

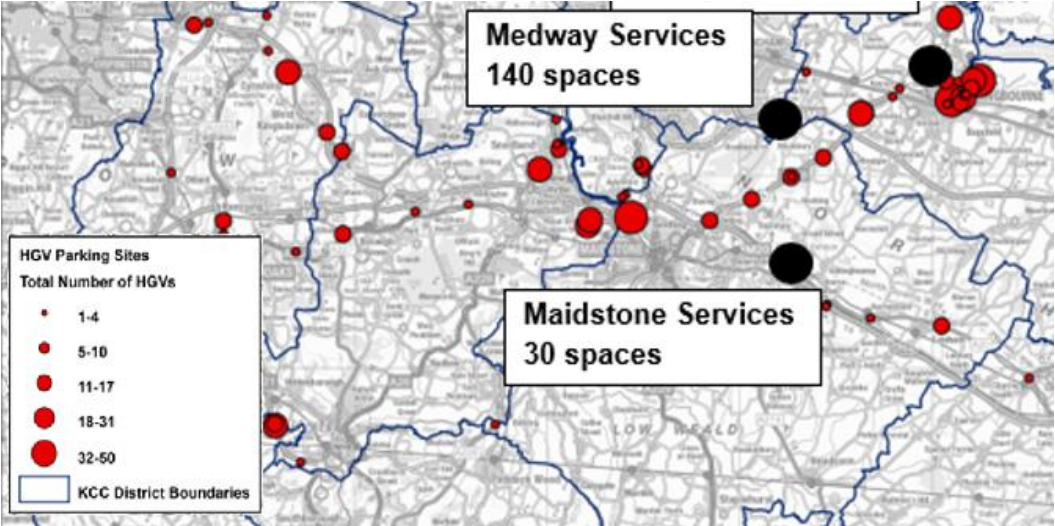
Policy / paragraph	Commentary
Chapter 1 Introduction	
	<p>The County Council, in its response to the previous Regulation 18 (1) consultation, emphasised its concern over the quantum of development that Maidstone Borough Council is having to plan to deliver as an output from the Government' standardised methodology for assessing housing needs. In that context, KCC acknowledges and supports the efforts being made by the Borough Council to take advantage of the transition period proposed by the government ahead of the introduction of any further proposed changes to the methodology, to allow the Borough Council to plan for the lower number of 1,214 homes a year (instead of 1,568 homes a year).</p> <p>The County Council recognises that to achieve this, the timetable for producing the review of the adopted Local Plan 2017 has been brought forward and has resulted in a three-week consultation for this Regulation 18 Preferred Approaches consultation. KCC has provided full comments on the Local Plan consultation below but given the timescales involved, would highlight the need for full coordination and further engagement on emerging site allocations and the range of wider strategic issues where further assessment is required.</p>
Chapter 3 Spatial Portrait & Key Local Issues	
Spatial Portrait & The LPR's Strategic Issues	<p>Heritage Conservation: There are five Registered Parks and Gardens in Maidstone Borough and the assets listed in this paragraph are not all built assets and include archaeological sites and landscapes. The County Council would therefore recommend that the first sentence of paragraph 3.9 is amended to <i>"The Borough is fortunate to benefit from a number of <u>heritage</u> and natural assets"</i>.</p> <p>Within the Local Plan Review paragraph 3.11, the strategic issue identified for heritage is limited to <i>"Ensuring that the borough's historic assets are conserved and managed"</i>. The County Council notes that other environmental issues listed are presented more positively. The County Council would therefore recommend the following amendment: <i>"Ensuring that the borough's historic assets are conserved and enhanced"</i>.</p>
Progress on Neighbouring Authority Plans	<p>The County Council would welcome discussions with the Borough Council on compiling of a Statement of Common Ground (SoCG) to ensure that relevant matters which relate to the County Council's role are picked up as part of the Local Plan Review process. Engagement is required to ensure the relevant local and strategic infrastructure is in place to support the growth strategy proposed in this Review.</p> <p>The County Council would recommend that all relevant strategic cross-boundary issues are captured in an SoCG with KCC, to include transport, waste infrastructure, community infrastructure, education and climate change mitigation and adaptation. The County Council would make the following observations in relation to Table 3.2 "Cross Boundary Issues". KCC notes recognition of historic assets and risk of flooding and would also request engagement on these matters.</p> <p>The County Council encourages the importance of the Local Plan review process to focus on a place-making approach that puts infrastructure first. This will ensure that planned residential and commercial growth will deliver high quality and sustainable developments and provide opportunities for local people. This "Infrastructure First" approach is embedded in the Kent and Medway Infrastructure Proposition, a deal with Government for new infrastructure investment that will enable accelerated housing delivery, which is focussed on building the right homes in the right places and providing the public services, transport infrastructure, jobs and homes that residents will need now and in the future.</p>

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Chapter 4 Spatial Vision and Objectives	
Local Plan Spatial Vision	<p>Air quality: The County Council supports the commitment for developments within, and with the potential to, adversely impact the borough's AQMA to be required to mitigate their impact, having regard to both on-site design and travel patterns and modes of travel. The recognition of the need for 'tackling congestion and air quality issues through improvements for vehicles, pedestrians and cyclists, including public transport' in achieving the Maidstone Town Centre 2050 Vision is also welcomed.</p> <p>Easing congestion on Bluebell Hill and improving the junctions should improve air quality as Bluebell Hill is a hotspot.</p> <p>Resilience and Emergency Planning: Consideration of the need for spaces to adapt to the challenges presented by climate change will be important, as well as exploration of 'cool towns' principles, to inform the design of the public realm. Consideration of flood risk and biodiversity opportunities for the River Len should feature.</p> <p>Heritage Conservation: In respect of paragraph 4.2, the County Council welcomes the addition of the protection of heritage to the Spatial Vision.</p>
Chapter 5 The Borough Spatial Strategy	
SS1 The Borough Spatial Strategy	<p>It is understood that, of the total additional 5,790 homes to be planned for, a total of 1,966 homes would be provided in Maidstone County Town, 2,700 homes would be delivered in the two garden settlements (with a total of 1,700 homes in the settlements, once fully built out beyond the Plan period) and the remaining 1,124 homes being built in Rural Service Centres (467 homes), Larger Villages (353 homes) and Smaller Villages and the Countryside (304 homes). The County Council provides commentary in respect of these locations and relevant policies below.</p> <p>The County Council, as key infrastructure provider supports an 'Infrastructure First' approach to growth, where infrastructure is planned for and delivered in a timely manner, ahead of residential development where necessary. In general, critical mass through large scale developments offers the most effective opportunity to provide infrastructure to support growth. The County Council therefore continues, in principle, to be supportive of the progression of garden settlement options. Engagement with the County Council at the earliest opportunity will be critical in ensuring that all the necessary KCC community infrastructure and services are incorporated into the master-planning to deliver sustainable growth. The County Council would welcome discussions with the Borough Council at the earliest opportunity on the proposals for growth.</p> <p>As a key infrastructure provider, KCC would like to be involved in any master planning discussions at an early stage to ensure the necessary infrastructure is planned from the outset, and the impact of development.</p> <p>Any infrastructure enhancements required as a result of growth within the Borough must be wholly funded through developer contributions. It will be essential for the funding mechanisms required for infrastructure requirements to be established at the outset, and this must underpin the initial discussions on all growth options, to ensure that prospective site allocations are genuinely viable and deliverable (<i>further comments are provided at SP13: infrastructure, below</i>).</p> <p>The County Council supports the commitment in Policy SS1 that infrastructure schemes that provide for the needs arising from development will be supported and that new development will be supported if sufficient infrastructure capacity is either</p>

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	<p>available or can be provided in time to serve it. KCC would welcome continued discussions with the Borough Council on the use of section 106 agreements to secure the delivery of infrastructure on strategic level sites, as opposed to the Community Infrastructure Levy (CIL). This will provide more certainty around funding and delivery of the required infrastructure, ensuring it is delivered in a timely manner as it is required by a new community.</p> <p>Highways and Transportation: The County Council, as Local Highway Authority, is working closely with the Borough Council on the transport considerations for the Local Plan Review. This is mutually beneficial, as delivery of a successful transport strategy that enables growth whilst preserving, and seeking to enhance, the functionality and capacity of the transport network requires close collaboration between the Local Highway Authority and Planning Authority.</p> <p>In respect of the spatial strategy (and the proposed site allocations set out in Chapter 8), it is noted that the strategy is broadly consistent with the recommendations put forward by KCC as part of its response to the Regulation 18(1) consultation. KCC requested that all opportunities were explored to utilise the potential for Garden Communities and larger strategic allocations to achieve the critical mass needed to create self-contained communities. Such an approach enables significant mitigation measures to be provided and reduces the dependency on smaller scale sites in less accessible locations, where there is less scope to secure transport network improvements.</p> <p>The proposed spatial strategy is also broadly consistent with the recommendations provided by within the Transport Modelling Stage 1 Technical note, which recommended a “move away from reliance on Rural Service Centres and Larger Villages” and continued to advise that, overall, the scenario “strikes the balance between allocating sites within Maidstone Town Centre ... and the Garden Settlement sites” (Conclusions and Next Steps, page 66).</p> <p>The pattern of site allocations proposed is generally consistent with this advice; however, it is important to note that the consultation document does still include allocations in the Rural Service Centres and Larger Villages. Careful consideration must be given to constraints on the highway network in those areas.</p> <p>The County Council, as Local Highway Authority is also supportive of the intention to focus growth on Maidstone Town Centre, where there are greater opportunities to encourage sustainable travel behaviours due to the close proximity to key facilities and public transport hubs. Town centre growth is dependent on sustainable transport options.</p> <p>Consideration must be given to the constraints that currently exist on the highway network. These constraints are experienced across the Borough, as many of the principal road corridors are affected by congestion over prolonged periods; however it is most pronounced in the Maidstone urban area. In many cases, the built-up nature of the surrounding environment will prevent or limit the scope for road capacity improvements to be implemented. It is imperative that growth is directed to locations where sufficient network capacity can be made available, rather than simply worsening road conditions on corridors where the impacts cannot be fully mitigated. Because of this, KCC as Local Highway Authority does have serious concerns in relation to a number of the proposed allocations, particularly the relatively significant number proposed towards the south east of the urban area, where the scope for further capacity upgrades on the A229 and A274 is very limited.</p>

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	<p>The safeguarding of land for a potential Leeds Langley Relief Road is welcomed in that it ensures the delivery of such a road will not be prejudiced by future development. The County Council remains willing to play its part in the ongoing discussions with Maidstone Borough Council, landowners and developers in exploring how housing growth could facilitate provision of the road.</p> <p>Education:</p> <p><u>Primary Education:</u> The County Council, as Education Planning Authority, has provided comments in respect of primary provision within commentary regarding Policy SP1, 3, 4(a), 4(b), 6 and 7.</p> <p><u>Secondary School Provision:</u> Given the strategic nature of secondary provision, commentary is largely provided within this Policy. The proposed spatial distribution presents a challenge for secondary school provision. In total, an additional 8FE of provision would be required to accommodate growth within the Plan period and 13FE of provision to accommodate all growth identified in the proposed Local Plan Review, i.e. with the total garden settlement capacities of 7,000, that will be delivered beyond the plan period.</p> <p>In particular, the growth identified for Maidstone Town will be challenging to mitigate. Approximately 4FE of provision would be required to meet the growth in Maidstone Town. Providing this through expansions of existing schools is likely to be very challenging given the limited scope for existing schools to expand, nor does it represent a level of demand that would sustain the establishment of a new secondary school within the town.</p> <p>Within the plan period, an additional 4FE of secondary demand would be generated by development outside of Maidstone Town. There may be scope for the Lenham School to expand by up to 2FE, but a significant element of growth outside of Maidstone Town is likely to place additional demand on Maidstone Town schools.</p> <p>The establishment of a new secondary school to support growth at Heathlands will be necessary and a significant amount of work will need to be undertaken to identify how development in and around Maidstone and the Regional Service Centres could be accommodated. This may include the need for an additional secondary school to be established within the Maidstone urban area.</p> <p>Provision and Delivery of County Council Community Services: There is need to ensure that all growth is delivered with an appropriate range of community facilities, including Early Years provision, Youth Services, Adult Social Care, Community Facilities and Social Services. The County Council would welcome the opportunity for continued working as the growth strategy for the Borough is progressed to ensure that for each emerging site allocation, an adequate level of infrastructure is delivered alongside development.</p> <p>Sustainable Urban Drainage Systems (SuDS): The Department for Environment, Food and Rural Affairs (Defra) is currently undertaking a review of the Non-Statutory Technical Standards for Surface Water Drainage, which guides how Lead Local Flood Authorities review drainage strategies submitted for new major development. The revisions are likely to require more in relation to multi-functionality of the drainage systems, specifically in relation to biodiversity and amenity and promoting the use of rain-water harvesting. This will require that KCC as Lead Local Flood Authority</p>

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	<p>ensures that drainage strategies deliver more as blue-green infrastructure.</p> <p>The Borough Council should ensure that policies in the Local Plan Review concerning site allocations are supportive, and promote delivery of, multi-functional drainage systems. This includes the incorporation of local drainage features within development schemes to promote connectivity and the existing natural environment. It would be beneficial if policies could provide better direction as to the requirements for surface drainage features, specifically in relation to amenity within public open space.</p> <p>It should also be noted that for larger development allocations, Flood Risk Assessments (FRA) will be required due to their site area alone. KCC recommends that policies clearly state that the FRA should also consider surface water drainage provision, contributions to blue-green infrastructure and provision of multi-functional benefits.</p> <p>KCC notes that the Heathlands site is in the Stour catchment and is therefore potentially affected by the nutrient neutrality issue. The County Council strongly supports the delivery of nutrient neutrality on the Stour; the garden settlement offers an opportunity to integrate nutrient neutrality into the masterplan of the settlement in a way that can deliver multiple benefits. This is the approach that is being taken for Otterpool Park by Folkestone and Hythe Borough Council and KCC would strongly support a similar approach.</p> <p>Resilience and Emergency Planning: Development across the Borough should look to incorporate natural climate solutions.</p> <p>Biodiversity: There is need for a strategic consideration of green infrastructure and connectivity between and within all the allocated sites to maintain and improve ecological connectivity throughout the Borough. Sites should not be developed in isolation but should have consideration of other proposed and potential developments, to ensure that areas of green and open spaces and landscaping connect to each other.</p> <p>In respect of net gain, the Kent Nature Partnership (through its Sub-Group) is exploring the potential for a County-wide 20% net gain approach and work is currently being undertaken to demonstrate whether that would be feasible and viable. KCC would recommend close working with the Kent Nature Partnership as the Local Plan Review progresses. The Local Plan Review should aim to be as aspirational as possible and KCC supports the garden settlement policies to incorporate 20% net gain.</p> <p>The County Council has adopted the Biodiversity Strategy, which commits to setting out a five year implementation plan to sit alongside the strategy, with delivery of the targets broken down into smaller, shorter actions to progress towards the 25-year vision. The County Council would recommend that the Borough Council works closely with the Kent Nature Partnership so that the Local Plan can help embed and deliver the Strategy's ambitions to consider, protect and enhance Kent's valuable natural capital resource and the services it provides.</p>
Commercial Development Needs	<p>It is noted that the Economic Development Needs Study and the Maidstone Economic Development Strategy are being reviewed and refreshed to feed into the Regulation 19 Local Plan Review. KCC would emphasise the need for all emerging development allocations across the Borough to be supported by provision for local jobs, to ensure that a holistic and sustainable approach is taken to housing and new communities – this will be particularly important for any proposed sites in the Rural Service Centres and other rural locations. Digital infrastructure – including gigabit capable broadband</p>

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	<p>connections (e.g. full fibre) – will help contribute, as part of sustainable development, to boosting the resilience of the local workforce, allowing them to work flexibly and at home where necessary.</p> <p>The Ministry of Housing, Communities and Local Government (MHCLG) made the following amendment to Paragraph 107 of the National Planning Policy Framework 2019 (NPPF): “<i>Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance.</i>”</p> <p>KCC surveys of overnight lorry parking have determined that the Maidstone area has significant numbers of Heavy Goods Vehicles (HGV) parked inappropriately overnight, (as indicated in Figure 1 below) most notably along the A20 and A249 corridors (data from these surveys can be provided on request). There are also “<i>local shortages</i>” in lorry parking provision with only around thirty spaces at Maidstone Services at Junction 8 of the M20 (the nearby Medway Services on the M2 in Medway Council’s administrative area provides a greater number [c.140] of spaces). It is reported that the lorry parking area at the Maidstone Services is full most nights and causes localised parking problems when vehicles are rejected from the site.</p> <p>Lorry parking provision at Junction 8 of the M20 is also of strategic importance. This is because it is the start of Operation Stack when there is disruption at the Channel Tunnel and/or Port of Dover, with non-port bound traffic diverted from the M20 at Junction 8 onto the A20, while the coast-bound carriageway of the M20 is used to queue port bound freight traffic. From the end of the EU Departure Transition, (1 January 2021) it will be the start of Operation Brock with a moveable barrier placed between Junctions 8 and 9 on the London-bound carriageway to enable two way contraflow for non-port bound vehicles, while the coast-bound carriageway is used to queue port-bound freight vehicles if there are delays to crossing the international border. This strengthens the case further for additional lorry parking facilities to be provided at Junction 8 to meet the needs of freight drivers who might need to take mandatory breaks before potentially long delays in Operation Brock.</p> <p>Potential impacts on Junction 8 from developments, especially regarding its function for international freight traffic management, will need to be considered.</p> <p><u>Figure 1: Lorry Parking Surveys in the Maidstone Area</u></p> 

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Chapter 6 Strategic Policies	
SP1 Maidstone Town Centre	<p>Highways and Transportation: The County Council as Local Highway Authority is generally supportive the intention to focus growth on Maidstone Town Centre, where there are greater opportunities to encourage sustainable travel behaviours due to the close proximity to key facilities and public transport hubs. However, as expressed under Policy SS1 above, consideration must be given to the constraints on the network, which are most pronounced within the town centre and urban area, and where in some locations, impacts cannot be fully mitigated. A move towards sustainable transport has to be a priority.</p> <p>Education: The County Council notes that an additional 882 units are proposed in the Maidstone Town (Town Centre Regeneration and Maidstone Urban Area), which would likely place additional pressure for primary school places – this is expected to be at 1FE or 210 places. It should be noted that demand for primary school places in this area continues to be generated by the conversion of employment space to residential through permitted development rights. In order to ensure that all growth is sustainable, the County Council requests that the Borough Council provides an estimation of the total growth expected in the town, and where this is to be located so that infrastructure, in the form of school places, can be planned for the total anticipated level of growth.</p> <p>Whilst Maidstone County Town has many existing primary schools, the scope for existing schools to expand is typically limited due to site constraints; this is particularly true for the schools in the most urban areas.</p> <p>The Local Plan does not identify infrastructure projects to increase the number of school places needed to support growth identified in the town and the associated policies do not reference the need for school places. The County Council requests engagement to appraise infrastructure options - and this may include the need for land to be allocated within the Plan for education purposes.</p> <p>Provision and Delivery of County Council Community Services: From the perspective of delivering KCC community infrastructure and services, the County Council notes that there are an additional 700 homes within the Maidstone Town Centre (with a further 182 homes within the Urban Area), which will generate further pressure on existing services. Within urban locations, current infrastructure provision can often be constrained in terms of expansion opportunities to accommodate additional growth. Collaboration between the County Council, Borough Council and other key infrastructure providers at an early stage will be essential in ensuring that the necessary infrastructure associated with these emerging sites can be made available to support growth – with necessary services and facilities in sustainable and accessible locations. Any infrastructure improvements or new facilities and services required as a result of growth within the Borough must be wholly funded through developer contributions.</p> <p>Waste Management: The County Council, as Waste Management Authority is in the process of commissioning a new additional Household Waste Recycling Centre (HWRC) to be located at Allington, which is due for delivery in the next eighteen months. This will help support projected housing growth within Maidstone Town Centre, as well as that to the west and potentially north. KCC requests that Waste Management facilities are referenced as infrastructure requirements within policy.</p> <p>Heritage Conservation: The County Council notes the lack of objectives that make reference to the town's physical environment. An attractive town centre can assist in</p>

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	<p>the delivery of the economic objectives listed. The County Council recommends a new objective is added that commits the Borough Council to ensuring that Maidstone is a physically attractive centre in terms of its environment, built heritage and public realm. In respect of paragraph 3.39, regarding the Town Centre Strategic Vision, the following amendment is recommended:</p> <p><i>“By 2050 a renewed Maidstone town centre will be a distinctive, safe and high quality place that has:</i></p> <ul style="list-style-type: none"> <i>• Retained its best environmental <u>and heritage</u> features, including the riverside, <u>historic buildings</u> and the enhanced public realm”</i> <p>The County Council notes the supporting text recognises the potential for improving the setting and accessibility of Maidstone’s heritage, but there is no corresponding text in the ‘key components’ list. KCC recommends inclusion of the following text:</p> <p>- <u>Enhancing the built and historic environment of the town so that it has a stronger character for new build to reference in design and materials.</u></p> <p>Resilience and Emergency Planning: Where possible, green spaces must be delivered alongside housing, employment and infrastructure growth. Consideration should also be given to the potential for the removal of manmade obstructions along town centre watercourse (where possible) to support biodiversity connectivity. Consideration must be given to improvements to boost the resilience of local communities to the challenges presented by climate change.</p>
<p>SP3 Development at the edge of Maidstone</p>	<p>Highways and Transportation: As expressed within Policy SS1, the County Council requests that consideration is given to the constraints that currently exist on the highway network – which are most pronounced in the Maidstone urban area. In many cases, the built-up nature of the surrounding environment will prevent or limit the scope for road capacity improvements to be implemented, which can limit opportunities for transport mitigation. Therefore, KCC does have concerns around some of the proposed allocations, particularly the relatively significant number proposed towards the south east of the urban area, where the scope for further capacity upgrades on the A229 and A274 is minimal. The County Council therefore has strong concerns due to the severe congestion issues.</p> <p>Education: The total proposed additional growth of 1,076 units in the edge of Maidstone will generate a cumulative demand of approximately 1.5FE of primary provision. Given the wide geographic spread of these allocations, the additional primary provision would also likely need to be distributed in proportion to the growth. This is likely to require 1FE of additional provision in the south areas of Maidstone through the expansion of an existing school. Additional provision will be needed to support the north and north east allocations (0.5FE), which may need to be considered alongside proposed growth within the town area.</p> <p>Provision and Delivery of County Council Community Services: The County Council understands that, of the additional 1,084 dwellings being proposed in Maidstone Urban Area, 84 homes would be in the north, 250 homes in the South West, 658 homes in the South/South East and 92 homes in the North East. The County Council would request further, ongoing discussions with the Borough Council to assess the potential service pressures from these individual site allocations and to assess the current infrastructure provision and constraints and the mitigation that may be required to ensure that adequate levels of infrastructure can be provided.</p>

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	<p>Waste Management: The County Council, as Waste Management Authority, has submitted two projects for inclusion in Maidstone's Infrastructure Delivery Plan to address the proposed growth in the district. Initially, a short-term project is required to expand the existing HWRC at Tovil. A longer-term project is then needed to relocate the HWRC to a larger site to ensure the required capacity to serve all future development is available. With such a weighting of development to the south and east of Maidstone, it will be vital to ensure that the longer-term project and its funding through developer contributions is supported in policy. KCC requests that these infrastructure projects are supported by Local Plan policy and referenced as infrastructure requirements within policy.</p>
<p>SP4 Garden Settlements</p>	<p>Highways and Transportation: The County Council notes the reference to a new M20 motorway junction at Heathlands Garden Settlement (Policy SP4(a)) and a new connection to the M2 at Junction 4 to support Development North of the M2/ Lidsing (Policy SP4(b)) to support the delivery of these garden settlements. The Borough Council will need to engage at the earliest opportunity with Highways England about the feasibility of additional junctions or improvements to the Strategic Road Network (SRN) and in particular, about the operational impacts on Operation Stack / Brock of a new junction between M20 Junctions 8 and 9. The County Council would welcome being part of these discussions to understand wider implications on the local highway network.</p> <p>Full Highways and Transportation comments relevant to the two proposed Garden Settlement allocations are set out below at SP4(a) and SP4(b).</p> <p>Education: Comments relevant to the two proposed Garden Settlement allocations are set out below at SP4(a) and SP4(b).</p> <p>Provision and Delivery of County Council Community Services: KCC supports the objective to establish garden settlements as a model of future delivery, provided that they are suitably located, master-planned and delivered with respect to existing infrastructure and that upgrades to existing infrastructure are properly assessed for their ability to cope with new development. New supporting infrastructure must be appropriate in terms of scale. It is critical that KCC services are considered at an early stage and that they are commensurate with the scale of the development and future proofed to cater for the growing community.</p> <p>Overall, there will need to be a range of policies that look to ensure that the essential infrastructure will be delivered, phased and prioritised to support the significant growth planned at the two garden settlements. The County Council would strongly advocate the need to secure and/or fund all necessary infrastructure through Section 106 and Section 278 legal agreements, to ensure that infrastructure is delivered at the appropriate phases of the developments.</p> <p>The County Council would welcome early engagement with the Borough Council on the type and location of community infrastructure required to support the proposed garden settlements, to ensure that they can be delivered sustainably. Overall, the County Council would welcome a prominent role in the planning of and delivery of garden settlements within Maidstone to ensure that necessary infrastructure can be planned for, funded and delivered in a timely manner.</p> <p>The County Council would also encourage consideration of policy requirements for the consideration of long-term community stewardship options for the developments, to ensure that infrastructure is managed and maintained.</p>

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	<p>Public Rights of Way and Access Service: The proposed garden settlements would transform the landscape. Local Plan policy must ensure that the garden settlements adhere to good design principles and positively accommodate the Public Rights of Way (PRoW) network. At this stage, the County Council is comfortable that the proposals within the garden settlements (combined with policies SP12 and SP14A) will ensure that new developments will provide opportunities for active travel and outdoor recreation.</p> <p>Waste Management: The County Council, as Waste Management Authority, recognises that garden settlement developments provide an opportunity for new waste infrastructure. The impact of the garden settlements on waste infrastructure and the need for waste infrastructure capacity to support growth must be considered within Local Plan policy and further discussions are encouraged with the County Council on this matter.</p> <p>Digital Connectivity: In respect of paragraph 1g), reference to <i>superfast broadband</i> should be changed to <i>gigabit-capable broadband</i>, as current government policy requires new development to be connected with full-fibre (FTTP) or gigabit capable connections.</p> <p>Heritage Conservation: The County Council recommends the following addition: <i>“The council supports the development of appropriate Garden Community developments, subject to them, as well as having regard to other policies in this Plan: ... h) have regard to the conservation and enhancement of the historic environment”</i></p> <p>Resilience and Emergency Planning: The new garden settlements will need to be delivered to be resilient against the challenges presented by climate change and be designed to be water use and waste water efficient.</p>
SP4(a) Heathlands Garden Settlement	<p>The County Council raises a number of key issues, as set out below, that will need to be addressed /resolved as the Local Plan Review progresses and KCC would welcome continued involvement to ensure that all KCC services and infrastructure considerations are factored in at the early stages of site assessment and development.</p> <p>The commitment to infrastructure delivery will be critical to the acceptability of the scheme. All County Council services and infrastructure must be captured in the planning, phasing and delivery of a new settlement in this location, to ensure that services are funded, delivered to a high standard and well maintained in the long term. In recognition of both the scale and complexity of this project, the County Council would look to contribute effectively to detailed negotiations and would expect to be a signatory to a section 106 agreement as part of any future planning application.</p> <p>Highways and Transportation: The County Council notes that this policy sets out a number of items indicative of the transport strategy for this site under point 7. KCC as the Local Highway Authority has the following comments to make in regard to these proposals:</p> <ul style="list-style-type: none"> a) Providing a new rail station with a Garden Settlement site would generate sustainable transport opportunities; however, KCC has concerns over deliverability, especially in terms of the cost and complexity in delivering new railway infrastructure, and the impact of increased journey times caused by an additional stop for passengers on existing services. KCC strongly recommends

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	<p>that Maidstone Borough Council engage with Network Rail to undertake a feasibility study at the earliest opportunity to establish whether this proposal is deliverable and, if so, in what timescales. KCC requests engagement on the prospect of a new station to support this development.</p> <ul style="list-style-type: none"> b) It is likely that the proposed two new A20 junction accesses can be achieved in terms of layout. KCC does have concerns as to whether other key junctions on the A20 corridor, particularly on the approach to M20 Junction 8, have capacity to cater for the likely traffic impacts and this will need to be assessed. c) The provision of new and improved bus services is supported and the site could realistically provide a significant investment to support journeys by bus. d) Good quality walking and cycling connections to shops, schools and other facilities can be provided from the outset within the site and connections outside the development should also be considered. e) A new motorway junction in close proximity to the site would reduce the impact on local roads; however, KCC has concerns over the funding and time scale to deliver such infrastructure which would come forward in the latter stages of the development and the overall likely impact of increasing car trips compared to journeys by rail and bus. <p>The Heathlands Garden Settlement development is still at a conceptual stage and the details that would enable the Local Highway Authority provide a technical assessment in terms of impact and measures required and how these measures could be achieved are expected over the coming months.</p> <p>Education: The development of 5,000 homes at the Heathlands Garden Settlement would necessitate 7FE of additional primary provision to be established. This would likely be appropriately met through three new primary schools within the development; two at 2FE and one at 3FE.</p> <p>The development, once fully occupied, would also generate a demand for 1,000 secondary school places. This will require the establishment of a new secondary school, which will either be 6FE or 8FE.</p> <p>The draft policy references the establishment of one primary school; this is wholly insufficient. Three primary schools and a secondary school would be required to accommodate the demand generated directly by the development.</p> <p>It is imperative that a masterplan for the total development is created, identifying broad locations for all of the schools that will be required. Paragraph 6.74 indicates that the development could accommodated an additional 2,000 units beyond that outlined in the policy; education provision for the greatest potential of growth should be planned for, and this can then be scaled down as certainty is developed with regards to the total expected level of growth.</p> <p>Minerals and Waste: KCC would draw attention to discussions which have taken place with the Mineral Planning Authority regarding Heathlands site which is affected by the Chapel Farm allocation for soft sand in the recently adopted Kent Minerals Sites Plan, 2020. The Heathlands site is also in close proximity to a number of active mineral sites at Shepherds Farm and Burleigh Farm. Development of the strategic allocation proposed will need to ensure that the mineral reserves allocated in the Kent Minerals Sites Plan 2020 and the safeguarded reserves of other permitted mineral sites in the vicinity are not sterilised. This may have implications for phasing and design. The County Council would welcome ongoing dialogue as the plan work progresses.</p>

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	<p>Waste Management: The proposed garden settlement allocation at Heathlands is situated on the edge of the Maidstone and Ashford district boundary and for that reason, it has the potential to cause a significant impact upon the KCC HWRC service. As stated, residents of Kent are free to visit whichever KCC HWRC they wish. Unlike the kerbside collections which are district bound, residents tend to choose to visit the HWRC that is the closest and quickest to get to, and most efficient when disposing of their waste. New residents at Heathlands are likely to favour the Ashford HWRC in Brunswick Road as opposed to the existing Maidstone HWRC at Tovil. The Ashford HWRC is both closer in mileage, has better access from the main highway network and is a newer site with a more customer focused layout. Whilst residents are free to choose, the Ashford HWRC is nearing capacity and with projected housing growth in Ashford district, it will not be able to accommodate the additional demand from 5,000 new homes at Heathlands.</p> <p>There is currently no scope to increase the capacity at the Ashford HWRC. KCC has submitted two projects for the Maidstone Household Waste Recycling Centre (HWRC) at Tovil to Maidstone's IDP, being a short term project to increase capacity at the current location and a longer term project to relocate the HWRC to better serve all Maidstone residents. The project to improve Tovil HWRC in the short term is unlikely to be significant enough to change this behaviour and the only long term solution would be to locate a HWRC closer to Heathlands. However, in doing so, the relocated Maidstone HWRC would then possibly not adequately serve residents of Maidstone. The County Council would request the need to increase HWRC capacity is included in the infrastructure section of Policy SP4(a) for Heathlands Garden Settlement – and that it indicates the need to solve the capacity issue that will be created by this development.</p> <p>Sustainable Urban Drainage Systems: At the Heathlands Garden Settlement, surface water flood risk is associated with the ordinary watercourses that cross the site. The extents of flood risk should be accommodated within any masterplan for development in this area. The County Council, as Lead Local Flood Authority, requests that surface water is considered at early stages of master-planning to allow for SuDS to provide wider multi-functional systems and environmental benefit. A Flood Risk Assessment will be required for this Garden Settlement.</p> <p>Nutrient neutrality: Nutrient neutrality is a potentially substantial constraint on the Heathland Garden Settlement and nutrient neutrality on the River Stour will need to be delivered. Further, KCC would encourage Maidstone to recognise and promote the substantial opportunities this offers to deliver integrated blue/green infrastructure to provide multiple benefits, including high quality amenity, habitat, habitat connectivity, carbon sequestration and potentially reduced water consumption.</p> <p>KCC would encourage Maidstone Borough Council to make nutrient neutrality a more substantial part of the delivery of the garden settlement. At the very least, KCC considers this should also be considered in section 6 Infrastructure, as infrastructure will be required to meet this challenge. KCC also considers the potential scale of the measures and the need to integrate them from the start of planning means it should also be considered in section 4 Master planning and design parameters.</p> <p>Public Health: The County Council notes the requirement in Policy SP4 for both of the Garden Settlements to give residents the best opportunities to follow healthy lifestyles, allowing activity to be built into their daily lives and provide opportunities to buy and grow healthy food along with ensuring that health services are close at hand. This</p>

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	<p>ambition is strongly supported. If the ambition is to embed health and well-being from the start of development, as indicated in policy SP4, there must be a commitment to public health. The Joint Health and Well Being Strategy (2015 to 2021) ¹ provides further policy context on both the social care and the public health needs that must be considered. In addition, Kent and Medway's Sustainability and Transformation Plan for Kent and Medway² provides further detail.</p> <p>The scheme should incorporate the positive learning from the Healthy New Towns concept, including the experience at Ebbsfleet, North Kent. For example, it should include sufficient focus on the needs of those living within the development with dementia.</p> <p>The provision for delivery of Public Health services, which may include capital build costs for employment and community space, equipment, rent free use of space and initial start-up costs funded by the applicant, should be secured within a section 106 agreement.</p> <p>Sustainable Business and Communities: The development of a new garden settlement at Heathlands presents an opportunity to incorporate high quality sustainable design from the outset and test innovative low carbon energy generation/district heating and transport infrastructure at a community scale. This aspiration should be included within the Local Plan policy.</p> <p>Heritage Conservation: The County Council recommends that, in view of the potential significance of archaeology, clear reference must be made to the historic environment within the policy relating to Heathlands Garden Settlement.</p> <p><i>SP4(a) Heathlands Garden Settlement: Introduction to the Policy/Reasoned justification</i></p> <p>Heathlands contains known significant buried and visible archaeology and has the potential to contain significant as yet unknown archaeology. Of particular note is the site of Chapel Farm which seems to be an Iron Age, Roman and Medieval settlement of considerable regional if not national importance. The important heritage of this garden settlement could play a vital role in the sustainability ethos and providing a distinctive, high quality environment and public realm. It is essential that design and master-planning process utilises evidence-based heritage assessment. To ensure appropriate consideration of the historic environment KCC recommends the following paragraphs is included in within the policy:</p> <p><u><i>Heathlands has a rich and diverse heritage which presents unique opportunities and constraints. It will be important that key parts of the site are carefully designed to ensure appropriate conservation and enhancement of heritage assets to the benefit of the garden village community; their awareness, understanding and enjoyment of the special historic environment here.</i></u></p> <p><i>4) Master-planning and design parameters:</i></p> <p><u><i>f) Heritage assessment to inform design parameters including specific consideration of Chapel Hill Farm site</i></u></p> <p>The County Council also recommends the following paragraph is deleted and replaced</p>

¹ https://www.kent.gov.uk/_data/assets/pdf_file/0014/12407/Joint-health-and-wellbeing-strategy.pdf

² <https://kentandmedway.nhs.uk/resources/kent-medway-sustainability-transformation-plan/>

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	<p>with the suggested text below:</p> <p><i>8) Environmental</i></p> <p><i>d) There are several areas of potential archaeological sensitivity across the site, and these should be surveyed to ensure their (west of the site) + other areas</i></p> <p><u><i>9) Heritage</i></u></p> <p><u><i>a) Archaeological Strategy needed for the appropriate conservation, management and enjoyment of the historic environment.</i></u></p> <p><u><i>b) Community Heritage Programme required to ensure the wider social, health and well-being and environmental benefits that conservation and utilisation of heritage on this site can bring to the garden village community;</i></u></p> <p><u><i>c) Chapel Hill Farm safe-guarding zone based on suitable evidence to ensure its conservation and be utilised to the benefit of the community.</i></u></p>
<p>SP4(b) Development North of M2/Lidsing</p>	<p>Highways and Transportation: The County Council notes that this policy sets out a number of items to inform a transport strategy. KCC as the Local Highway Authority has the following comments to make in regard to these proposals:</p> <ul style="list-style-type: none"> a) A new connection to the M2 at Junction 4 would reduce the impact on local roads and exploring this potential is supported. It is important that any such infrastructure is delivered in a timely manner, however, as local roads could be heavily impacted if delivery is delayed or later than is required to accommodate trip generation from the new settlement. b) Improving bus services is supported, however it is noted that this specific route falls mostly within the Medway area and Medway Council will have detailed views on this proposal. c) As with the Heathlands proposal, good quality walking and cycling connections to shops, schools and other facilities should be provided from the outset within the site and connections outside the development should also be considered. d) This item does not appear to directly link with the North of M2 site. While new motorway links play a strategic role, it would not be a mitigation measure for the specific impacts of this proposal. <p>The North of M2 development is still at a conceptual stage and the details, which would enable KCC officers to provide a technical assessment in terms of impact and measures required and how these measures could be achieved, are also expected over the coming months.</p> <p>Education: The development of 2,000 homes would necessitate the establishment of a new primary school; this should be designed for a total capacity of 3FE.</p> <p>There are no existing schools within the KCC area that could serve this development. This will present a challenge in the early years/phases of the development. In these years the demand would not be high enough to sustain a new primary school and pupil pressure will fall within the Medway area. Significant engagement and coordination work will be required with Medway Council and KCC to identify the school provision challenges of development in this area before the Local Plan progresses further.</p> <p>Provision and Delivery of County Council Community Services: The County Council emphasises the need for engagement between KCC, Medway Council and the Borough Council in ensuring that the relevant community infrastructure is available to meet the needs of the new community.</p>

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	<p>Waste Management: The proposed garden settlement at Lidsing is in very close proximity to Medway Council administrative area and Medway Council's HWRC at Capstone. Although KCC currently has an agreement for Kent residents to use Medway facilities, the capacity of their sites as well as the longevity of this agreement are unknown. However, if access to the Capstone site was not permitted in the future then access to the KCC site in Tonbridge and Malling or Maidstone should still be sufficient if contributions are received to enable the longer term Maidstone HWRC project. As with the Heathlands Garden settlement, the County Council would welcome the inclusion of waste infrastructure requirements in section 6 of Policy SP4 (b). Duty to cooperate conversations with Medway Council and KCC will be critical.</p> <p>Heritage Conservation: The County Council recommends the following amendment: c) Archaeological assessment. <u>c) Archaeology Strategy needed for the appropriate conservation, management and enjoyment of the historic environment of Lidsing Garden Village</u></p>
SP5(a) Potential Development in the Leeds-Langley Corridor	<p>Highways and Transportation: It will be essential to attain clarity on the design and construction costs associated with the road and the level of housing growth that may be required to secure the funding necessary for delivery. This, in turn, will enable the merits of a road-based intervention to be compared against any alternative transport proposals that may come forward for this geographical area.</p> <p>Heritage Conservation: This area contains very sensitive heritage including designated heritage assets. Consideration of the development options need to be fully informed by Archaeological and Archaeological Landscape Assessments, adhering to national guidance as appropriate including the Design Manual for Roads and Bridges. The County Council recommends the following inclusion within the policy: <u>Historic environment assessment will be used to inform decisions on development within the Leeds-Langley Corridor</u></p>
SP5(c) Lenham broad location for housing growth	<p>Sustainable Urban Drainage Systems: At Lenham, surface water flood risk is associated with the ordinary watercourses which cross the site. The extents of flood risk should be accommodated within any masterplan for development in this area. The County Council, as Lead Local Flood Authority, requests that surface water is considered at early stages of master-planning to allow SuDS to provide wider multi-functional systems and environmental benefit. A Flood Risk Assessment will be required for development in Lenham.</p> <p>Heritage Conservation: As Lenham has known significant archaeology and the potential for as yet unknown significant archaeology, heritage must be considered during design and development in Lenham. As such, KCC recommends the following principle included within Policy SP5(c): <u>11) Protect, conserve and enhance the historic environment appropriate to its significance. Historic Environment Assessment will be used to inform development and identify opportunities to enhance awareness, understanding and enjoyment of the historic environment to the benefit of the neighbourhood and its community.</u></p>
SP6 Rural Service Centres	<p>Education: The proposed levels of growth within Harrietsham, Headcorn, Marden and Staplehurst are individually not of a quantum to sustain new provision or the expansion of existing schools. These areas have typically seen significant levels of growth under the existing Local Plan and school expansions have either been undertaken or are already planned in these areas to accommodate the existing Plan growth. These</p>

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	<p>expansions may be able to mitigate the proposed levels of additional growth. However, in areas where this is not possible, this could result in a small number of children being required to travel to schools in neighbouring villages. As with the smaller settlements, analysis is required.</p> <p>Heritage Conservation: Harrietsham, Headcorn, Lenham, Marden and Staplehurst are all historic market towns or villages. Below and above ground remains of the past communities survive and it is the historic aspects of these settlements which provide each of their unique sense of place. Respect and retention of the historic character is fundamental to retaining their distinctiveness. As such, KCC recommends the following statement is included within this policy:</p> <p><u>4) Protect, conserve and enhance the historic environment appropriate to its significance. Proportionate historic environment assessment will be used to inform development and identify opportunities to enhance awareness, understanding and enjoyment of the historic environment to the benefit of the village and its community.</u></p> <p>Employment and jobs: The County Council notes that there will be a need to refresh the Economic Development Needs Study to take into account the impacts of COVID-19 and the changes to the Use Class Order.</p> <p>The Local Plan should be adaptable to accommodate these changing trends in work patterns, as the long-term influence of COVID-19 becomes apparent. Shared workspaces and accessible employment locations have the added benefit of reducing the level of commuting out of the local area. Providing local jobs for residents will be particularly important where new growth is being proposed in the Rural Service Centres, to ensure that growth is sustainable and avoids journeys by private car. Suitable spaces for home working should be designed into new development and this will have positive benefits by boosting the resilience of this sector of the local workforce and their ability to continue working.</p> <p>The rural economy is changing, and the Local Plan Review should look to accommodate this sector as it evolves to meet current and future challenges. To develop a vibrant rural economy that is capable of delivering Net Zero, the Local Plan should support the rural economy in delivering and increasing productivity, employment opportunities and food security.</p>
<p>SP7 Larger Villages</p>	<p>Education: Development in the smaller settlements would need to be assessed on an individual basis, taking into account the locality of each area. In some areas, small elements of growth could act to support the sustainability of small schools; in others, development could add demand on schools in rural areas which could not be accommodated. The County Council requests that these assessments of each area are undertaken prior to the Local Plan progressing to the next stage.</p> <p>Heritage Conservation: Below and above ground remains of the past communities survive and it is the historic aspects of these settlements which provide each of their unique sense of place. Respect and retention of the historic character is fundamental to retaining their distinctiveness. As such, KCC recommends the following statement is included within this policy:</p> <p><u>Protect, conserve and enhance the historic environment appropriate to its significance. Proportionate historic environment assessment will be used to inform development and identify opportunities to enhance awareness, understanding and enjoyment of the historic environment to the benefit of the village and its community.</u></p>

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SP8 Smaller Villages	<p>Heritage Conservation: Below and above ground remains of the past communities survive and it is the historic aspects of these settlements that provide each of their unique sense of place. Respect and retention of the historic character is fundamental to retaining their distinctiveness. As such, KCC recommends the following statement is included within this policy:</p> <p><i><u>Protect, conserve and enhance the historic environment appropriate to its significance. Proportionate historic environment assessment will be used to inform development and identify opportunities to enhance awareness, understanding and enjoyment of the historic environment to the benefit of the village and its community.</u></i></p>
SP9 Development in the Countryside	<p>Rural Economy: The phrase ‘traditional land-based activities’ could be open to interpretation and the relevant agricultural, horticultural and vinicultural (etc) sectors should replace this phrase where appropriate. The County Council would also draw attention to the Agriculture Act – which could alter intensive farming practices and place emphasis on farm payments in return for public goods and ensure an increased environmental focus in this sector. The Local Plan Review should take account of changes in farming practices that could result from the Act.</p> <p>Heritage Conversation: The County Council welcomes the commitment to ensure that new development in the countryside is in keeping with the character of existing settlement. It should be noted that development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. Historic England (together with KCC and the Kent Downs AONB team) has published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character of the countryside³. The Kent Farmsteads Guidance has been endorsed by the County Council and it is recommended that the Borough Council considers adopting the guidance as SPD, as part of the Local Plan process. The County Council would be happy to discuss this further.</p> <p>Maidstone contains remnants of significant archaeological landscapes ranging from ancient field systems around historic farm and ancient water systems around mills, to wider scale designed Medieval and Post Medieval parklands and linear Prehistoric and Roman routeways. These all form visible and fundamental components of the countryside. Awareness and conservation of the archaeological landscapes of Maidstone is needed to prevent the erosion of Maidstone’s distinctive rural character. As such, KCC recommends that the following statement is added to policy:</p> <p><i><u>8) Protect, conserve and enhance the historic environment and archaeological landscapes appropriate to its significance. Proportionate archaeological landscape assessment will be used to inform development and identify opportunities to enhance awareness, understanding and enjoyment of the historic environment to the benefit of the community.</u></i></p>
Chapter 7 Thematic Strategic Policies	
SP10(c) Affordable Housing	<p>The County Council set up an Affordable Housing Select Committee in 2019 to determine whether KCC can play a greater role in maximising the development of affordable housing in Kent. The County Council will welcome continued engagement with key stakeholders, including the Borough Council, in respect of ensuring that all</p>

³ <http://www.kentdowns.org.uk/publications/kent-downs-aonb-farmstead-guidance>

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	residents have an opportunity to live in good quality affordable housing.
SP10(d) Gypsy & Traveller Site Allocations	Gypsy and Traveller Service: The County Council notes that the Local Plan Review sets out that a new Gypsy, Traveller and Travelling Showpeople Development Plan Document (DPD) will be created to manage emerging identified need. The County Council would advise that any allocated Gypsy and Traveller sites identified through the DPD will need to take into account of whether they are in locations that have good local connections (whether in urban or rural areas) and with careful consideration of their integration with existing communities. The County Council's Gypsy and Traveller Service would welcome further engagement on this DPD will seek to meet the needs of the Gypsy, Traveller and Travelling Showpeople in the Borough.
SP11 Economic Development	<p>It is noted that the early implications of COVID-19 and the EU departure have been considered in the Local Plan Review and that there is considerable uncertainty about the role of employment land and floorspace, which is tied up with patterns of home working and improved telecommunications infrastructure.</p> <p>The impact of COVID-19, both in the long and short term, should be fully considered within the Local Plan. Although the long-term impacts are unclear, there may be a shift in the demand for office spaces - which could potentially be replaced with demand for shared workspaces. The Local Plan should be adaptable to accommodate these changing trends in work patterns, as the long-term influence of COVID-19 becomes apparent and will be likely to shape the future of town and village centres.</p> <p>As well as boosting improvements to information and communications technology as promoted within point 6 of Policy SP11, suitable spaces for home working should be designed into new development and this will have positive benefits by boosting the resilience of this area of the local workforce and their ability to continue working.</p>
SP11(a) Retention of Employment Sites	The County Council notes that in paragraph 7.45, the Local Plan Review identifies a need to ensure additional employment floor space is provided across the borough so employment sites will not be released at this time. Employment opportunities must be made available, in accessible locations, to meet the needs of the current local workforce, as well as the future workforce resulting from growth in the Borough.
LPRSA273 Land between Maidstone Road and Whetsted Road	Sustainable Urban Drainage Systems: The County Council notes that this site, which is proposed for employment space, is severely constrained due to extents of flood risk and the exception test may not be met. There is a preference for development to be outside areas of flood risk and KCC, as Lead Local Flood Authority, requests that further review and consultation with the Environment Agency is carried out ahead of progressing with this site.
SP12 Sustainable Transport	Strategic Transport: With reference to paragraph 7.88, the County Council advises that the reference to the Rail Action Plan for Kent should be updated to refer to the draft Kent Rail Strategy for 2021. This updated Strategy underwent public consultation in autumn 2020 and is expected to be agreed by KCC's Cabinet in early 2021, after which it will supersede the quoted Rail Action Plan for Kent of 2011. Paragraph 7.88 should clarify that the draft Kent Rail Strategy for 2021 sets out the County Council's objectives for the next South Eastern concession agreement, now expected to commence in 2023 at the earliest. The reinstatement of services between Maidstone and the City of London is one of the strategy's top priorities. It also recognises the need for the level of rail fares charged in Kent to offer better value for money, by linking any future rail fare increase to consumer price index (CPI) rather than retail price index (RPI). The strategy calls for greater availability of Smartcard ticketing,

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	<p>offering combined bus and rail travel in Kent, similar to Transport for London's Oyster card.</p> <p>KCC recommends consideration that there may be future mitigations to M20 Junction 6 (A229) as part of the potential Large Local Major (LLM) scheme for the A229, for which KCC is bidding to the Department for Transport (DfT) for funding. This scheme is required not only to address existing congestion and planned local growth, but also to address forecast increased traffic as a result of Highways England's Lower Thames Crossing (LTC) project, which proposes no mitigation for this junction. KCC has commissioned a study of the traffic impacts of the LTC on the strategic and local road network, together with proposed mitigation measures. Some of these measures may become part of KCC's requests to Highways England through the LTC Development Consent Order (DCO) planning process. The County Council, as Local Highway Authority, would welcome further discussions on this matter.</p> <p>Highways and Transportation: The County Council welcomes the partnership with the Borough Council to date regarding this Local Plan Review and through this engagement, suitable highways mitigation can be designed, planned and agreed at Local Plan policy stages to ensure growth can be delivered sustainably.</p> <p>The County Council, as Local Highway Authority, considers that the proposed approach to highways and transport mitigation recognises the need for impacts on the transport network to be properly assessed and tested through transport modelling. It also recognises the need for a combination of carriageway capacity upgrades and sustainable transport mitigations. However, there is concern that there may be an over-reliance within the proposed strategy on the extent to which junction capacity improvements can mitigate the impacts of growth. The County Council is aware that many areas within the Borough have limited scope for significant improvements to junction capacity and therefore it is important that the new or revised Integrated Transport Strategy features a balance of capacity and sustainable transport measures which are developed in collaboration with KCC and other key partners, such as Highways England and public transport operators.</p> <p>One other important point in regard to the planning of mitigation measures, both in terms of capacity improvements and sustainable transport measures, is timing. It is important that any necessary mitigations that are identified can be delivered at the earliest practicable time and before the impacts they are to mitigate against are realised. Ideally, improvements would be in place before first occupation, however this is not always viable and certain measures, like public transport services, may require a "critical mass" of demand to be achieved before they can be introduced. It is therefore of crucial importance that the timing, as well as the viability, of any proposed mitigations is carefully considered.</p> <p>The County Council welcomes the inclusion of the protection and enhancement of PRoW within this policy.</p>
SP13(A) Infrastructure	<p>The County Council considers that sustainable communities are delivered successfully when supporting infrastructure is delivered, where necessary, ahead of housing growth. Taking an infrastructure first approach is key to ensuring that this is achieved. Following this consultation, as a key infrastructure provider, the County Council would welcome continued engagement with the Borough Council in the production of its Local Plan Review, to ensure that an infrastructure first approach is taken to considering the Local Plan strategy and through to the delivery of schemes, to ensure that the necessary infrastructure to support development is adequately funded and</p>

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	<p>delivered in a timely manner so the ambition of sustainable development is realised during the lifetime of the Plan.</p> <p>Provision and Delivery of County Council Community Services: In order to secure the necessary provision of infrastructure, adequate levels of funding arising from development must be planned for from the outset and secured accordingly. The County Council therefore welcomes the commitment to the use of section 106 agreements to deliver site specific contributions. The County Council welcome a key role in the negotiation of section 106 agreements to ensure they include the necessary KCC infrastructure to support communities.</p> <p>The KCC response emphasises the need for the section 106 mechanism to be used to fund education wherever possible and KCC would want 'education' to be included on the document's priority list alongside adult education, waste and youth services. It is understood that the garden settlements may both be secured through section 106 and this is strongly recommended. The County Council is pleased to see the inclusion of transport, social services and libraries on the residential development priority list (and for transport included on the list for commercial development).</p> <p>The County Council notes that the intention for the CIL to continue to be used to secure contributions towards strategic infrastructure – the County Council requests continued engagement with the Borough Council to ensure that this mechanism provides appropriate levels of funding certainty to support the necessary infrastructure across the Borough to support/deliver the relevant KCC infrastructure to support planned growth.</p> <p>The County Council welcomes the inclusion of Waste within the Social Infrastructure Spatial Topic Paper⁴. Other services, including the range of KCC community services (including libraries, adult education and youth services) do not feature, but contributions will be required.</p> <p>The County Council would also draw attention to the following provisions that will need to be incorporated:</p> <ul style="list-style-type: none"> • All new homes should be compliant with Approved Document Part M4(2). • Community facilities delivered to support growth should be provided with design that is Dementia friendly. • Toilets and changing facilities for the severely disabled will need to be in accordance with the Changing Places specification set out in KCC's Kent Adult Social Services Glossary document dated October 2008 or any successor document or as modified by legislation or best practice or otherwise agreed. <p>Waste Management: KCC as the Waste Disposal Authority is disappointed to see that essential infrastructure to support a sustainable waste management service is not properly assessed in the document. Whilst section 2.19 quotes the NPPF stating that Local Plans should make sufficient provision for infrastructure for a number of services including waste management, this is not followed through in the subsequent chapters of the document, with transportation and utilities being almost the sole focus.</p> <p>KCC as Waste Disposal Authority has highlighted to the Borough Council the importance of ensuring that sufficient waste infrastructure appropriately located to support residents and housing growth is made. The County Council would therefore</p>

⁴ [Social Infrastructure Spatial Topic Paper](#)

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	<p>like to reiterate the following:</p> <p>KCC operates a network of eighteen HWRCs and six co-located Waste Transfer Stations (WTSs) across the administrative area of Kent. Demand on these sites is at unprecedented levels. As a result of additional demand generated by housing growth, this could result in a requirement to build more, larger sites or invest in the maintenance or repair of existing facilities. There is currently only one HWRC in the Maidstone District, located at Tovil, although residents are permitted to access any KCC HWRC. This site already under significant pressure due to the high number of vehicles entering the site and will be exacerbated further as a result of increased housing growth. Consequently, it is important that the requirement for waste facilities is included within the Local Plan.</p> <p>Heritage Conservation: Growth in Kent, including within the Maidstone Borough will impact on archaeological remains. Irreplaceable archaeological remains constitute a key component in the historic environment of the district being tangible survivals of the County's heritage. The NPPF recognises the importance of this resource within paragraph 199:</p> <p><i>“Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted. Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.”</i></p> <p>After the archaeological work is completed, an archaeological ‘archive’ is created – a sample of the most significant finds and records from the excavation. This archive is what allows the research and community exploitation of the archaeological work. It allows researchers to assess aspects of the excavation even many years after the event. It allows schools and community groups to investigate their local heritage and see the materials that were discovered, even, perhaps, underneath their own homes. The archives are a key method by which the now-lost heritage is connected to the modern community. In most counties in England these archives are deposited in local museums. In Kent, however, most museums are now full, and the archives are left in what are often insecure and inappropriate stores at the archaeological contractors.</p> <p>The need for archaeological storage for these materials, with proper education and access facilities, is critical for the proper exploitation of the heritage of Kent. This need is created almost entirely by development and represents a significant infrastructure requirement that is imposed by developers and for which there are no additional resources. The ongoing costs of the archiving service are met in part by developers on a site by site basis. This does not provide for the initial setup cost, however, nor the facilities for community use, and it is these elements that are appropriate for inclusion within the CIL. A charge should therefore be applied to large-scale development to provide for an archiving service in the county where the archives from Kent can be deposited and where the community can access those materials.</p>
SP14 The Environment	<p>Sustainable Urban Drainage Systems: The reference to green and blue infrastructure within paragraph 7.127 focuses upon the importance of green connectively and provisions. There should be reference to the importance of maintenance of watercourse connectivity and enhancement as well as how new drainage provision can improve and provide other multi-functional benefits, including</p>

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	<p>water quality protection, amenity spaces and enhanced biodiversity.</p> <p>Heritage Conservation: Geodiversity does not seem to have been considered within the Local Plan Review. It is important that geodiversity is assessed in its own right, but it should also be considered in terms of its links with the historic environment dimension. Geological assets are additionally important where they include fissures or possible cave sites which may contain Palaeolithic remains, for example, within the Loose Valley or areas to the west of Maidstone and also in relation to the character of the built historic environment and the sourcing of traditional building materials.</p> <p>The Local Plan does highlight the importance of Maidstone's historic parks and gardens. If this resource is to play its full role, however, there is a need to ensure an evidence based approach to protecting and where necessary, enhancing these assets.</p> <p>At present, the main information resource for the local (as opposed to Registered) historic parks and gardens of Maidstone is the 1996 Compendium of Historic Parks and Gardens (KCC and the Kent Gardens Trust (KGT)). The Compendium needs reviewing in order to ensure that it is brought up to date and that the significance of the Borough's gardens is properly assessed. Only then can it be used to manage and, where possible, enhance this extremely important resource. KCC has recently been working on a number of such reviews with the KGT and would be happy to discuss an update for Maidstone with the Borough Council.</p> <p>Many of the green and blue corridors are themselves historic routes and contain nationally and locally important heritage assets. For example, during the Second World War, the River Medway was the GHQ Stop-Line and still contains dozens of pillboxes and defence sites. These constitute a nationally important group of heritage assets. They may not be protected in law as protecting complexes such as this is particularly difficult and scheduling is seen as a management decision, but they need to be respected and protected as though they were statutorily protected sites in line with the NPPF.</p> <p>Where the River Len flows into the Medway is a constructed mill pond. It is a landmark feature for Maidstone Town with the reflection of the Rootes building and the industrial historic character being highly memorable. This site is particularly sensitive archaeologically in view of its position within the historic complex of the Archbishops Palace. There may have been a mill here during the Medieval Period, forming part of the medieval palace complex, but certainly post medieval mills were sited here and the adaptation of the River Len channel for industrial use just before it enters the River Medway is of key historic importance.</p> <p>The River Len is also well known for the numerous mills which utilised the healthy flow of the river during the Medieval and Post Medieval periods and perhaps earlier. This distinctive character of the River Len is of special importance within the borough and possibly makes it different to the other minor rivers flowing through Maidstone. An assessment of the heritage of the rivers in Maidstone would be a useful and informative dataset that could help develop the potential of the rivers and enable their effective management.</p> <p>In addition to landscape assessment referred to in paragraph 7.414, a specific historic landscape assessment should be carried out for the Borough. To fully understand landscape character, it is important to consider its historic aspect. This means the pattern of tracks, lanes, field boundaries and other features that comprise the historic character of the modern landscape. The Kent Historic Landscape Characterisation</p>

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	<p>(2001) has identified the broad historic character of the landscape of Kent. Where it is to be applied locally further study is needed to refine its conclusions, but it remains an essential tool for understanding Maidstone's landscape. Such a more detailed assessment has already been carried out in parts of Kent, such as the High Weald and Hoo Peninsula, and KCC would be happy to discuss such a project with the Borough Council.</p> <p>In respect of paragraph 7.142, SuDS may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to known heritage assets – for example if a historic drainage ditch is widened and deepened as part of SuDS works. Alternatively, they may directly impact on unknown assets such as when SuDS works damage buried archaeological remains. Indirect impacts are when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. For example, using an area for water storage, or improving an area's drainage can change the moisture level in the local environment. Archaeological remains are highly vulnerable to changing moisture levels which can accelerate the decay of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings to flood damage to their foundations.</p> <p>When SuDS are planned it is important that the potential impact on the historic environment is fully considered and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record (HER) and by taking relevant expert advice. KCC has recently produced advice for SuDS and the historic environment. It provides information about the potential impact of SuDS on the historic environment, the range of mitigation measures available and how developers should proceed if their schemes are believed likely to impact on heritage assets. This guidance should be considered as part of the Local Plan Review.</p> <p>Sustainable Business and Communities: The County Council is supportive of the strong theme of climate change, carbon emissions and the environment throughout the Local Plan Review within this policy. The County Council would recommend consideration and inclusion of the Energy and Low Emissions Strategy (ELES) within this policy and should address the 2050 targets.</p>
<p>Policy SP14(a) Natural Environment</p>	<p>Public Rights of Way and Access Service: The County Council welcomes inclusion of the PROW with the natural environment with regards to connectivity and accessibility of natural green spaces within the Borough.</p> <p>Biodiversity: The County Council notes that reference has been made to the need for Net Biodiversity Gain but the Local Plan does not detail how much within this policy. This policy should either include the minimal amount of gain which is to be required, or clarify how it will be determined (e.g. by following agreed county approach which is currently being discussed as part of a Sub Group for the Kent Nature Partnership; or set out within a SPD).</p> <p>The policy states that measures should “<i>avoid damage to and inappropriate development considered likely to have significant direct or indirect adverse effects</i>” on designated sites and priority habitats. The County Council recommends that this section of the policy also makes reference to significant / notable populations of species.</p> <p>The County Council further recommends that the policy refers to developments following the mitigation hierarchy.</p>

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	<p>The County Council is also concerned with the phrase “<i>by incorporating measures where appropriate</i>”. The County Council recommends this is replaced with the phrase <i>where required by the LPA</i>.</p> <p>Point 2 i. of the policy references an “<i>Ecological Evaluation</i>”. However, what the policy is actually making reference to is an Ecological Impact Assessment (EclA). An EclA is a process of identifying, quantifying and evaluating the potential effects of development on habitats, species and ecosystems, so providing all ecological survey information alongside any necessary avoidance, mitigation and compensation proposals within one document. The policy must also include what will happen if appropriate mitigation can be implemented.</p> <p>The County Council would also raise a query on the use of the terminology “<i>Candidate Sites</i>” as this is the terminology usually used for SPA/SACs.</p> <p>Rural Economy: This policy should also consider the potential changes that the new Agricultural Bill could bring forward.</p> <p>Resilience and Emergency Planning: This policy could seek the restoration and reconnection of habitats across the borough and the restoration of lost wildlife.</p>
<p>Policy SP14(b) Historic Environment</p>	<p>Heritage Conservation: At present, the text within the Local Plan, including paragraph 3.9, only reviews the designated heritage assets in Maidstone, focusing on buildings and gardens from the Medieval period onwards. It should be noted that the Kent Historic Environment Record identifies almost 1,000 archaeological monuments in the Borough, dating from the Palaeolithic period (up to 1 million years ago to c. 10,000 BC) to the present day.</p> <p>Lower/middle Palaeolithic handaxes have been found across the Borough, for example at Boxley, Chart Sutton and Marden, and at Boughton Monchelsea the remains of animals that lived alongside the early humans were found, such as cattle, red deer, horse, hyena, mammoth and woolly rhinoceros.</p> <p>Similarly, Mesolithic and Neolithic flints have been found at various places across Maidstone, and flint working sites at Sandway Road, Lenham, Allington and Harrietsham.</p> <p>Fairly extensive Bronze Age evidence has been found across the Borough. Early Bronze Age features were found at Holm Hill in 1999 during A20 diversion works and a late Neolithic/early Bronze Age occupation site was found at Sandway Road, Lenham during Channel Tunnel Rail Links works and at Swadelands School. Two late Bronze Age barrows have been found at Hollingbourne and occupation sites and field systems elsewhere in Maidstone. Bronze Age metal finds of axes, daggers, rapiers and spearheads, as well as metal hoards, have also been found across the area.</p> <p>The most significant site in Iron Age Maidstone was probably the large and well-preserved series of (scheduled) earthworks at Boughton Monchelsea, these may constitute an oppidum or proto town. In addition, numerous examples of late Iron age / early Roman settlements have been found such as at Hockers Lane, Detling, Boarley Farm, Maidstone Hospital and Harrietsham among many others.</p> <p>Maidstone also has an extensive Roman archaeological resource. Roman roads and routeways ran from the Maidstone area south-east to the coast. Several Roman villas</p>

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	<p>are known from the area such as the Mount Villa, Maidstone and at Teston, Thurnham and East Farleigh and many other rural settlements at Detling, Barming, Harrietsham, Maidstone, Boughton Monchelsea and Ulcombe. Many cremation cemeteries have also been found across the Borough.</p> <p>Anglo-Saxon settlement evidence has been limited in Maidstone, as elsewhere, although occupation features have been found at Boarley Farm and at Glebeldand, Harrietsham. Several cemeteries have been found however, at Wheeler St, Maidstone, Thurnham Friars, Lenham and Hollingbourne. This archaeological evidence is a significant part of Maidstone's heritage and should be recognised.</p> <p>The County Council recommends that archaeological evidence in Maidstone must be considered as part of the Local Plan Review to underline the extent and depth of the heritage resource in the Borough. The County Council would also welcome more recent heritage within the Borough being considered; such as the Borough's industrial heritage - in particular, its military heritage in the form of the Second World War GHQ Line with its outstanding collection of pillboxes along the Medway and Detling Airfield with its largely intact defensive system.</p> <p>Although Maidstone's heritage is briefly reviewed within the Local Plan Review, it has greater potential and opportunity to contribute more effectively to the quality of life in the area than is suggested at present. The heritage is complex, however, and needs careful consideration to ensure that the opportunities it presents are not missed and that it is not harmed by inappropriate or poorly planned development. In recent years, KCC has developed a Heritage Strategy for Dover District Council and is currently developing another for Folkestone and Hythe District Council. The goals of these strategies are:</p> <ul style="list-style-type: none"> • To identify and describe the key themes of relevance of the heritage of the district and the heritage assets that represent them • To assess the role that these can play in regeneration and tourism • To identify both their vulnerabilities and the opportunities they provide • To inform site allocations within the district • To support policy development <p>The County Council recommends that the Borough Council needs a similar strategy, which would also be compliant with paragraph 185 of the NPPF which requires local authorities to have a <i>"positive strategy for the conservation and enjoyment of the historic environment."</i> KCC notes that the draft text indicates that a Heritage Assets Review and Heritage Strategy will be developed at some point in the future. The County Council would recommend that a firm timetable is produced for this Strategy and adhered to.</p> <p>In respect of paragraph 7.145, the current text is satisfactory for its consideration of the impact of the built heritage on Maidstone's character, and the need to conserve and enhance this. The County Council recommend that the text also considers the older heritage of the Borough, which also forms a key component of character. The County Council recommends the following amendments for this paragraph:</p> <p><i>"Maidstone Borough has been shaped and influenced by a long past history, the legacy of which is a strong and rich cultural heritage. <u>In addition to an extensive and important archaeological heritage from prehistory, Roman, Anglo-Saxon and Medieval and later periods,</u> the Borough contains an impressive and visible built heritage resource. Brewing, paper making and shipping along the Medway have been notable</i></p>

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	<p><i>industrial influences on the borough's heritage. The borough's varied geology has been the source of locally distinctive building materials, namely Kentish ragstone, Wealden clay for brick and tile making and oak from the Wealden forests used in the construction of timber-framed buildings and weather boarding."</i></p> <p>The current text in paragraph 7.174 highlights the importance of designated heritage assets but implies that these are the only significant components of the historic environment – the County Council therefore suggests the following amendment:</p> <p><i>"Collectively these heritage assets contribute to the strong sense of place which exists across the borough. This historic inheritance also has wider economic, social and cultural benefits. The Archbishop's Palace and Leeds Castle are two particularly high profile examples which help to drive tourism in the borough. Mote Park is a registered historic park which both local residents and visitors value highly as a popular recreational resource. <u>Non-designated heritage assets also play an important role in the historic character of the Borough</u>, and historic features such as buildings, traditional field enclosures and monuments are also integral to the borough's high quality landscape, particularly enjoyed by users of the borough's extensive public rights of way network."</i></p> <p>The County Council would also recommend that the Local Plan Review makes reference to Local Listing. Local Lists are intended to help Local Planning Authority give special regard to assets of local character in their development control decision-making. The Maidstone Borough does have a small number of Locally Listed buildings, but the number has not been added to in some years. Moreover, the only Locally Listed heritage assets in Maidstone are buildings and Local Listing offers an opportunity for the LPA to recognise assets of value from a more diverse range of heritage types including archaeological sites, green spaces and landscapes. The County Council would recommend a commitment within the Local Plan Review to refresh the Maidstone Local List.</p> <p>Paragraph 7.148 states that a 'heritage assessment' will be carried out. However, within Policy ENV 1, reference is made to a 'Heritage Asset Review and Heritage Strategy'. The County Council assumes these are to be the same document and would recommend consistent terminology.</p> <p>In respect of Policy SP14(b) Historic Environment, The County Council considers that the current policy working is limited given the diverse and complex resource as the heritage assets of Maidstone Borough. Ideally, separate policies would be developed for Conservation Areas, Listed Buildings and Archaeology that are suited to managing development that affects these very different asset types. The Local Plan should identify what makes the heritage of the Borough special and explain how the Council will use the policies in the Local Plan to conserve and enhance this significance. It should explain how other policies – such as those on rural development, green space, the natural environment and sustainable design - will respect and take advantage of the historic environment to improve the quality of development in the Borough. In accordance with the NPPF, the Local Plan should take into account:</p> <ul style="list-style-type: none"> – <i>"the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation</i> – <i>the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring</i> – <i>the desirability of new development making a positive contribution to local character and distinctiveness; and</i>

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	<p>– opportunities to draw on the contribution made by the historic environment to the character of a plan.”</p> <p>The County Council provides the following as a draft example policy on Archaeology:</p> <p><u>Policy XX</u></p> <p><u>The Council will promote the enjoyment of Maidstone borough’s archaeological resource through the protection and enhancement of archaeological sites, monuments and historic landscape features, and will seek to encourage and develop their educational, recreational and tourist potential through research, public access, management and interpretation.</u></p> <p><u>Where possible developers should seek to use Maidstone’s archaeological assets to shape their development proposals, provide interest and character and protect the assets.</u></p> <p><u>The framework for the management and enjoyment of Maidstone’s archaeological heritage will be is the Maidstone Heritage Strategy (to be adopted in xxxx). Development proposals affecting heritage assets with an archaeological interest must be accompanied by a desk-based assessment, and if necessary by archaeological fieldwork, that:</u></p> <ul style="list-style-type: none"> • <u>Characterises the nature, extent and condition of the archaeological deposits in the development area</u> • <u>Assesses the significance of the deposits and the contribution made by their setting</u> • <u>Describes and assesses the impact of the development proposals on the archaeological deposits, their significance, and their setting</u> • <u>Describes how the archaeological deposits will be protected during development. Where this is not possible the assessment should clearly justify why this is not possible and should describe the proposals for mitigating any impacts</u> <p><u>Development proposals leading to substantial harm to the archaeological interest of designated heritage assets such as Scheduled Monuments, Registered Parks and Gardens, Protected Military Remains or heritage assets of comparable significance will normally be refused.</u></p> <p><u>Where development proposals affect non-designated heritage assets with an archaeological interest, the Borough Council would expect the archaeological deposits to be preserved in-situ. Where this is not possible clear justification will be required. Where the justification is accepted a programme of archaeological recording may be required to be carried out. The fieldwork will be appropriate to the significance of the archaeological deposits and must be carried out by an appropriately qualified contractor following a written specification agreed by the Borough Council. The programme will include all phases of desk-based and fieldwork, post-excavation analysis, publication of the results and deposition of the site archive in an appropriate repository.</u></p>
Policy SP14 (c) Climate Change	<p>Sustainable Business and Communities: The County Council is supportive of the strong themes of climate change, carbon emissions and the environment throughout the Local Plan Review and within this policy, including reference to the Borough Council target for the area to achieve Net Zero by 2030. The County Council also welcomes reference to the ELES within this policy. The County Council encourages</p>

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	<p>the inclusion of high standards of digital connectivity to reduce the needs to travel, as well as the support for low carbon transport and energy infrastructure.</p> <p>Rural Economy: It should be recognised that climate change and housing growth will put a strain on water resources and certain crops are heavily water dependent. The County Council would recommend consideration on the strain on water resources from additional growth within the Borough.</p>
SP15 Design	<p>Kent Design Guide: KCC would welcome reference to the new Kent Design Guide within the Local Plan, which is due to launch in 2021. The Kent Design Guide is a collaborative initiative, involving a range of stakeholders including Medway Council and all of Kent's district authorities, with support from the Kent Planning Officers Group and Kent's Local Authority Chief Executives. It is written to take account of an increasing need to reflect sustainable and environmentally sensible development practices to help Kent and Medway meet Net Zero carbon targets that all authorities in the county have signed up to. The guide provides information on a range of county delivery responsibilities for the built environment, such as Highways and Designing for Movement, but which are of equal importance for Kent's Local Planning Authorities, including Maidstone. It will be an extremely useful point of reference for inclusion in Maidstone developing Local Plan. There is also a clear point of reference and information to the planning and design policies and principles of each Kent Local Authority, including that of Maidstone. Policy should also promote the role of design as a tool to encourage communities to be active and promote positive health and wellbeing choices.</p> <p>Sustainable Urban Drainage Systems: The County Council recommends that Criteria V1 should reference local watercourses within the natural features for consideration and incorporation.</p>
Chapter 8 New allocations proposed in the Local Plan Review	
	<p>Highways and Transportation: The County Council, as Local Highway Authority, is generally supportive of the intention to focus growth on Maidstone Town Centre, where there are greater opportunities to encourage sustainable travel behaviours due to the close proximity to key facilities and public transport hubs.</p> <p>Consideration should be given to the constraints that currently exist on the highway network. These constraints are experienced across the Borough, as many of the principal road corridors are affected by congestion over prolonged periods, however this is most pronounced in the Maidstone urban area. In many cases, the built-up nature of the surrounding environment will prevent or limit the scope for road capacity improvements to be implemented. It is imperative that growth is directed to locations where sufficient network capacity can be made available rather than simply worsening road conditions on corridors where the impacts cannot be fully mitigated. Because of this, the Local Highway Authority does have concerns around some of the proposed allocations, particularly the relatively significant number proposed towards the south east of the urban area, where the scope for further capacity upgrades on the A229 and A274 is minimal.</p> <p>Given the stage of the Local Plan Review, detailed site-by-site analysis has yet to be carried out. The Transport Technical Note detailing the Stage 1 Modelling project focuses on "hotspots" and "corridors" of congestion and Air Quality impacts, which is the proportionate level of detail for this stage. The Stage 2 Transport Modelling Project will assess in more detail the likely impacts of proposed allocations and that will provide the basis for more granular planning of specific mitigations. As a result, the</p>

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	<p>County Council is not providing comments on specific proposed allocations.</p> <p>Provision and Delivery of County Council Community Services The County Council would welcome joint working in assessing the impacts on KCC's Community Services as the emerging allocated sites progress, to ensure that an adequate level of infrastructure is delivered alongside development.</p> <p>PRoW: Further, the local site policies highlight specific PRoW, detailing path diversions or enhancements that would be necessary in order for the development to proceed. These policies are welcomed, as they would support the work of the KCC PRoW and Access Service.</p> <p>Minerals and Waste: Attention is drawn to the need to demonstrate compliance with mineral and waste safeguarding considerations as set out in the recently adopted Kent Minerals and Waste Local Plan 2013-30 (as amended by the Early Partial Review, 2020). The consultation submission does not include any assessments of the potential sterilising effect of the allocations on landwon minerals and the potential loss of safeguarded facilities from new development.</p> <p>The relevant policies that are effective are Policy DM 7: Safeguarding Mineral Resources and Policy DM 8: Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities. Both policies are part of the recently reviewed and adopted Kent Minerals and Waste Local Plan 2013-30 (KMWLP). These policies detail how the NPPF requirements for mineral and waste safeguarding can be demonstrated and where appropriate how an exemption from the presumption to safeguard can be invoked.</p> <p>Policy DM 8 is of particular relevance to those allocations that are within 250m of Tovil HWRC, Leeds WWTW and the plant and machinery associated with the operation of Shepherds Farm and Burleigh Farm Quarries.</p> <p>The emerging local plan allocation also affects a number of economic minerals that are safeguarded. They fall into two groups:</p> <p>Aggregate forming minerals</p> <ul style="list-style-type: none"> • Superficial deposits- Alluvial and Sub-alluvial River Terrace-Sands and Gravels • Crustal deposits- Folkestone Formation Soft/Silica Sand, Limestone Hythe Formation (hard rock -Kentish Ragstone) <p>Non-aggregate forming Minerals</p> <ul style="list-style-type: none"> • Limestone-Paludina Limestone- building stone • Limestone- Hythe Formation (hard rock -Kentish Ragstone-building stone applications exist) • Sandstone- Sandgate Formation (industrial mineral) <p>All the proposed allocations that affect potentially economically viable deposits that are coincident with and come close enough to be considered proximate to should be assessed in accordance with the criteria set out in Policy DM7. The Mineral Planning Authority would welcome and encourage an ongoing dialogue on these matters to aid the Borough Council's understanding of the supply and landbank consideration affecting each economic mineral.</p> <p>As advised above, the Heathlands Garden Community allocation includes land</p>

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	<p>allocated at Chapel Farm in the adopted Mineral Sites Plan. The mineral within this allocation (3.2million tonnes of Folkestone Formation Soft/Silica Sand) is a critical element of the mineral strategy for Kent and the wider area. The working of the mineral site will be dependent upon the timing and securing of a planning consent and is likely to be required from current land bank considerations towards the end of the 2020's. The exact year will be apparent through yearly assessments of aggregate need via the Local Aggregate Assessment monitoring process. Theoretically if 2027 is the year further reserves are required to maintain the Council's 7-year landbank, the reserves could last until 2037-42. This would need to be considered further in terms of delivery and phasing of the Heathlands allocation such that the mineral reserves are not sterilised.</p> <p>In addition to demonstrating compliance against policy DM7 in relation to the Chapel Farm site, further evidence will be required to demonstrate that the proposed Heathlands allocation will not constrain the operation of the permitted reserves at the neighbouring Shepherds Farm Quarry and the permitted operations at Burleigh Farm Quarry, Charing</p> <p>It is understood that delivery of all the housing proposed in the garden community will not be achieved in the anticipated local plan period, however, this should be clarified in relation to permitted and allocated mineral reserves.</p> <p>The County Council would request that these matters are discussed with the Borough Council at the earliest opportunity.</p> <p>Sustainable urban Drainage Systems: The County Council has assessed all the proposed allocation sites and noted where there are any significant fluvial and surface water flood risk implications for development - and has submitted this information directly to Maidstone Borough Council. Twenty-one of the sites needed further consideration and this has been reflected in the current representation, as they have been removed. One site, proposed for mixed-use development, was noted to be impacted by Flood Zone 2 (Land between Maidstone Road and Whetsted Road), remains included, but the County Council notes that the assessment states that there is a need for suitable flood mitigation and SuDS measures within the site.</p> <p>Heritage Conservation: In the background data for each site, it is essential that the historic environment is covered under its own section and not placed under Landscape and Ecology. The historic environment will have opportunities and constraints separate to, and different from, the natural environment. Many small development allocations will have archaeological issues and some may include designated heritage assets and/or archaeological landscape features. These need to be highlighted for each allocation where they exist.</p> <p>Biodiversity: In respect of biodiversity matters, KCC has not commented on the individual policies as a desk top review of the site allocations has been provided directly to Maidstone Borough Council.</p> <p>Any proposed development in the Lenham and Lenham Heath areas, including the growth location, existing allocations and Heathlands, will need to be explicitly considered against the requirements set out in the Natural England advice note issued in July 2020. These proposals have a potential to impact on the Stodmarsh National Nature Reserve (NNR) downstream in the Canterbury area and therefore due regard should be had to the requirement of the Conservation of Habitats and Species Regulations 2017. The Habitats Regulation Assessment being undertaken as part of this Local Plan Review is considering the potential for these developments to impact</p>

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	on the nutrients of the Stour. Whilst there is no legal requirement, a screening will be undertaken at Regulation 18b stage. This assesses the plan and site allocations in light of the development proposed in the Lenham area and their potential to impact on the Stodmarsh NNR.
Chapter 9 Non-strategic policies – Development Management Preferred Approaches	
CD6: New Agricultural Buildings and Structures	Attention is drawn to the Agricultural Bill regarding field margins and biodiversity. The policy also does not specifically mention new buildings and structures for diversification projects (e.g. food processing)
CD7: Expansion of Existing Businesses in Rural Areas	<p>The County Council would highlight the importance of providing local jobs for residents – this will be particularly important where growth is being proposed outside the urban areas, to ensure that it is sustainable and avoids unnecessary travel by private car. The policy to enable the expansion of existing businesses in rural areas is therefore supported.</p> <p>Farm shops should be able to sell produce from neighbouring farms and sales should not be restricted to the produce of the ‘home’ farm only.</p>
INF1: Publicly Accessible Open Space and Recreation	<p>Active Design: The County Council is currently working to develop local Kent examples to sit alongside the ten Sport England Active Design principles, which are set out in the Sport England Design Guidance.⁵</p> <p>Open spaces should be designed to be well connected and accessible, to limit car usage where possible. They should also be designed to create a comfortable environment for physical activity and recreation.</p> <p>Plans for growth should seek to provide a mix of formal and informal areas/spaces (indoor and out) where people can be active, including walking and cycling routes, open spaces and water-based activities.</p>
INF4: Digital Communications	<p>KCC welcomes the proposals to bring gigabit capable connections to new developments (FTTP). However, concerning the comments in the development management summary: (p314)</p> <ul style="list-style-type: none"> - The siting of equipment in sensitive locations should follow national policy and guidelines rather than be resisted <i>per se</i>. - Any local requirement for ‘innovative solutions’ which are outside established industry practice creates a high risk of those areas missing out from future market-led investments – leading to reduced or areas no mobile coverage
ENV 2: Change of Use of Agricultural Land to Domestic Garden Land	Heritage Conservation: Please see comments relating to Policy SP 14b Historic Environment.
Q&D 4: Design Principles in the	There is mention of increased traffic on country lanes, but no account has been made of the increase in size of farm machinery. Farm machinery that needs to be taken from

⁵ <https://www.sportengland.org/facilities-planning/active-design/>

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Countryside	field to field (often by contract farmers farming someone else's land) and the increasing size of this machinery (because it does more) makes it difficult to access some lanes. Farmers will need to alter the access and egress to farm sites and create new entrances to some fields, which could helpfully be considered in the Local Plan Review.