

By: Paul Crick – Director of Planning and Environment
To: Cabinet Member for Environment, Highways & Waste
Date: 11th October 2011
Subject: KCC Representations on Maidstone Local Development Framework, Core Strategy

Classification: Unrestricted

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Summary

This report updates progress with the Maidstone Core Strategy since KCC's comments on options under consideration in November 2010 (part 1), and recommends KCC's responses to the policies that are now the subject of public consultation (part 6). In particular, it is recommended that KCC supports the number and distribution of new dwellings, but objects to a proposed new site for distribution and logistics near Junction 8 of M20.

Recommendation :

The Cabinet Member for Environment, Highways & Waste is asked to note the proposed policies of the Maidstone Core Strategy, and to agree the proposed representations by KCC in section 6 of this report, together with a schedule of detailed points.

1 Introduction

1.1 Following a Cabinet Members Meeting on the 15th November 2010, KCC expressed concern that one of the Options then being considered by Maidstone Borough Council (MBC) was for a mixed use urban extension on the south-eastern edge of Maidstone (the MUE). This was to be supported by a new *South East Maidstone Strategic Link* road (SEMSL).

1.2 KCC had previously considered the SEMSL to be essential, but reconsidered its view in November 2010, and wrote to the Borough Council as follows:

"KCC ... has strong reservations about a commitment to a major urban extension in Maidstone because of :

- the uncertainty whether new employment, shopping and other facilities, combined with transport measures, would achieve the necessary reduction in car journeys*
- the unclear consequences for transport congestion and investment of the completed development, post 2026*
- the substantial impact of traffic on roads in the surrounding area for which mitigation measures have not been resolved*

- *the greater costs for school and community provision*
- *the uncertainty for funding transport and other investment in KCC services from developer contributions or other sources.*

A decision on whether to embark upon a major urban extension must be taken on the basis of the impacts and costs of the completed development, and not just a partial development at 2026.”

1.3 Maidstone Borough Council are now consulting on their revised preferred option for the Core Strategy, plus a number of supporting Papers providing technical evidence. KCC is a consultee and this report seeks agreement to the response to be provided.

2 Relevant priority outcomes

2.1 The priority outcome for KCC is that the Borough Council should take full account of the implications for KCC service provision in their local plan. The Borough Council will consider the representations it receives and draft the Core Strategy to be considered at public Examination accordingly.

3 Financial Implications

3.1 The decisions to be taken by the Borough Council may have long term financial implications for KCC, depending on the mechanisms in place and the funding available in the future for infrastructure and service provision.

4 Legal Implications

4.1 Maidstone Borough Council is the responsible authority for the Local Development Framework and decisions on the scale and location of development. KCC provides information to the Borough Council as part of the evidence gathering that it must undertake to inform its decisions.

5 The Maidstone Borough Wide Strategy 2011

5.1 The *Borough Wide Strategy* in Policy CS1 of the consultation provides a summary of the main planning proposals – some are shown on the *Key Diagram*, attached to this report:

- *the development of **10,080 new houses** and the generation of **10,000 new jobs** with an emphasis on increasing skilled job and learning opportunities;*
- *new development to be **mainly within and adjoining the urban area** with regeneration of the town centre making best use of the brownfield land the priority;*
- ***strategic locations** for housing at North West Maidstone to deliver 975 dwellings and South East Maidstone 1,000 dwellings;*
- *strategic locations for employment development : including industry and warehousing at **Junction 8 of the M20**, and medical research and development **Junction 7 of M20***
- *greenfield development sites at the edges of **Rural Service Centres** of Harrietsham, Headcorn, Lenham, Marden and Staplehurst to deliver some 1,130 dwellings, alongside suitably scaled employment opportunities.*

- *priority to be given to the protection of the **rural character** of the Borough, avoiding coalescence between settlements including Maidstone and surrounding villages and Maidstone and the Medway Gap/Medway Towns conurbation.*
- ***Infrastructure** will be brought forward in a timely way to provide for the needs arising from development.*
- ***financial contributions** will be sought from the Community Infrastructure Levy (CIL) and Section 106 Agreements as appropriate and other appropriate funding streams as they emerge through the plan period..*

6 KCC Response to Consultation

6.1 It is proposed that KCC responds to the consultation as follows:

(i) Number of new dwellings

6.2 KCC supported a target of 10,080 dwellings for the period 2006-26 proposed by Maidstone in their 2007 Core Strategy consultation, and preferred this value in November 2010.

6.3 It is **recommended** that KCC should continue to support 10,080 dwellings. Although this target is slightly below the South East Plan target of 11,080 dwellings it would be sufficient to meet local needs plus some continuing in-migration, and give support to growth of the local economy. This number can be supported as complying with the draft National Planning Policy Framework (NPPF).

(ii) Location of new dwellings

6.4 2,728 dwellings were completed in Maidstone Borough from 2006 to 2010, and there is a deliverable 5 year supply of 2,957 dwellings already committed (Paper 1). The Core Strategy must therefore make new provision for an additional 4,395 dwellings to meet a target of 10,080.

6.5 MBC have not pursued the proposed urban extension, and favour more housing in the five main villages. This pattern is similar to their Option 2 considered in November 2010. The main locations for additional dwellings are as follows - the distribution between the rural centres of Harrietsham, Headcorn, Lenham, Marden and Staplehurst is not given:

North West Maidstone	975
South East Maidstone	1,000
Rural Service Centres	1,130
Total	3,105

6.5 Including existing planning commitments, 79% of new dwellings will be at the Maidstone urban area. It is **recommended** that KCC should support the amended distribution of new dwellings.

(iii) Maidstone town centre

6.6 The regeneration of Maidstone town centre is a high priority in the Core Strategy. Seven "Quarters" are defined for an expanded town centre, and a *Central Maidstone Action Plan* will provide details of the sites to be developed. An expanded town centre is

consistent with the draft NPPF, which expects retail and leisure demand to be met, and confirms town centres as the first choice for their location.

Retail

6.7 A forecast of demand for an additional 29,950 sq m of additional comparison retail floorspace is felt to be a reasonable basis on which to plan (Paper 5 para. 6.28). There is capacity for up to 34,500 sq m of comparison floorspace in the town centre (para. 6.4).

6.8 Accordingly Policy CS1 states that sites for 29,950 sq m of comparison retail will be identified. Accessibility to and within the town centre by a choice of transport means should be increased.

Offices, leisure and residential

6.9 MBC have been advised that much of the vacant office space in the town centre does not meet modern requirements. This existing floorspace is therefore discounted in assessing the need for new office space, which is judged to be up to 26,000 sq m of new Grade A office space (Paper 2 para. 3.20). MBC are advised that *“It would be reasonable to aspire to 70% of future high quality office demand in the town centre”* (Paper 5 para. 6.12).

6.10 Policy CS8 states that *“planning permission will be granted for employment uses at or near to motorway junctions where it is proven that the development cannot be located within the town centre first, followed by edge of centre locations”*.

6.11 The town centre has capacity for up to 31,300 sq m of offices (CS para. 6.4). The scale of new office development will clearly affect traffic volumes. The map of town centre Quarters shows a Campus area, including Springfield Mill, and a Gateway area including the prison. It is not clear whether the eventual redevelopment of the Mill and prison is envisaged. Paper 2 refers to a new town centre office quarter for 15,000 to 17,000 sq m (para. 3.21).

6.12 In addition there are opportunities in the town centre for some 380 dwellings to 2026, additional convenience shopping, leisure, culture and tourism uses, in response to demand.

6.13 It is **recommended** that KCC support the attempts to regenerate the town centre, subject to satisfactory Transport and Parking Strategies, and clarification of the quantity of office development that is planned there.

6.14 Paper 2 includes material that it would be helpful to reflect in the Core Strategy, such as the criteria for the town centre boundary, the reasons for discounting vacant office space, and potential large central sites for new offices.

(iv) Employment and economic development

6.15 Policy CS1 establishes the aim of generating *“...10,000 new jobs with an emphasis on increasing skilled job and learning opportunities”* and proposes *“strategic locations for employment development : including industry and warehousing at Junction 8 of the M20, and medical research and development Junction 7 of M20”*. The role of the town centre in providing employment land uses is summarised above.

6.16 An updated *Employment Land Review* commissioned by MBC in 2011 provides a forecast range of demand for office, industrial and warehouse development, and recommends that the maxima be provided to support economic development (Paper 5 paras. 6.4 and 6.5).

- as indicated above the need for new office space is judged to be up to 26,000 sq m of new Grade A office space (Paper 5 para. 6.11).
- additional allocations of industrial land are not required (Paper 5 para. 6.14).
- an additional 15.2 ha of land for warehousing and distribution uses is forecast to be required.

6.17 Accordingly, the number of new jobs planned to 2026 is as follows (Paper 5 para. 6.30):

Created 2006-2009	1,854
Office	4,688
Industrial	44
Warehousing	1,344
<i>(Business sub total</i>	<i>6,076)</i>
Retail	950
Balance form other sectors	1,120
Total	10,000

6.18 The Core Strategy states that “*although warehousing, distribution and logistics are not a priority*” (para. 7.20) the need for an additional 15.2 ha of land is identified. However, “*development will need to avoid significant impact on the AONB and the wider countryside*”.

6.19 The Key Diagram shows a strategic employment location near Junction 8 of M20. It does not specify the size, exact location or land use, but by implication it is for the greater part of the 15 ha of warehousing, distribution and logistics thought to be needed.

6.20 KCC supported MBC in opposing the *Kent International Gateway* (KIG) proposal at Junction 8, and gave evidence at the Planning Inquiry in 2009. In dismissing the applicant’s appeal the Secretary of State concluded:

“Given the importance and value of the open countryside which currently forms the appeal site and of the AONB which adjoins it, and given the harm the proposal would cause to them, the Secretary of State agrees (with the Inspector) that substantial weight should be given to these matters in the determination of the appeal” (para 20).

6.21 The draft Core Strategy does not indicate the exact location, size or land use of the strategic allocation at Junction 8. It provides no criteria in policy for the site, mass or setting of an employment site, or the mitigation that would be required. However, the development of a significant new site for warehousing, distribution and logistics near Junction 8 would be contrary to the conclusion of the KIG Inquiry on the importance of protecting the setting of the AONB. It would create a precedent for the location of substantial activity dominated by heavy goods vehicle movements and requiring large buildings, that could lead to pressure for larger scale development and associated land uses.

6.22 The commercial case for distribution and logistics would be more appropriately assessed having regard to the demand and development opportunities in Mid Kent as a whole, including the Medway Gap. Junction 8 is poorly located in relation to the main concentrations of workforce and support services on which warehousing, distribution and logistics would depend. The Core Strategy does not assess alternative locations within the labour market better suited to development of this kind, which would be completely out of character with the countryside surrounding Junction 8.

6.23 It is therefore **recommended** that KCC object to the proposed employment allocation near M20 Junction 8 in Policy CS1 and on the Key Diagram for the reasons above. KCC should seek amendment to paragraph 5.7 to clarify that the principle of employment uses has not been established at Junction 8, and to Policy CS8 to exclude Junction 8 from the locations at which employment uses will be granted. KCC should also request that the Core Strategy clarify the scale of employment land currently available in the Borough for the plan period, and the quantity, type and broad locations of the additional land to be provided by the plan.

6.24 Paper 5 includes material that it would be helpful to reflect in the Core Strategy, such as the composition and justification for 10,000 new jobs.

(v) **Transport Assessment**

6.25 Policy CS7, Sustainable Transport, states that MBC are working with KCC, the Highways Agency (HA) and others to:

“support Maidstone’s role as a regionally important hub (and) ensure that improvement to the public transport infrastructure, network and services are secured. An Integrated Transport Strategy will be prepared in partnership with KCC and the HA...”

6.26 A report on a *Draft Transport Strategy* was considered by the *Joint Transport Board* on 5th October, and the outcome will be reported verbally. This *Draft Transport Strategy* states:

“MBC is currently going through further internal discussion on its parking strategy, including the Park and Ride service and the management of the town centre off-street car parks. A separate Parking Strategy document will emerge in due course.

... the measures that might be used to promote sustainable transport and less reliance on the private car may also be a deterrent to the inward investment required to fulfil the LDF Core Strategy’s growth aspirations.

The package of transport measures emphasises management of the existing network as efficiently as possible, and working towards more sustainable patterns of movement. This is particularly important in regard of the desired prosperity of the town centre, whereby the Borough Council seeks to bring more investment into the town to create jobs. There are also pressing traffic and transport issues around the periphery of the town and in the rural areas to be addressed.

Conclusion

The opportunity now exists to set these issues into the context of the Borough Council's long term spatial planning objectives, and seek to coordinate public and developer funding streams towards potential solutions."

6.27 The report to the *Joint Transport Board* and the Core Strategy are accompanied by a package of measures to use existing resources as efficiently as possible, promote sustainable transport and manage demand (Paper 6). They include reduction of long term town centre parking, new park and ride sites and increased bus frequency. The measures are felt to be within the bounds of "*reasonable expectations of available funding*", and they are the result of testing alternative development options and transport measures

6.28 The *Draft Infrastructure Delivery Plan* (Appendix 2 of the Core Strategy) includes a similar list of transport investments at a cost about £30m to 2026. Funding from sources in addition to KCC budgets will be necessary to meet such a target. This expenditure would include two new park and ride sites, and upgrade of two existing sites, and does not include the cost of a South East Maidstone Strategic Link.

6.29 The draft Core Strategy envisages medical uses at J7 of M20, and proposes a new employment site near Junction 8. The impact of these proposals on the junctions has yet to be agreed with the Highways Agency. The smaller strategic housing allocations now proposed to the north west and south east of the town may also cause some traffic difficulties.

6.30 In Maidstone the aspiration for employment growth, including a town centre focus, and the proposed dwellings will increase traffic volumes and cause congestion, especially in the central area. Measures to manage demand and switch movements to public transport, cycling and walking are also seen as likely to make investment in the town centre less attractive, by virtue of reduced long term parking and higher charges for example. However, to avoid deterring investment it should be possible to manage the introduction of demand management measures so that they respond to the increasing commercial strength of the town centre. There is also scope for greater use of local rail services for work journeys to Maidstone centre, and this should be given more prominence in the Core Strategy.

6.31 It is therefore important that the transport and parking strategies are finalised to an agreed timetable. It is **recommended** that KCC confirm to MBC that measures to manage traffic demand will be required to accommodate the development proposed by the Core Strategy, and that before the Core Strategy can be finalised, KCC and MBC must agree those measures and their likely funding, and suitable Core Strategy policies. To avoid adverse impacts on the town centre this may include the phased introduction of measures and monitoring. Greater use of local rail services for work journeys to Maidstone centre should form part of the transport strategy within the Core Strategy

(vi) Community Infrastructure

Schools

6.32 The report to Cabinet Members Meeting on 15th November 2010 included an assessment by KCC of the cost of new school capacity with the 4 dwelling options. Option 2 was for 10,080 dwellings with no urban extension. This required two new primary schools at Maidstone at a cost of £10.5m, and additional capacity in the rural area at a cost of about £383,000.

6.33 These costs have been refined in response to the revised distribution of dwellings. A pattern similar to that now proposed by the draft Core Strategy was used for the *Draft Infrastructure Delivery Plan*. Current estimates are that two new primary schools at Maidstone would cost £9.6m, and the cost of additional capacity in the rural area would increase to about £1.7m.

Adult Health and Social Care

6.34 The report to Cabinet Members Meeting in November 2010 stated that the dwelling options may have little influence on where KCC would wish to locate facilities for Adult Health and Social Care, and this remains the case. Information provided to Maidstone BC on the investment that KCC would wish to make is included in the *Draft Infrastructure Delivery Plan* and this totals about £1.22m, slightly more than assessed in 2010. Facilities include a hydrotherapy pool and local hub incorporating a dementia centre. The location of a hub, or hubs, remains to be decided.

Library, Adult Education and Youth Services

6.35 The report to Cabinet Members Meeting in November 2010 gave estimates of the developer contributions that KCC would seek for these services. The dispersed Option 2 with 10,080 dwellings would require about £2.54m. The requirements arising from the dwelling option now proposed in the Core Strategy consultation would be similar. However, the future delivery of Libraries and Adult Education are currently under review, and the future of the Youth Service is out to consultation. The *Draft Infrastructure Delivery Plan* includes no costs for these services.

6.36 KCC's FSC and BSS Directorates emphasise that the manner in which *Adult Health and Social Care* and *Library, Adult Education and Youth Services* are delivered, and the costs, could change as a result of financial constraints, policy or legislation.

6.37 It is **recommended** that KCC invite Maidstone BC to continue the dialogue and provide further details of the location of dwellings proposed, to enable KCC to assess the services that will be provided and their costs.

(vii) Funding infrastructure, new land, and use of KCC property

6.38 The Core Strategy (Policy CS14 – Infrastructure Delivery) states that:

“Dedicated Planning Agreements will be used to provide the range of site specific facilities which will normally be provided on site.....

The Community Infrastructure Levy will be used to secure contributions to help fund the strategic infrastructure needed to support the sustainable growth proposed in Maidstone.”

These statements are welcome. However, paragraph 8.5 recognises that there is likely to be a shortfall of funds, and that it will be necessary to set priorities for the use of CIL and other revenue.

6.39 KCC is responsible for highways, schools and other essential services which will need to be funded by Dedicated Planning Agreements (S106) or the *Community Infrastructure Levy* (CIL), but as a first tier authority KCC does not have power to levy CIL, or prioritise its use. The *Draft Infrastructure Delivery Plan* (Appendix 2) lists KCC projects

to support new development, but as stated above (para. 6.35), these requirements will be updated in the light of operational and other considerations.

6.40 KCC requires that land for new facilities and infrastructure is provided by developers free of charge. KCC also wishes to work with local authorities and their communities on the modernisation of its property to match changes in service delivery, and expects to increasingly use its property to provide more than one service from the same building. Land allocations will need to reflect this. There may be disposal of some assets to part fund new infrastructure in existing communities.

6.41 Clause 4 of CS14 commits the Borough Council to consideration of reduced CIL contributions. However, such a commitment in a Core Strategy policy could prejudice the collection of CIL, and it would be preferable to include criteria for exemption from or reduction of CIL in the Charging Schedule when published.

6.42 In the light of the above it is **recommended** that KCC requests MBC to make the following amendments:

In Policy CS14:

- state that KCC services to support new development must be funded by developer contributions, and that it will be necessary for Maidstone BC to pass CIL revenue to KCC for schools, highways and other services.
- make clear that site(s) for schools etc. will be allocated in the appropriate Development Plan Document, and where they are located on development sites the developer should provide land fit for development at no cost to KCC.
- delete clause 4 which commits the Borough Council to consideration of reduced CIL contributions

In the accompanying text recognise that:

- KCC projects to support new development will change in the light of operational and other considerations
- KCC will use its property in a flexible way to provide more than one service from the same building, and that land allocations will need to reflect this.
- a dialogue will be continued with KCC to update the *Draft Infrastructure Delivery Plan*

(viii) **Environment**

6.43 The principal response to climate change is the policy to develop a network of *green and blue infrastructure* – linked open spaces, rivers and water courses (para. 7.36) which protect biodiversity and offer alternative means of flood mitigation, such as Sustainable Urban Drainage Systems (SUDS). This is complemented by policies for high quality design and sustainable construction and is commendably dealt with. The policies for air quality management, the location of development to minimise energy use, and the promotion of sustainable transport, are also part of the local climate change strategy.

6.44 The strategy gives a strong focus to the urban area and the town centre but arguably less to the built and natural environment. In particular the document would benefit from greater elaboration of the Borough's environmental assets, the pressures on them, and the policy response.

6.45 It is **recommended** that KCC requests that the Core Strategy should amplify the text on the Borough's environmental assets, the pressures on them, and the policy response.

(ix) Landscape and Countryside

Area of Outstanding Natural Beauty (AONB)

6.46 Landscape policy is particularly important in Maidstone Borough because of the proximity of the urban area to the Kent Downs AONB, which was crucial in overcoming the proposal for a rail freight interchange between Bearsted and Junction 8 of M20 (KIG).

6.47 The Core Strategy states that "*the whole landscape will be viewed as a resource to be protected rather than just designated sites*" (para. 6.128). It recognises that AONBs have national protection (para. 6.19) but Policy CS5 states only that development proposals:

"will need to have regard to the Kent Downs AONB Management Plan". and "will not be permitted where they lead to adverse impacts on local landscape character for which mitigation measures ...cannot be achieved"

6.48 It is **recommended** that KCC requests that Policy CS5 should recognise the national protection given to the AONB, and amplify how this will be applied.

Areas outside the AONB

6.49 Policy CS5 also states that development proposals "*will not be permitted where they lead to adverse impacts on local landscape character for which mitigation measures ...cannot be achieved.*" The Core Strategy should amplify its approach to landscape policies outside the AONB

6.50 Many locally valued landscapes are within *Special Landscape Areas* established by the Kent & Medway Structure Plan, and which remain in place by virtue of "saved" policies from the Maidstone Local Plan. However, national policy and the *European Landscape Convention* now discourage the use of such local designations. Local planning authorities are urged to adopt criteria based policies against which to judge development proposals.

6.51 Paper 4 annexed to the Core Strategy considers three alternative approaches to policy for landscape outside the AONB. It concludes that the best way forward is to retain a policy protecting the AONB, to delete policy for the SLAs, and to rely on a criteria based policy to protect other countryside and the setting of settlements. This would include a reference to the setting of the AONB.

6.52 It is **recommended** that KCC agrees that the Core Strategy should include a policy giving protection to the setting of the AONB, and the criteria for protection of other countryside and the setting of settlements.

Treatment of the setting of the AONB and landscape east of Maidstone

6.53 The M20 forms the southern boundary of the AONB to the north and east of Maidstone. Paragraph 6.21 above refers to the outcome of the planning Inquiry into major warehouse development on the east side of Maidstone near Junction 8, and the importance attached by the Secretary of State to protecting the setting of the AONB.

6.54 The Core Strategy *key diagram* shows an extensive “green wedge” on the east side of the Maidstone urban area and another on the northern side, and this is welcomed. However, these exclude land providing the critical setting for the AONB north of Bearsted.

6.55 The draft NPPF states that local communities should be able to identify for special protection green areas of particular importance to them by designating them as *Local Green Space* (para. 130). This designation would be used only in close proximity to an urban area, and the land demonstrably holds particular local significance because of its beauty or recreation value for example.

6.56 It is **recommended** that KCC seeks amendment of the Key Diagram Green Wedge designation to include the setting for the AONB north of Bearsted, and that the Core Strategy should recognise the suitability of this area for a *Local Green Space* if this designation is confirmed as a national policy.

6.57 In response to a consultation in January 2011 on the *Landscape Character Assessment* commissioned by MBC, KCC commented on the landscape scores attributed to this land and neighbouring areas as follows:

*“Areas 14.4, Water Lane Arable, and 14.5, Hollingbourne Wooded Arable, are assessed with Poor condition and Moderate sensitivity, despite comments in the text that these area have high visibility. The sensitivity scores should be reconsidered. Scores of “High” would be consistent with those for Thurnham Farmlands to the east and Eythorne Vale to the west.”*6.58 *The importance attached by the Secretary of State to protecting the setting of the AONB is such that consideration should be given to its extension to the east of Maidstone, having regard to the landscape quality of vale formed between the scarp of the North Downs and the dip slope of the Greensand Ridge in this area, and presence of strong historical features, notably Leeds Castle.*

6.59 It is **recommended** that KCC reiterate its comments in para. 6.55 on the landscape scores in the *Local Landscape Character Assessment*, and seek support in principle in the Core Strategy for the extension of the AONB to the east of Maidstone.

(x) Minerals and Waste

6.60 District planning authorities should show minerals and waste safeguarding areas and allocations from any development plan document adopted by KCC as the minerals and waste planning authority. KCC is progressing its *Minerals and Waste Development Framework* (MWDF) which will make provision for land won minerals to 2030. Until the MWDF is adopted, the Maidstone Borough Proposals Map should identify saved allocations from the 1993 Kent Minerals Local Plan, notably Proposals Map Inset V which identifies consented areas for soft sand extraction and large areas of search in the Harrietsham- Lenham - Charing Area.

6.61 It is **recommended** that KCC request that the areas of search shown on the Kent Minerals Local Plan 1993 Inset V are identified on the Maidstone Borough Proposals Map at pre-submission stage.

7 Recommendation

7.1 The Cabinet Member for Environment, Highways & Waste is asked to note the proposed policies of the Maidstone Core Strategy, and to agree the proposed representations by KCC in section 6 of this report, together with a schedule of detailed points.

Background Documents

1. Maidstone Borough Council “Core Strategy 2011” Regulation 25 Public Participation Consultation – September 2011
2. KCC Comments on Maidstone Landscape Character Assessment stakeholder consultation questionnaire January 2011.

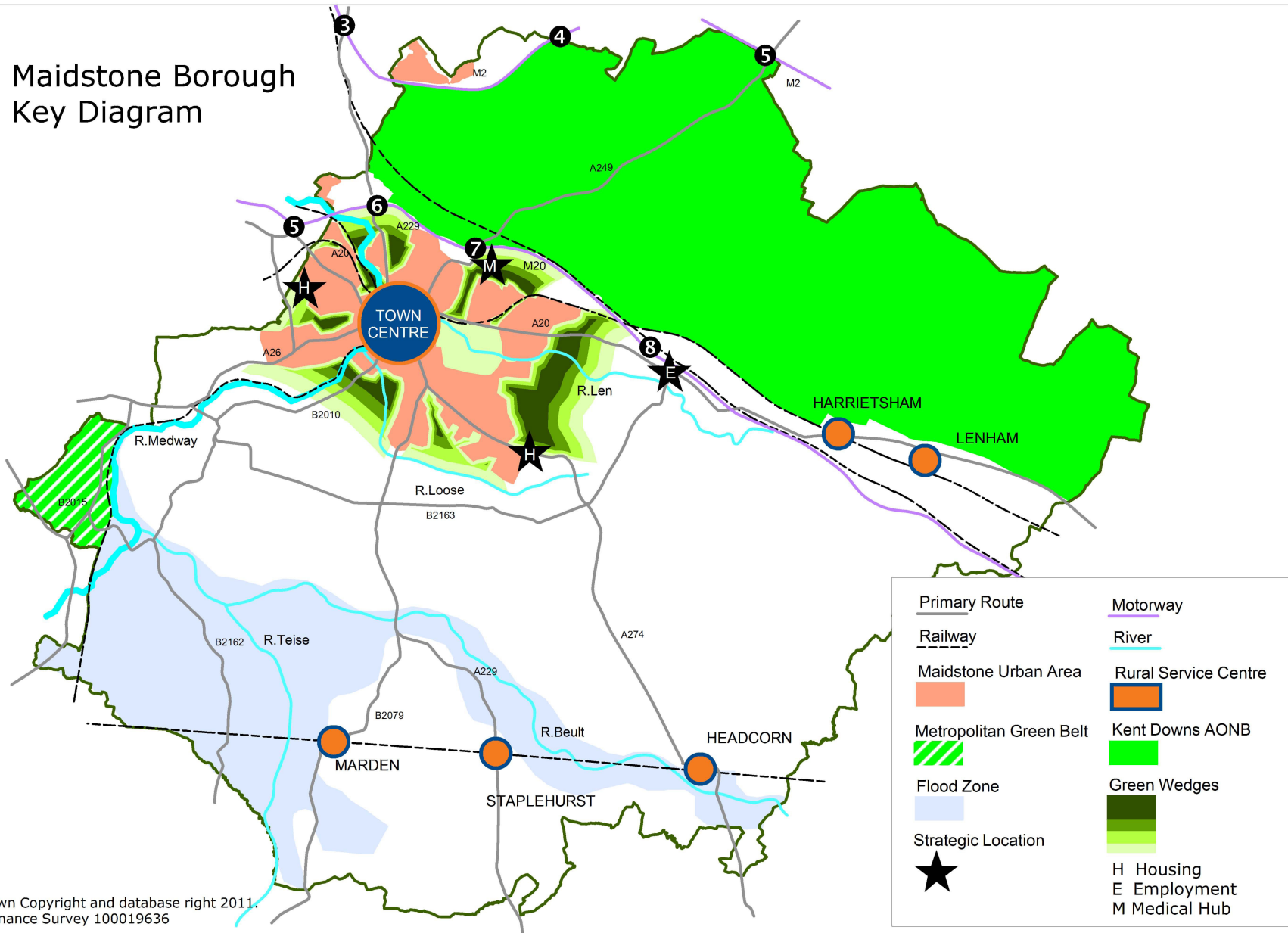
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Planning and Environment
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Maidstone Borough Key Diagram



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