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Date 7<sup>th</sup> May 2014

Annex 1

Dear Spatial Policy Team,

**Re. Maidstone Borough Local Plan Regulation 18 Public Consultations  
21<sup>st</sup> March to 7<sup>th</sup> May 2014.**

Thank you for this opportunity to respond to the above consultation. As you will be aware our two authorities have been working closely in accordance with the Duty to Cooperate, not least in respect of the joint commissioning of consultants to prepare our Strategic Housing Market Assessments (SHMA). These assessments are a key piece of Local Plan evidence for establishing our objectively assessed housing needs and are based on a robust methodology that reflects the most up to date Government guidance. This Council recognises the approach adopted in the emerging Local Plan identifying an objectively assessed need (OAN) of 19,600 new dwelling over the plan period supported by the outturn of the SHMA.

These responses build on the constructive discussions between our authorities on Local Plan matters and the earlier comments we have made in respect of previous consultations on the emerging Local Plan. As you will be aware some of those comments raised some concerns over the potential impacts associated with the strategic housing allocations to the north west of Maidstone and specifically on Hermitage Lane and the junctions with the A26 and A20 and on air quality in Watlingbury and on A20. In responding to these concerns significant weight was placed on the then Integrated Transport Strategy (ITS) and future investment in the transport infrastructure to accompany the proposed growth in this area.

As the revised ITS and other key pieces of supporting evidence are yet to be finalised (for example the results of the latest Call for Sites exercise, the emerging Sustainability Appraisal, the additional work to identify additional office floor space and preparing the Community Infrastructure Levy), this Council reserves its position on commenting on the housing target of 17,100 dwellings over the Plan period.



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INVESTOR IN PEOPLE

Clearly a robust position will be needed to justify a lower housing target than OAN and a clear demonstration as to how Maidstone Borough Council has sought to address this OAN. We look forward to being able to comment further as that position emerges.

If the intention is to move to the publication stage (Regulation 19) after the current consultations (para 1.6) it will of course be important to ensure that the whole Plan is updated to reflect the new evidence. This will also be an opportunity to refresh certain parts to reflect recent changes in national planning policy guidance, particularly in the light of the Planning Practice Guidance published in March and the Ministerial statement on 13<sup>th</sup> March in relation to the Housing Standards review, which suggests in respect of the Code for Sustainable Homes that the requirement to achieve Code Level 4 (set out in Policy DM2) may be relaxed.

In view of the cross boundary issues between our two authorities, the shared Housing Market Area and in light of the Duty to Cooperate, I would be grateful if you could alert us to any other representations or key issues arising in relation to policies or sites to the north west of Maidstone.

In addition to these general points, please find attached some detailed responses for consideration.

Yours sincerely,

A handwritten signature in black ink that reads "Ian Bailey". The signature is written in a cursive, slightly slanted style.

**Ian Bailey**  
Planning Policy Manager