

## Officer Level Responses in Respect of Maidstone Local Plan Regulation 18 Public Consultation

Reference	Issue	Response	Comment
2.2	National Plans and Strategies	Could now be updated to reflect the new Planning Practice Guidance March 2014.	Updating
2.5	Regional Plans and Strategies	Could make reference to emerging Kent Waste and Minerals Local Plan	Updating
2.8	Evidence Base	See general comments in respect of the emerging Integrated Transport Strategy. Also the Strategic Flood Risk Assessment dates from 2008 and may be in need of updating now?	Updating
4.3/4.4	Meeting Objectively Assessed Housing Needs	The 19,600 OAN is recognised. Comment is reserved on the Local Plan provision of 17,100 pending the final outcome of the most recent Call for Sites. It is agreed that any unmet need will have to be supported by a very strong case of constraint on development. TMBC look forward to being involved in the further consultations on any additional sites arising from the Call for Sites.	Further consultations to follow.
4.6	Office based requirement – further work to meet 15,583sq.m shortfall	There is a degree of inconsistency with the housing target. Although the unmet housing need of 2,500 units may be reduced by the latest Call for Sites exercise, the implication in 4.3/4.4 is that the Plan may go forward with a shortfall. In the case of unmet office floor space it is assumed this will be resolved following further work.	Inconsistency point.
4.21/4.22	Sustainability Appraisal (SA) of the Housing Strategy options.  The SA work seems to favour a dispersed pattern of growth for the 17,100 provision explained in	Since the ‘very strong case’ for justifying the lower housing target referred to in 4.3/4.4 relies heavily on the SA work, this section could be expanded to add further weight to the justification. For example, to explain why the under supply of jobs is an issue, particularly in the light of 4.6 above.	Strengthening the supporting text in respect of the SA work.

	4.3/4.4. The options for the full OAN of 19,600 score less well due to potential environmental impacts and an over supply of housing relative to jobs.	Also, the SA concludes that the option for a new settlement is uncertain and therefore scores less than a dispersed option. It is unclear how this assessment has been weighted bearing in mind that such an option could help meet the unmet housing need and deliver new infrastructure thus alleviating some of the potential environmental impacts associated with the other growth options, for example, additional pressure on the local highway network in Maidstone itself?	
Policy SS1	9. In other locations, protection will be given to the rural character of the borough avoiding coalescence between settlements, including Maidstone and surrounding villages, and Maidstone and the Medway Gap/Medway Towns conurbation.	In Policy SS1 and the sections dealing with the strategic sites in the north west of the borough there is an aspiration to protect the coalescence of the Maidstone and the built up areas in Tonbridge and Malling. This reflects the Strategic Gap policies in the Maidstone Local Plan (2000) and the TMBC LDF. However, the new NPPF no longer provides the basis for such policies and the emerging Maidstone Local Plan reflects this by allocating sites up to the joint borough boundary.	Amend wording.
6.6	<b>North west strategic housing location</b>  <b>6.6</b> At this location the council is keen to retain the separation between the edges of Barming and Allington and the edge of the Medway Gap settlements in Tonbridge and Malling Borough i.e. Aylesford, Ditton and Larkfield.	The policy aspiration to retain the separation of the built up areas listed in paragraph 6.6 is acknowledged, however, it should be recognised that this Plan can only influence future development proposals and/or development restraint policy within Maidstone Borough.	Clarification.
Policy H3 and 6.15	<b>Broad Locations for Growth</b>  Post 2026 up to 600 extra dwellings	See comment above in relation to 4.6 under supply of office floor space.	Need for additional office floor space to be identified over

	are anticipated in the Town Centre 'broad location' possibly as a result of the conversion of poor quality office accommodation.	While appreciating that the intention is to review the plan by 2021 when the situation might be much clearer regarding the broad areas of search, doesn't the implication that existing office floor space will be lost from the town centre mean that in fact even more office capacity will need to be identified in addition to the 15,583sq.m shortfall?	the plan period.
Policy DM2	Minimum requirement for level 4 Code for Sustainable Homes	Could be updated in the light of the recent Housing Standards Review. No longer required.	Update
Policy DM16 and 11.90	The Council will review the significance of the air quality impacts from new proposals in line with national guidance.	The impacts on air quality arising from new development in Maidstone on areas beyond the borough boundary should also be taken into account, for example in relation to Wateringbury and the Hermitage Lane allocations.	Clarification
Appendix A	North West Strategic Housing Allocations	See earlier comments in respect of mitigating impacts along Hermitage Lane and particularly the junctions with the A26 and A20.	Reiteration of earlier responses.
Appendix A	Sites H1(2) Land East of Hermitage Lane and H1(3) Land West of Hermitage Lane  Appropriate air quality mitigation measures will be implemented as part of the development.	Further to the comment in relation to DM16 above, will this extend to Wateringbury?	Clarification
Appendix A	Site H1(4) Oakapple Lane, Barming  Site for up to 240 dwellings with main access through Land West of Hermitage Lane Site	TMBC have not been invited to or commented on this allocation previously. The same concerns apply as to those already made in relation to sites H1(2 and 3).	See comments above in relation to Appendix A.