



Planning, Transport
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Annex A

Mrs Sue Whiteside
LDF Team
Maidstone Borough Council

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Our ref PTL5/P&C/03-02
Date 14 October 2011

Dear Mrs Whiteside

Maidstone Core Strategy Consultation Draft (2011)

I submit the following comments on behalf of Tonbridge and Malling Borough Council as representations to the Maidstone Borough Council Core Strategy Consultation Draft (2011).

The Borough Council assumes that the Core Strategy will be adapted to the circumstances that may present themselves as an when the National Planning Policy Framework is finally adopted by Government. Should this lead to revisions to, removal of, or addition of policy then the Borough Council would expect to be reconsulted.

With regard to the Strategic Location for Housing (SLH) shown on the Key Diagram to the north-west of Maidstone on our shared borough boundary, Tonbridge & Malling has a number of serious concerns. It is noted that the adopted Local Plan (December 2000) already had an allocation for housing in this general location for 380 units but that that allocation is not retained in the Saved Policies document. The new proposed SLH appears to be in the same general area but is now for 975 units.

It would appear from your SHLAA documents that the land comprised in this allocation may run close to, cross or abut the common boundary of our Authorities. In any event it would be helpful if you would let us know exactly which area you have focussed on to realise a capacity of 975 dwellings. The allocation of such a substantial strategic housing site in this location would result in Maidstone urban area further expanding and intruding into open countryside and the Strategic Gap as identified in the adopted TMB Core Strategy, between the urban confines of our two areas, thereby weakening the integrity of the Strategic Gap. This places pressure on the area in a way which could unacceptably erode this important anti-coalescence belt, which has been and remains an important open feature that has defined the structure of the urban areas and provides relief to the otherwise continuous spread of development.



Planning Policy is a Division of Planning, Transport & Leisure Services
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Moreover, in the absence of detailed highways and transport information, TMBC are very concerned about potential capacity implications for Hermitage Lane, its junction with the A20 London Road, Coldharbour roundabout and junction 5 of the M20. Our current experience is that capacity is extremely limited or non-existent at peak times. It is not clear how far these factors have been tested. We presume that the Highway Authority has been engaged in the formulation of this strategy and it would be helpful to understand how the existing network capacity has been assessed in this respect. We are also concerned that there is no obvious recognition of the potential impact of additional traffic generated by this development on air quality, particularly with regard to the Air Quality Management Areas (AQMA's) west of Hermitage Lane on the A20 and between junction 5 and junction 4 of the M20 and the potential for deterioration to the air quality to an extent where extending the geographical area of the AQMA's might need to be considered as a result. We would, therefore, be similarly opposed on transport and AQ issues to any new developments without being consulted further on these aspects.

It is not clear that the decision to make such a large strategic allocation north-west of Maidstone has been fully tested in respect of the above matters or taken into account the fact that the adopted Tonbridge and Malling LDF identifies the Preston Hall site, at the northern end of Hermitage Lane, for housing development for in the region of 180 dwellings which itself will have impacts on the road network referred to above.

The Council is also concerned over potential detrimental impacts on air quality, in particular nitrogen dioxide and particulate matter, as a result of proposed major development sites for employment particularly as a result of increased traffic movements attributable to the major employment location identified at junction 8. This may have significant potential to adversely affect air quality along the M20 and particularly in the TMBC Air Quality Management Area (AQMA) between junctions 5 and 4 of M20.

Thank you for the opportunity to comment on the Maidstone Core Strategy Consultation Draft. Please do not hesitate to contact Jill Peet if you need further information or clarification.

Yours sincerely



Nigel De Wit
Senior Planning Officer (Policy)