

Maidstone Borough Council

Local Plan Review

Scoping, Themes and Issues

Consultation (Regulation 18)

July 2019



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Chair of Strategic Planning and Infrastructure Committee

[to be agreed after SPI Committee]

CHAPTER 1 - INTRODUCTION

We are at the first consultation stage of the review of the Maidstone Borough Local Plan. The purpose of this document is to set out – and get views on – the key issues that the Local Plan Review will need to address. This will help MBC decide what the overall scope of the review should be.

The issues are, potentially, wide ranging and some are quite technical in nature. This document provides the background we think you might find useful. We have also prepared a ‘bitesize’ summary document which is available separately.

Most of this initial document is structured under key ‘issues’ such as ‘ensuring a sufficient supply of affordable housing’ or ‘addressing climate change’. Where possible - and recognising that we are at an early stage - we have set out initial considerations for how a particular issue could be addressed. In addition to considering the themes and issues in this document we are seeking your views on what the plan ought to contain.

The council’s Strategic Plan ([insert link](#)) has played an important role in framing this document. Amongst other things the Strategic Plan is clear that the council will embrace future growth and will play its part to ensure associated infrastructure is planned for and delivered. As we are particularly interested in your views about how we can best embrace growth, we have posed the following set of seven overarching questions that apply to the whole of the document and which we would also like you to consider as you read it.

OQ1 – What can the Local Plan Review do to make the growth we need ‘good growth’?

OQ2 – What could the Local Plan Review do to help make our town and village centres fit for the future?

OQ3 – How can the Local Plan Review ensure community facilities and services are brought forward in the right place and at the right time to support communities?

OQ4 – What overall benefits would you want to see as a result of growth?

OQ5 - What infrastructure and services, including community services and facilities, do you think are the most important for a successful new development?

OQ6 – How can the Local Plan Review help support a thriving local economy, including the rural economy?

OQ7 – How can the Local Plan Review ensure we have an environmentally attractive and sustainable borough?

More detailed consultation questions are included throughout the main body of this document. You do not need to answer all the questions; just focus on the ones which are of particular interest to you.

As stated, we are at an early stage. Subsequent stages will become more and more detailed as we gather together the evidence and assess and refine the potential ways forward. Options and choices will narrow down and become more specific and the next consultation stage to follow this one will be on a 'preferred approaches' style document. We will then be working towards producing a full draft of the Local Plan Review (the 'pre-submission' plan) for public consultation. This will be the version of the plan we intend to submit for independent Examination.

More evidence is being prepared to support the Local Plan Review. Public consultation feedback will be used in conjunction with this evidence and other assessments and information to inform the future iterations of the Local Plan Review.

How you can respond to this consultation

Please submit your comments online here [\[add link\]](#) or use the dedicated response form.

The deadline for your response is **5pm Friday 27th September 2019**.

CHAPTER 2 - BACKGROUND TO THE LOCAL PLAN REVIEW

Maidstone Borough Council's (MBC's) activities impact on the lives of people living and working in the borough in a variety of ways. From collecting refuse from homes and businesses, keeping our public open spaces clean, tidy and fit for purpose, actively intervening to make the borough 'open for business', managing the housing register and finding safe places to live for those in greatest housing need, all the way to managing the elections in the borough, the council's responsibilities and activities are diverse.

This responsibility is reflected in MBC's recently adopted Strategic Plan which highlights our responsibility "to make every effort to deliver its services and produce cohesive plans for – economic, environmental, social and cultural prosperity. We have stewardship of our future and it is important that we get it right."

MBC is also a 'local planning authority'. This means the council makes the decisions on planning applications and is responsible for preparing a 'Local Plan' for the borough.

What is a Local Plan and what does it do?

A Local Plan is a document produced by councils across the country which guides the way new development will happen over the coming years. It provides the key framework for future decisions on planning applications. It sets out how much new development is needed, where it should be built and what supporting infrastructure such as roads, schools and health centres should be provided. It also guides the quality of development. Like the Strategic Plan, the Local Plan is a forward-looking document. It can be thought of as a blueprint for the future growth of the borough. It is relevant for anyone interested in the future success of the borough - residents, workers, businesses, landowners, developers and infrastructure providers.

Maidstone's Local Plan is not concerned simply with new development. The planning policies and designations it contains also help to protect what is most valued in the borough – landscapes, historic buildings, wildlife habitats – by ensuring that new development is directed away from the locations that are the most sensitive and new development is planned in a way which enhances the overall quality of the borough. Its policies and proposals also have the potential to positively affect communities by adding social value.

There is already a Local Plan in place for this borough. The Maidstone Borough Local Plan was 'adopted' (finished) in October 2017 and it looks ahead to 2031, anticipating and planning for the new homes, business premises, shops and infrastructure needed over the coming years.

What is the Maidstone Local Plan Review?

Whilst it might seem early to start a review, there are some key influences why this needs to be done;

1. MBC has adopted a new Strategic Plan which sets its aspiration for the borough through to 2045 and how we are going to achieve it.
2. The independent Planning Inspector who examined the adopted Local Plan decided that an early review of the plan would be needed (see Policy LPR1 in the adopted Local Plan)
3. The Government now requires Local Plans to be reviewed at least every five years.
4. National planning policy – in the form of the National Planning Policy Framework (NPPF) and the associated guidance – has been updated since the Local Plan was adopted. This is important as MBC's Local Plan needs to stay in line with the Government's requirements for example in terms of new housing numbers

We will take these matters in more detail in turn;

1. Maidstone has ensured that its Strategic Plan has been produced prior to the start of the Local Plan Review. It contains ambitious priorities that recognise the potential of the borough whilst setting long terms aspirations that will benefit our residents, businesses and partners now and in the future. The Strategic Plan makes it clear that a fundamental way to achieve our aspirations is by being good stewards and ensuring we take a long term view. As the plan states “the choices we make today will impact on the state of our environment and the quality of life enjoyed by our residents decades from now.” Fundamentally this is why it is so important for the council to have its long-term Strategic Plan in place with a Vision to lead us towards a planned future where we embrace controlled growth.

Our Vision is “Maidstone - a vibrant, prosperous urban and rural community at the heart of Kent where everyone can realise their potential”

The Strategic Plan sets out the council's aspiration for Maidstone through to 2045 and how we are going to achieve it.

The Vision translates into priorities and outcomes – reproduced below – which emphasise the council's role in directing and delivering positive growth with its partners that also seeks to add social value from new development. The Local Plan Review will play an important role in respect of these priorities and this will be elaborated on throughout this document



The Local Plan Review will also contain a vision; this could draw heavily on that contained in the Strategic Plan and adapted to correspond with the land use focus of the Local Plan Review. The proposed vision and objectives for the Local Plan Review will be included in the later preparatory stages as the content of the plan becomes more specific, informed by the evidence which supports it.

2. The current Maidstone Borough Local Plan was adopted in October 2017 following extensive public consultation and independent examination by a Planning Inspector appointed by the Secretary of State. It covers the period up to 2031. It is a comprehensive local plan containing a range of policies which guide development in the borough. It also sets out where growth will meet local housing and employment needs.

There are four types of policies in the Local Plan (highlighted in bold below), 168 policies in all which are set out over eight chapters:

- a. Introduction to Maidstone Borough Local Plan
- b. Key Influences – including national policy and guidance, and other complementary plans and strategies.
- c. Spatial Portrait – setting out the Vision and Objectives for the Plan

- d. **Strategic Policies** (31) – identifying the Spatial Strategy of where growth will go, setting strategic policy for the larger settlements in the borough, and policies managing strategic cross-borough issues including housing mix, economic development, sustainable transport and development in the countryside.
- e. **Strategic Site Policies** (95) – identifying sites which will deliver the homes that Maidstone required to meet local need (66), detailed policies for broad locations for housing growth (3), detailed site allocations policies for Gypsy & traveller accommodation (16), detailed site allocation policies for retail and mixed use (6), and detailed site allocation policies for employment (4).
- f. **Development Management Policies** (26) – setting out how planning applications will be determined on local matters including management of the natural environment, design and density, and management of open spaces.
- g. Development Management Policies for the town centre (3);
- h. Development Management Policies in the countryside (12);
- i. **Monitoring & Review Policy** (1)

Policy LPR1 of the adopted Local Plan sets out a requirement to undertake a review of the Local Plan and includes a list of specific matters which an early review of the plan needs to consider.

Policy LPR 1 Review of the local plan

The council will undertake a first review of the local plan. The matters which the first review may need to address include:

- i. A review of housing needs;
- ii. The allocation of land at the Invicta Park Barracks broad location and at the Lenham broad location if the latter has not been achieved through a Lenham Neighbourhood Plan in the interim;
- iii. Identification of additional housing land to maintain supply towards the end of the plan period and, if required as a result, consideration of whether the spatial strategy needs to be amended to accommodate such development;
- iv. A review of employment land provision and how to accommodate any additional employment land needed as a result;
- v. Whether the case for a Leeds-Langley Relief Road is made, how it could be funded and whether additional development would be associated with the road;
- vi. Alternatives to such a relief road;
- vii. The need for further sustainable transport measures aimed at encouraging modal shift to reduce congestion and air pollution;
- viii. Reconsideration of the approach to the Syngenta and Baltic Wharf sites if these have not been resolved in the interim; and
- ix. Extension of the local plan period.

The target adoption date for the review of the local plan is April 2021.

The positive decision to prepare a Local Plan Review demonstrates the council's commitment to take active control over the borough's future growth. Through the review, we will locally shape, inform and make decisions about the locations for new development. This will help avoid 'planning by appeal' in the future. In the worst case, authorities which do not make sufficient progress preparing local plan risk having the plan prepared for them by central government.

3. It is very important that the plan is kept up to date – overall, decisions on planning applications should follow what it says. Having an up to date plan is a key way to make sure that the council keeps control of the new homes needed in future and avoids 'planning by appeal'. The NPPF now requires plans to be reviewed at least every five years.

This is a **review** of the adopted Local Plan, not a completely new plan. Some aspects of the current plan will not need to be updated or changed. Others will need to be amended because of changes to national planning policy or other significant changes of circumstances. One change will be extending the number of years that the plan covers - to at least 2037 – and dealing with the additional new development requirements which that will bring. Further key alterations will be needed because of Government changes to the calculation of housing requirements which results in a significant increase in the number of new homes which will be needed.

4. England has a town and country planning system that is 'top-down' in nature with central Government taking a significant, directing role towards local planning authorities like MBC. The Government's approach to town and country planning, which includes the preparation of Local Plans, is prescribed in its 'National Planning Policy Framework' (NPPF). The NPPF provides overall national guidance, policy and objectives that local authorities like MBC must apply to their areas. The NPPF was most recently updated in February 2019 following a substantial revision in July 2018. which has many fundamental consequences for the production of the Local Plan Review and its content.

The purpose of the planning system is to achieve sustainable development to the greatest extent possible. Sustainability has three dimensions; economic – helping to build a strong, responsive and competitive economy; social – supporting strong, vibrant and healthy communities; and environmental – contributing to the protection and enhancement of the natural, built and historic environment. These aspects can sometimes compete with one another and the Local Plan Review will aim to strike a successful balance between the three. A key way this will be considered is through the parallel process of Sustainability Assessment (incorporating Strategic Environmental Assessment). This is explained in greater detail in Chapter 3.

An important component of the Government's ethos is that the development that the country needs – new homes, new commercial premises, community facilities and the associated infrastructure - should be planned. The way to do this is to have a Local Plan in place which anticipates the development required and puts the planning arrangements in place to make it happen in a sustainable way.

How will the Local Plan be reviewed?

Our new Strategic Plan notes that “We invest in regular consultation, engaging with our residents, parish councils, businesses and partners on important issues and decisions that affect and benefit us all. This underpins our decision-making and the direction and journey we will take together.”

The preparation of the Local Plan Review is a public process. Decisions on the content of the plan are made by elected councillors at public committee meetings. Iterations of the Local Plan Review will be open to full public consultation. We have also produced a Statement of Community Involvement which, among other matters, confirms the steps and arrangements for public involvement on the Local Plan Review. [\[insert link\]](#)

In addition to the public's involvement, the Local Plan Review will include a significant degree of collaboration. As the Strategic Plan states, “we value the relationships with partners, both in the private and public sector. We will continue to collaborate so that we use our finite resources to get the best results, particularly in meeting the communities' housing needs, improving health and employment opportunities and delivering sustainable transport and infrastructure solutions.” The Statement of Community Involvement affirms that we will engage on an on-going basis with a range of stakeholders and interest groups as the Local Plan Review progresses.

Producing the plan is only the start of the process; collaboration will need to continue as we deliver the finalised Local Plan Review. The Vision set out in the Strategic Plan is ambitious and the outcome we are seeking to achieve will require working with our partners and key stakeholders across the borough to drive forward positive outcomes. The Strategic Plan recognises that we have a key role in the borough through our direct service delivery as well as the services we commission. Furthermore, it says “We are keen to take an active role in shaping the borough through investing our resources in housing and regeneration as well as leading the development of new communities”. For the Local Plan Review this means that the Council could take an active role in delivering the new growth that is planned.

There are also a number of other key plans and strategies prepared both by MBC and partners which we will pay regard to in preparing the Local Plan Review and we have referred to these throughout.

Following periods of public consultation the Local Plan Review will be independently examined by a Government-appointed Planning Inspector who will consider and challenge its content and any objections to it and reach a decision on its overall ‘soundness’. The Local Plan Review will need to meet the NPPF’s ‘tests of soundness’ as follows:

- “a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.”

These tests will guide the work on the Local Plan Review from the outset. There are also specific legal tests that it will need to pass, including that MBC has engaged positively with its strategic partners as part of its ‘Duty to Co-operate’.

The ‘tests of soundness’ underline the importance of evidence underpinning the content of the Local Plan Review. This evidence needs to be sufficiently up to date to be a sound foundation for the review. We will take a proportionate approach so that resources are focused on the studies which are integral to the plan, that they contain sufficient but not excessive detail and that best use is made of the adopted Local Plan evidence which is still fit for purpose.

We have also completed an initial review of the policies in the adopted Local Plan to check which are likely to need to be amended, based on the information we have at this point. The outputs from this assessment are included in a schedule in Appendix B. For each policy, we indicate whether it is likely to require significant change, limited change or no change and the schedule gives reasons for the conclusions reached.

The timetable for the Local Plan Review is set out in a document called the ‘Local Development Scheme’ which was agreed by the Council in July 2018 [\[inset link\]](#). In line with this programme, the Local Plan Review will be submitted for Independent Examination in March 2021, following three stages of public consultation of which this is the first.

Neighbourhood Plans

Neighbourhood plans are a way that local communities can influence the planning of the area in which they live and work. Parish councils and designated neighbourhood forums can prepare plans for their designated neighbourhood areas.

Neighbourhood planning is very active in Maidstone, and the council takes a positive approach to its duty to assist, confirmed by the Council's Strategic Plan which commits MBC to "working with parishes and community groups on neighbourhood plans."

Two plans have already been completed ('made'): the North Loose Neighbourhood Plan 2015-2031 and the Staplehurst Neighbourhood Plan 2016-2031. At the time of writing, an additional eight plans are in preparation:

- Loose Neighbourhood Plan has recently completed a successful examination and will be subject to local referendum in the near future;
- Lenham Neighbourhood Plan, which is allocating land to house 1,000 homes in accordance with the area's 'broad location' status, and Marden Neighbourhood Plan have both completed first rounds of public consultation; and
- Boughton Monchelsea, Otham, Sutton Valence, Tovil and Yalding Neighbourhood Plans are at various stages of progression towards publication for public consultation.

A further six parishes are designated neighbourhood areas, a first step to producing neighbourhood plans in the future.

The Government requires neighbourhood plans to conform to national policies and be in general conformity with the strategic policies of the adopted Local Plan. The draft plan must be approved by an independent Examiner and pass a local referendum before it can be 'made' by MBC at which point it becomes part of the Development Plan (see diagram in Chapter 3).

Neighbourhood plans can allocate sites for development, including for housing, over and above the sites allocated in an adopted Local Plan. Similarly, the Local Plan Review may need to allocate sites in addition to those included in a neighbourhood plan, to ensure that the new borough-wide growth targets are met in full.

Neighbourhood plans and Local Plans should be complementary to avoid any conflict between policies or land allocations. The Local Plan Review will need to take into account the policies of made neighbourhood plans. Where neighbourhood plans are emerging alongside the review, the parish councils and MBC will need to work together to minimise any potential conflicts. In the case where there is a conflict, neighbourhood plans will need to be in general conformity with the strategic policies of Maidstone's adopted Local Plan and then also with the strategic policies contained in the Local Plan Review. Government legislation requires that where other policies in neighbourhood plans and local plans overlap, the last document to become part of the Development Plan has primacy.

Local plans should now include a housing requirement for designated neighbourhood areas, which reflects the plan's strategy for the spatial distribution of development, i.e. the pattern and scale of development. It is envisaged that housing targets for neighbourhood areas will be set out in the Local Plan Review, based on the spatial strategy.

CHAPTER 3 –A FRAMEWORK FOR THE LOCAL PLAN REVIEW

There are a variety of influences which will impact on the process and content of the Local Plan Review and two are of particular note;

- Maidstone Strategic Plan
- The requirements of the English planning system

Maidstone Strategic Plan (2019-2045)

The Maidstone Strategic Plan sets out the overarching priorities, outcomes and short-term actions to be given particular importance, to deliver the overall Vision. In addition it identifies four cross-cutting themes which are correlated to the short-term actions and, by extension, to the identified outcomes. We will make sure these priorities, outcomes and additional cross-cutting themes are embedded in our approach to the Local Plan Review.

The English Planning System

The degree of prescription in the Government's NPPF, and the guidance contained in the associated National Planning Practice Guidance (NPPG), means that the council does not have a free hand to decide what the Maidstone Local Plan Review should and shouldn't contain. We must also prepare the plan within the framework that national (and European) legislation creates.

The NPPF sets out that Local Plans should include strategic policies, which address the key strategic issues for the borough, as well as policies which will help to inform decision making on planning applications. The strategic policies of the Local Plan Review will need to:

“...set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation”¹

¹ NPPF paragraph 20

We have taken these NPPF strategic themes and attuned them to make them more specific for Maidstone borough, as shown in the table below.

Strategic Theme (NPPF Paragraph 20)	Strategic Issue for Maidstone borough
Set out an overall strategy for the scale, pattern and quality of development and make sufficient provision for	
...Housing (including affordable housing), employment, retail, leisure and other commercial development	Meeting the borough's local housing need and helping to meet needs across the relevant Housing Market Area/s
	Ensuring a sufficient supply of affordable housing
	Ensuring sufficient land and floorspace is provided to support economic growth in the borough and to contribute to the needs of the wider economic market area
	Ensuring that Maidstone has a vital and vibrant town centre which maintains its role in the sub-region and that a network of local centres continue to serve local retail and service needs.
....Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation	Ensuring that the borough's environmental assets such as the Area of Outstanding Natural Beauty, Landscapes of Local Value, the countryside and Green Belt are suitably protected
	Ensuring that the borough's biodiversity and wildlife habitats are suitably protected and managed
	Ensuring that the borough's historic assets are conserved and managed
	Contributing to an overall improvement in air quality, in particular in the Maidstone Air Quality Management Area.
	Managing the risk of flooding from all sources.
	Addressing climate change
...Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)	Ensuring sufficient transport infrastructure is provided to serve the new development that is planned.
	Ensuring sufficient utilities infrastructure is provided to serve the new development that is planned.
....Community facilities (such as health, education and cultural infrastructure);	Ensuring that sufficient provision is made for health and education to serve the new development that is planned.
	Ensuring a sufficiency of parks and open spaces
	Ensuring that sufficient provision is made for community infrastructure

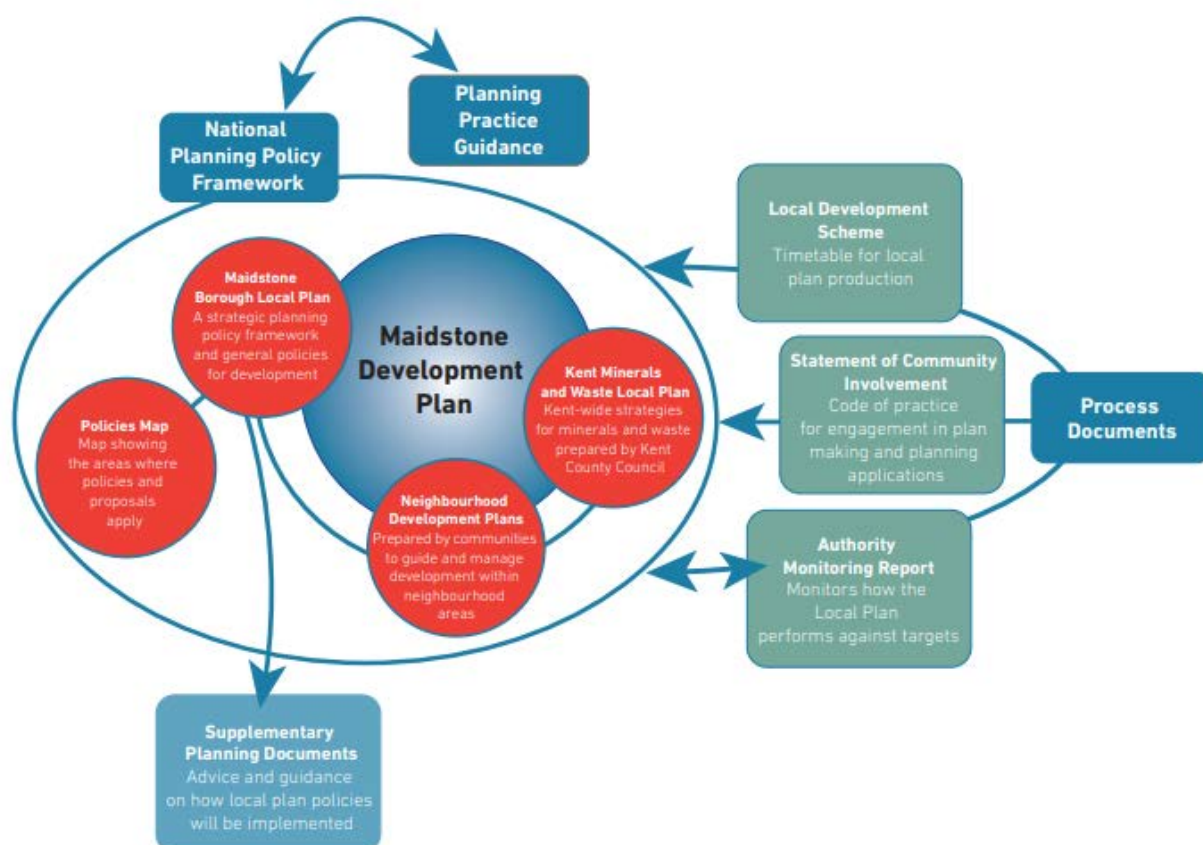
NPPF changes

The NPPF has also been revised significantly since the Maidstone Borough Local Plan was adopted. The most significant changes include:

- a. Strengthening the requirement to produce a Statement of Common Ground concerning how overall need and cross-boundary co-operation is taking place;
- b. Introduction of the standard method for calculating the starting figure for the number of new homes an area needs termed 'local housing need' figure. This is explained in more detail in Chapter 4.
- c. A more detailed requirement to set out the housing needs of particular groups including families, older people, people with disabilities, students, and private renters;
- d. Increased guidance on how rural developments should make use of an area's existing infrastructure/services and that villages should work together to provide rural service networks;
- e. A requirement to make 10% of new homes on major² sites available for affordable home ownership
- f. A more onerous test of 'deliverability' setting out how local authorities should demonstrate availability and deliverability of land for new housing;
- g. Strategic policies to set out a housing requirement figure for designated neighbourhood areas;
- h. A requirement to set out a vision and strategy for economic growth locally;
- i. Promoting the re-use of existing and underutilised land and buildings to help meet local need;
- j. Clarifying that the 'agent of change' (or applicant) should be responsible for mitigating the impact of their scheme of potential nuisance arising from existing development;

² Defined as 10+ homes or a site of 0.5+ ha should this be 1ha

The Development Plan



The Government describes its planning system as ‘plan-led’; this means that decisions on planning applications should align with what the relevant adopted plans say, unless there are convincing planning reasons to do otherwise.

The above diagram illustrates the relationships between the national and local planning documents that apply in the borough. The ‘Development Plan’ is the collective term for the primary documents which are used in planning application decisions, including planning documents produced by Kent County Council (KCC), which is responsible for waste & minerals, MBC and neighbourhood planning authorities.

Currently the Maidstone Development Plan comprises the adopted Maidstone Borough Local Plan (2017), the adopted Kent Minerals & Waste Local Plan (2016), the North Loose Neighbourhood Plan (2016) and the Staplehurst Neighbourhood Plan (2016). Once the Local Plan Review is adopted, it will supersede elements of the adopted Maidstone Borough Local Plan.

Evidence base

We will bring together a proportionate evidence base for the Local Plan Review using current and future studies, to include;

- 1) Sustainability Appraisal incorporating Strategic Environmental Assessment
- 2) Strategic Housing Market Assessment
- 3) Economic Development Needs Study (includes retail assessment)
- 4) Strategic Land Availability Assessment
- 5) Open Space Assessment
- 6) Transport assessments and modelling
- 7) Air quality assessment and modelling
- 8) Strategic Flood Risk Assessment
- 9) Sports Facilities Assessment
- 10) Landscape Character Assessment
- 11) Habitat Regulations Assessment
- 12) Gypsy & Traveller and Travelling Showpeople Assessment
- 13) Viability Assessment
- 14) Minerals Assessment

We may also draw on studies led by other, expert agencies. An example is the Kent Joint Strategic Needs Assessment published by the Kent Public Health Observatory which analyses the key health-related issues in the county.

An important foundation for the Local Plan Review will be the Sustainability Appraisal (incorporating the Strategic Environmental Assessment). This has an important role in influencing and impacting on the content of the review, including on the pattern of future development that is ultimately selected. It is an evidence document prepared in an iterative way and in parallel with the evolution of the Local Plan Review. It provides an assessment of the overall and relative sustainability of the plan's policies and approaches. The first Sustainability Appraisal document – the SA Scoping Report – is available here ([add link](#)).

Plan Period

The current, adopted Local Plan covers the period 2011-2031 and we will need to confirm what additional time period the Local Plan Review will cover.

The Government now requires a local plan to have a 15-year time horizon from the date it is adopted. This means that the end date for the Local Plan Review will need to be at least 2037, given the proposed adoption date of April 2022.

As the Local Plan Review is a 'rolling forward' of the current plan, and not a wholly new plan, there will be an overlap in the time horizon of the two. The development strategy of the adopted Local Plan will continue to be delivered up to 2031, including in particular the 'broad locations' which are currently programmed to be delivered in the post-April 2021 and post-2026 periods (Lenham and Invicta Barracks respectively). The Local Plan Review will address the additional development requirements for the post 2022 period resulting

from the Government's standard methodology (for housing) and other evidence updates as well as the revised NPPF.

It may be pragmatic to have a longer timeframe for the Local Plan Review beyond 2037, particularly if the development strategy includes large scale developments which will take an extended number of years to build. As noted in Chapter 2, the Council's Strategic Plan takes such a longer-term approach, looking ahead to 2045. Choosing a longer plan period would mean we'll need to identify a greater amount of development land to cover the additional years.

A variation on this approach would be for only selected aspects of the plan to look beyond 2037. This could be like the broad locations approach in the adopted Local Plan which signal a longer term 'direction of travel' for major housing development with the detail to follow in subsequent iterations of the Local Plan or, in the case of Lenham, a neighbourhood plan.

With these choices in mind, and where appropriate, the evidence we are collecting is looking further ahead to 2042. This will give MBC information on longer term trends and requirements, recognising that predictions and forecasts become more uncertain the further into the future they look. This approach gives the council the option to select a longer plan period if this looks like being a prudent option.

TQ1 – What do you think should be the end date for the Local Plan Review? Why?

WHAT ARE THE KEY CROSS-BOUNDARY ISSUES?

The NPPF states "Local planning authorities and county councils (in two tier areas) are under a duty to co-operate with each other, and with other prescribed bodies, on strategic matters which cross administrative boundaries."³ It goes to note "Effective and on-going joint working between strategic policy making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere."⁴

Accordingly, in producing the Local Plan Review and associated evidence base we will engage with our council neighbours, KCC and statutory organisations on matters which have cross-boundary implications.

The duty to co-operate is an on-going process; joint working must be effective and 'deal with strategic, cross-boundary matters rather than defer them'⁵. The purpose of the duty is to ensure that we take account of the implications of our plan for our neighbours and our

³ NPPF paragraph 24

⁴ NPPF paragraph 26

⁵ The 'effective' test of soundness, NPPF paragraph 35

statutory partners and that they do the same. Local plans should not be prepared in isolation from what is happening elsewhere. Importantly, these partners will also be involved in delivering aspects of the plan, notably the infrastructure needed to support the new development.

Joint working can take place to differing degrees. The greatest degree of integration is where councils collaborate to prepare a joint plan which could cover a limited number of topic areas that have cross-boundary implications or could be a comprehensive local plan for the combined area. A variation on this would be where councils each produce individual plans but the preparation timetable and overall approach to policy matters is integrated across the extended area. A more focused approach would be for councils to progress their own individual plans to their own independent timetables whilst ensuring that cross-boundary issues are addressed as the plans evolve through the duty to co-operate framework. In any scenario, it is open to a council to accept additional levels of development from a neighbour as part of this process and the duty to co-operate.

To date MBC and its neighbours have all progressed individual plans. Neighbouring authorities are all at varying stages with the preparation of their local plans as follows;

- Ashford Borough Council – adopted a comprehensive Local Plan in February 2019. The plan identifies sufficient land for the amount of new housing that the borough needs for the period 2011 to 2030, set at some 16,872 new homes and similarly provides for the new employment land needed. The adopted Local Plan states that a review of the plan will be adopted by the end of 2025 although at the time of writing no formal timetable for the review (Local Development Scheme) has been published.
- Tunbridge Wells Borough Council – has an adopted Core Strategy (2010) and a Site Allocations Local Plan (2016). A local plan to cover the period to 2033 is in preparation. TWBC produced an ‘Issues & Options’ consultation plan in May 2017 and intends to produce draft Local Plan (Regulation 18 consultation) in August 2019. The Examination is scheduled for Spring/Summer 2021. The local housing need figure for the borough using the standard methodology is some 682 homes/year.
- Tonbridge & Malling Borough Council – has a Core Strategy (2007), Development Land Allocations Development Plan Document (2008) and a Managing Development and the Environment DPD (2010). The ‘Tonbridge & Malling Local Plan’ has been submitted for Examination. The plan covers the period 2011-31. It makes provision for the full number of new homes needed, 13,930, and the matching employment land requirements. The current Local Development Scheme anticipates adoption of the Local Plan by the end of the year.
- Medway - is in the process of preparing a Local Plan for the period 2018-35. There have been 3 stages of consultation so far (2016, 2017, 2018) and a further ‘Regulation 19’ consultation stage planned for this summer. Adoption of the plan is

programmed for 2020. Under the Government's methodology, Medway's housing requirement is 37,143 homes.

- Swale – has adopted a comprehensive Local Plan (2017) which covers the period to 2031. It has commenced a review of this plan which will cover the period 2022-2038. There was an initial consultation stage in 2018 and, following further consultation stage/s, adoption of the plan is anticipated in Autumn 2021 according to the latest Local Development Scheme. Under the Government's methodology, the housing requirement is in the order of 1,054 homes/year.

With the imperative to have an up-to-date Local Plan in place, there has been no apparent appetite for councils to change their own preparation timetables to enable joint plans to be prepared. It is also pertinent that the links between the neighbouring authorities are quite diverse, varying according to both geography and subject matter.

To illustrate, Maidstone town and the Malling area of Tonbridge & Malling are physically closely connected and decisions on development quantum, transportation and air quality matters taken in one area impacts on the other. Work for the adopted Local Plan identified the extent of the Maidstone 'housing market area' stretching westwards to include the Malling area of Tonbridge & Malling borough, including West Malling and Kings Hill. On the other hand the Lenham, Harrietsham and Headcorn areas of this borough were found to fall with Ashford's housing market area. This analysis will be revisited as part of the new Strategic Housing Market Assessment which has been commissioned as part of the evidence for the Local Plan Review.

In a similar vein, the functional economic market area describes the broad geographical area over which the local economy operates. Research done for the adopted Local Plan found links with all our neighbouring boroughs with the strongest of these being with Tonbridge & Malling and Medway. Analysis of the functional economic market area/s will again be part of the forthcoming Economic Development Needs study.

A more comprehensive list of the links between this borough and its neighbours is set out in the table on page X.

As a minimum, we will need to demonstrate that we have complied with the duty to co-operate by engaging actively with our neighbours (and other required bodies). According to the matter at hand, this involvement may need to be more intensive and result in agreed approaches. Evidential studies will look beyond the borough boundaries where appropriate. Where feasible, we will explore the joint-commissioning of evidence with our partners.

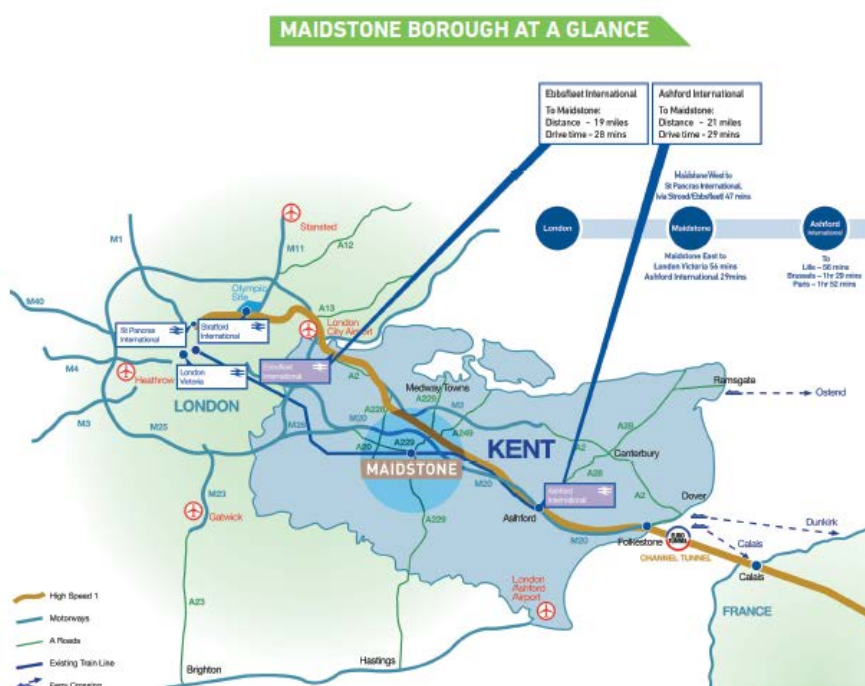
Factors which could affect any future decisions on joint planning include;

- Whether it will demonstrably achieve better planning outcomes for the borough;
- The imperative to maintaining an 'up to date' planning framework for the borough;
- Resource availability; and

- Political decision-making arrangements.

The co-operation that does occur will be formalised through a **Statement of Common Ground**. This statement is signed by the parties involved and affirms that the identified cross boundary issues have been dealt with. For this borough, the strategic bodies which may be involved, (in addition to other local authorities) could include the South East Local Enterprise Partnership, Kent Nature Partnership, infrastructure providers and advisory bodies. These additional signatories will only need to agree with those parts of the SCG that are directly relevant to role and required cooperation.

The map below shows Maidstone's location within Kent and also shows some of the key transport connections for the borough.



The table below reproduces the strategic issues for the borough (taken from [page x](#)), indicates what the potential cross boundary issue may be and indicates which organisations may be party to the Statement of Common Ground.

Strategic Theme (NPPF Paragraph 20)	Strategic Issue for Maidstone borough	Geographical area relevant for the 'Duty to Co-operate' ⁶	Possible Statement of Common Ground signatories
Set out an overall strategy for the scale, pattern and quality of development and make sufficient provision for		-	-
...Housing (including affordable housing), employment, retail, leisure and other commercial development	Meeting the borough's local housing need and helping to meet needs across the relevant Housing Market Area/s	Housing Market Area/s; neighbouring authority areas	[extent of HMA to be confirmed through future evidence]
	Ensuring there is a sufficient supply of affordable housing		
	Ensuring sufficient land and floorspace is provided to support economic growth in the borough and to contribute to the needs of the wider economic market area	Functional Economic Market Area	[extent of FEMA to be confirmed through future evidence] South East Local Enterprise Partnership
	Ensuring that Maidstone has a vital and vibrant town centre which maintains its role in the sub-region and that a network of local centres continue to serve local retail and service needs.	Retail Catchment Area	[extent of RCA to be confirmed through future evidence]
....Conservation and enhancement of the	Ensuring that the borough's	Green Belt	Tonbridge & Malling BC.

⁶ Subject to the selected spatial strategy.

natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation	environmental assets such as the Area of Outstanding Natural Beauty, Landscapes of Local Value, the countryside and Green Belt are suitably protected	Kent Downs AONB; setting of High Weald AONB	Tonbridge & Malling BC; Medway; Swale BC; Ashford BC; Tunbridge Wells BC.
		Landscapes of Local Value	Tonbridge & Malling BC; Ashford BC; Tunbridge Wells BC.
	Ensuring that the borough's biodiversity and wildlife habitats are suitably protected and managed	North Downs Woodlands Special Area of Conservation and, potentially, European designated sites in other boroughs	[extent of impacts to be identified through the Habitat Regulations Assessment]. Kent Nature Partnership
		SSSIs, Local Wildlife Sites, ancient woodland which straddle the borough's boundaries.	Natural England Tonbridge & Malling BC; Ashford BC; Medway; Swale BC; Tunbridge Wells BC.
	Ensuring that the borough's historic assets are conserved and managed	Maidstone borough	Historic England
	Contributing to an overall improvement in air quality, in particular in the Maidstone Air Quality Management Area.	Maidstone AQMA; AQMA in the Malling area of Tonbridge & Malling.	Kent County Council (as highway authority); Tonbridge & Malling BC.
	Managing the risk of flooding from all sources.	Catchments of the River Medway, Stour, Beult & Teise.	Environment Agency; Tonbridge & Malling BC; Medway; Ashford BC; Tunbridge Wells BC

	Addressing climate change	Maidstone borough. [Significant overlap with air quality and transport matters]	[see air quality and transport matters]
...Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)	Ensuring sufficient transport infrastructure is provided to serve the new development that is planned.	Strategic highway network, local highway network, and public rights of way within the borough and, potentially, key junctions falling in neighbouring authority areas. Rail infrastructure within the borough.	Kent County Council; Highways England; Network Rail; Tonbridge & Malling BC; Ashford BC; Medway; Swale BC; Tunbridge Wells BC.
	Ensuring sufficient utilities infrastructure is provided to serve the new development that is planned.	Maidstone borough (subject to the selected spatial strategy)	Utility providers
....Community facilities (such as health, education and cultural infrastructure);	Ensuring that sufficient provision is made for health and education to serve the new development that is planned.	Maidstone borough (subject to the selected spatial strategy)	Kent County Council; West Kent Clinical Commissioning Group; Maidstone & Tunbridge Wells NHS Trust.
	Ensuring a sufficiency of parks and open spaces	Maidstone borough	-
	Ensuring that sufficient provision is made for community infrastructure	Maidstone borough	-

TQ2 – Have we identified the correct cross boundary issues? Please give reasons for your answer.

Bringing the framework together

The table below brings together the Strategic Plan's priorities and outcomes, the NPPF strategic themes and the associated strategic issues for Maidstone borough. This table helps provide the basis for the structure of the remaining chapters of this document.

Each of the priorities in the Strategic Plan has a specific reference colour and this same colour coding has been used throughout this document to help signify the integration of the Strategic Plan and the Local Plan Review. At the start of each section we also denote where there are particularly strong links to one or more of the four cross-cutting objectives from the Strategic Plan. To recap, these are;

- Heritage is respected
- Health inequalities are addressed and reduced
- Deprivation is reduced and social mobility is improved
- Biodiversity and environmental sustainability is respected.

Maidstone Strategic Plan Priorities	Maidstone Strategic Plan outcomes	Strategic Theme (NPPF Paragraph 20)	Strategic Issue for Maidstone borough
Embracing growth & enabling infrastructure Homes & Communities	Council leads masterplanning and invests in new places which are well designed Existing housing is safe, desirable and promotes good health and well being	Set out an overall strategy for the scale, pattern and quality of development and make sufficient provision for	
Embracing growth & enabling infrastructure Homes and communities	Housing need is met including affordable housing Homelessness and rough sleeping are prevented	...Housing (including affordable housing), employment, retail, leisure and other commercial development	Meeting the borough's local housing need and helping to meet needs across the relevant Housing Market Area/s
Embracing growth & enabling infrastructure Homes and communities	Housing need is met including affordable housing Homelessness and rough sleeping are prevented		Ensuring a sufficient supply of affordable housing
Embracing growth & enabling infrastructure A thriving place	Key employment sites are delivered Skills levels and earning potential of our residents are raised		Ensuring sufficient land and floorspace is provided to support economic growth in the borough and to contribute to the needs of the wider economic market area

Maidstone Strategic Plan Priorities	Maidstone Strategic Plan outcomes	Strategic Theme (NPPF Paragraph 20)	Strategic Issue for Maidstone borough
	Local commercial and inward investment is increased		
A thriving place	Our town and village centres are fit for the future A vibrant leisure and cultural offer		Ensuring that Maidstone has a vital and vibrant town centre which maintains its role in the sub-region and that a network of local centres continue to serve local retail and service needs.
Safe clean and green	An environmentally attractive and sustainable boroughConservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation	Ensuring that the borough’s environmental assets such as the Area of Outstanding Natural Beauty, Landscapes of Local Value, the countryside and Green Belt are suitably protected
Safe clean and green	An environmentally attractive and sustainable borough		Ensuring that the borough’s biodiversity and wildlife habitats are suitably protected and managed
Heritage is respected (Cross-cutting objective)			Ensuring that the borough’s historic assets are conserved and managed
Safe, clean & green	A borough that is recognised as clean and well cared for by everyone		Contributing to an overall improvement in air quality, in particular in the Maidstone Air Quality Management Area.
Safe clean and green	People feel safe and are safe		Managing the risk of flooding from all sources.

Maidstone Strategic Plan Priorities	Maidstone Strategic Plan outcomes	Strategic Theme (NPPF Paragraph 20)	Strategic Issue for Maidstone borough
Embracing growth and enabling infrastructure	An environmentally attractive and sustainable borough Sufficient infrastructure is planned to meet the demand of growth		
Safe, clean and green	An environmentally attractive and sustainable borough		Addressing climate change
Embracing growth & enabling infrastructure	Sufficient infrastructure is planned to meet the demands of growth	...Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)	Ensuring sufficient transport infrastructure is provided to serve the new development that is planned.
Embracing growth & enabling infrastructure	Sufficient infrastructure is planned to meet the demands of growth		Ensuring sufficient utilities infrastructure is provided to serve the new development that is planned.
Homes & communities	Community facilities and services in the right place at the right time to support communities		Ensuring that sufficient provision is made for health and education to serve the new development that is planned.
Safe, clean and green	Everyone has access to high quality parks and green spacesCommunity facilities (such as health, education and cultural infrastructure);	Ensuring a sufficiency of parks and open spaces
A thriving place	A vibrant leisure and cultural offer		
Homes and communities	A diverse range of		Ensuring that sufficient provision is made

Maidstone Strategic Plan Priorities	Maidstone Strategic Plan outcomes	Strategic Theme (NPPF Paragraph 20)	Strategic Issue for Maidstone borough
Safe, clean & green	community activities is encouraged. People are safe and feel safe		for community infrastructure

CHAPTER 4 – CREATING A STRATEGY FOR THE SCALE, PATTERN AND QUALITY OF GROWTH

The relevant Strategic Plan cross-cutting objectives for this topic are:

- Heritage is respected
- Health inequalities are addressed and reduced
- Deprivation is reduced and social mobility is improved
- Biodiversity and environmental sustainability is respected

THE AMOUNT OF NEW HOUSING GROWTH

The Strategic Plan is clear that as we embrace growth, we will also meet the required need for housing. This aligns with the Government's NPPF objective to significantly boost the overall supply of housing as well as meeting wider development needs. Furthermore, the Strategic Plan is clear that we need the right type of growth and that this will be pro-actively led by the council, particularly regarding masterplanning and investing in new places which are well designed. The Council is keen to ensure that the growth that occurs benefits local communities and that developers are clear on the expectations of what development must deliver.

The adopted plan's spatial vision, objectives, spatial strategy – and the site allocations which fit within it - will continue to be implemented and this will make a significant indent into the borough housing requirements over the coming years. This means that the review will be concerned with identifying the spatial strategy to achieve the additional growth needed as an outcome of the standard methodology (explained further below), updated evidence requirements and the extended plan period.

We have recently undertaken a **Call for Sites**, requesting information about sites which could be suitable for development in the future. The extent to which the council is seeking to take a pro-active role is signified by this Call for Sites and specifically the council's decision to seek from developers a comprehensive suite of information and evidence to support their submissions. The Call for Sites' important purpose is to give MBC a starting list of candidate sites to consider. As the site registration and processing is a work in progress, this consultation document does not include any conclusions about the submitted sites. In due course the outcomes of the sites assessment will be compiled into a single report called a Strategic Land Availability Assessment which will be one of the evidence documents underpinning the Local Plan Review.

So what is the scale of the housing growth we will need to plan for?

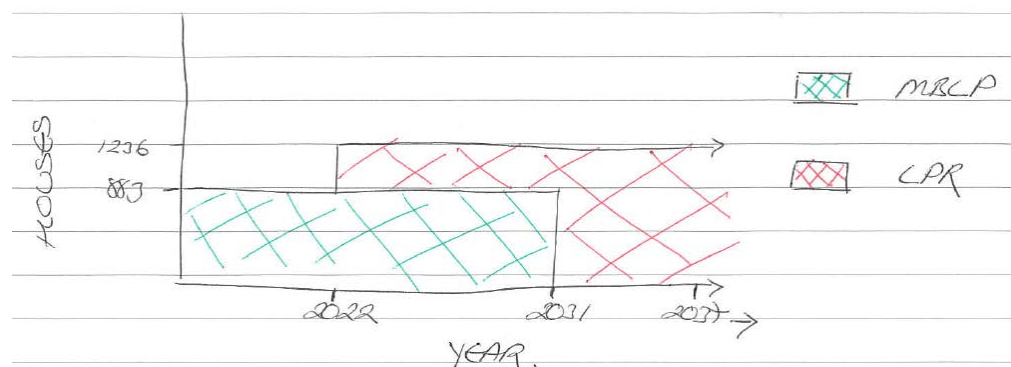
The Government introduced a standard way to calculate an areas new housing requirement, in November 2018.

The standard approach gives Maidstone borough a starting point 'local housing need' figure of **some 1,236 homes/year**. This is a working figure will apply from 2022 onwards.. This figure is an increase of 40% when compared with the adopted Local Plan target of 883 homes/year. The NPPF goes on to state that "in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for". As things stand, the councils which neighbour Maidstone borough are, or are intending to, meet their housing requirements within their own boundaries.

The standard approach caps the potential increase in an area's housing requirement to no more than 40% of the target in an adopted local plan. An advantage of this standard approach is that there will be less dispute over what the housing target for the borough should be; the Government confirms – through its National Planning Policy Framework –its expectation that the standard methodology will be followed unless there are exceptional reasons to do otherwise.

In any event, the 'local housing need' figure can be expected to change as a result of national data updates. More fundamentally, the Government has already announced that it intends to revise its standard approach following unexpected outputs from the population projections issued in September 2018.

As stated, this Local Plan Review is being prepared whilst the housing planned in the current, adopted Local Plan for the period up to 2031 is still being delivered. We will need to 'top up' our housing supply from 883 dwelling/year to approximately 1,236 dwellings/year from 2022 to 2031, and thereafter identify sufficient sites and locations to achieve the full 1,236 annual figure.



Housing Land Supply

The table below sets out our current housing land supply position.

This includes an allowance from development on windfall sites. A windfall site is one which is granted planning permission for housing which had not been previously identified for housing in a Local Plan. We can include a prediction for how many such sites will get

planning permission in the future in our housing land supply forecast. The revised NPPF changed the definition of a 'windfall site' to include greenfield sites in addition to previously developed sites (aka brownfield land).

The windfall calculation draws on historical data for small (1-4 dwelling) and large (5+ dwelling) windfall sites between 2008/09 and 2018/19. The table below shows the output of this calculation which uses the same method which was examined and accepted by the Inspector for the adopted Local Plan, adjusted to take account of the revised definition.

	Total (2022-37)
Small sites	1,665
Large sites	1,827
Total	3,492

REQUIREMENT		
Local housing need figure (2022-2037) (1,236 x 15 years)		18,540
Projected under supply from the adopted Local Plan @ 2022		100
10% contingency ((18,540+100) x10%)		1,864
Plan requirement (18,540+100+1,864)		20,504
SUPPLY		
Projected remaining supply from adopted Local Plan at 2022 (including remaining extant permissions, existing allocations with/without permission and broad locations between 2022 to 2031)	6,985	
Invicta Barracks post 2031	800	
Potential windfall allowance 2022 to 2037	3,492	
'Known' supply		11,277
BALANCE		9,227

The balance figure is the current estimate of how many new homes the Local Plan Review will need to find sites for.

TQ3 – Do you agree with our housing land supply calculation at this stage?

A key issue is how to achieve the annual rate of housebuilding needed throughout the years of the Local Plan Review. MBC will aim to achieve a deliverable portfolio of sites that will sustain a five year supply and compliance with the Housing Delivery Test.

TQ4 - How do you think the council can achieve a consistent annual rate of housebuilding throughout the Local Plan Review period?

THE PATTERN OF NEW HOUSING GROWTH

As we seek to embrace growth and meet the needs as committed in the Strategic Plan, we will need to consider various locations across the borough and these are described below. To achieve our growth requirements, a blend of these types of sites are likely to need to feature in the Local Plan Review.

Maidstone Town Centre –

The town centre provides various opportunities for embracing the new growth. We have already been working to produce planning guidance for five key brownfield sites, the **Town Centre Opportunity Areas**. Working with landowners, the purpose of this guidance is to help encourage the revitalisation of these sites and in particular to promote their potential for residential-led redevelopment. This is reiterated in the Strategic Plan which commits MBC to developing and delivering plans for the five opportunity sites which are;

- 1) Granada House and Buzz Bingo (formerly Gala Bingo) on Gabriels Hill;
- 2) Mote Road;
- 3) Len House (Robins & Day Peugeot);
- 4) Riverside (including the Baltic Wharf site); and
- 5) the area around Maidstone West station.

The revised National Planning Policy Framework supports the placement of housing in town centres and supports a ‘town centre first’ approach to planning for ‘main town centre uses’⁷. It also now incorporates a specific section about making the best use of land which, amongst other things, expects local plans to achieve significantly higher housing densities in town centres. Whilst the town centre has the potential to realise various benefits of growth, we will also need to be mindful that poor quality development can lead to unacceptable issues in terms of internal space and access to outside communal green space for example.

⁷ Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Rest of Maidstone urban area –

The ‘rest of the urban area’ comprises those parts of Maidstone beyond the town centre. There may be further such opportunities for embracing growth, including sites which are no longer suitable for their current use and which could be re-purposed through the Local Plan Review, or ones which could be used more intensively. This could include regenerating existing housing areas, in particular those managed by our Registered Provider partners.

Edge of Maidstone –

Sites at the edge of Maidstone could contribute to modest outwards extension of the town. Such sites are most likely to be greenfield in nature.

In and at the edge of the most sustainable villages –

Some villages could benefit from new growth. The revised NPPF confirms that housing in rural areas “should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services”⁸.

Countryside sites –

New housing sites in the countryside, away from the most sustainable villages and removed from services and good public transport links generally score more poorly in sustainability terms.

New Garden Communities –

New Garden Communities may also present opportunities for the council to take a proactive role in creating and investing in new places. However, New Garden Communities need to be of a sufficient scale to deliver meaningful supporting infrastructure. The Government defines ‘garden villages’ as being of between 1,500 and 10,000 homes and ‘garden towns’ as being of 10,000+ homes⁹. Such new settlements and major urban extensions are a potential way to help embrace a proportion of the growth the borough needs. This is an approach which has not been followed in Maidstone borough previously.

Small sites –

The NPPF includes a requirement for Local Plans to identify (‘allocate’) at least 10% of its housing requirement on sites of 1ha or less. For the Local Plan Review this could equate to a figure in the order of 1,854 dwellings.

⁸ NPPF paragraph 78

⁹ Garden Communities Prospectus, August 2018

Brownfield sites –

As part of our proactive approach to considering development opportunities, work will be done through the Economic Development Needs Study to test which of the borough's existing industrial estates continue to be fit for purpose. Any which do not have a commercial future could be considered for alternative uses, including for housing, and this chimes with the NPPF expectation that best use will be made of brownfield sites.

Exception sites –

The NPPF urges local authorities to support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local, rural needs. This includes potentially allowing some market housing on these sites to help facilitate development. This could be an avenue for neighbourhood plans to explore.

Entry-level exceptions sites are sites specifically ring-fenced for first time buyers/tenants. Support for the development of such sites is expected unless the need for such homes is already being met within an authority's area.

Other Approaches

Density standards for housing sites –

One of the ways MBC could proactively steer growth into the most sustainable locations would be through increasing development densities.

Building upwards, particularly in the town centre provides opportunities for well-designed development. We could also explore the option of identifying an area of the town centre for a cluster of tall buildings for housing. There could also be the potential to achieve increased densities on those remaining housing allocations in the adopted Local Plan (Policy H1) which do not yet have planning permission. The potential on each site will need to be assessed.

The approach is supported by the NPPF which urges average densities to be significantly increased in town centres and other locations well served by public transport, unless there are strong reasons not to do so. A range of minimum density standards for other areas of the borough should also be considered.

New and improved infrastructure in the town centre would be needed. Consideration would also need to be given to the impact of intensification on local character, the street scene and skyline.

TQ5 – Have we identified all the possible types of housing sites?

TQ6 – What approaches could we use to identify more small sites suitable for allocation in the Local Plan Review?

TQ7 – What approaches could we use to increase the number of new homes being built on brownfield sites and to make brownfield development more viable and attractive to developers?

TQ8 – What factors should we take into account when considering minimum density standards elsewhere in the borough, beyond the town centre?

OTHER TYPES OF GROWTH

ECONOMIC GROWTH

Offices, industry and warehousing

As part of a future spatial strategy for the local economy, we will seek to identify linkages with the spatial strategy for housing, particularly as part of an aim to minimise the number and length of journeys¹⁰. We are also clear that sufficient infrastructure should be in place or planned to meet the demands of economic growth and this is supported by the NPPF which identifies inadequate housing and infrastructure as potential barriers to economic growth¹¹.

To ensure that economic growth is successful, we will assess the requirements of different economic sectors and consider in particular the credentials which successful employment locations share¹², namely;

- Good quality of provision – they may not be ‘Grade A’ but are clean, modern and well maintained;
- Relatively strong public realm attributes – with good servicing areas that present a smart and tidy ‘first impression’;
- Flexibility of space – both in terms of the scale and internal configuration, enabling users to adapt business processes;
- Appropriate space for activity in the area – providing the appropriate size of space, mixes of floorspace types and permitting certain activities to meet prevailing demand trends; and
- Realistic price point compared to nature of stock – enabling businesses to afford space in the area.

As with housing growth, the adopted Local Plan provides a firm foundation for meeting future employment needs for the period up to 2031. The Plan’s approach was to identify extensions to existing successful rural business sites, to pinpoint opportunities in Maidstone town centre for new office development and to allocate land at Woodcut Farm adjacent to

¹⁰ National Planning Policy Framework paragraph 104

¹¹ National Planning Policy Framework paragraph 81

¹² Paragraph 6.16, Maidstone Qualitative Employment Site Assessment (2014), GVA.

Junction 8 of M20 for a substantial new mixed use business park. This site has subsequently received outline planning permission for 45,294sqm of mixed employment floorspace.

The adopted Local Plan also allocates land at Newnham Court for the Kent Medical Campus, a specialist hub for medical-related development. Outline consent for the medical campus was renewed in June 2017 and detailed applications have been consented for a 65-bed hospital and a care facility comprising a mixture of step-down residential, nursing, dementia, rehabilitation and respite care. Both these developments are currently under construction. The campus is part of the North Kent Enterprise Zone. In line with its Strategic Plan commitment to intervene where necessary to deliver key employment sites, MBC has recently submitted a planning application for a £9.5 million Innovation Centre, providing more than 3,500sqm of flexible office space, facilities and support for small and medium-sized enterprises working in the life science, healthcare and med-tech sectors, complementing the campus' existing offer to the medical sector.

The established local plan allocations will be refined only if and when up to date evidence points to the need for a revised planning approach on a particular site.

Types of sites

We recognise that to fully embrace employment growth which meets the needs of different sectors we may be required to consider a variety of different locations and types of site, for example;

Mixed use sites are an avenue which could be explored where complementary uses are co-located on the same site or broad area. There are clear benefits to this approach where large scale new development is planned – for example in the case of a New Garden Community or neighbourhood - as a way of making the new community more self-sustaining by providing some local employment. New infrastructure such as improved transport connections would benefit the local business community as well as residents. Mixed use development in the town centre may also be a way to make particularly efficient use of brownfield sites.

Further, **new business locations** may help. This approach has the particular potential to deliver modern-standard space on a site which can be planned comprehensively from the outset.

Embracing growth may also provide opportunities to make the most of **established, successful industrial estates and business parks** as a way to ensure there is a sufficient stock of commercial premises for new and expanding businesses. There may be scope to redevelop parts of these sites to boost the supply of modern business premises. Additionally, we could explore the scope to extend existing sites to provide land for

additional business growth. This approach can capitalise on existing infrastructure like road and public transport connections and services, although these may need to be upgraded. It could also mean that established firms are able to expand in situ without having to relocate to a new site. Opportunities for extensions may be limited however, particularly in Maidstone town, because existing sites are already surrounded by other land uses.

TQ9 – Have we identified all the possible types of employment sites?

RETAIL & LEISURE GROWTH

The Local Plan Review presents an opportunity to achieve an updated appreciation of the amounts and types of new retail floorspace needed as well as an understanding of future leisure needs as part of the new evidence base.

This will provide a firm foundation for embracing retail and leisure growth and ensuring that such growth is successful. We will consider the matters which could impact on the type and quantity of new retail floorspace and leisure needs, including:

- The potential to upgrade the quality of sub-optimal retail space – either in terms of quality or location
- The changing nature of retail – including on line shopping - and how the town centre can respond by attracting and accommodating modern retailers and linked uses

Work carried out for the adopted Local Plan showed that Maidstone town centre draws shoppers from Medway and Sittingbourne to the north, from the west towards, but not including, Bluewater, Sevenoaks and Tunbridge Wells and from the east towards Ashford. Maidstone town centre performs as a major regional centre for shopping.

Taken as a whole, the retail market is in a highly dynamic phase and in order to embrace this change we will undertake work to predict the implications of these changes at the local level. Perhaps the most fundamental change in the retail sector is the prevalence of multi-channel and home shopping. These ‘special forms of trading’ as they are termed by retail experts, now account for close to 20% of total retail sales nationally. For perspective, this compares to just below 5% of total retail sales in 2008. The growth in on-line sales will have implications not only for the amount, type and location of the demand for new shopping floorspace but also potentially for travel patterns as shopping traffic is partially substituted with home delivery vehicles (often vans) operating from centralised distribution hubs. Conversely ‘click and collect’ points to a continuing need for physical shopping floorspace for people to browse for goods and also as a collection point for online orders.

Many high street retailers have changed their store format/model. For over two decades, high street national multiples have increasingly sought larger modern shop units (over

2,000sqm) with an increasing propensity to locate in the larger national, regional and sub-regional centres. Many retailers now require fewer, larger stores to serve their catchment areas. This trend looks set to continue.

The process of embracing this change has already commenced and will continue into the future. As with employment and housing, the adopted local plan puts the borough on a firm footing including through the allocation of a number of sites for redevelopment and new floorspace. An example is Maidstone East/Royal Mail Sorting Office site which is an edge of centre site is allocated for a mixed use redevelopment of some 10,000sqm of new retail floorspace, 4,000sqm of offices and 210 dwellings. The council has taken the decision to purchase this site with KCC who together are advancing an outline scheme for the site.

The adopted Local Plan also allows for the consolidation of the existing permitted retail floorspace at Newnham Court Shopping Village through redevelopment. The Mall is identified as a longer term redevelopment proposition which would substantially upgrade the quality of this indoor shopping centre and deliver a significant number of new homes (estimated at 400) as part of a comprehensive scheme.

We will proactively seek to understand which future sites we will need to bring forward to support the retail and leisure offer within the town centre for the Local Plan Review. In addition, and as set out previously, increasing the number of town centre homes can promote activity and vitality in the town centre, creating a local catchment of customers for the town centre businesses, during and outside normal working hours.

Types of sites

As we continue to help to shape the borough's retail and leisure offer, we will have regard to national guidance which advocates a 'town centre first' policy when deciding where new shops and leisure uses should be located. This means that a sequential approach is needed to site selection as we look to meet future needs for at least the next ten years¹³. The core of the town centre will be the first preference, although it is recognised that realistic opportunities for large scale redevelopment may prove to be limited with the exception of The Mall, then moving out to look at edge of centre sites next and only when these avenues are exhausted, looking to well-connected out of town sites.

TQ10 - What approaches could we use to identify sites in and at the edge of the town centre for future shopping and leisure needs?

¹³ NPPF, paragraph 85 d)

CREATING A STRATEGY FOR THE SCALE AND PATTERN OF GROWTH

Settlement hierarchy

The settlement hierarchy is a useful tool we can use to illustrate the respective roles and relative sustainability of the borough's settlements. It does not, of itself, prescribe where new development should be directed.

We will review the hierarchy of settlements by assessing available services and facilities. The hierarchy in the adopted Local Plan has three classifications as follows;

1 – Maidstone town

2- Rural Service Centres

Marden, Staplehurst, Headcorn, Harrietsham, Lenham.

3 - Larger Villages

Sutton Valence, Boughton Monchelsea, Yalding, Coxheath, Hollingbourne

Some of the factors which influenced the current hierarchy are the presence of a school, local shops and public transport connections such as access to a train station. It is possible that the sustainability credentials of a particular location can be made better if key improvements can be secured in conjunction with new development.

TQ11 – Do you think there should be changes to the current settlement hierarchy? If yes, what evidence do you have for your answer?

Initial spatial options

A fundamental part of the Local Plan Review process will be considering how we proactively take forward the various forms of growth in a way which can realise its benefits. This means we need to carefully consider the reasonable alternative ways that growth can be managed and that development requirements can be met before selecting the best approach for inclusion in the Review.

There are a number of factors which will help us make our decisions on our preferred spatial strategy and these include making sure infrastructure is planned to meet the demands of growth, deliverability, viability, sustainability appraisal and compliance with national policy and guidance.

In respect of sustainability appraisal, the NPPG confirms the following;

“Reasonable alternatives should be identified and considered at an early stage in the plan making process, as the assessment of these should inform the local planning authority in choosing its preferred approach”¹⁴

This means that we will need to identify distinct and realistic options need for what the spatial distribution of development could be and then assess these in a transparent and reasoned way, in particular through the sustainability appraisal process, to help conclude on the best approach for the Local Plan Review. The sustainability appraisal will be key to, amongst other things, an assessment of the overall and relative sustainability of the emerging options.

As part of our pro-active approach to considering and embracing growth, we have identified some initial spatial strategy options for illustration purposes. At this stage we have focused on options relating to housing. Employment options will be developed when more evidence on the nature and scale of future needs has been collected.

These options are presented in no order of importance and each on its own may not be sufficient to meet full housing needs;

- A. **Maidstone focus.** The ways this option could be achieved have been previously highlighted and include building at higher densities, regenerating existing housing areas, reusing commercial and institutional premises and other brownfield sites in the town for housing or for mixed commercial/housing development and allocating greenfield sites at the edge of Maidstone including, potentially, major urban extension(s).

Focusing significant additional growth in and at the edges of the town raises the following initial considerations;

- In terms of ensuring sufficient infrastructure is planned to meet the demand of growth, this approach could enable best use to be made of the town’s network of existing infrastructure – roads, services and facilities – and we will proactively seek to establish what further ambitious improvements are likely to be needed to address the future demands up to 2037 (or beyond), including by leading discussions with developers around bringing forward the right infrastructure at the right time for our communities.
- Brownfield sites, such as the Town Centre Opportunity Sites, present a wonderful opportunity to help regenerate and revitalise the town. A vibrant stock of business premises also needs to be retained and expanded to help secure the economic future of the town and wider borough.

¹⁴ NPPG paragraph: 017 Reference ID: 11-017-20140306

- Partnership working with Registered Providers (housing associations) may present opportunities to replace outdated homes with new modern stock and realistic opportunities for significant and comprehensive housing estate renewal may be revealed, even if the net number of additional homes that result could be limited.
- The Council would need to take a proactive lead on discussions with housebuilders to ensure housebuilding rates can be sustained and the contribution maximised within such a discrete area of the borough.
- Higher density development, particularly in the town centre, presents opportunities but must also be planned in a way that achieves well-designed development.

B. **Dispersal.** This approach would spread growth and its benefits into key locations across the borough, including Maidstone itself. It is worth noting that the adopted Local Plan's spatial strategy has seen the majority of growth directed towards Maidstone (67%) with a lesser amount (24%) to the borough's main villages (Rural Services Centres and Larger Villages) and the balance (8%) on sites in the countryside.

The dispersed approach raises the following initial considerations;

- In terms of ensuring sufficient infrastructure is planned to meet the demand of growth, this approach could enable best use to be made of the town and villages' network of existing infrastructure – roads, services and facilities – and we will proactively seek to establish what further ambitious improvements are likely to be needed to address the future demands up to 2037 (or beyond) including leading discussions with housebuilders around bringing forward the right infrastructure at the right time for our communities.
- The diversity of sites and locations means that a number of different housebuilders can be building on different sites at the same time, serving differing segments of the local housing market. Supply is not dependent on a limited number of housebuilders and the approach can be a good way to sustain high rates of housebuilding.
- The impacts and benefits of growth are spread across the communities of the borough.

A variant on this approach (Option Bi) could be to further disperse new housing to a fourth tier of villages that more limited facilities than the Rural Service Centres and Larger Villages.

- C. **Focus on planned new settlements and major extensions to existing settlements ('garden suburbs')** – as demonstrated by the Call for Sites exercise which included a Garden Communities Prospectus, Maidstone is committed to embracing all forms of future growth. This option would place emphasis on new settlements and major extensions to achieve the right types of growth for the borough.

The approach raises the following initial considerations. This option is not specific to a particular location or locations in the borough at this stage;

- Growth would be directed to a particular geographical area or areas which means that the impacts and benefits of the growth are more focused on specific local communities. The approach would provide a longer term strategy, including potentially rolling forward into the next iteration of the Local Plan and could present an opportunity for the council to take a leading role on masterplanning and investing in new places, proactively working with housebuilders, developers and infrastructure providers to ensure maximum benefits of growth. A concerted approach to masterplanning could also help to minimise lead in time that would allow us to deliver housing in the medium to longer term.
- This option gives the best opportunity for comprehensively planning a new neighbourhood from the bottom upwards using a masterplanning approach, achieving 'economies of scale' by planning for a new community or neighbourhood which is of a sufficient size to support a school, GP surgery, local employment or highway improvements for example and achieving a range of types and tenures of housing.
- We would need to supplement this approach with additional sites to a) provide housing in the shorter term whilst the new communities are coming on stream; and b) to sustain delivery rates at the required levels.
- This approach has the potential to deliver a significant number of new homes overall.

TQ12 - What is your preferred option for the future pattern of growth (A, B, Bi or C) and why?

TQ13 – For your preferred option, what infrastructure would you want to see brought forward as a priority?

TQ14 – If your favoured option won't achieve the number of new homes needed, at the rate they are needed, what combination of options do you think would be best?

QUALITY OF NEW DEVELOPMENT

MBC's Strategic Plan is clear that well designed places are a fundamental part of embracing growth. The quality of future development is crucial to the council and it will take a lead role in the masterplanning of, and investment in, new places which are well designed.

Throughout the masterplanning process, the council will work collaboratively with developers in the planning and co-ordination of strategic scale development from inception through to delivery on the ground.

To ensure a holistic and successful design that also adds social value, a masterplan should also consider:

- the neighbourhood's character and heritage;
- the creation of mixed communities in terms of land uses and house types, tenures and sizes;
- the provision of a range of open space and leisure facilities with regard to function, size and scale;
- the protection of significant biodiversity and landscape assets;
- the provision of supporting infrastructure, such as public transport, schools, shops, employment and utilities; and
- connecting pedestrian and cycling routes to existing and proposed infrastructure.

The NPPF underlines the importance of good design and describes the creation of high-quality buildings and places as "fundamental" to the planning and development process. To quote - "Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities"¹⁵.

It is also clear that plan making should set a design vision and expectation and that design policies should be developed with local communities, reflecting local aspirations. There may be a particular role for neighbourhood plans in this regard.

A recent example of MBC's action is ***Building for Life 12 Maidstone Edition***. The Council has adopted this assessment tool which consists of 12 design questions that focus on connection and integration of neighbourhoods, the creation of place, the streets and the home. The Maidstone version places particular local importance on;

- vernacular detailing and materials;
- landscaping being integral to good design;
- the importance of streets for all;
- sustainable design principles; and
- biodiversity being integral to good design.

¹⁵ NPPF paragraph 124

It has been designed to support consultation and community participation and to;

- guide masterplans and design codes;
- frame pre-application discussions;
- inform design reviews;
- structure design and access statements;
- support local decision making;
- give a framework to the design section in committee reports; and
- where necessary justify conditions relating to detailed aspects of design.

The Government has produced technical guidance on a 'nationally described space standard' (2015) which sets minimum limits for the internal space within new homes.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf]. To have weight in planning decisions, we would need to incorporate these standards into the Local Plan Review.

TQ15 – Have we identified the correct areas of focus for future masterplanning? What are the reasons for your answer?

TQ16 - Should the national space standards be incorporated into the Local Plan Review? What are the reasons for your answer?

CHAPTER 5 - SCOPING THE STRATEGIC ISSUES

This chapter sets out the remaining strategic issues for consideration in the Local Plan Review. **ISSUE 1 - Meeting the borough's local housing need and helping to meet needs across the relevant Housing Market Area/s**

ISSUE 2 - Ensuring a sufficient supply of affordable housing

The relevant Strategic Plan cross-cutting objectives for this topic are:

- Health inequalities are addressed and reduced
- Deprivation is reduced and social mobility is improved

To help the Council take a lead role regarding housing challenges faced by the borough it has produced **Maidstone Housing Strategy (2016-20)**. This is an overarching plan that guides the Council and its partners in tackling the major housing challenges facing the borough. The strategy is cross-cutting; it promotes the delivery of new homes –both market and affordable – which gives it a strong inter-relationship with the adopted Local Plan and the forthcoming review. Amongst other things, the Strategy indicates that MBC will work with its partners to enable the delivery of new affordable housing and promote the uptake home ownership products such as Help to Buy, Starter Homes and Shared Ownership.

The Strategy also seeks to raise the quality of the borough's existing housing stock, in particular in the private rented sector, and it aims to provide for the homeless and vulnerable residents. The Strategy is due for a review, giving the opportunity to maintain the synergy between it and the Local Plan Review as the latter progresses.

The Strategic Plan confirms that MBC will seek to ensure that housing need is met and this includes affordable housing. It also commits the Council to expanding its role in the delivery of affordable and market rent housing. This may have a variety of benefits including helping reduce homelessness and rough-sleeping in a sustainable way.

Affordable housing

Affordable housing is provided at reduced cost to help those who cannot afford to buy or rent a property at market rates. Office of National Statistics data shows that the median (mid-point) house price in the borough is more than 11 times the median gross annual income of those who work in the borough. This 'affordability ratio' has been on a worsening trend since the beginning of the decade. In 2011 it stood at approximately 8:1.

The NPPF confirms that affordable housing should be part of the overall housing mix on sites of 10 dwellings and above and also confirms that the definition of 'affordable housing' includes;

- Affordable housing for rent;

- Starter homes;
- Discounted market sales housing; and
- “Other affordable routes to home ownership” such as shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

The overall need for affordable housing will be quantified through the forthcoming Strategic Housing Market Assessment. This assessment will also look at the relative contributions that the different affordable housing tenures can make to meeting local needs.

Specialist Housing.

In addition to affordable housing, we will also plan for the homes needed by specific groups as affirmed in the NPPF.

Homes for an ageing population. The number of over 65s in the borough is set to increase by more than 50% between 2019 and 2037¹⁶.

We will plan for these specialist needs, such homes with a greater element of care and, potentially, more smaller homes. This will in turn enable older people to “downsize”, freeing up existing family housing to meet the growing needs of young families in the borough. Additionally, building homes which can be easily adapted will mean older people can stay living in their own homes for longer.

The specific needs and opportunities for older persons’ housing will be identified through the Strategic Housing Market Assessment.

Custom and self-build housing. This is where an individual or group of individuals (or people working for them) build their own home/s to live in. The first owner of the home will have had primary input into its design and layout. At October 2018 there were 293 people registered on the Self-build Register for the borough. 41 of these pinpointed Maidstone as their first choice location. We will analyse this register information, supported as necessary by secondary sources, in the Strategic Housing Market Assessment to quantify the realistic demand for this type of housing over the timespan of the Local Plan Review.

TQ17 - How can the Local Plan Review best plan for the different types of housing which will be needed?

Gypsy & Travellers and Travelling Showpeople

Maidstone borough has a significant resident Gypsy & Traveller community. National planning policy recognises that Gypsies and Travellers have specific site needs. The

¹⁶ 2014-based sub-national population projections

Government's overarching aim is "to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community"¹⁷.

In 2015 the Government revised the planning definition of Gypsies & Travellers to exclude those who have permanently stopped travelling. Additionally however, the 2016 Housing & Planning Act requires assessments to consider the needs of those generally who require caravan based accommodation and this would include those who are culturally Gypsies, whether or not they are actively travelling.

We will take a pro-active approach to assessing the community's need for additional pitches through a forthcoming Gypsy & Traveller Accommodation Assessment. We will also seek to respond to the identified needs by making specific site allocations as part of the Local Plan Review, provided suitable sites can be identified. To this end, Gypsy & Traveller accommodation is one of the uses which was included in the recent MBC Call for Sites.

TQ18 – How can the Local Plan Review best plan for the accommodation needs of Gypsy & Travellers and Travelling Showpeople?

ISSUE 3 - Ensuring sufficient land and floorspace is provided to support economic growth in the borough and to contribute to the needs for the wider economic market area

The relevant Strategic Plan cross-cutting objective for this topic is:

- Deprivation is reduced and social mobility is improved
- Health inequalities are addressed and reduced

The ***Maidstone Economic Development Strategy (2015-2031)*** . The overall approach of this strategy is to make the most of the borough's economic assets, while at the same time protecting the qualities which make it a special place. The council is keen to support businesses to grow, creating jobs for all of our residents and ensuring they are equipped with the skills to maximise their potential. Priorities in the strategy include 'retaining and attracting investment'; 'enhancing Maidstone town centre' and 'improving the infrastructure'. The adopted Local Plan, and the Local Plan Review, can respond to these priorities by anticipating business' growth needs, identifying a sufficient supply of land and sites for commercial development, retaining existing, good quality business premises and sites and identifying the infrastructure improvements that new development generates.

The Economic Development Strategy is due to be reviewed and updated shortly.

¹⁷ Paragraph 3, Planning Policy for Traveller Sites

Home to more than 7,295 businesses, Maidstone borough continues to perform well economically despite the uncertain national and global economic climate, asserting itself as the powerhouse for growth and innovation in the heart of Kent.

Traditionally sectors such as finance and retail provided key sources of employment but this is changing. In terms of the types of jobs people do, a number of sectors have seen a large proportional increase over the last two decades including hospitality and recreation; administrative and support services; wholesale and transport; and social care. Meanwhile other sectors have recorded an overall decline in employment, namely finance and insurance; retail; manufacturing; other private services and utilities.

These changing trends in employment bring differing requirements in terms of the type of workplace required, the amount and location of floorspace and the supporting infrastructure needed.

The town centre is a major workplace. In addition to those employed in service sector roles, Maidstone borough is the largest office centre among the six neighbouring local authorities, with the stock of office floorspace predominantly focused within and around the periphery of Maidstone town centre. The Government's 2013 revision of Permitted Development Rights enables offices to be converted to homes without the need for planning permission. At 1st April 2019 approximately 26,668sqm of town centre office space has been converted of which 18,549sqm was poorer quality office stock. A further 13,518sqm is in the pipeline for conversion. We will be obtaining evidence for the Local Plan Review about the realistic demand for new office space.

There will also be implications for workforce productivity, with different types of employment generating differing Gross Value Added (GVA) per worker. Maidstone currently falls below the Kent, wider south east and UK averages on this measure. The Strategic Plan takes a proactive approach in response by seeking to ensure skills levels and earning potential of our residents are raised and local commercial and inward investment is increased. The Local Plan Review will play an important role in supporting the Strategic Plan alongside other strategies such as the Maidstone Economic Development Strategy.

The size of local businesses in Maidstone is comparable to both the regional and national averages, dominated by micro-firms (0-9 workers) and, to a lesser extent, small-sized firms (10 to 49 workers). A particular positive for the borough is the significant number of business start-ups, with a higher proportion of the resident population setting up new businesses in the borough than elsewhere across the south east and UK. Not only this but these start-up businesses have a healthy level of survival over the first few years of trading, exceeding the rates for Kent, the south east and the UK. There is clear evidence of an entrepreneurial culture in the borough which the Local Plan Review should seek to support and encourage.

Other key points to note;

- the borough has a business base greater than any other in the county
- employment is strong – unemployment rates have fallen since 2017, currently resting at 2.8%
- median earnings of Maidstone workers and residents have increased steadily since 2017 but are both below the equivalent Kent average.
- although approximately 60.3% of Maidstone’s employed residents work within the borough, it is also an attractive place to live for London commuters.
- the borough is a slight net exporter of labour overall; 30,000 workers commute into the borough each day compared with the 31,180 residents who commute out. The most popular destination is Tonbridge & Malling.

Existing business sites

The Strategic Plan takes a positive approach to ensuring key employment sites are delivered with the council intervening where necessary in the market. In addition ensuring that the borough’s portfolio of established business parks, estates and sites is suitably protected in planning terms will also be a crucial consideration. Developing and retaining the best commercial property is important for sustaining the borough’s businesses and enabling them to thrive and expand.

Brownfield land such as redundant employment sites may play a key role in helping to deliver other types of growth for example, housing, mixed uses and infrastructure. The approach is supported by the NPPF which signals that employment sites with no reasonable prospect of coming forward for their allocated use should be either reallocated through the process of plan-making or should be supported for alternative uses where the proposed use would contribute to meeting an unmet need for development in the area¹⁸.

The Rural Economy

Agriculture remains an important industry to the borough including the traditional production of soft fruits and associated haulage and storage facilities. Farming benefits from the borough’s high grade soil conditions and many businesses have begun to diversify away from traditional rural activities through the re-use of buildings for commercial non-agricultural purposes. There is also a trend in agriculture for produce to be available all year round to meet consumer demand.

Maidstone Strategic Plan supports the borough’s vibrant leisure and culture offer that can be enjoyed by residents and that is attractive to visitors. The importance of the tourism sector to the local economy is also increasing with independent research commissioned by Visit Kent – the Destination Management Organisation for Kent - showed that the value of Maidstone’s visitor economy shot up by 8.7% in 2017 and is now worth over £283 million.

¹⁸ NPPF paragraph 120

Visits to the borough increased by 7.9% in 2017 to 4.5 million trips with 4.1 million day trips and nearly half a million overnight stays. The total number of jobs supported by tourism grew by 8.3% to 5,909 with the industry accounting for 8% of total employment in the borough. The Local Plan Review could play a role in supporting this sector and approach.

The Strategic Plan also supports bringing forward community facilities and services in the right place at the right time to support communities and the Local Plan Review can also play a role.

The NPPF supports a positive approach to all these matters stating that local plans should support a prosperous rural economy through policies that enable:

- The development and diversification of agricultural and other land-based rural businesses;
- Sustainable rural tourism and leisure developments which respect the character of the countryside;
- The retention and development of accessible local services and community facilities; and
- The sustainable growth and expansion of rural businesses through the conversion of existing buildings and well-designed new buildings.

TQ19 – How can the Local Plan Review help ensure that local economic growth benefits everyone?

ISSUE 4 - Ensuring that Maidstone has a vital and vibrant town centre which maintains its role in the sub-region and that a network of local centres continue to serve local retail and service needs.

The relevant Strategic Plan cross-cutting objectives for this topic are:

- Heritage is respected
 - Health inequalities are addressed and reduced
 - Deprivation is reduced and social mobility is improved
- Biodiversity and environmental sustainability is respected

Maidstone Town Centre

To sustain and flourish, and to insure against the systemic changes in retailing, Maidstone Town Centre is likely to need to become home to a greater diversity of uses – shopping, leisure, food and drink, cultural and community uses, workplaces and homes. Town centre visits in particular may become more focused on ‘experiential’ activities as well as shopping. These supporting activities can help lengthen the duration of peoples’ visits to the town centre, so called ‘dwell time’.

We are also actively involved in managing the town centre and improving its environment, working with partners to enhance its offer. For example, working with KCC, the council has recently invested in major environmental enhancements in the heart of the town centre. Raising the physical quality of the public realm is a key way to enhance people's experience of the town centre. It improves access and helps illuminate the quality of the town's historic core. Following the highly successful scheme for the High Street, work recently finished on the £3 million complementary scheme for Week Street and Gabriel's Hill.

Another example is the council's involvement with One Maidstone, a not-for-profit Community Interest Company dedicated to improving the trading environment in the town. In October 2018 Maidstone Town Centre Business Improvement District (BID) came into effect following a ballot of local businesses the preceding summer. The BID is projected to generate an income of approximately £2.15m over its initial five-year term which will be ring-fenced for initiatives around 'Manage, Promote and Discover' projects such as street ambassadors, tackling crime and anti-social behaviour, events and promotions to promote trade and footfall in the town.

Other centres in the borough

The borough has a comprehensive network of district and local centres which complement Maidstone town centre and play an important role in serving the day-to-day needs in their local areas. One of the outcomes of the Strategic Plan is that 'our town and village centres are fit for the future'. This is not simply about retail and there is likely to be a need to focus on a greater diversity of uses, including community uses, in these areas. The Strategic Plan also commits to working with parishes and community groups on their neighbourhood plans which can also contribute to these areas becoming thriving places.

TQ20 – How can the Local Plan Review help sustain our town and local centres?

INFRASTRUCTURE – an introduction

MBC's Strategic Plan makes it clear that as part of embracing growth we will take a leading role in enabling infrastructure, matching the growing needs of our residents and local economy. The expected outcome expected is that sufficient infrastructure is planned to meet the demand of growth.

The council can't do this alone. To get infrastructure planned, funded and delivered we will be working proactively with partners and make clear our expectations of developers. Indeed many of the key types of infrastructure are not the direct responsibility of this council. Roads, public transport and walking/cycling routes; health care including GP surgeries; education such as primary and secondary schools; libraries, social care and community

facilities; emergency services; and flood prevention and mitigation measures are all services which fall to other organisations to deliver. So our collaboration with key infrastructure partners is crucial.

Central to our approach for the Local Plan Review will be identifying what, when and how the infrastructure needed to support the plan's growth will be delivered. We will start by understanding what pre-existing capacity there is and then what future plans and projects are in place that will extend infrastructure capacity before, crucially, identifying what additionally needs to be in place to match the growth coming forward through the Local Plan Review.

As with the other areas of growth discussed earlier in this document, we are able to benefit from work undertaken for the adopted Local Plan and from work undertaken since. A key document is the council's Infrastructure Delivery Plan (IDP). This sets out the programme for delivering infrastructure of all types and it is updated annually. For each infrastructure project, the IDP provides information about who will deliver it, when it will be delivered, its estimated cost and its priority. Over time, the IDP will iterate to incorporate the infrastructure implications of the growth plans in the emerging Local Plan Review.

It is increasingly the case that the provision of infrastructure is funded in whole or part through new development. It is paramount that developers do their share to ensure that sufficient infrastructure is planned, bringing benefits to those same communities that are affected by new development. Again, the Strategic Plan is clear in its expectations that community facilities and services should be in the right places at the right time to support communities.

One way MBC can help ensure that infrastructure and services are delivered is through 'developer contributions' and the proactivity of the council has already put it in an excellent position in this regard. Not only do we ensure that developers provide site-specific mitigation through section 106 agreements but we have also introduced a local Community Infrastructure Levy (CIL) that will help fund new, strategic-scale infrastructure.

What is the Community Infrastructure Levy (CIL)? CIL is a non-negotiable financial levy that councils can charge on new floor space. The money raised is used to help deliver the infrastructure needed to support the new development which is happening in the borough. Maidstone introduced its CIL in October 2018. It applies to residential development, 'convenience' retail and out of town centre 'comparison' retail developments where new floorspace is created. Legal agreements (section 106 agreements and/or section 278 agreements) are still used but in a more limited way to secure the on-site infrastructure specifically required by the development such as road access improvements, affordable housing and open space.

The money raised through the collection of CIL is intended to fill gaps in the funding of infrastructure in the borough and should be viewed as just one of many potential funding sources. It will not be able to cover the cost of all infrastructure provision. CIL money is collected by the council and then, after a fair and transparent bidding process, is released to the relevant infrastructure providers to deliver their schemes. A proportion of CIL receipts is also used for local, community projects.

TQ21 – How can the Local Plan Review best plan for the new infrastructure that will be needed to support growth?

We will now discuss the main types of infrastructure in turn.

ISSUE 5 – Ensuring sufficient transport infrastructure is provided to serve the new development that is planned

The relevant Strategic Plan cross-cutting objectives for this topic are:

- Health inequalities are addressed and reduced
- Deprivation is reduced and social mobility is improved

We recognise that better transport is one of the highest priorities for the borough's residents. Particular transport issues, some of which can be addressed through the Local Plan Review, include;

- Congestion hotspots on the borough's road network
- Poor air quality in the town which correlates with the main arterial roads. The NPPF underlines the link between better sustainable transport and improvements to air quality and public health¹⁹.
- Relatively high levels of car ownership whilst car occupancy levels are relatively low.
- Ensuring the appropriate level of provision of vehicle parking in new developments
- Future trends such as increased home/remote working, increased on-line shopping and home delivery of groceries and other goods
- The provision of realistic alternatives to the private car
- Changes to travel patterns and network capacity, including as a result of growth in surrounding districts and boroughs
- The impact of the proposed Lower Thames Crossing.

As noted previously, the Strategic Plan makes it clear that we will help enable infrastructure. We will fulfil this role whilst recognising that the provision, improvement and maintenance of the borough's public roads are the responsibility of others. Highways England is the Government agency responsible for the maintenance and management of England's motorways and major A roads, notably the M20 and M2 and the A249 from its junction with the M2 (Stockbury), north to Sheerness. The roads in the rest of the network are the responsibility of KCC as the highway authority.

Maidstone's rail connections are generally good. Maintaining a good rail network is the responsibility of Network Rail and the rail operators (e.g. South Eastern). The borough is

¹⁹ NPPF paragraph 103

served by the Ashford-Victoria line, the Hastings-Charing Cross line and the Medway Valley line. In December 2019, a new Thameslink rail service will connect Maidstone (East station) to Cambridge via London Bridge, Blackfriars and St Pancras.

The **Quality Bus Partnership** (QBP) is a good example of collaboration in action. The QBP was set up to improve and enable communication and decision making regarding bus service provision in the Maidstone area. Attendance by representatives from MBC, KCC, and multiple bus operators (Arriva and Nu Venture) at this quarterly meeting allows effective discussion of any bus related matters.

Some of the ways in which we may be able to work with our partners to ensure that transport infrastructure improvements are made could include the following:

Increase road capacity by finding engineering solutions to improve 'pinch point' junctions	Junction improvements have already been identified and funded in connection with the developments coming forward from the current, adopted Local Plan. Some schemes still need to progress. A good example is the forthcoming improvements to A249 Bearsted Road. This scheme is being funded by a package of central government funding, developer contributions and money from MBC.
Design healthy places	Vital to the masterplanning of any new communities, is that opportunities for healthy lifestyle choices such as active travel options are integrated into the overall design, thereby reducing the preference for private car use.
Build new roads	This is a way of increasing capacity by adding additional routes, including routes to bypass an existing pinch point. Government funding for new road building is highly limited and generally new roads will only be delivered in connection with development as the means to cross subsidise the costs of the road.
Facilitate and promote active travel e.g. – walking, cycling and the use of public transport.	These need to be direct, coherent, attractive alternatives e.g. safe walking route, direct safe cycle route and convenient cycle parking or through-ticketing on public transport e.g. PlusBus tickets. This is frequently presented as an all or nothing alternative but even the partial uptake of these options (e.g. cycling to work one day a week) helps reduce overall pressure on the road network. Additional walking and cycling

	connections can be achieved in concert with new developments.
'Smart city' technology	This approach helps to make travel across the borough easier. The availability of real time information on things such as road traffic flows and public transport times helps people to make smart travel choices e.g. avoid congestion and/or give them certainty when using public transport. The Kent Connected website and associated App is a journey planer aimed at saving people money, improving the quality of each journey and peoples' health, whilst easing congestion in Kent. Also, measures such as using contactless payments on buses encourage users onto buses, removing the need to pre-purchase tickets or have cash.
Public transport e.g. buses and trains	This could include, for example, bus priority measures or the provision of revenue funds to support new bus routes until they become commercially viable. Measures which prioritise buses over private cars have, to date, not always proved acceptable to key decision makers.
Parking control	This can encompass 'stick' measures such as increased parking charges in the town centre and/or restricting the number of car parking spaces in new developments to compel people to use alternative means of transport. This is quite an extreme approach (potentially suited to larger cities where there are more comprehensive alternatives) and can result in unintended consequences such as negatively impacting the viability of the town centre and introducing parking blight if not carefully managed.

TQ22 – Have we identified all the types of transport measures? Which measures do you think we should prioritise?

The proactive stance which the council intends to take is supported by national planning guidance which underlines that development should be planned in a way which limits people's overall need to travel and which gives people a genuine choice of transport modes²⁰. Increased levels of walking, cycling and public transport use has cross-cutting

²⁰ NPPF paragraph 103

benefits for congestion, emissions, air quality and public health. We will also need to have regard to the NPPF's direction that the residual cumulative highway impacts associated with new development would need to be 'severe' before development could be refused or prevented²¹.

The council has a number of avenues available to it to identify and specify the transport infrastructure requirements generated by the proposed growth. These are;

- Working in collaboration with KCC and Highways England, we will review and update our Integrated Transport Strategy with an updated list of requirements, schemes and actions to support the growth in the Local Plan Review.
- Highway modelling jointly commissioned by KCC and MBC will test the effects of the planned levels and locations of growth on the highway network. A second stage will be to identify the measures that can be implemented in conjunction with development to address the additional pressure on the network.
- Alongside a review of the Integrated Transport Strategy, it is envisaged that the interrelated Walking and Cycling Strategy will also be reviewed. Such a review would bring it in to alignment with the recent Government guidance regarding Local Cycling and Walking Plans.

Leeds-Langley Relief Road

We are working positively with Kent County Council as it explores;

- a) the case for a Leeds Langley Relief Road and alternatives to it;
- b) how it could be funded; and
- c) whether additional development would be associated with such a relief road²².

Initial investigations by KCC's consultants will determine, in outline, the effect that a new road in this location could have on traffic movements in and through the town. The work should seek to determine whether a relief road is needed and justified to deal with the additional traffic generated by the new developments. This work stream will also need to identify and assess on an equivalent basis alternatives to a relief road as signalled by Policy LPR1.

We recognise that there will be environmental impacts of a new road in this location including landscape and biodiversity impacts and potentially these could be significant. The case would also need to need to be made for funding (if the scheme proves to be justified). Funding for the road could potentially come from public sources, such as central government, and/or be enabled by new development.

²¹ NPPF paragraph 109

²² Policy LPR1 of the adopted Local Plan

ISSUE 6 – Ensuring sufficient utilities infrastructure is provided to serve the new development that is planned

The relevant Strategic Plan cross-cutting objective for this topic is:

- Deprivation is reduced and social mobility is improved

Utility providers play a key role in planning for and delivering the infrastructure necessary to support the growth advanced in the Local Plan Review. The Strategic Plan seeks to ensure that all services are in place at the right time to support communities and this is not limited to traditional utilities such as water, electricity and gas supplies. Advanced, high quality and reliable communications infrastructure such as broadband is essential for economic growth and social well-being²³.

Moving forward with the Local Plan Review, it is important that superfast broadband roll out continues to those existing properties currently without it, as well as providing connections for planned new development. We will seek to set out how high-quality digital infrastructure is expected to be delivered and upgraded over the lifetime of the Plan and aim to prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution)²⁴. To this end, continued close liaison with broadband providers is crucial.

KCC is working with the Government's broadband agency, Broadband Delivery UK (BDUK) to improve access to superfast services under the 'Making Kent Quicker' scheme. 95% of properties across Kent and Medway can now access to superfast broadband service of at least 24mbps. Also available is the Government's Better Broadband Scheme which provides subsidised installation of fixed wireless satellite broadband connectivity to properties that cannot currently access a broadband speed of at least 2mbps.

The supply of clean water to premises in the borough is the responsibility of South East Water whilst the removal of waste water is the responsibility of Southern Water. Both companies have produced draft five-year business plans for 2020-2025, setting out how they will fulfil their statutory obligations to provide and remove water at properties – both residential and commercial. Both plans have been initially assessed by OFWAT and neither are yet ready to implement. We will liaise with both organisations to confirm what capacity improvements will be needed and for them to programme them into their capital works programme accordingly.

The key stakeholders for the provision of gas and electricity infrastructure are UK Power Networks (UKPN) and Southern Gas Network (SGN). UKPN own and maintain the electricity

²³ NPPF paragraph 112

²⁴ NPPF paragraph 112

cables across the whole of the south east, whilst SGN manage the network of pipes that supply gas across the same area. We will continue to work with these partners to get the energy related infrastructure planned, funded and delivered including ensuring that the capacity improvements needed are factored into their capital works programmes.

ISSUE 7 – Ensuring sufficient provision is made for health and education

The relevant Strategic Plan cross-cutting objectives for this topic are:

- Health inequalities are addressed and reduced
- Deprivation is reduced and social mobility is improved

We will be working closely with partners around health and education provision so that these forms of infrastructure are planned, funded and delivered.

The Strategic Plan seeks to support the health service to improve access to primary care such as clinics and GP surgeries and including care hubs. Fundamentally, we will continue to work with health providers to get infrastructure planned, funded and delivered and this includes Maidstone & Tunbridge Wells NHS Trust which is responsible for acute care and the operation of Maidstone Hospital. In terms of primary care, it is the NHS West Kent Clinical Commissioning Group (CCG) which is responsible for commissioning healthcare services across West Kent. It co-ordinates GP provision through its Estates Strategy (2018) which anticipates future demand and programmes where additional GP capacity is needed taking account of existing facilities and capacity and the scope to consolidate and co-locate services.

Responsibility for **public health** rests with KCC. The County Council collaborates with MBC on a number of projects to improve the health and wellbeing of its residents including delivery of health improvement services known as One You Kent.

It is recognised however that many of the functions delivered by Maidstone Borough Council have an impact on the health and wellbeing of the population including provision of green spaces and leisure facilities, housing, environmental health, economic development and planning.

The Local Plan Review can also play an important role in enabling communities to take control and improve their health and wellbeing with a number of direct and indirect interventions including:

- Providing for formal recreational and sports facilities as part of planned growth;
- Providing for informal recreation e.g. green spaces, walking routes where people can exercise and also socialise which can help overall mental wellbeing as part of planned growth;
- Helping people to make active travel choices i.e. to walk or cycle to a destination rather than use the car;
- Provide for health service facilities such as clinics or GP surgeries, in association with planned growth;
- Supporting communities to have access to a wide range of healthier food production and consumption choices;
- Working with developers to promote social interaction through the provision of shared spaces and multi-purpose community facilities which helps to enhance the sustainability of communities. Wherever possible we will seek to ensure that places are safe and accessible so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

TQ23 – How can the Local Plan Review best integrate health and wellbeing into the planning of new development?

Education

There are 48 primary/infant schools in the borough and 11 secondary-tier schools. KCC is responsible for ensuring that every child in the borough has a school place, at primary and secondary level. Future planning for primary and secondary school places is covered by KCC's Schools Commissioning Plan which is reviewed and updated annually. Additional places are created through the expansion of existing schools and the provision of new schools.

We continue to work with KCC in a positive, proactive and collaborative way to ensure that a sufficient choice of school places is available to meet the needs of existing and new communities²⁵ and this is highlighted in national guidance.

The majority of schools in the borough are run by KCC as the education authority. However, there are also publicly funded academy schools that receive funding directly from central government and operate outside of local authority control and free schools which are set up

²⁵ NPPF paragraph 94

by local groups e.g. parents, teachers, charities, trusts etc. and are also funded directly from central government.

Libraries

Again, KCC is responsible for the provision of public libraries. Libraries play an important role in supporting our local communities, bringing people together in a safe, trusted and welcoming environment, as well as supporting people to find the information they need to help them live independently and well.

The recently published KCC Libraries, Registrations and Archives Strategy 2019-22 sets out how KCC will continue to provide a sustainable libraries, registration and archives service to meet the needs and choices of the community. The Strategy recognises the need to support Kent's growing population and changing community needs as well as acknowledging the need to be flexible and adaptable to rapid technological change in order to provide optimal user choice. Key features of the Strategy include: retaining the network of libraries, archive and register offices; maximising the use of community buildings; promoting the services offered through new marketing; and widening access to archive collections through digitisation.

The Council wishes to support KCC in delivering its statutory duty to provide a comprehensive and efficient library service for those working, living or studying in the borough. Throughout the Local Plan Review process, MBC will engage with KCC to ensure that access to library services is well-integrated into planned development. This could, for example, be through physical access e.g. providing safe walking/cycling routes or digital access e.g. ensuring provision of broadband connectivity in new developments.

ISSUE 8 - Managing the risk of flooding from all sources.

The relevant Strategic Plan cross-cutting objective for this topic is:

- Biodiversity and environmental sustainability is respected

Flooding and flood risk are key issues for new development in parts of our borough. Maidstone is a key bridging point on the river Medway and as such it is likely that sites will be promoted for development which carry some risk of flooding. Where sites can be demonstrated to deliver significant benefits, developers should investigate the cost of managing and/or mitigating the risk of flooding. Parts of the borough are also subject to flooding because of local surface water drainage issues

The Strategic Plan seeks to achieve an environmentally attractive and sustainable borough. At the same time development must be planned in a way that people feel safe and are safe, in this case from the risk of flooding. We are not starting afresh in this regard. A Strategic Flood Risk Assessment was completed in 2016 which identifies all sources of flood risk in the

borough. The Environment Agency will be updating their flood modelling later in 2019 and it is intended that a revised assessment will be prepared to take account of this latest data.

The Council, working with the Environment Agency, will use the information from the Strategic Flood Risk Assessment to help locate appropriate uses to appropriate areas having regard to the vulnerability of the proposed use and the degree of flood risk. The approach to assessing and managing flood risk is confirmed by the NPPF which states that we should apply a sequential, risk based approach to the location of development so as to avoid, where possible risk to people and property²⁶.

As part of its proactive approach to embracing growth, MBC will work to identify how sites could be developed in such a way that ensure they appropriately manage overall flood risk (including ensuring that the development does not increase flood risk elsewhere) prior to the allocation of sites in the Local Plan Review. Once the results are known there may be various ways that flood risk could be mitigated and we will look into this on a site-specific or area-wide basis. The former Syngenta works at Yalding is an example of a site where the risk of flooding must be addressed comprehensively if development is to progress.

TQ24 – How can the Local Plan Review best manage flood risk whilst still achieving the growth that is needed?

ISSUE 9 – Ensuring that the borough’s environmental assets such as the Area of Outstanding Natural Beauty, Landscapes of Local Value, the countryside and Green Belt are suitably protected

The relevant Strategic Plan cross-cutting objective for this topic is:

- Biodiversity and environmental sustainability is respected

A key strategic issue for the Local Plan Review will be to embrace growth in a way which supports the protection of nationally and locally important landscapes and the countryside. The Strategic Plan promotes an environmentally attractive and sustainable borough as an integral part its ‘safe, clean and green’ priority.

Considering key aspects in turn:

Countryside - This comprises all parts of the borough that lie outside the defined settlement boundaries of Maidstone’s urban area, the Rural Service Centres, and Larger Villages and includes some area of higher quality agricultural land. The intrinsic character and beauty of the countryside is of significant value and should be respected²⁷. The overall settlement pattern within the countryside is characterised by a great number of small villages and hamlets that rely on Maidstone, the ten Rural Service Centres and Larger Villages and

²⁶ NPPF paragraph 157

²⁷ NPPF paragraph 170

settlements outside the borough for a range of services. These services include shops, post offices, health care, education and nursery facilities, banking, communal spaces, places of worship and public houses. These are vital to support rural communities. The importance of such facilities is emphasised in the Strategic Plan which seeks the provision of community facilities and services in the right places at the right time to support communities.

The Plan will also recognise that some forms of development will support the rural economy including utilising the best and most versatile agricultural land, tourism, leisure and culture. It will be important to balance these (at times) competing objectives.

Where proposals can be identified as having a potentially negative impact on the countryside, measures should be put in place to mitigate the impact. These measures might take the form of planting new landscape screening or directing development to less prominent parts of the site.

Green Belt - This national policy designation has the fundamental purpose of preventing urban sprawl, ensuring that settlements remain distinct from one another by ensuring that land is kept permanently open. The NPPF confirms the considerable restrictions on new development in the Green Belt and Green Belt boundaries should only be altered in exceptional circumstances. The Metropolitan Green Belt surrounds London and extends into a small part of the borough in the vicinity of Nettlestead. Our starting point is that we do not intend to revise the Green Belt boundary in our borough as part of the Local Plan Review.

Area of Outstanding Natural Beauty (AONB) – Just over 27% of the borough is within the Kent Downs Area of Outstanding Natural Beauty. AONBs are nationally important areas which are of special landscape quality, scenic quality, wildness or tranquillity and/or have particular natural or cultural heritage features. The south-facing steep slopes (scarps) of chalk and greensand are a prominent feature of the Kent Downs AONB. Under the Countryside and Rights of Way Act (2000), the council must make sure that decisions have regard for the purpose of conserving and enhancing the natural beauty of the AONB. This duty is also relevant for proposals which are outside the AONB which nonetheless may have an impact on the AONB's statutory purpose. Setting impacts are also pertinent in the south of the borough in parts of Marden and Staplehurst parishes which lie close to the High Weald AONB.

The NPPF is clear that major development within an AONB is not appropriate unless exceptional circumstances exist.

Landscapes of Local Value (LLV) is a local landscape designation, comprising significant tracts of landscape that are valuable and more sensitive to change. The LLVs were highlighted as areas of local value by local communities through previous local plan consultations and were assessed against specific criteria according to their distinct landscape character and sensitivity to change. There are five LLVs: the Greensand Ridge,

the Medway Valley, the Len Valley, the Loose Valley and the Low Weald. These landscapes cover more than 19% of the borough's total area. Any development within these protected landscape areas should contribute positively to the conservation and enhancement of the landscape through their siting, scale, mass, materials and design.

In designating the LLVs, consideration was given to the evidence in the Landscape Character Assessment (LCA). The LCA provided an up-to-date assessment of landscape character. Whilst over time there may be some localised changes within a landscape character area as a result of development, the overall and substantive character of the areas is likely to sustain. This being the case, we do not propose to alter the LLVs as part of this review.

TQ25 – How can the Local Plan Review best plan for the protection of the borough's environmental assets whilst still achieving the growth that is needed?

ISSUE 10 – Ensuring that the borough's historic assets are conserved and managed

The relevant Strategic Plan cross-cutting objective for this topic is:

- Heritage is respected

Maidstone has a wide-ranging heritage with tangible examples of buildings and monuments dating from the Iron Age right the way through to the post Second World War era. These make a vital contribution to the character and economic health of the borough and do much to ensure local distinctiveness. This legacy is recognised through the Strategic Plan which requires heritage to be respected.

The borough is particularly rich in timber-framed houses dating from the 14th to the 17th Centuries and contains many fine Georgian buildings. There are also widespread examples of traditional farm buildings, including some magnificent barns and oast houses. There are many fine medieval churches as well as castles and country houses. There are monuments to industries past which have played an important part in the area's history.

The NPPF recognises that heritage assets are an irreplaceable resource to be conserved and the significance of much of the borough's built heritage has been formally recognised. There are 43 Grade I listed buildings in the borough²⁸, a further 104 Grade II* and 1,876 Grade II. There is a particular concentration of listed buildings in the town centre. Groups of historically important buildings and features are recognised through the designation of 41 conservation areas. The heritage list also provides information on scheduled ancient monuments of which there are 26 across the borough with a particularly high concentration in the north west of the borough. There are five historic parks and gardens of special

²⁸ National Heritage List for England <https://historicengland.org.uk/listing/the-list>

interest at Boughton Monchelsea Place; Leeds Castle; Mote Park; Chilston Park and Linton Park.

A small portion of the designated heritage assets in the borough are at risk. The Heritage at Risk Register indicates that there are 14 designated heritage assets considered to be at risk²⁹ comprising two conservation areas, seven listed buildings and five scheduled ancient monuments.

Furthermore the NPPF emphasises that Local Plans should set a positive strategy for the conservation and enjoyment of the historic environment underlining, amongst other things, “the desirability of new development making a positive contribution to local character and distinctiveness”³⁰.

TQ26 – How can the Local Plan Review best plan for the conservation of the borough’s heritage assets whilst still achieving the growth that is needed?

ISSUE 11 – Ensuring that the borough’s biodiversity and wildlife habitats are suitably protected and managed

The relevant Strategic Plan cross-cutting objective for this topic is:

- Biodiversity and environmental sustainability is respected

Kent Biodiversity Strategy (August 2015) prepared by the Kent Nature Partnership identifies 35 habitat types across Kent that are in urgent need of conservation, all of which are nationally important and some of which are rare and threatened on a global scale. The **Kent Biodiversity Opportunity Areas** (BOAs) also identified by Kent Nature Partnership are a spatial reflection of the Kent Biodiversity Strategy and identify the areas where activity should be focused for maximum biodiversity benefits. There are five BOAs which affect Maidstone.

A **Maidstone Biodiversity Strategy** is being prepared. MBC is taking a leading role in developing a new biodiversity strategy for the borough and most importantly involving residents and wildlife groups in the process and support people in taking practical action whether large or small.

Green (vegetation) and blue (water) assets together form a network which brings a wide range of benefits in addition to the habitats they provide. The borough has large and important ecological sites, protected through local, national, and European level designations. The matter is given high priority within the Strategic Plan which seeks to respect biodiversity and environmental sustainability. In other words, whilst embracing

²⁹ Heritage at Risk Register <https://historicengland.org.uk/advice/heritage-at-risk/search-register/>

³⁰ NPPF paragraph 185

growth the Local Plan Review will act to ensure that development does not threaten these habitats and to create new open spaces and/or improve the quality of existing open spaces to meet local recreation and ecology needs more effectively.

In addition, there is a specific process – Habitat Regulations Assessment – for testing the impacts of the proposed Local Plan Review strategy on the integrity of the European nature conservation sites in and close to the borough. This process requires cumulative impacts to be assessed which take account of development in other boroughs and districts. The council has appointed expert consultants to undertake this technical assessment.

The key designations and assets relating to biodiversity and wildlife habitats are introduced below.

Special Areas of Conservation (SAC) – These are ecological sites which have a European level of importance because of the habitats and/or species they contain. The North Downs Woodland SAC is characterised by woodland and dry grassland on steep slopes. The impact of the Local Plan Review’s proposals on this SAC and those with the potential to be impacted beyond the borough boundaries will be specifically assessed through a Habitat Regulations Assessment.

Sites of Special Scientific Interest (SSSI) – These are sites which are nationally important because of their wildlife, geology or landform. Development which will adversely affect a SSSI should not normally be permitted unless the benefits of the proposal ‘clearly outweigh’ these effects, according to the National Planning Policy Framework.

Local Nature Reserves (LNR) and Local Wildlife Sites (LWS) – The borough’s Local Wildlife Sites and Local Nature Reserves are designated by Kent Wildlife Trust for their value for natural habitat and conservation. The National Planning Policy Framework confirms that local plans should safeguard local biodiversity sites such as these.

Ancient woodland, veteran trees and Tree Preservation Orders – Designated ancient woodland is woodland which has been continuously planted since 1600 or earlier. A veteran tree is one which ‘is of interest biologically, culturally or aesthetically because of its age, size or condition’³¹. Both are categorised as ‘irreplaceable habitats’ and development that would lead to their loss should be refused planning permission unless there are wholly exceptional reasons to do otherwise and compensation arrangements are in place. There are pockets of designated Ancient Woodland and specimen veteran trees across the borough. Tree Preservation Orders are used to protect trees (not necessarily ancient woodland or veteran trees) which are of particular amenity value.

³¹ Veteran Trees – a guide to good management (Natural England)

Green infrastructure – Many of the above designations contribute to the Borough’s green infrastructure and biodiversity value. However, green infrastructure extends beyond those designations. For example, the provision of green spaces within urban areas is essential to local residents being able to lead healthy lifestyles and enjoying leisure and cultural activities. An example of this is the legacy of green tracts between neighbourhoods and along rivers in the town which provide a structure to, and a break between, the built up urban area. This green infrastructure also brings environmental benefits by capturing carbon and air particles, mitigating flood risk, and as wildlife habitats.

Blue infrastructure - Rivers have shaped how the borough has developed and provide a structure for open spaces and urban development. Rivers act like corridors and their banks are often protected for flood inundation whilst the amenity of rivers is highly sought after by humans and wildlife alike. These functions need to be protected and enhanced.

Ecological networks - In addition to the designated areas above, there are numerous rivers, woods, heaths, grasslands, meadows, hedgerows and even buildings which provide a stock of spaces which sustain local ecology. We will expect the full potential impact of a development on local ecology to be identified and opportunities to achieve biodiversity net gain actively implemented.

An example of practical action on this front, supported by the Strategic Plan, is the ‘Go Green Go Wild’ initiative which encourages residents to help look after the nature on their doorstep, be it an open meadow, a grass verge, back garden or even a window box. This could help create wildlife corridors, encourage native species and provide new wildlife habitats throughout the borough.

TQ27 – How can the Local Plan Review best plan for the protection of the borough’s biodiversity whilst still achieving the growth that is needed?

ISSUE 12 – Contributing to an overall improvement in air quality, in particular in the Maidstone Air Quality Management Area.

The relevant Strategic Plan cross-cutting objectives for this topic are:

- Health inequalities are addressed and reduced
- Biodiversity and environmental sustainability is respected

The council’s **Low Emissions Strategy** sets out how to achieve a higher standard of air quality across Maidstone. It seeks to assist MBC in complying with relevant air quality legislation, embedding an innovative approach to vehicle emission reduction through integrated policy development and implementation. This includes improving the emissions of the vehicle fleet beyond the ‘business as usual’ projection and promoting the uptake of low and ultra low emission vehicles.

Poor air quality has a direct impact on people's health, in particular those with respiratory conditions, older people and children. The combustion of fossil fuels for power generation, industrial processes, domestic heating and transport gives rise to air pollutants including ozone, nitrogen oxides, carbon monoxide, particulate matter and sulphur dioxide.

Congestion, increased volumes of traffic and an increased proportion of HGVs on our roads can all worsen air quality. Poor air quality can also impact on biodiversity; nitrogen oxides contribute to the acidification of soil and watercourses which impacts on animal and plant life.

The Maidstone Air Quality Management Area (AQMA) is shown on the map below³². It encompasses areas in the town close to the main arterial roads and junctions, including along the M20 corridor where statutory limits for nitrogen dioxide are exceeded. Fine particulate concentrations are also of concern, although levels fall below EU thresholds.



Maidstone is taking a proactive approach to dealing with air quality in the borough. The Strategic Plan aspires to a borough that is recognised as clean and well cared for by everyone and which is environmentally attractive and sustainable. Improving air quality is one of the matters which the plan places particular emphasis on.

³² Reproduced from the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationary Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. The Maidstone Borough Council Licence No 100019636 , 2018 Scale 1:40,000. Produced by GIS MidKent Services.

MBC has agreed planning guidance identifying how the potential impact on air quality of new development should be identified and a cost for mitigating the impact calculated.

As we embrace growth, new development does not have to be inherently negative for air quality. Whilst a new development at a particular site may generate its own emissions, it may also bring an opportunity to reduce overall emissions in an area over time through the installation of new, cleaner technologies and applying policies that promote sustainability, including improved cycling and walking infrastructure and increased use of public transport.

As part of the evidential work for the Local Plan Review, we will commission air quality modelling which will predict the air quality effects of the preferred development strategy which in turn will help decide the type and location of the specific mitigation measures which will be required. This modelling exercise is directly linked with the transport modelling which the review will also require. Reducing the need to travel and providing for improved public transport and increased walking and cycling are key ways to tackle poor air quality.

This ability to take a comprehensive approach to air quality issues that the Local Plan Review brings was a particular influence on the council's decision made in July 2018 not to progress an early, single subject Air Quality Development Plan Document (i.e. an Air Quality Local Plan) which had been a commitment in the adopted Local Plan.

Actions could include measures to encourage reductions in the individual use of private cars such as car clubs, reduced car parking levels and increased cycle parking, as well as facilitating the use of low emission vehicles such as electric vehicles through the installation of charging points. Research has shown that travel habits develop very quickly in new developments and once people have chosen their travel mode, they tend to stick to it. This means that it is important to ensure that sustainable transport options such as improved bus routes, bike hire, EV charging points and car clubs are available from the outset on a new development.

Design measures can also be incorporated into new developments such as landscaping and the setting back of development to help to reduce people's direct exposure to poor quality air.

The NPPF supports action on this front. It underlines that opportunities to improve or mitigate air quality should be identified, preferably as part of the plan-making process.

TQ28 – How can the Local Plan Review best plan for an overall improvement in air quality in the Maidstone Air Quality Management Area, and manage air quality elsewhere, whilst still achieving the growth that is needed?

The maps below illustrate the key national and local environmental assets and designations which are material to the Local Plan Review and which may impact on future decisions about the selection of sites.

Figure 1 - Nationally-significant environmental assets and designations.

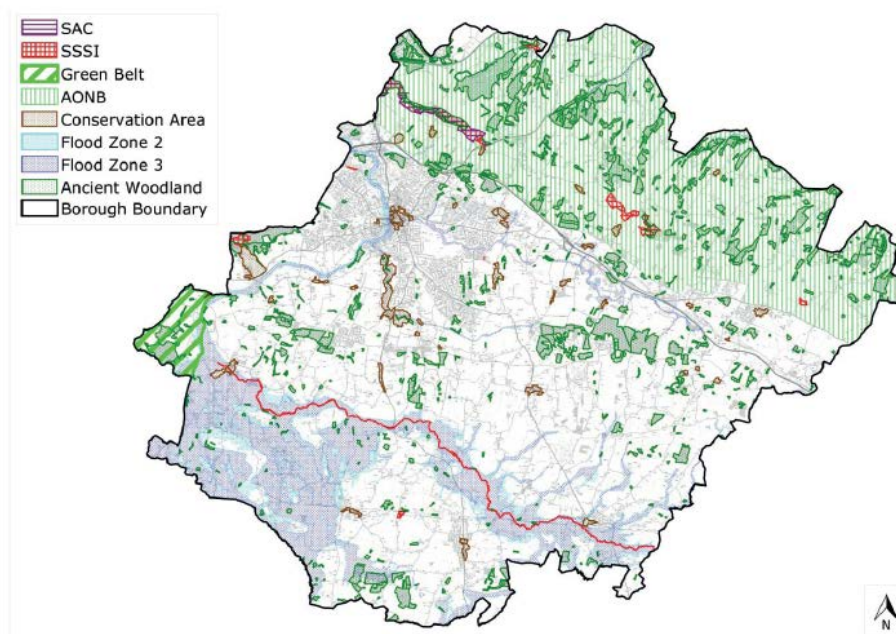
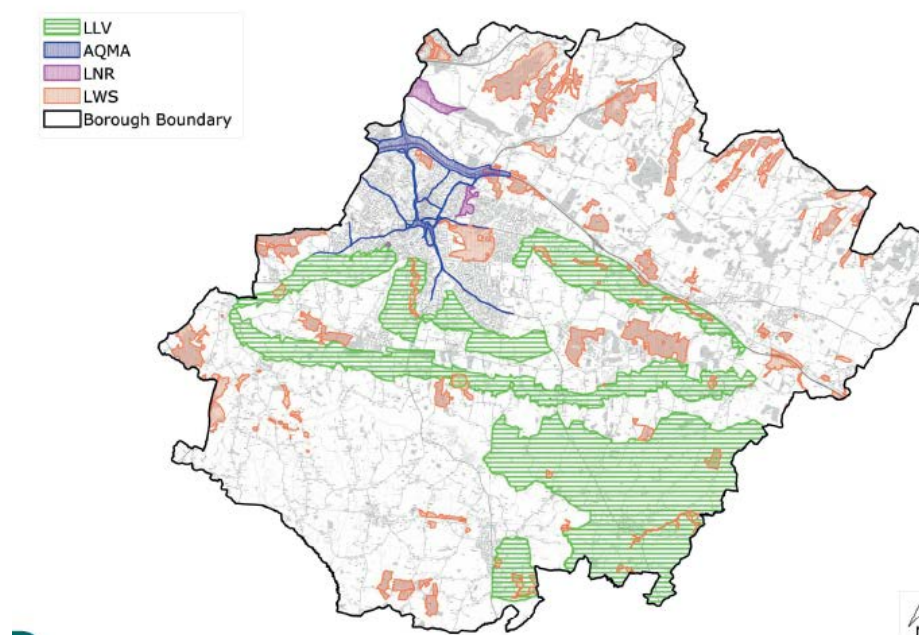


Figure 2 - Locally significant environmental assets and designations.



ISSUE 13 – Addressing climate change

The relevant Strategic Plan cross-cutting objectives for this topic are:

- Biodiversity and environmental sustainability is respected

There is scientific consensus that our climate is changing due to the sustained global emission of greenhouse gases. The Climate Change Act (2008) established a long term and legally binding framework for tackling carbon emissions; it includes a target to reduce carbon emissions by 80% by 2050.

Transport is now the largest emitter of carbon in the UK, with the main source being from cars and other road vehicles. Maidstone borough has above average car use³³ and consequentially a higher than average carbon emission per capita than the UK generally.

Despite the ongoing decreases in carbon emissions, it is forecast that there will be impacts on our climate in the form of more extreme weather events, specifically a warmer climate and more severe storm events. In Maidstone this will present challenges for the cooling of properties, particularly in summer, and a need to manage increased flood risk.

Maidstone is taking a proactive approach to addressing climate change and recently resolved to consider a target date of 2030 for the whole borough to become carbon neutral. The Strategic Plan seeks an environmentally attractive and sustainable borough where environmental sustainability is respected. The Local Plan Review can also make a contribution; Government legislation places a statutory duty on councils to include in their Local Plans “policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change”³⁴. The NPPF affirms that the planning system should support our transition to a low carbon future. Broadly the system should act in two ways; to reduce the generation of carbon emissions, and to address the impacts of climate-change through mitigation.

National energy efficiency standards for new buildings are set out through Building Regulations. The setting of more stringent local standards for energy and/or water efficiency must be justified with significant evidence and tested for viability as they could impact on overall development costs. This in turn could impact on overall delivery and other developer contributions, notably affordable housing.

As part of embracing growth the council could help secure an transition to electric vehicle use by requiring charging points to be built into new, and potentially existing, built up areas (subject to viability) . Short-term reductions are likely to be driven by increasing walking,

³³ Maidstone Integrated Transport Strategy

³⁴ Section 19(1A) of the Planning and Compulsory Purchase Act 2004 .

cycling, shared vehicle use and public transport. Again MBC could work with developers to set out its expectations in this regard.

Renewable energy generation schemes such as solar farms will have benefits for sustainable energy production which will need to be balanced against the costs of installing equipment as well as impacts on matters such as local landscape character and built form. The council has already prepared planning guidance for both domestic and larger scale solar installations.

TQ29 – How can the Local Plan Review best reduce the generation of carbon emissions and mitigate for the effects of climate change whilst still achieving the growth that is needed?

ISSUE 14 – Ensuring a sufficiency of parks and open spaces

The relevant Strategic Plan cross-cutting objectives for this topic are:

- Health inequalities are addressed and reduced
- Biodiversity and environmental sustainability is respected

‘Open space’ is an umbrella term; the adopted Local Plan sets targets for quantum, access to, and minimum sizes of five types of open spaces: amenity, play, sports pitches, allotments, and natural/semi-natural green space. Each of these types plays a role in meeting local needs.

The borough will embrace growth and proactive planning is needed to ensure the borough’s land is used effectively. The Strategic Plan seeks to ensure that everyone has access to high quality parks and green spaces. This includes accessible play and sports pitches and the Strategic Plan seeks to provide a vibrant leisure and culture offer to be enjoyed by residents and attractive to visitors.

Opportunities for creating new open spaces and facilities and/or improving the quality of spaces and facilities will also be a key consideration for the Local Plan Review and a clear expectation in discussions with developers.

As part of its proactive approach MBC has recently completed a Sports Facilities Strategy and a Playing Pitch Strategy (2019) which assess the current supply and future demand for sports facilities in the borough. The Sports Facilities Strategy recommends safeguarding existing provision, improving capacity through both new and enhanced facilities and giving consideration to the replacement or refurbishment of Maidstone Leisure Centre. The Playing Pitch Strategy makes recommendations for specific pitch uses, generally by type of sport. It principally seeks existing capacity to be safeguarded and new capacity to be created to meet the growth expected in the population. It makes reference to the benefit that 3G surface pitches can have to increased capacity of pitches in the borough.

MBC also recognises that where new open space and facilities are in place, provision and access should continue through proper maintenance. MBC manages many of the existing parks and play spaces in the borough. Local trusts run by community groups and parish councils also take on the management of local areas. Commitment to ongoing maintenance is an important consideration in the design and development of new and improved open spaces.

The Local Plan Review can also influence the way we calculate open space requirements. Currently the provision of new open space in connection with new homes is calculated based on standards in the adopted Local Plan, taking into account whether there is an overall under- or over-provision of green space in the area. Where the prescribed quantum of new open space can't be incorporated onto a site, financial contributions are taken to be spent on improving existing facilities in the locality or creating new green space elsewhere in the locality. We could potentially refocus this approach to ensure that key local amenity, play, allotment and sports provisions are located on-site, in close proximity to local populations.

The current natural/semi natural requirement is not deliverable on-site in virtually every circumstance and an option is that this be re-cast as a borough-wide target that new development should contribute towards, rather than an on-site requirement.

TQ30 - How can the Local Plan Review best provide for open space in new development?

ISSUE 15 – Ensuring that sufficient provision is made for community infrastructure

The relevant Strategic Plan cross-cutting objectives for this topic are:

- Health inequalities are addressed and reduced
- Deprivation is reduced and social mobility is improved

Community Safety Plan (2019-22) The Safer Maidstone Partnership is collaboration between the police, MBC and KCC and the health, probation and fire services and with the purpose of improving community safety in the borough. The work of the Partnership is guided by the Community Safety Plan which was recently updated. The priority themes for 2019-22 are;

- Protecting our communities against Organised Crime Groups (including modern slavery)
- Reducing the harm caused by Domestic Abuse (including stalking)
- Keeping Children and Young People Safe
- Reducing the impact of Substance Misuse on our community
- Safeguard people whose Mental Health makes them vulnerable to becoming a victim or where it leads to an impact on the wider community

The borough's community centres and church and village halls play an important role, providing venues for community events and activities and support services. This is recognised by the Strategic Plan which encourages a diverse range of community activities.

Embracing growth could be linked to maintaining and improving these meeting places to help sustain a sense of community within a neighbourhood, village or parish. Local shops, cafes and pubs as well as cultural venues and places of worship all help to sustain local communities and make a local area a good one to live and work in. Conversely the unnecessary loss of such facilities is to be avoided.

Well planned places also help engender more informal social contact. Attractive streets and paths that link public spaces and facilities encourage more of us to make journeys on foot, or to walk for pleasure. We will work with developers to plan new developments accordingly.

As well as encouraging activity, such measures can also help to make places feel safer as the presence of other people can help to both deter crime and suppress the fear of crime. The Strategic Plan is clear that people should feel safe and be safe. In addition, the NPPF advocates a proportional approach to public security in the design and planning of new development, applying realism about the nature of possible threats and the number of people that could be affected.

TQ31 – What community facilities do you consider are the most important to a successful new development?

CHAPTER 6 – NEXT STEPS

The preparation of this Local Plan Review is an iterative process. Options will narrow down as we gather more information over the coming months. Specifically we will consider the comments made on this consultation document, continue to prepare background evidence and work with our key partners to help identify and refine policy choices.

In due course we will test the cumulative impacts of the favoured future pattern of development on matters such as air quality, road capacity and local services and then pinpoint what measures can be put in place to overcome any identified limitations. There is a requirement to test the plan for overall viability in accordance with Government guidance.

We intend to produce a ‘preferred approaches’ style consultation document early next year with a full draft Local Plan Review for public consultation to follow and then submit the plan to the Government for Examination. The Local Development Scheme [\(add link\)](#) contains the current timetable in full and this is reproduced below;

- Preferred Approaches consultation (Regulation 18) – February/March 2020
- Pre-submission consultation (Regulation 19) – October/December 2020
- Submission – March 2021
- Examination – July-September 2021
- Adoption – April 2022

TQ32 – Are there any other themes, issues and considerations that you believe we should address as part of this Local Plan Review?

APPENDICES

A - List of consultation questions

B - List of MBLP policies and assessment of need to review (to follow)

APPENDIX B Consultation TQ33 – Have we identified the extent of potential changes to the adopted Local Plan correctly? What alternative or additional ones do you suggest and why?

Appendix A – List of consultation questions

Overarching Questions (7)

OQ1 – What can the Local Plan Review do to make the growth we need ‘good growth’?

OQ2 – What could the Local Plan Review do to help make our town and village centres fit for the future?

OQ3 – How can the Local Plan Review ensure community facilities and services are brought forward in the right place and at the right time to support communities?

OQ4 – What overall benefits would you want to see as a result of growth?

OQ5 - What infrastructure and services, including community services and facilities, do you think are the most important for a successful new development?

OQ6 – How can the Local Plan Review help support a thriving local economy, including the rural economy?

OQ7 – How can the Local Plan Review ensure we have an environmentally attractive and sustainable borough?

Technical questions (33)

TQ1 – What do you think should be the end date for the Local Plan Review? Why?

TQ2 – Have we identified the correct cross boundary issues? Please give reasons for your answer.

TQ3 – Do you agree with our housing land supply calculation at this stage?

TQ4 - How do you think the council can achieve a consistent annual rate of housebuilding throughout the Local Plan Review period?

TQ5 – Have we identified all the possible types of housing sites?

TQ6 – What approaches could we use to identify more small sites suitable for allocation in the Local Plan Review?

TQ7 – What approaches could we use to increase the number of new homes being built on brownfield sites and to make brownfield development more viable and attractive to developers?

TQ8 – What factors should we take into account when considering minimum density standards elsewhere in the borough, beyond the town centre?

TQ9 – Have we identified all the possible types of employment sites?

TQ10 - What approaches could we use to identify sites in and at the edge of the town centre for future shopping and leisure needs?

TQ11 – Do you think there should be changes to the current settlement hierarchy? If yes, what evidence do you have for your answer?

TQ12 - Which is your preferred option for the future pattern of growth (A, B, Bi or C) and why?

TQ13 – For your preferred option, what infrastructure would you want to see brought forward as a priority?

TQ14 – If your favoured option won't achieve the number of new homes needed, at the rate they are needed, what combination of options do you think would be best?

TQ15 – Have we identified the correct areas of focus for future masterplanning? What are the reasons for your answer?

TQ16 - Should the national space standards be incorporated into the Local Plan Review? What are the reasons for your answer?

TQ17 - How can the Local Plan Review best plan for the different types of housing which will be needed?

TQ18 – How can the Local Plan Review best plan for the accommodation needs of Gypsy & Travellers and Travelling Showpeople?

TQ19 – How can the Local Plan Review help ensure that local economic growth benefits everyone?

TQ20 – How can the Local Plan Review help sustain our town and local centres?

TQ21 – How can the Local Plan Review best plan for the new infrastructure that will be needed to support growth?

TQ22 – Have we identified all the types of transport measures? Which measures do you think we should prioritise?

TQ23 – How can the Local Plan Review best integrate health and wellbeing into the planning of new development?

TQ24 – How can the Local Plan Review best manage flood risk whilst still achieving the growth that is needed?

TQ25 – How can the Local Plan Review best plan for the protection of the borough's environmental assets whilst still achieving the growth that is needed?

TQ26 – How can the Local Plan Review best plan for the conservation of the borough’s heritage assets whilst still achieving the growth that is needed?

TQ27 – How can the Local Plan Review best plan for the protection of the borough’s biodiversity whilst still achieving the growth that is needed?

TQ28 – How can the Local Plan Review best plan for an overall improvement in air quality in the Maidstone Air Quality Management Area, and manage air quality elsewhere, whilst still achieving the growth that is needed?

TQ29 – How can the Local Plan Review best reduce the generation of carbon emissions and mitigate for the effects of climate change whilst still achieving the growth that is needed?

TQ30- How can the Local Plan Review best provide for open space in new development?

TQ31 – What community facilities do you consider are the most important to a successful new development?

TQ32 – Are there any other themes, issues and choices that you believe we should address as part of this Local Plan Review?

TQ33 – (Appendix B) Have we identified the extent of potential changes to the adopted Local Plan correctly? What alternative or additional ones do you suggest and why?

Appendix B – Adopted Local Plan Policy-by-Policy Review

The following tables provide an initial assessment of the extent to which policies in the adopted Maidstone Borough Local Plan may need to be altered as part of the Local Plan Review process. The matters highlighted such as the revisions to the NPPF and changes of circumstances could result in the need to change the policies. The actual extent and nature of the changes will become more apparent as work on the plan progresses.

Strategic Policies

The strategic policies are all likely to change to some degree to reflect the preferred spatial strategy for the distribution of new development as well as NPPF changes and updated evidence.

Policy	Scope/ Trigger for potential change
SS1 – Maidstone Borough Spatial Strategy SP1 – Maidstone Urban Area SP2 – Maidstone Urban Area: North West Strategic Development location SP3 – Maidstone Urban Area: South East Strategic Development Location SP4 – Maidstone Town Centre SP5 – Rural Service Centres SP6 – Harriestsham Rural Service Centre SP7 – Headcorn Rural Service Centre SP8 – Lenham Rural Service Centre SP9 – Marden Rural Service Centre SP10 – Staplehurst Rural Service Centre SP11 – Larger Villages SP12 – Broughton Monchelsea Larger Village SP13 – Coxheath Larger Village SP14 – Eythorne Street (Hollingbourne) Larger Village SP15 – Sutton Valence Larger Village SP16 – Yalding Larger Village	<ul style="list-style-type: none"> The Local Plan Review will need to specify the spatial distribution for the additional development needed. Factors which will influence the selection of the spatial strategy include the up to date evidence base (in particular the Strategic Land Availability Assessment and Sustainability Appraisal/Strategic Environmental Assessment), national policy and consultation feedback. An updated suite of policies like these will be required to show where development is broadly anticipated to go over the extended plan period. For Policies SP1-SP16, the content of each policy will depend upon the amount and locations of development expected to be delivered in each area. Where development has already happened in any of these locations, and if there are no further development is proposed, an area could be removed from this section. Conversely any new development locations would require additional policy coverage. The settlement hierarchy will be reviewed as part of the Local Plan Review. Settlement boundaries will be updated where necessary. References to sites which are now complete can be removed from Policies SP1-16. Any new infrastructure requirements arising from planned growth will need to be identified.
SP17 - Countryside	<ul style="list-style-type: none"> Policy follows national policy for AONB and Green Belt and should be retained. LLV is a locally set landscape protection policy and is expected to be retained. NPPF changes give an increasing role for small-medium housing sites (<1ha) and this could include those which will help to meet rural housing needs. The Green & Blue Infrastructure Strategy identifies linking

Policy	Scope/ Trigger for potential change
	assets in the countryside with urban areas will be a beneficial way of improving access to nature.
SP18 – Historic Environment	<ul style="list-style-type: none"> SP18 offers a generally positive strategy for the conservation and enjoyment of the historic environment required by NPPF
SP19 – Housing Mix	<ul style="list-style-type: none"> NPPF paragraph 61 requires LPAs to consider the needs of different groups in the community when planning for a mix of housing (including families with children, older people, students, people with disabilities, service families, travellers, people who rent their home and those wishing to custom/self-build) and also size/ type/ tenure/ range. Policy SP19 or its successor/s will need to be considerably more detailed. An updated Strategic Housing Market Assessment (SHMA) will identify this increased range of needs.
SP20 – Affordable housing	<ul style="list-style-type: none"> NPPF contains a widened definition of affordable housing which needs to be incorporated into the LPR. An updated SHMA will identify this increased range of needs. SHMA evidence will reveal if there is a need for rural or entry-level exceptions sites. Policy needs to confirm how it applies (or not) to Use class C2 (nursing/care homes and some forms of extra-care housing) % requirements and tenure breakdown will need to be revisited based on updated SHMA and viability evidence. Local Plan Inspector's Report identified a reduction in affordable housing supply towards the end of the plan period which should be addressed through the Local Plan Review. NPPF requires all major developments to provide at least 10% of homes to be available for affordable home ownership.
SP21 – Economic development	<ul style="list-style-type: none"> Local Plan Review's approach to employment land provision and supporting the local economy more widely will be revisited using the updated understanding of needs in the forthcoming Economic Needs Study.
SP22 – Retention of employment sites	<ul style="list-style-type: none"> Review of the sites, and the justification for their protection for employment purposes, will be part of the Economic Needs Study. The town centre office market will be reviewed through the same work.
SP23 – Sustainable transport	<ul style="list-style-type: none"> Full review of Policy SP23 will be required in the light of the updated transport evidence and spatial strategy. Transport modelling of a future preferred spatial strategy will be undertaken. Latest position and implications of major transport projects in and around the borough will need to be considered, as will an update of progress with the delivery of MBLP-identified transport improvements.
H1 – Housing site allocations	<ul style="list-style-type: none"> Progress with the current allocated sites and the future selection of new sites will inform the changes to this policy.

Policy	Scope/ Trigger for potential change
	<ul style="list-style-type: none"> NPPF requirement for 10% of housing requirement to be on small-medium sized sites (<1Ha) will need to be addressed.
H2 – Broad locations for housing growth	<ul style="list-style-type: none"> Progress with 3 x broad locations will be assessed; the Local Plan Review may include specific site allocations in one or more of the broad locations. Review of potential housing sites and the future preferred spatial strategy will inform this Policy; it may be appropriate to identify further broad locations.
OS1 – Open space allocations	<ul style="list-style-type: none"> Progress with the current allocated sites and the future selection of new sites will inform the changes to this policy. The policy approach to securing new open space in connection with development will be reviewed, taking account of experience delivering this policy and evidence of open space requirements.
GT1 – Gypsy and Traveller site allocations	<ul style="list-style-type: none"> Progress with the current allocated sites and the future selection of new sites will inform the changes to this policy. The forthcoming Gypsy & Traveller Accommodation Assessment will provide evidence to update pitch requirements.
RX1 – Retail and mixed use allocations	<ul style="list-style-type: none"> Progress with the current allocated sites and the future selection of new sites will inform the changes to this policy. The forthcoming Economic Needs Assessment, which covers retail and leisure, will provide evidence of needs.
EMP1 – Employment Allocations	<ul style="list-style-type: none"> Progress with the current allocated sites and the future selection of new sites will inform the changes to this policy. The forthcoming Economic Needs Assessment will provide evidence of needs.
ID1 – Infrastructure Delivery	<ul style="list-style-type: none"> Review of the policy, and the associated Infrastructure Delivery Plan, to reflect the latest position on infrastructure delivery and the additional infrastructure requirements associated with the future preferred spatial strategy.

Site Allocations – Housing Sites

Policy H(x)	Site name/address	Update
1	Bridge Nursery London Rd Maidstone	Complete, remove from Plan
2	East of Hermitage Lane	Planning permission granted. – Reconfirm deliverability and retain
3	West of Hermitage Lane	Planning permission granted. – Reconfirm deliverability and retain
4	Oakapple Lane Barming	Not implemented – Reconfirm deliverability and retain

5	Langley Park Sutton Road B. Monchelsea	Planning permission granted. – Reconfirm deliverability and retain
6	North of Sutton Road Otham	Complete, remove from Plan
7	North of Bicknor Wood Gore Court Road Otham	Planning permission granted. – Reconfirm deliverability and retain
8	West of Church Road Otham	Not implemented – Reconfirm deliverability and retain
9	Bicknor Farm Sutton Road Otham	Planning permission granted. – Reconfirm deliverability and retain
10	South of Sutton Road, Langley	Planning permission granted. – Reconfirm deliverability and retain
11	Springfield, Royal Engineers Road and Mill Lane Maidstone	Planning permission granted. – Reconfirm deliverability and retain
12	180-188 Union Street Maidstone	Planning permission granted. – Reconfirm deliverability and retain
13	Medway Street Maidstone	Not implemented – Reconfirm deliverability and retain
14	American Golf, Tonbridge Rd Maidstone	Planning permission granted. – Reconfirm deliverability and retain
15	6 Tonbridge Road, Maidstone	Not implemented – Reconfirm deliverability and retain
16	Slencrest House 3 Tonbridge Road Maidstone	Planning permission granted. – Reconfirm deliverability and retain
17	Laguna Hart Street Maidstone	Not implemented – Reconfirm deliverability and retain
18	Dunning Hall (Fremlin Walk) Week Street Maidstone	Not implemented – Reconfirm deliverability and retain
19	18-21 Foster Street Maidstone	Not implemented – Reconfirm deliverability and retain
20	Wren's Cross Upper Stone Street Maidstone	Planning permission granted. – Reconfirm deliverability and retain
21	Barty Farm, Roundwell, Thurnham	Planning permission granted. – Reconfirm deliverability and retain
22	Whitmore Street, Maidstone	Not implemented – Reconfirm deliverability and retain
23	Bell Farm, North Street, Barming	Planning permission granted. – Reconfirm deliverability and retain
24	Postley Road, Tovil	Planning permission granted. – Reconfirm deliverability and retain
25	Bridge Industrial Centre Wharf Road Tovil	Not implemented – Reconfirm deliverability and retain

26	Tovil Working Men's Club Tovil Hill	Not implemented – Reconfirm deliverability and retain
27	Kent Police HQ, Sutton Road, Maidstone	Planning permission granted. – Reconfirm deliverability and retain
28	Kent Police training school, Sutton Road, Maidstone	Planning permission granted. – Reconfirm deliverability and retain
29	West of Eclipse, Sittingbourne Road	Planning permission granted. – Reconfirm deliverability and retain
30	Bearsted Station, Goods Yard, Bearsted	Not implemented – Reconfirm deliverability and retain
31	Cross Keys Bearsted	Planning permission granted. – Reconfirm deliverability and retain
32	South of Ashford Road Harrietsham	Complete, remove from Plan
33	Mayfield Nursery Ashford Road Harrietsham	Planning permission granted. – Reconfirm deliverability and retain
34	Church Road Harrietsham	Planning permission granted. – Reconfirm deliverability and retain
35	Old School Nursery Station Rd Headcorn	Planning permission granted. – Reconfirm deliverability and retain
36	Ulcombe Road and Mill Bank Headcorn	Planning permission granted. – Reconfirm deliverability and retain
37	Grigg Lane and Lenham Rd Headcorn	Planning permission granted. – Reconfirm deliverability and retain
38	(Gibbs Hill Farm) South of Grigg Lane Headcorn	Planning permission granted. – Reconfirm deliverability and retain
39	Knaves Acre Headcorn	Planning permission granted. – Reconfirm deliverability and retain
40	Land at Lenham Road Headcorn	Complete, remove from Plan
41	Tanyard Farm, Old Ashford Rd Lenham	Planning permission granted. – Reconfirm deliverability and retain
42	Glebe Gardens Lenham	Planning permission granted. – Reconfirm deliverability and retain
43	Howland Road Marden	Planning permission granted. – Reconfirm deliverability and retain
44	Stanley Farm Plain Road Marden	Planning permission granted. – Reconfirm deliverability and retain
45	The Parsonage Goudhurst Rd Marden	Planning permission granted. – Reconfirm deliverability and retain
46	Marden Cricket & Hockey Club Marden	Planning permission granted. – Reconfirm deliverability and retain

47	Land South of The Parsonage Goudhurst Road Marden	Planning permission granted. – Reconfirm deliverability and retain
48	Hen & Duckhurst Farm Marden Road Staplehurst	Planning permission granted. – Reconfirm deliverability and retain
49	Fishers Farm Fishers Road Staplehurst	Planning permission granted. – Reconfirm deliverability and retain
50	Land to the North of Henhurst Farm, Pinnock Lane, Staplehurst	Not implemented – Reconfirm deliverability and retain
51	Hubbards Lane and Haste Hill Rd B. Monchelsea	Complete, remove from Plan
52	Land at Boughton Mount Boughton Lane	Not implemented – Reconfirm deliverability and retain
53	Land at Church St./Heath Rd B. Monchelsea	Planning permission granted. – Reconfirm deliverability and retain
54	Lyewood Farm, Green Lane. B. Monchelsea	Planning permission granted. – Reconfirm deliverability and retain
55	Hubbards Lane Loose	Complete, remove from Plan
56	Linden Farm Stockett Lane Coxheath	Planning permission granted. – Reconfirm deliverability and retain
57	Heathfield Heath Rd Coxheath	Complete, remove from Plan
58	Forstal Lane Coxheath	Planning permission granted. – Reconfirm deliverability and retain
59	Land North Of, Heath Road (Older's Field), Coxheath, Maidstone, Kent, ME17 4TB	Planning permission granted. – Reconfirm deliverability and retain
60	Clockhouse Farm Heath Road Coxheath	Planning permission granted. – Reconfirm deliverability and retain
61	East of Eyhorne Street Hollingbourne	Planning permission granted. – Reconfirm deliverability and retain
62	W of Eyhorne Street Hollingbourne	Complete, remove from Plan
63	Land adj The Windmill Eyhorne Street Hollingbourne	Planning permission granted. – Reconfirm deliverability and retain
64	Brandy's Bay South Lane Sutton Valence	Planning permission granted. – Reconfirm deliverability and retain
65	Vicarage Road Yalding	Planning permission granted. – Reconfirm deliverability and retain
66	Bentletts Yard Claygate Road Laddingford	Planning permission granted. – Reconfirm deliverability and retain

Site Allocations – Gypsies, Mixed Use and Employment

Policy & Site name/address	Update
Policy GT1(1) The Kays, Heath Road, Linton	Not implemented – Reconfirm deliverability and retain
Policy GT1(2) Greenacres (Plot 5), Church Lane, Boughton Monchelsea	Not implemented – Reconfirm deliverability and retain
Policy GT1(3) Chart View, Chart Hill Road, Chart Sutton	Complete – remove from Plan
Policy GT1(4) Land at Blossom Lodge, Stockett Lane, Coxheath	Partially Implemented – Monitor
Policy GT1(5) Little Boarden, Boarden Lane, Headcorn	Complete – remove from Plan
Policy GT1(6) Rear of Granada, Lenham Road, Headcorn	Not implemented – Reconfirm deliverability and retain
Policy GT1(7) The Chances, Lughorse Lane, Hunton	Complete – remove from Plan
Policy GT1(8) Kilnwood Farm, Old Ham Lane, Lenham	Not implemented – Reconfirm deliverability and retain
Policy GT1(9) 1 Oak Lodge, Tilden Lane, Marden	Not implemented – Reconfirm deliverability and retain
Policy GT1(10) The Paddocks, George Street, Staplehurst	Not implemented – Reconfirm deliverability and retain
Policy GT1(11) Bluebell Farm, George Street, Staplehurst	Not implemented – Reconfirm deliverability and retain
Policy GT1(12) Cherry Tree Farm, West Wood Road, Stockbury	Partially Implemented – Monitor
Policy GT1(13) Flips Hole, South Street Roadm Stockbury	Not implemented – Reconfirm deliverability and retain
Policy GT1(14) The Ash, Yelsted Road, Stockbury	Not implemented – Reconfirm deliverability and retain
Policy GT1(15) Hawthorn Farm, Pye Corner, Ulcombe	Not implemented – Reconfirm deliverability and retain
Policy GT1(16) Neverend Lodge, Pye Corner, Ulcombe	Not implemented – Reconfirm deliverability and retain
Policy RMX1(1) Newnham Park, Bearsted Road, Maidstone	Partially Implemented – Monitor
Policy RMX1(2) Maidstone East and former Royal Mail sorting office, Sandling Road, Maidstone	Not implemented. Review policy through the Local Plan Review process.
Policy RMX1(3) King Street car park and former AMF Bowling Site, Maidstone	Partially completed, amend Plan.
Policy RMX1(4) Former Syngenta Works, Hampstead Lane, Yalding	Not implemented. Review policy through the Local Plan Review process.
Policy RMX1 (5) Powerhub building and Baltic Wharf, St Peter's Street Maidstone	Not implemented. Review policy through the Local Plan Review process.
Policy RMX1(6) Mote Road, Maidstone	Not implemented. Review policy through the Local Plan Review process.
Policy EMP1(1) West of Barradale Farm, Maidstone Road, Headcorn	Partially completed, amend Plan.
Policy EMP1(2) South of Claygate, Pattenden Lane, Marden	Not implemented – Reconfirm deliverability and retain
Policy EMP1(3) West of Wheelbarrow Industrial Estate, Pattenden Lane, Marden	Partially completed, amend Plan.
Policy EMP1(4) Woodcut Farm, Ashford Road, Bearsted	Outline permission approved, retain in Plan.

Development Management Policies

Each development management policy tends to deal with a discrete subject area. This means that the extent of change needed will vary from policy to policy. To signal the scale of the change which may be necessary, based on our initial assessment, we have used a RAG rating, shown below.

Key

	Replacement/removal likely
	Significant change likely
	Minor/no change likely

Policy	Scope/Trigger for potential change	
DM1 – Principles of good design		Principle of policy unlikely to change, minor amendments may be justified.
DM2 – Sustainable Design		Policy requires review in the context of any subsequent changes to BREEAM and Building Regulation standards. We could chose to rely solely on Building Regulations and omit the policy altogether. Alternatively the policy could require standards above existing Building Regulations but this would need to be a) justified and b) viable.
DM3 – Natural Environment		Policy is lengthy and wide-ranging and includes content which could be considered as ‘strategic’, pointing to the potential for some of the content to migrate into an earlier chapter. For ease of use it could be beneficial to separate the remaining policy content into more specialised DM policies.
DM4 – Development affecting designated and non-designated heritage assets		Principle of policy unlikely to change but it could be amended to make reference to the NPPF’s requirement for planning authorities to maintain or have access to a historical environment record.
DM5 – Development on brownfield land		This policy is partially repetitive of other policies in the Plan and it may be possible to simplify although setting out the policy approach for brownfield development in the countryside is likely to continue to be needed.
DM6 – Air Quality		MBC is committed to updating and strengthening its approach to air quality to reflect the significance of the issue locally, the AQMA and latest local and national guidance.
DM7 – Non-conforming uses		This policy is repetitive of other policies in the Plan and could be adapted to include the “agent of change” principle included in the latest version of the NPPF.
DM8 – External lighting		Principle of policy unlikely to change, minor amendments may be justified.
DM9 – Residential extensions, conversions and redevelopment within the built up area		Principle of policy unlikely to change, minor amendments may be justified.
DM10 – Residential premises above shops and businesses		Policy may need to be amended to reflect changes to permitted development rights. Part 2 of this Policy may not be necessary, depending on the need to promote increases in town centre retail and/ or employment space.
DM11 – Residential		Principle of policy unlikely to change, minor amendments may be justified.

Policy	Scope/Trigger for potential change	
garden land		
DM12 – Density of housing development		NPPF requires minimum densities. The policy is likely to need be reviewed to include minimum densities for different locations/types of sites based on the future preferred spatial approach.
DM13 – Affordable local needs housing on rural exception sites		Principle of policy unlikely to change, minor amendments may be justified.
DM14 – Nursing and care homes		Emerging SHMA evidence will identify the local need for this use and this may inform a change to this policy.
DM15 – Gypsy, Traveller and Travelling Showpeople accommodation		This policy will be reviewed in the light of changed national guidance and to take account of relevant findings in the forthcoming Gypsy & Traveller Accommodation Assessment.
DM16 – Town centre uses		This policy largely reflects the approach in the NPPF. Details may need to be amended in light of evidence coming forward in the Economic Needs Assessment.
DM17 – District centres, local centres and local shops and facilities		Details may need to be amended in light of evidence coming forward in the Economic Needs Assessment. The policy allocates town/ local centres and this could be moved to the allocations section of the reviewed Plan
DM18 – Signage and shop fronts		Principle of policy unlikely to change, minor amendments may be justified
DM19 – Open space and recreation		This policy may need to be revised to reflect updated open space requirements and to improve the delivery of open spaces across the borough.
DM20 – Community facilities		This policy may need to be revised based on an updated understanding of community infrastructure needs.
DM21 - Assessing the transport impacts of development		The principles of this policy are unlikely to change but detailed content may need to be reviewed, particularly as the transport impacts of a new spatial distribution of development are likely to be important in determining the preferred spatial strategy.
Policy DM22 - Park and ride sites		The Park & Ride service is being delivered from the two named sites on a commercial basis and this policy may need to be updated in response.
Policy DM23 - Parking standards		KCC is updating its parking standards. Changes to this policy (including Appendix B) are likely to be needed.
Policy DM24 - Renewable and low carbon energy schemes		Policy may need to change to focus more on how renewable and low carbon energy can be produced in the borough.
Policy DM25 - Electronic communications		Principle of policy unlikely to change, minor amendments may be justified
Policy DM26 - Mooring facilities and boat yards		Emerging SHMA evidence will identify the local need for residential moorings and this could inform changes to this policy.
Policy DM27 - Primary shopping frontages		NPPF no longer requires retail frontages to be identified.
Policy DM28 - Secondary shopping frontages		NPPF no longer requires retail frontages to be identified.
Policy DM29 - Leisure and community uses in the town centre		Principle of policy unlikely to change, minor amendments may be justified.
Policy DM30 - Design		Principle of policy unlikely to change, minor amendments may be justified

Policy	Scope/Trigger for potential change	
principles in the countryside		
Policy DM31 - Conversion of rural buildings		Principle of policy unlikely to change, minor amendments may be justified
Policy DM32 - Rebuilding and extending dwellings in the countryside		Principle of policy unlikely to change, minor amendments may be justified
Policy DM33 - Change of use of agricultural land to domestic garden land		Principle of policy unlikely to change, minor amendments may be justified
Policy DM34 - Accommodation for agricultural and forestry workers		Principle of policy unlikely to change, minor amendments may be justified
Policy DM35 - Live-work units		Principle of policy unlikely to change, minor amendments may be justified
Policy DM36 - New agricultural buildings and structures		Principle of policy unlikely to change, minor amendments may be justified
Policy DM37 - Expansion of existing businesses in rural areas		Principle of policy unlikely to change, minor amendments may be justified
Policy DM38 - Holiday caravan and camp sites		Principle of policy unlikely to change, minor amendments may be justified
Policy DM39 - Caravan storage in the countryside		Principle of policy unlikely to change, minor amendments may be justified
Policy DM40 - Retail units in the countryside		Principle of policy unlikely to change, minor amendments may be justified
Policy DM41 - Equestrian development		Principle of policy unlikely to change, minor amendments may be justified

Review of the Local Plan

Policy	Scope/Trigger for potential change	
Policy LPR1 – Review of the Local Plan		Completion of the Local Plan Review will achieve this policy. Omit.

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