need if it is allowed to operate unchecked. Developers would like to use their own</p>	<p>The SHMA looks at need as well as what the market determines is appropriate. While the council accepts that the SHMA is itself a snapshot in time, it provides an accurate reflection that should serve as a starting point for developers.</p> <p><u>Plan changes</u> Make it clearer that the SHMA will be one part of the</p>

Key issues Arising from Representations	Responses and Plan Changes
information rather than the SHMA.	evidence base, but that it is the starting point. Require that developers demonstrate how information from the SHMA has been incorporated.
<p><u>Policy CS9 Issue 2: Housing allocations at smaller villages</u></p> <p>Confusion with CS1 (borough wide strategy) – smaller villages do/don't need housing. Some consultees considered that CS9 was the appropriate policy in which to determine housing distribution for the plan.</p>	<p>CS1 (borough wide strategy) is the appropriate policy for setting the housing distribution strategy for the borough. CS9 determines housing mix and how different types and tenures of housing development should balance against each other.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy CS9 Issue 3: Policy detail</u></p> <p>More detail in policy required/do not cross reference to SHMA. The policy should set specific targets for housing mix.</p>	<p>The SHMA provides a valuable insight into the borough's housing market and this contains a lot of detail. If the policy contained more detail, rather than referring to a document that is easier to update, the rigidity could adversely affect the market situation. Retain flexibility and do not add rigid specifications to the policy.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy CS9 Issue 4: Accommodation for the elderly</u></p> <p>Elderly provision needs to be accounted for. It was considered that the policy did not effectively address the needs of the elderly.</p>	<p>The existing SHMA does address elderly provision in the borough. The updated SHMA will also address elderly provision in the borough.</p> <p><u>Plan changes</u> None.</p>

Key issues Arising from Representations	Responses and Plan Changes
<p><u>Policy CS9 Issue 5: Neighbourhood plans</u></p> <p>Parish councils should have influence over the mix of development, for example in neighbourhood plans.</p>	<p>Neighbourhood plans are different to the purpose of CS9, however, in relation to parish council influence, it is agreed that parish councils do hold valuable local information.</p> <p><u>Plan changes</u> Reference parish councils as a valuable local stakeholder.</p>
<p><u>Policy CS9 Issue 6: Correlation of dwelling size with the Strategic Housing Market Assessment</u></p> <p>Figures from SHMA do not correlate to the stated requirement for extra family size homes.</p>	<p>Family size housing is a requirement identified in the 2010 SHMA. The policy is flexible enough to respond to SHMA updates because it contains a cross reference to the accommodation profiles set out in the SHMA. Reproducing specific SHMA data in supporting text is superfluous.</p> <p><u>Plan changes</u> Delete specific 2010 SHMA data (dwelling sizes) from the supporting text.</p>
Policy CS10: Affordable housing	
<p><u>Policy CS10 Issue 1: Sub division of sites</u></p> <p>Consultees were concerned that the sub division of sites would enable developers to avoid affordable housing provision by avoiding the threshold.</p>	<p>This issue will be covered in the affordable and local needs housing supplementary document. In the policy, the threshold is being reduced to one unit, which will address this concern.</p> <p><u>Plan changes</u> Remove mention from policy as it is now addressed in a different way.</p>

Key issues Arising from Representations	Responses and Plan Changes
<p><u>Policy CS10 Issue 2: Viability</u></p> <p>Policy flexibility – for and against. In relation to viability, some consultees were concerned that if developers were allowed to use a viability argument they would not provide any affordable housing. Some consultees were happy that the viability clause of the policy was included as it allows the policy to be flexible and reasonable.</p>	<p>The policy needs to retain flexibility, otherwise it could be considered both as unjustified in terms of the NPPF, and simply against the viability principles of the NPPF.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy CS10 Issue 3: Affordable housing targets</u></p> <p>Adjustable targets, listen to SHMA, policy is crude, arbitrary percentage. Some developers suggested a graduated policy target e.g. a 20% requirement for 20 dwellings, a 30% requirement for 30 dwellings and a 40% requirement for 40 dwellings and above, or some variation of this. Developers also considered that a 40% uniform target was inflexible and crude, not taking account of viability evidence.</p>	<p>Viability testing, undertaken since the consultation, has informed a more detailed approach to affordable housing targets.</p> <p><u>Plan changes</u> Amend targets in policy to reflect further evidence.</p>
<p><u>Policy CS10 Issue 4: Viability</u></p> <p>The policy needs to be subject to viability testing as per the requirements of the NPPF.</p>	<p>Up to date viability testing has been undertaken on the new affordable housing targets.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy CS10 Issue 5: Relationship between affordable and market housing</u></p> <p>Contradiction in aims – affordable housing versus overall target. If more houses are built in general terms then more</p>	<p>Research has since been undertaken and is ongoing, relating to the housing target for the borough. The council needs to strike a balance between the provision of market housing and affordable housing – it is not as simple as just building more houses. Environmental issues would inevitably apply. Viability</p>

Key issues Arising from Representations	Responses and Plan Changes
<p>affordable housing will be delivered.</p>	<p>considerations also affect this.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy CS10 Issue 6: Contributions towards affordable Gypsy & Traveller accommodation</u></p> <p>The vast majority of respondents did not support the allocation of affordable housing funds from conventional sites being used to support the provision of affordable Gypsy and Traveller pitches.</p>	<p>Evidence work, since undertaken, has proved inconclusive on this issue. There is no clear evidence justifying the inclusion of this element of the policy.</p> <p><u>Plan changes</u> Remove Gypsy and Traveller contributions from policy.</p>
<p><u>Policy CS10 Issue 7: Affordable housing provision in villages not classified as rural service centres</u></p> <p>Rural areas are concerned that they will receive no affordable housing as a result of this policy combined with the spatial distribution of development, defined in CS1 (borough wide strategy).</p>	<p>The local needs housing policy (CS11) will address how those areas that do not receive a supply of market housing, and thus general affordable housing, will be catered for.</p> <p><u>Plan changes</u> None.</p>
<p><u>Policy CS10 Issue 8: Policy detail</u></p> <p>The policy is too prescriptive and this issue is better left to be addressed by the markets operating freely.</p>	<p>Leaving the issue to market forces is not an option. Beside socio-economic arguments, the fact that there is a substantial affordable housing need in the borough illustrates that further intervention is required. In terms of the remaining prescriptive elements of the policy, a lot of the detail will be substituted into the affordable and local needs housing supplementary document.</p> <p><u>Plan changes</u> Retain necessary detail in the policy, but other elements can be covered in the affordable and local needs housing</p>

Key issues Arising from Representations	Responses and Plan Changes
	supplementary planning document.
Policy CS11: Local needs housing	
<p><u>Policy CS11 Issue 1: Clarification</u></p> <p>A lot of responses confused the purpose of this policy with that of CS10 (affordable housing), relating to the general provision of affordable housing through market developments. Other responses were unclear how occupation criteria operate and did not understand why local needs housing might not be available to a person with no connection to the settlement in question.</p>	<p>The purpose of this policy needs to be distinct from that of CS10 (general affordable housing). The confusion relating to occupation criteria stems partly from this. However, there does remain an issue of clarity and how these apply/why they apply.</p> <p><u>Plan changes</u></p> <p>Amend supporting text wholesale to better describe how local needs housing works.</p> <p>Delete the occupation criteria and relocate to the affordable and local needs housing supplementary planning document where more justification and detail can be included.</p>
<p><u>Policy CS11 Issue 2: Defining settlements that the policy covers</u></p> <p>Some consultees considered that this policy was the appropriate point of the document to determine which settlements this policy applies to, i.e. spatial distribution of development.</p>	<p>CS1 (borough wide strategy) is the appropriate policy relating to settlement types and which of these settlements are allocated housing development. There does, however, need to be further distinction as to where exception sites are located. The nature of exception sites is that they would not normally be considered, but an appropriate level of the decision making process still needs to consider sustainability factors.</p>

Key issues Arising from Representations	Responses and Plan Changes
	<p>Plan changes Include criteria relating to the appropriate location of local needs housing.</p>
<p><u>Policy CS11 Issue 3: Conformity with the NPPF</u></p> <p>Some consultees considered that this policy did not conform to the Localism Bill/draft National Planning Policy Framework (NPPF) as they were.</p>	<p>The Localism Bill was enacted in 2011 and the NPPF was published in 2012. All policies have been amended with this in mind.</p> <p>Plan changes Incorporate appropriate elements of the NPPF into CS11.</p>
Policy CS12: Gypsy, Traveller and Travelling Showpeople accommodation	
<p><u>Policy CS12 Issue 1: Gypsy & Traveller Accommodation Assessment (GTAA)</u></p> <p>The current GTAA is not robust or credible and, as policy is based on it, the policy is therefore no longer credible either. There is a need to explain how the current pitch figure evolved from the GTAA. Several representations commented that 71 pitches seems a high level and several others commented that this figure was too low to reflect the reality of the situation. There were a number of comments that the GTAA did not cover the whole of the plan period and questions have been asked about how we are treating any completions from the period from 2006 to 2011.</p>	<p>A new Gypsy and Traveller and Travelling Showpeople Accommodation Assessment has been completed by Salford University. This assessment reveals a need for some 157 Gypsy & Traveller pitches and some 9 Travelling Showpeople plots between October 2011 and March 2026. These targets have been approved by Cabinet for inclusion in the local plan at its meeting in March 2012.</p> <p>The plan period will be extended to 2031 which means that the pitch and plot requirements have needed to be rolled forward a further 5 years by Salford University. This results in a Gypsy pitch target for 2026-31 of 30 pitches and a Travelling Showpeople plot target of 2 for the same period. The requirements for the whole plan period (2011-31) become 187 pitches and 11 plots.</p> <p>Permanent consents granted since October 2011 contribute</p>

Key issues Arising from Representations	Responses and Plan Changes
	<p>to the achievement of these targets. Policy CS12 should be amended to include these updated targets (including the intervening targets for the 5 year periods 2011-16, 2017-21, 2022-26 and 2027-31).</p> <p>Plan changes: Amend Policy CS12 and the preceding text to include the pitch and plot targets derived from the new Gypsy & Traveller and Travelling Showpeople Accommodation Assessment for the period 2011 to 2031.</p>
<p><u>Policy CS12 Issue 2: Policy criteria</u></p> <p>A number of issues were raised about the detail of the criteria in the policy:</p> <ul style="list-style-type: none"> • The policy should be worded in the positive; “permission will be granted when...” • Criterion 1 (accessibility): the terms used are too vague • Criterion 2 (landscape): the criterion is too onerous • Criterion 4 (flood risk): the Environment Agency’s maps are a crude tool and site specific Flood Risk assessments should be referred to. The Environment Agency (EA) states that temporary/seasonal sites are acceptable in flood risk areas • A biodiversity criterion is needed (Kent Wildlife Trust) 	<p>To bring this policy into line with others in the local plan, it should be amended to refer to the conditions when consent will be granted, rather than when it will be refused. For clarity, a further addition should be made to the policy that permission will also be granted on the sites specifically allocated for this use.</p> <p>Criterion 1: This criterion should be revised to be more specific about what ‘sustainable modes’ are namely on foot, by cycle or public transport. It is not accepted that the criterion is vague. Government guidance points to the importance of access to health and education facilities and in view of the rural nature of many of the Gypsy sites proposed this is considered to be a relevant consideration. Nonetheless, incorporating specific distance thresholds in the policy is not recommended as these would of necessity be arbitrary. Indeed it is recognised that accessibility will be a matter of judgement as this will depend upon such matters as the condition and nature of the connecting routes and the</p>

Key issues Arising from Representations	Responses and Plan Changes
	<p>regularity and destination of bus services.</p> <p>Criterion 2: Landscape impact is considered to be a critical consideration. The criterion would be improved if it were more explicit about the factors which would govern the judgement about landscape impact, namely the impact on landscape character, as set out in the landscape character assessment, the cumulative landscape impact arising from the development in conjunction with other caravans and the extent to which the development would be screened by existing, permanent landscape features. The scope for additional planting to supplement existing features should also be usefully recognised in the policy.</p> <p>Criterion 4: This criterion would be improved by specific reference to flood zones 3a and 3b rather than 'an area liable to flood'. In addition, the actual flood risk (or lack of risk) is sometimes confirmed through a site specific Flood Risk Assessment (FRA) as these can offer a more refined analysis than the Environment Agency's (EA) flood risk maps alone. This should be reflected in the policy with the clear caveat that any such FRAs must have the approval of the EA. The view of the EA regarding sites with temporary consent is not accepted in this case. Experience of planning applications in the borough and EA advice on them is that Gypsy and Traveller applications for temporary permission are also regarded as highly vulnerable to flooding. The key issue is the nature of the occupation, i.e. that the caravan is used as a primary residence albeit that the consent is time limited for a period of years.</p>

Key issues Arising from Representations	Responses and Plan Changes
	<p>In addition, an ecology criterion should be added to the policy. Gypsy sites are frequently proposed on rural sites which have the potential to be of ecological value. In such cases, habitat and species studies are needed to identify the potential for ecological impacts and to identify whether these can be addressed through mitigation.</p> <p>Criterion 3, which relates to highways access, would benefit from the clarification 'by vehicles using the site on a regular basis'.</p> <p>Plan changes: Reword policy CS12 (1) to refer to health/education facilities being accessible from the site preferably on foot, by cycle or by public transport.</p> <p>Reword CS12 (2) to specify the key landscape considerations of impacts on landscape character.</p> <p>Add to CS12 (3) 'by vehicles using the site on a regular basis'.</p> <p>Add a new criterion requiring ecological survey and the confirmation of arising mitigation and enhancement measures.</p>

Key issues Arising from Representations	Responses and Plan Changes
<p><u>Policy CS12 Issue 3: Affordable pitches</u></p> <p>There was uncertainty for some respondents whether affordable pitches on public sites would contribute to the target number of pitches. Another questioned how quickly the financial contributions towards affordable pitches would be accumulated.</p>	<p>An addition to the text preceding the policy should be made to clarify that any affordable pitches delivered would indeed contribute to the overall pitch target. In the first part of the plan period, 15 public pitches will be delivered using the £1.3million Homes & Communities Agency grant.</p> <p>The requirement in Policy CS10 (affordable housing) to seek financial contributions towards affordable Gypsy pitches will not be pursued. A consequent change is needed to remove the cross reference in Policy CS12 to that aspect of Policy CS10.</p> <p>Plan changes: Add text to confirm that affordable pitches as well as private sites contribute to the achievement of the pitch target.</p> <p>Omit the sentence 'financial contributions will be sought for the provision of affordable pitches for affordable rent as set out in Policy CS10 as part of the overall affordable housing requirement'.</p>
<p><u>Policy CS12 Issue 4: Site allocations</u></p> <p>A number of representations request that Gypsy site allocations be made as soon as possible. Large housing sites should include Gypsy pitches. Some representations state that a more even borough distribution of pitches should be achieved.</p>	<p>Gypsy and Traveller site allocations will be made in the Local Plan. The criteria in the policy will be applied in the allocation of sites and this could usefully be clarified in the preceding text as could the national planning policy requirement that local planning authorities should demonstrate a 5 year supply of housing land. Allocated sites should be used in preference to granting consent on windfall sites.</p> <p>At its starting point the search for new Gypsy sites for</p>

Key issues Arising from Representations	Responses and Plan Changes
	<p>allocation will encompass the whole of the borough. As for conventional housing, sites to be allocated will need to be suitable and available as well as being deliverable now, or at a point in the future. When sites are assessed for their suitability in planning terms, recognised planning constraints must be given weight such as the AONB and Green Belt designations, alongside areas of flood risk. Just as the distribution of land with significant planning constraints is uneven, the availability of suitable sites which are acceptable in planning terms will be, in reality, uneven. A pre-determined 'quota' approach would fail to recognise that site allocations should stem from an objective planning assessment of candidate sites, alongside an assessment of their availability and deliverability, so that the most appropriate sites are allocated.</p> <p><u>Plan changes</u></p> <p>Amend the preceding text to confirm that the policy criteria will guide both the determination of planning applications and the allocation of sites in the Local Plan.</p> <p>Amend the preceding text to refer to the requirement in 'Planning for Traveller sites' for local planning authorities to demonstrate a 5 year supply of Gypsy sites, that allocated sites should be used in preference to granting consent on windfall sites and that there is a preference for sites adjacent to settlements.</p>

Key issues Arising from Representations	Responses and Plan Changes
Policy CS13: Historic and natural environment	
<p><u>Policy CS13 Issue 1: Definition and scope of natural assets</u></p> <p>A number of respondents voiced concern that the wider landscape and assets such as hedgerows and trees would not be properly encompassed within 'natural assets'.</p>	<p>The policy name and the associated text can be improved to ensure it reflects the terminology in the NPPF and is more specific in terms of 'natural assets' defined within the policy.</p> <p><u>Plan changes</u> Amend the policy name, the policy itself and the associated text to "Historic and Natural Environment".</p>
<p><u>Policy CS13 Issue 2: Landscape</u></p> <p>Reference to landscape designations and the importance of ensuring appropriate protection is also considered to be inconsistent.</p>	<p>It is agreed that landscape is a core policy matter better dealt with under CS13.</p> <p><u>Plan changes</u> Move supporting text and policy relating to landscape from CS5 (Countryside) to CS13.</p>
<p><u>Policy CS13 Issue 3: Loss of agricultural land</u></p> <p>Criticism has been expressed over the lack of protection for higher grade agricultural land.</p>	<p>The economic issues of loss of agricultural land are best addressed in policy CS5 (countryside) whilst the role of soil in contributing to biodiversity is better dealt with under CS13.</p> <p><u>Plan changes</u> Amend supporting text and add a reference to high grade agricultural land in policy CS5 (countryside) and its supporting text. Add an explanation of the role of soil to biodiversity to the supporting text of CS13.</p>

Key issues Arising from Representations	Responses and Plan Changes
<p><u>Policy CS13 Issue 4: Habitat connectivity</u></p> <p>Views have been expressed relating to the lack of specific references to the importance of ensuring habitat connectivity through enhancing and extending linkages as opposed to just protecting those that currently exist.</p>	<p>Policy CS13 can be more definitive about its support for improved habitat connectivity and promote the need to act on opportunities to enhance and extend linkages as well as protect existing linkages.</p> <p><u>Plan changes</u> Amend supporting text and policy wording for improved habitat connectivity.</p>
<p><u>Policy CS13 Issue 5: Public rights of way (PRoW)</u></p> <p>The policy does not address the need to protect the existing public rights of way network or to create new links to the existing network to help improve connectivity.</p>	<p>Policy CS13 can provide better safeguarding for the existing public rights of way network and more guidance on improving and enhancing the network.</p> <p><u>Plan changes</u> Amend supporting text and policy wording to safeguard the existing public rights of way network and improve connectivity.</p>
<p><u>Policy CS13 Issue 6: Climate change</u></p> <p>The issues of concern to respondents include the lack of a reference to water shortages in policy criterion 5 together with a lack of recognition of the Water Framework Directive within the policy and supporting text generally.</p>	<p>The issue of climate change should be broadened to incorporate references to drought, water storage and water quality into the supporting text. The local plan should encapsulate the aims of the Water Framework Directive in order to help the local authority meet its responsibility to not compromise the achievement of UK compliance with EC Directives.</p> <p><u>Plan changes</u> Amend wording of supporting text to add a new section on the Water Framework Directive.</p>

Key issues Arising from Representations	Responses and Plan Changes
<p><u>Policy CS13 Issue 7: Historic environment</u></p> <p>A key concern is the lack of recognition of heritage assets such as conservation areas, listed buildings and historic parks within the policy.</p>	<p>The policy name and the associated text can be improved to ensure it reflects the terminology of the NPPF and is more specific in terms of 'heritage assets' defined within the policy.</p> <p><u>Plan changes</u> Amend policy name, policy criteria and associated text to replace "natural assets" with "historic and natural environment".</p>
<p><u>Policy CS13 Issue 8: Open space provision</u></p> <p>Not enough detail has been provided as to how open/green space deficiencies will be identified and addressed.</p>	<p>The policy and its supporting text would benefit from including more definitive advice as to how deficiencies in open space and facilities will be identified and how those deficiencies will be expected to be met. Reference should be made to the Open Space Development Plan Document and the local standards it contains.</p> <p><u>Plan changes</u> Amend supporting text to explain how open space deficiencies will be met and cross reference the policy to the Open Space Development Plan Document.</p>
Policy CS14: Infrastructure delivery	
<p><u>Policy CS14 Issue 1: Reference to potential reduction in community infrastructure levy (CIL) requirement</u></p> <p>Respondents are concerned that CIL must be charged in full to all developers, the general concern being that the last paragraph of Policy CS14 and the supporting text para 8.9</p>	<p>Some types of development are automatically exempt from CIL (e.g. affordable housing, social housing, development used for charitable purposes) so the policy can not simply say that CIL will be charged on all development.</p> <p>Viability testing (ongoing) will help to determine what the CIL levy will be, or whether the council will use a range of levies</p>

Key issues Arising from Representations	Responses and Plan Changes
<p>readily commits the Borough Council to consideration of reduced CIL contributions.</p>	<p>for housing, employment, retail etc. Once the CIL levy is adopted, it will be applied on all development that meets the qualifying criteria and this will be non negotiable. This needs to be reflected more clearly in the policy.</p> <p><u>Plan changes</u> Delete paragraph 4 of Policy CS14 and amend the policy to make clear that CIL will be charged to all developments that meet the qualifying criteria, as set out in the charging schedule. Amend the supporting text to ensure consistency with the above.</p>
<p><u>Policy CS14 Issue 2: The role of CIL and the need to prioritise infrastructure</u></p> <p>A number of respondents expressed concern about how infrastructure in the borough will be funded.</p>	<p>The supporting text lacks detail on the intended role of CIL and the importance of prioritising critical infrastructure schemes to ensure the local plan is deliverable.</p> <p><u>Plan changes</u> Amend supporting text to explain the role of CIL. Include infrastructure priorities in the policy and supporting text, and re-consult on the policy through public consultation (regulation 18).</p>