

LOCAL PLAN REVIEW

RESPONSE FORM

SCOPING THEMES & ISSUES
JULY 2019



MAIDSTONE LOCAL PLAN REVIEW: SCOPING THEMES & ISSUES (JULY 2019)

Response form

***Name:**

Organisation (optional):

Client (optional):

***Address:**

Email:

*Please note: we are unable to consider your comments unless these details are fully completed.

How should I complete the form?

You do not need to answer every question; just answer the ones which are most relevant to you. You can complete it on line (<https://maidstone-consult.objective.co.uk/portal/>) or by printing or downloading this form.

Who should I send it to?

Please return your completed form to **Strategic Planning, Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent, ME15 6JQ** OR email to ldf@maidstone.gov.uk. Responses must be received **by 5pm on Monday 30th September**.

How will you use my data?

All consultation comments will be made publicly available on the consultation portal (<https://maidstone-consult.objective.co.uk/portal/>) in due course. This is so that interested parties can view all the responses that have been received. Published information will include the comment and responder name. All demographic and contact data will be removed. All data is processed in accordance with the Data Protection Act 2018. The consultation responses will be used to inform the next stages of the Local Plan Review.



Overarching questions

QQ1 – What can the Local Plan Review do to make the growth we need ‘good growth’?

Firstly, of paramount concern for the County Council is the quantum of development that Maidstone Borough Council is having to plan to deliver as an output from the Government’s standardised methodology for assessing local housing needs. When the methodology was under consultation, the position the County Council put forward was that housing need should be locally determined, as the methodology has a disproportionate increase in housing provision in many southern counties; imposing housing on those that have already delivered significant growth. This is certainly the case for Maidstone Borough, which is already delivering high levels of growth and has already expanded beyond what would be considered reasonable in terms of sustainability (ranking 36 out of all local authorities in its three year delivery of net new dwellings)¹. The Government standardised methodology, which is requiring the Local Plan Review to plan for 1,236 homes a year from 2022 (well in excess of the 883 homes a year required under the adopted Local Plan), will increase the housing requirements dramatically beyond the current housing numbers already planned in the adopted Local Plan. This is an issue that Kent County Council feels it must lobby central Government and Kent MPs on for change, alongside Maidstone Borough Council.

Notwithstanding the above, within this response the County Council has sought to provide technical consideration of the growth strategies proposed within the Local Plan Review - Scoping Themes and Issues consultation to meet the local housing need. The County Council notes that this consultation is the first stage of the Local Plan Review, which sets out key issues to be addressed in the Review. The County Council has sought to provide a comprehensive response to the questions raised within the consultation as a key infrastructure provider in Kent.

Highways and Transportation: The County Council, as Local Highway Authority, considers that good growth involves a mix of land uses that minimise the need to travel over longer distances and so encourages sustainable patterns of movement. The growth strategy should be founded on a coordinated and planned set of arrangements that enable the transport infrastructure that is required to support growth to be delivered in an effective and timely manner.

Achieving good growth will require full regard to be given to the constraints that currently exist on the highway network. These constraints are most pronounced in the Maidstone urban area, but equally, across the whole Borough - Headcorn, Staplehurst, Marden and Langley - where many of the principal road corridors are affected by severe levels of congestion over prolonged periods. In most 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.

Good growth results in the creation of communities that are well-connected and provide residents with an attractive range of travel options. These connections may be more difficult to achieve in rural parts of Maidstone Borough due to the limitations of the existing transport networks. It will therefore be important to direct growth to areas that afford scope for improved transport links to be established.

Public Rights of Way (PRoW): As Local Highway Authority, the County Council would also like good growth to ensure the protection and enhancement of the PRoW network. Local planning policy support for the PRoW network helpful in both the protection of the network and negotiating enhancements to it through new development. The KCC Rights of Way Improvement Plan (ROWIP)² should be referenced within the Local Plan Review. The ROWIP aims to provide a high quality PRoW network, which will support the Kent economy, provide sustainable travel choices, encourage active lifestyles and contribute to making Kent a great place to live, work

¹ MHCLG Live Table 100, Dwelling stock: Number of Dwellings by Tenure and district: England; 2015 to 2018
Office for National Statistics Population Estimates for UK, England and Wales, Scotland and Northern Ireland: Mid-2018

² https://www.kent.gov.uk/_data/assets/pdf_file/0005/90491/Rights-of-Way-Improvement-Plan-2018-2028.pdf

and visit. KCC is committed to working in partnership with the Borough Council to achieve the aims contained within ROWIP.

Sustainable Business and Communities: The County Council notes that the Borough Council has signed up to the Climate and Ecological Emergency Declaration and has pledged to be carbon neutral by 2030. If this is to be met, significant change will have to be incorporated into new growth, existing communities and infrastructure. Sustainability principles will need to be at the core of planning policies and sustainable growth will need to be 'clean' growth.

It is recognised that the Local Plan Review alone cannot achieve the carbon neutral aspiration, however, it can have a positive influence over new growth within the Borough. The Local Plan Review should support the transition to a net-zero carbon economy. By ensuring that clean growth is entwined within the planning and development of a Borough, environmental sustainability objectives from the Borough and County wide level are more likely to be achieved locally. Examples of changes that could be encouraged within the Local Plan Review could include energy efficiency measures, high standard of design, use of renewables and decentralised energy systems.

The County Council also recommends that the Local Plan Review should ensure optimal environmental and community resilience in terms of location, design and materials. Incremental climate change and associated severe weather impacts should inform new development at the earliest stage.

Public Health and Prevention: Good growth must address health and wellbeing. This can be achieved by not only considering healthcare and leisure facilities, but also the wider determinants of health, such as access to green space, air quality and economic opportunity. The County Council notes that one of the strategic issues for the Local Plan Review to address is to contribute to an overall improvement in air quality; particularly in the Maidstone Air Quality Management Area.

With the whole of Maidstone town, including the M20 corridor, designated as an Air Quality Management Area (AQMA) - and the main highway routes within and around Maidstone Town Centre particularly affected (with the nitrogen dioxide emissions at a series of locations within the town exceeding air quality target limits set by EU Directives and national regulations, and fine particulate concentrations also of concerns) - the air quality issues faced by Maidstone could be compounded through further growth, unless measures are taken within the Local Plan Review to address this. Indeed, this issue was acknowledged by the Inspector's Local Plan report (27 July 2017) as one of the reasons for an early review, with the Inspector identifying a clear need for further sustainable transport measures aimed at encouraging modal shift to reduce congestion and air pollution.

The County Council notes, and is supportive of, the intention for the Review to be progressed in light of the objectives of the Borough Council's Low Emissions Strategy, which sets out how to achieve a higher standard of air quality across Maidstone. The County Council therefore supports the commissioning of air quality modelling, which will be crucial in examining the effects of any preferred growth strategy – and KCC will work closely with the Borough Council as this is progressed alongside the transport modelling, to identify the necessary mitigation measures required. The County Council will be supportive of policy requirements to ensure cleaner technologies and the promotion of sustainable forms of transport (such as footpath infrastructure and the promotion of public transport) and will work closely with the Borough Council as the Review is progressed to help combat public health issues associated with poor air quality.

Heritage Conservation: The County Council welcomes the identification of the historic environment as crucial to a community's sense of place, as it reminds people of how their community came to be and how it evolved. The historic environment also brings forward opportunities for health and wellbeing benefits, which is particularly important for new developments whether in the form of new settlements or growth on the urban fringe. If such developments are to feel part of the continuing story of the Borough and form sustainable new communities, then the historic aspects of such places must be recognised and conserved.

The most significant historic environment issues that will need to be taken account of in the Local Plan Review include:

- The setting and layout of new developments – new layouts should complement and be considerate to existing historic settlement patterns, with existing patterns retained as much as possible. The County Council would like to ensure that good growth respect existing settlements in terms of scale, layout and orientation so that pre-existing historic settlements are not diminished by new development.
- Building materials – the Local Plan Review should encourage new developments to be designed to complement any existing local historic character that an area may have. Materials used within new

development be encouraged to be appropriate to the existing character, but locally sourced, and traditional materials should be used where possible.

- Protection and conservation of historic assets whether built or buried. The County Council would like to draw attention of the Romano-British site at Westhawk Farm, Ashford as an example of excavation and part protection.
- Incorporation of the historic environment assets into leisure and cultural improvements, particularly relevant in the context of the Borough's historic parks and gardens.
- Working with the historic landscape – new developments may be more successfully integrated with the Borough if they work with the existing historic landscape.

0Q2 – What could the Local Plan Review do to help make our town and village centres fit for the future?

Highways and Transportation: Town and village centres can only be made fit for the future if the pace and scale of growth is fully supported by improvements to transport infrastructure.

The Review must ensure that new development is brought forward alongside the timely delivery of new and additional transport measures that can accommodate the associated increase in travel demand. A robust and wide-ranging approach will be essential, recognising that junction capacity improvements and measures to encourage modal shift will not, in isolation, be sufficient to achieve a modern, fit-for-purpose transport network.

KCC recognises that improvements can be more challenging to achieve in locations where transport networks are already heavily constrained, with limited scope for upgrading. The problematic nature of traffic congestion in south eastern Maidstone exemplifies how substantive investment in transport infrastructure is required. KCC has been undertaking investigative work in support of a Leeds Langley Relief Road, with a view to establishing how this much-needed scheme can be brought forward to provide relief to communities and add resilience to the network. A range of funding options will need to be explored in order to deliver the scheme and it is anticipated that a modest element of housing growth may be required to help facilitate it.

It remains essential that growth is positioned in such a way that it ensures there is scope for future demands to be accommodated.

Public Rights of Way: There is significant research highlighting the benefits of walking and cycling, including improved health and well-being, a boost to the economy and alleviating vehicle congestion on roads where networks are constrained. While progress has been made to improve the provision of walking and cycling infrastructure in recent years, further work is required to create high quality facilities within towns and villages that encourages active travel participation. The Local Plan Review should strengthen existing planning policies to ensure that future development provides high quality walking and cycling links for the public, including within town and village centres. There should be a greater requirement for developers to deliver new sustainable transport infrastructure and contribute towards the enhancement of the existing PRoW network. This will help ensure that the town and village centres are easily accessible in a sustainable manner.

Public Health and Prevention: Fundamentally, the air quality issues identified in the consultation document must be addressed and mitigated against.

Town and village centres need good access via public transport, including access for those with mobility issues.

Broadband: KCC welcomes the proposal to promote full fibre (fibre-to-the-premise connections) in both new and existing development, in line with current Government policy. It is recommended that full fibre connections are also delivered within town and village centres. Ashford Borough Council has developed a full fibre policy, (EMP6) which is widely promoted nationally as best practice, whilst being in line with the current National Planning Policy Framework (NPPF).

Emergency Planning and Resilience: Town and village centres and their infrastructure will also need to be more resilient to extreme weather events as climate change impacts become more prevailing. This could include incorporating more multifunctional green and blue infrastructure into centres - providing a multitude of benefits from helping tackle social isolation, biodiversity enhancement, natural shading and cooling.

QQ3 – How can the Local Plan Review ensure community facilities and services are brought forward in the right place and at the right time to support communities?

Provision and Delivery of County Council Community Services: Once priority facilities and services have been identified, the Local Plan Review should seek to provide policies that ensure that these facilities are delivered at appropriate stages of future development programmes. Community facilities must be spatially planned and delivered to ensure residents are able to access local services as required – and this must include the range of KCC provided services. Early delivery of these services can enhance the sense of community from the outset of a new development. Any community facilities which are brought forward should have consideration of the current, and future demographics of an area, to ensure that the facilities remain resilient to the evolving needs to the community. They should be developed via co-production with the communities they serve.

The County Council generally favours growth strategies that include sustainable larger development sites, as they are more capable of supporting new infrastructure, including schools, early years, childcare, libraries and community centres. When a more dispersed growth strategy is proposed, it is more challenging to ensure that the right community facilities are brought forward to support these smaller development sites.

Reductions in public sector funding have significantly reduced the ability of upper tier authorities to invest in capital projects for key strategic infrastructure, which has meant that the role of development contributions in providing this essential infrastructure has heightened in importance. The County Council would therefore like to work closely with the Borough Council on all new allocations to ensure full infrastructure funding to enable the delivery of the necessary infrastructure to support new development at the right time.

QQ4 – What overall benefits would you want to see as a result of growth?

Highways and Transportation: Sustainable new communities should be built offering the opportunity to live and work the Borough, with adequate infrastructure, including transport and utilities. There should be a provision for a modern and fit for purpose transport network that contributes to good quality of life for residents and ensures convenient and attractive access to work, education, social and leisure communities.

Public Rights of Way: Enhanced connectivity for walking, cycling and equestrian activity across the Borough, with a range of sustainable transport options available for the public and opportunities to access high quality open space should be provided. While the existing PRoW resource provides extensive opportunities for active travel and outdoor recreation, there are gaps in the network and accessibility issues that need to be addressed. Future growth and development should help to address these issues and enhance the PRoW network, so that the benefits of this access resource can be maximised by residents and visitors.

Provision and Delivery of County Council Community Services: The County Council would like to see new development being brought forward with innovative design that maximises sustainability in build quality and construction standards. This should include both housing and economic development.

Public Health and Prevention: Growth should improve health and wellbeing, particularly through the wider determinants of health and ensure that dispersal of new settlements/ major extensions do not widen health inequalities. The results of the air quality modelling that is to be undertaken should be used to ensure that new policies ensure that new growth must take opportunities to improve air quality in the Maidstone Borough.

Sustainable Business and Communities: As far as possible, all growth should be zero carbon, whilst supporting the adoption of zero carbon behaviours. Growth should support zero carbon innovation and attract increased investment into Kent for the low carbon environmental goods and services sector. Growth should also support the creation of sustainable and climate resilient communities.

Emergency Planning and Resilience: The County Council would also like to see high quality build and landscape design encompassing renewable and decentralised power generation and green and blue infrastructure. Growth should also further seek to provide infrastructure that is resilient to stand up to future challenges such as climate and ecological emergency and business continuity risks.

QQ5 - What infrastructure and services, including community services and facilities, do you think are the most important for a successful new development?

Provision and Delivery of County Council Community Services: To create a successful development, there is a need for a diverse range of services and infrastructure to be delivered, including all infrastructure and service provision that the County Council is responsible for. As the Local Education Authority, the County Council has a duty to ensure provision of sufficient primary pupil spaces at an appropriate time and location to meet its statutory obligation under the Education Act 1996 and as the Strategic Commissioner of Education provision in the County

under the Education Act 2011. The County Council is also responsible for ensuring the provision for Community Learning (formerly known as adult education), as well as Early Help for young people (from birth to 25 years old). Early Help duties include the delivery and commissioning of children's centre services, other specialist children's services, youth services and wider public health services. KCC also has a duty to ensure early years childcare provision in Kent, as set out in the Childcare Acts 2006 and 2016. The County Council has adult social care responsibilities (delivered through the Kent Accommodation Strategy for Adult Social Care) to ensure adequate facilities for older persons in the County. It is also the statutory library authority.

KCC supports the commitment for close collaboration between key partners to ensure that required infrastructure is planned, funded and delivered in a timely manner – this is as important to the success of a new development as the type of infrastructure brought forward to ensure a sustainable community is created and/or maintained.

Highways and Transportation: The County Council, as Local Highway Authority, considers transport infrastructure as one of the vital components to successful development - used on an everyday basis for movement from, to and within a development. Developments are often considered more attractive and successful if they can be easily accessed by different modes of transport. Poorly connected developments with problematic routes of access due to issues such as congestion are often viewed less favourably.

Public Rights of Way: A convenient, accessible and reliable transport network is vital for new development to be successful. Providing infrastructure that encourages a modal transport shift towards walking and cycling should be one of the most important elements of new development. Active travel would help to reduce vehicle congestion on roads, alleviate air quality issues and improve the health and well-being of the public.

In respect of green spaces, studies have shown that they provide considerable health and well-being benefits for the public, but the creation and preservation of this resource will come under increasing pressure from new development. With this in mind, the provision of high quality open space and green infrastructure, which provide opportunities for outdoor leisure and recreation, are important infrastructure requirements that must not be neglected if new development is to be successful.

Sport and Physical Activity: It is important that development takes account of Sport England guidance. KCC recommends that the Borough Council reviews the guidance with consideration of the Sport England's Facilities Planning Model, as well as Active Design Guidance. Sport England's strategies for sport are very much focussed on tackling inactivity and supporting/encouraging under-represented groups to be active. The national Active Lives Survey indicates that approximately 25% of people nationally (24% now in Kent - 26% two years ago) are inactive and this is having knock on effects on physical and mental health, as well as individual and social/community development. Development should consider a mix of formal and informal areas/spaces (indoor and out), where people can be active. This can include walking routes and open spaces.

Public Health and Prevention: Community meeting space, clinic space for outreach health services and other services and access to active travel and green spaces will all be important.

QQ6 – How can the Local Plan Review help support a thriving local economy, including the rural economy?

Broadband: Full fibre broadband infrastructure should be developed to encourage a thriving local economy, including the rural economy. The County Council is pleased to see that its role in the delivery of full fibre broadband is included within the Local Plan Review and would welcome further discussions with the Borough Council to seek to deliver full connectivity as far as possible across the Borough.

Public Rights of Way: The PRoW network also has a significant role in supporting a thriving local economy, directly contributing to transport, green infrastructure and open spaces. Leisure and tourism industries are increasingly key to supporting the socio-economic well-being of rural areas, providing jobs and supporting community services. For example, the Natural England Monitoring Engagement with the Natural Environment data indicated an average spend when visiting the countryside of £6.44 per visit; with an estimated total spend of £20bn in England between March 2014 and February 2015. The Local Plan Review should therefore support and encourage improvements to the PRoW Network, as the provision of high quality walking, cycling and equestrian infrastructure would enable the public to explore Kent's countryside and support the rural economy.

Analysis of the existing PRoW resource in Kent has identified a shortage of opportunities for higher right path users, with relatively limited off-road cycling and equestrian routes compared to the national average. Considering these path users make a significant contribution to the rural economy, the Local Plan Review should include a focus on developing off-road cycle routes and equestrian access for the public to enjoy.

Heritage Conservation: In respect of heritage, it should also be noted that much of Kent has historically had a dispersed settlement pattern. Development between villages and hamlets and amongst farm buildings would in many places be consistent with the historic character of those areas. Historic England, KCC and Kent Downs AONB have published guidance on historic farmsteads in Kent that consider how rural development proposals can be assessed for whether they are consistent with existing character. The Kent Farmsteads Guidance³ has been endorsed by the County Council and it is recommended that the Borough Council considers adopting this as Supplementary Planning Document.

QQ7 – How can the Local Plan Review ensure we have an environmentally attractive and sustainable borough that takes a pro-active approach to climate change?

The Local Plan Review must ensure there are robust policies in place to protect the natural environment and support proposals that can help address the challenges of climate change.

Highways and Transportation: The Local Plan Review should seek to accord with the key principles of the NPPF to ensure sustainable growth is achieved - this requires an approach that is founded on minimising the need to travel and ensuring good opportunities exist for walking and the use of public transport.

Public Rights of Way: With regards to future access and movement, the PRoW network provides opportunities for sustainable travel, which have a low environmental impact. By reviewing existing travel routes and consulting the public, new walking and cycling routes can be identified and established that provide alternatives to short distance car journeys. However, appropriate planning policy and political support will be necessary to secure the necessary funding for the delivery of these network improvements. The Local Plan Review must therefore ensure there are policies in place to facilitate the development of the PRoW network.

Sustainable Business and Communities: New development should also consider the utilisation of renewable and decentralised energy generation as a proactive approach to climate change.

Public Health and Prevention: Access to green and blue spaces for leisure would enhance mental health and give opportunities for physical activity, which improves both mental and physical health. In addition, there needs to be managed of air quality through all means, including engineering solutions, reduction in emissions from vehicles and access to cleaner forms of transport, including electric vehicles.

Heritage Conservation: In respect of heritage conservation matters, Maidstone's historic parks and gardens will have an important role in the delivery of sustainable growth. Historic parks are not only important as visually attractive heritage assets but also contribute to leisure, health and wellbeing. If this resource is to contribute effectively to sustainable development, then there is a clear need to ensure this approach is evidence based. 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 (Kent County Council 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 the County Council welcome further discussions with the Borough Council to provide an update.

Maidstone's towns and villages also sit within a landscape that is both historic and vulnerable. To understand and value landscape character fully it is important to consider its historic aspect, this includes the pattern of tracks, lanes, field boundaries and other features that comprise the historic character of the modern landscape and which can shape future growth. The Kent Historic Landscape Characterisation (2001)⁴ has identified the broad historic character of the landscape of Kent but it is strategic in scope. To be most useful at a local level, the landscape characterisation requires more detailed refinement as has already taken place in Medway and Tunbridge Wells. KCC would welcome further discussions on how this project could be progressed to provide the relevant localised detail.

Sustainable Urban Drainage Schemes (SuDS) may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to known heritage assets, Indirect impacts are when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. Archaeological remains in

³https://democracy.kent.gov.uk/documents/s40761/B2%20Appendix%20Part_1_Kent_Farmsteads_Guidance_2013_24%205%2013.pdf

⁴https://www.kent.gov.uk/_data/assets/pdf_file/0014/56210/Kent-Historic-Landscape-Character-volume-1.pdf

particular 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. 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 guidance 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. It is recommended that the Local Plan Review considers how this guidance is best implemented.

The historic environment has a significant role to play in the conservation of resources required for development and also in energy efficiency. In some scenarios, older buildings can often be more energy efficient than newer ones and benefit from being existing structures. There may be instances where it may take fewer overall resources to adapt an old building than to demolish it and build a completely new one. Historic England has produced guidance⁵ that reviews the threats to the historic environment posed by climate change. The guidance also demonstrates that historic structures, settlements and landscapes can in fact be more resilient in the face of climate change and more energy efficient than more modern structures and settlements.

QQ8– Are there any other themes, issues and choices that you believe we should address as part of this Local Plan Review?

Kent Design Guide: The County Council requests that the Local Plan Review makes reference to the newly emerging Kent Design Guide and its principles to encourage good practice in development.

Provision and Delivery of County Council Community Services: The County Council is supportive sustainable of high quality development that is delivered with adequate infrastructure. Permitted development rights that allow office to residential conversions do not allow for mechanisms such as section 106 agreements to ensure that adequate contributions are provided to enable the delivery of supporting infrastructure and other required mitigation. The County Council is concerned therefore that permitted development can sometimes lead to the development of poor quality housing that does not have access to appropriate community infrastructure and services. KCC is also concerned with the resulting loss of employment space within town centres. The County Council notes the agenda item for Maidstone Borough Council's recent Strategic Planning and Infrastructure Committee (10 September 2019) "Town Centre Article 4 Directions" and would be supportive of the Borough Council's investigation of the use of Article 4 directions throughout the Borough, to potentially allow for the securing of contributions towards infrastructure and other mitigation through developer contributions via the planning application process. This would help to ensure that office to residential conversions are appropriately managed to enable sustainable growth and adequate employment space within the Borough.

Public Rights of Way: The County Council recommends that consideration is given to the impact of future development on Non Motorised Users (NMUs) along rural lanes, as these routes provide vital connections for equestrians and cyclists travelling between off-road PRoW routes. New development is likely to increase vehicular traffic along these roads and raise safety concerns for NMUs, who then may be deterred from travelling along the rural lanes and using the PRoW network. Taking these points into consideration, the Local Plan Review should ensure that the experiences of the NMUs along rural lanes are considered and not adversely affected by growth in the Borough.

Sustainable Urban Drainage Systems (SuDS): It is requested that KCC's role as Lead Local Flood Authority is reflected and referenced within the Local Plan Review in issues pertaining to surface water drainage.

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, considers that the Local Plan Review should make reference to minerals and waste safeguarding, as outlined below.

The Local Plan Review is aimed at accommodating increased growth. It will need to achieve this with an understanding of the sustainable development principles as set out in the NPPF, as well as addressing to social and economic requirements for the area. Therefore, the Review should encompass both minerals and waste safeguarding as set out in the adopted Kent Minerals and Waste Local Plan 2013-30, including this Council's

⁵ <https://www.rbkc.gov.uk/pdf/73%20Climate%20Change%20and%20the%20Historic%20Environment%202008.pdf>

ongoing review work as part of its Early Partial Review of the Kent Minerals and Waste Local Plan. The County Council is currently reviewing the relevant development management policies (DM 7 and DM 8) that address when an exemption to the presumption to safeguard is justified. Of particular importance is the proposed changes to the criteria in both policies that ensure that any allocations in an adopted Plan have been fully tested in terms of minerals and waste safeguarding and found satisfactory. This is so that when the non-mineral or waste development comes forward as applications these are exempt from further consideration. There is an expectation that consideration of mineral and waste safeguarding matters are an integral part of any Local Plan preparation or review and will assist in demonstrating that the 'strategic matters' that form part of the duty to cooperate are satisfied.

The currently adopted Local Plan has allocations that are coincident with a number of important economic minerals which are subject to safeguarding requirements. However, in the case of Sandstone (Sandgate Formation) and Limestone Hythe Formation (Kentish Ragstone), it is recognised that the Independent Examination into the adopted Local Plan in 2017 considered the need to safeguard these minerals and the need to ensure an adequate level of housing delivery. It was concluded that the specific circumstances of these two mineral types in the area were such that the need for greater certainty of housing delivery was an overriding consideration in relation to the presumption to safeguard. Therefore, the allocations coincident with these minerals are currently exempt from further mineral safeguarding consideration. The County Council recommends that this exemption is considered as part of the Local Plan Review to demonstrate compliance with NPPF safeguarding requirements. However, the remaining economic minerals within the Borough do not benefit from the 'blanket exemption' and should be addressed in the Local Plan Review. At present, this is not incorporated in the consultation documentation.

The County Council is happy to discuss these matters as part of our ongoing Duty to Cooperate obligations.

Waste Management: It is important to ensure that there is sufficient waste infrastructure to support residents and housing growth. Kent County Council Waste Management operates a network of eighteen Household Recycling Centres (HWRCs) and six co-located Waste Transfer Stations (WTSs) and 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 HWRCs and WTSs.

There is only one Household Waste Recycling Centre in Maidstone, located at Tovil. The Tovil HWRC is a very busy site, which has reached its practical capacity, resulting in vehicles queuing out of the site on to the public highway, causing delays to visitors of the HWRC and the wider local area. Measures to improve the efficiency of the site as well as the permitted tonnage capacity have been investigated and where possible, implemented over the past few years. However, demand has continued to grow, such that there are now no practicable options to make further improvements at this site. Future housing growth / population increase indicates a significant increase in HWRC capacity will be required. Additional waste infrastructure within Tonbridge & Malling to serve both authority areas is anticipated to help alleviate these issues. However, it is important that the requirement for sufficient waste facilities is included within the Local Plan in order to ensure that there are adequate facilities to meet this increased demand.

With regards to Waste Transfer Station capacity, waste collected from the kerbside in Maidstone is currently deposited and bulked at a Waste Transfer Station in Allington (operated by Kent EnviroPower), where there is sufficient capacity.

Libraries, Registration, & Archives: There are twelve static libraries operating in Maidstone Borough, supported by 44 mobile library stops to smaller and more rural communities. As well as books, libraries also have computers for customers to use, free Wi-Fi and a programme of events and activities for all ages. Library services are also accessible online, for customers to access the library catalogue, renew and reserve books, pay fees and charges, and download e books, newspapers and magazines. There are over 50 free online resources covering topics like family history, business resources, homework help, jobs and the Ask a Kent Librarian service. KCC delivers a range of library direct services; for example, the home library service where volunteers visit customers unable to access our service in any other way, iPad loans and services to care homes.

KCC has recently published its service strategy for the next three years (2019-2022) informed by five ambitions below:

- Everyone is welcome
- Enriching people's lives
- Resilient and connected communities
- Sustainable & Innovative
- Helping everyone to live well

One of the key areas the strategy covers was the continued evolution of the service at a time when population is predicted to expand, demands on a number of council services is increasing and the financial challenges are increasing. Over the three years of the strategy, KCC is committed to our network of 99 libraries.

To ensure the adequate provision of library services moving forward as a community service, KCC is keen to explore discussions about how it can meet the opportunities and challenges of future development for Kent; and particularly around the issue of new growth communities and what services they will need. KCC would welcome further engagement with the Borough Council to discuss library services in the Borough present and future.

Technical questions

TQ1 – What do you think should be the end date for the Local Plan Review? Why?

TQ2 – Have we identified the correct cross boundary issues? Please give reasons for your answer.

Highways and Transportation: The County Council as Local Highway Authority welcomes the commitment within the Local Plan Review to engage on transport infrastructure matters with cross boundary implications. This acknowledges the need for the network-wide impacts of growth to be properly understood and how the scope of required mitigation may extend to areas that are beyond the Borough boundaries. A cross boundary approach is beneficial as it helps to maintain a consistency in transport provision across Kent as a whole. This is important in meeting user expectations and ensuring individual routes function as part of an effective network. The identified cross boundary issues for transport infrastructure should include reference to the bus network in view of the cross boundary operation of many services.

The County Council would also recommend that with reference to page 20 of the Local Plan Review, the strategic issue for infrastructure is expanded to encapsulate the importance of timely delivery, which will require the cooperation of other affected authorities.

Sustainable Business and Communities: In consideration of energy, the County Council welcomes the inclusion of energy infrastructure as a cross boundary issue - especially the inclusion of heat, air quality and climate change mitigation and adaptation.

Emergency Planning and Resilience: The County Council would also welcome a collaborative approach on the planning for severe weather impacts, which are likely to raise cross boundary issues.

TQ3 - How do you think the council can achieve a consistent annual rate of housebuilding throughout the Local Plan Review period?

TQ4 – Have we identified all the possible types of housing sites?

It will be crucial for a diverse range of housing types and tenures to be delivered to ensure there is adequate supply of homes to meet the diverse needs of the community. Any rationale for types of housing sites should be developed as a result of the Strategic Housing Market Assessment and Economic Development Needs Study (includes retail assessment). This should also ensure that homes are being built, sited and designed to allow for benefits such as remote working, reducing the requirement for unnecessary travel whilst being more environmentally sustainable.

Highways and Transportation: The types of housing site could also include those that are focused around

existing or new transport hubs, such as rail stations and bus interchanges. These provide good access to public transport and are usually well served by walking and cycling networks.

Strategic Commissioning – Senior Living and Extra Care: The County Council has adult social care responsibilities (delivered through the Kent Accommodation Strategy for Adult Social Care) to ensure adequate facilities for older persons in the County. The Borough Council should have regard to the Kent Accommodation Strategy for Adult Social Care in determining housing options for adult social care clients.

Kent County Council Strategic Commissioning has been in discussions with the Borough Council regarding future demand for Housing with Care (Extra Care) in the district and modelling has been shared. KCC forecasts a gap of 316 units, across all tenure types, to 2031. Particular challenges regarding extra care housing are the availability of land, and funding for developments of schemes. The County Council would like to work with the Borough Council to ensure that Extra Care housing is considered within the Local Plan Review and seek to overcome these challenges to ensure adequate supply in the Borough.

There is less demand for residential care places for people with medium needs as people are choosing to stay at home for longer or are selecting other housing options to maximise their independence such as Extra Care. However, there is still a requirement for care homes to be provided and the County Council would encourage their development as they can work effectively with people with challenging dementia. The number of people living with dementia continues to rise, resulting in a need for care homes that can offer nursing level care, given that people are living longer and with more complex medical conditions. The County Council would like to work with the Borough Council to ensure adequate provision of this housing type is considered within the Local Plan Review.

TQ5 – What approaches could we use to identify more small sites suitable for allocation in the Local Plan Review?

TQ6 – What approaches could we use to increase the number of new homes being built on brownfield sites and to make brownfield development more viable and attractive to developers?

Every effort should be made to bring forward brownfield sites, where they offer a sustainable development opportunity, and the Review process should identify opportunities for bringing sites forward that may be costly to remediate. The County Council would like to work with the Borough Council to seek to resolve viability and deliverability issues on brownfield land, involving other partners such as Highways England as may be necessary, to bring forward sites and secure a sustainable development.

TQ7 – What factors should we take into account when considering minimum density standards elsewhere in the borough, beyond the town centre?

TQ8 – Have we identified all the possible types of employment sites?

The County Council notes that there is limited information included within the Local Plan Review in respect of employment sites and that the allocations for employment space in the adopted Local Plan will only be refined in the Local Plan Review if updated evidence indicates the need for a revised planning approach for a site.

KCC recommends consideration of employment sites that are focused round existing and new transport hubs – including bus interchanges and rail stations that include good access to public transport and are well served by walking and cycling networks. The movement of goods is likely to warrant the consideration of locations where direct access to rail and/or strategic highway networks can be achieved.

The County Council notes the challenges raised in respect of employment space at M20 Junction 8 as to whether the economic benefits of major commercial development at this location, outweighs the harm caused to the landscape, the adverse impacts on visual amenity and the setting of the AONB. The County Council would like to ensure that new sites proposed within the Local Plan Review provide sustainable opportunities for new employment growth moving forward.

TQ9 - What approaches could we use to identify sites in and at the edge of the town centre for future shopping and leisure needs?

The methodology used to identify suitable sites should include an appraisal of accessibility to establish whether they can be conveniently reached by walking, cycling and public transport. The capacity pressures on the highway network in central Maidstone will also require an assessment of traffic impact, having regard to the internal and external parking arrangements.

TQ10 – Do you think there should be changes to the current settlement hierarchy? If yes, what evidence do you have for your answer?

TQ11 - Which is your preferred option for the future pattern of growth (A, B, Bi or C) and why?

In response to the initial spatial options presented within the Local Plan Review, the County Council supports 'Option C', subject to understanding and agreeing the spatial distribution of new settlements within the Maidstone Borough – which must all be well connected to roads, local economic areas and other infrastructure, necessary to ensure thriving communities.

The County Council would welcome discussions with the Borough Council at the earliest opportunity on any proposals for growth. 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

In addition, the County Council would welcome 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 CIL. This provides 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. 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. The Local Plan Review must proactively explore all ways of appropriately maximising land value capture, to ensure that the provision of all necessary infrastructure supporting new development is fully funded by growth.

In respect of the initial spatial options, KCC raises the following considerations.

Option A

Option A is the least favoured approach from a Local Highway Authority perspective, as it results in smaller scale development sites that are more isolated from other areas of growth. This reduces the scope for transport infrastructure improvements to be secured or brought forward in a timely fashion, which in turn can worsen the cumulative effects of additional travel demand.

The County Council as Local Highway Authority considers that Option A could offer some limited potential for growth if concentrated on Maidstone town centre, where a range of facilities are available within a short distance and there are good opportunities for sustainable patterns of movement. These advantages would have to be weighed against the more pronounced impacts that additional travel demand could have on an already congested urban highway network where there is likely to be limited scope for capacity improvements.

Brownfield sites with land uses that could have generated relatively high levels of trip generation will typically be easier to bring forward if a neutral impact or net reduction in trips can be demonstrated. A potential drawback with this approach is that it may result in a more fragmented pattern of growth across the urban area that may restrict the opportunities to secure more substantive improvements to transport infrastructure.

As Education Planning Authority, KCC would advise that primary schools within Maidstone town have experienced significant increased demand in recent years, which has largely been driven by the creation of new homes from allocated sites in the adopted Local Plan, windfall development and office to residential permitted

development. The increased level of demand is expected to remain and therefore existing schools within the town hold little scope for expansion in order to create additional places. Therefore, meeting the increased demand from a Maidstone Town focused strategy would be very challenging and would likely result in having to provide the additional provision needed for growth away from the town, undermining the sustainability of the strategy.

In respect of the provision and delivery of County Council Community Services, the County Council would have concerns with this option. Local infrastructure may not be capable of accommodating the additional demand from the growth around Maidstone, and there may be limited capacity to deliver additional infrastructure within the local area. This growth strategy could therefore deliver unsustainable housing development that is not served by infrastructure that is easily accessible.

Option B

For KCC as Local Highway Authority, Option B would compound current challenges on the network in view of the limited transport networks currently available in the more rural areas and the difficulties in achieving the scale of improvements necessary to enable growth to be supported.

This option would create increased demand for education places in many areas across the Borough - the increase in demand would trigger the need for additional places to be commissioned, but the level of demand might not provide the critical mass in all areas for viable expansion. The 'lumpy' nature of provision means that most often primary expansion can only take place in increments of 210 places (30 places per year group), but it is very important that the additional demand will be enough to fill the 210 places. Growth resulting in increased demand of, for example, 100 places, provides a very significant problem as there would not be places for the pupils but little chance of expanding existing schools to accommodate.

A dispersal approach to growth could present similar challenges to Option A in terms of existing infrastructure capacity for County Council community infrastructure provision. Furthermore, the dispersal approach does not usually create the critical mass to be able to deliver new infrastructure to meet the growth requirements.

Option C

The County Council's preferred option, as Local Highway Authority, is Option C, which seeks to deliver new settlements/major extensions. However, this is on the basis that any of the site options for future settlements are in suitable locations, which provide connectivity to (or can be designed to deliver) the full range of highway, rail, bus and cycle routes, and the community and utility infrastructure necessary for the proposed new communities.

This option affords the best opportunity to create new self-contained communities that will minimise the need to travel over longer distances. It is supported in the NPPF, which in paragraph 72 states:

'The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.'

The comprehensive planning and design of a new community enables the patterns of movement to be shaped around walking, cycling and public transport. This aligns with the NPPF objective of 'sustainable development' and crucially helps to minimise the impact on the existing highway network, which is particularly constrained in the urban area and offers limited scope for improvement.

A critical mass of development carries further advantages in how it is usually much easier to secure the timely delivery of any new infrastructure that may be required to support it or mitigate its impacts. Previous experience has highlighted the difficulties associated with piecemeal development, where individual sites are unable to viably bring forward improvements and instead rely on mitigation through financial contributions. This can often result in funding shortfalls that can delay or prevent delivery. There is a far better prospect of such situations being avoided with larger scale development, as the developers are better able to assume responsibility for delivery.

In addition, KCC as Education Planning Authority would advise that Option C is the preferred approach for education provision. Concentration of demand enables new provision to be commissioned and designed within the development itself and demand is of a scale that provides the critical mass for new primary provision to operate sustainably.

In respect of its role as community infrastructure provider, the County Council considers that Option C should

provide the critical mass that would generate the necessity for new infrastructure that is able to support the growth delivered through the Local Plan. The County Council's preference is for growth that is able to deliver the necessary new infrastructure to meet its needs. This is usually achievable on larger development sites where they are not reliant on existing local infrastructure that may not have the capacity to meet an increased need.

Option C also provides an opportunity to create zero carbon developments with high levels of technological innovation that can be master planned from the outset of the development proposal. This will have the potential to attract new investments into Kent.

TQ12 – For your preferred option, what infrastructure would you want to see brought forward as a priority?

Provision and Delivery of County Council Community Services / Sustainable Business and Communities: It is vital that County Council infrastructure and services are all an integral part of sustainable growth in the Borough and should be planned into development through early engagement. Infrastructure should seek to reduce the environmental impact of new development with high quality sustainable design that is fully funded and delivered in a timely manner.

Highways and Transportation: The County Council's Borough-wide transport priorities over the period to 2031 are identified in the Local Transport Plan (pages 36-37). Some of these, such as the Maidstone Integrated Transport Package, already benefit from committed funding and are currently progressing towards delivery. Those priorities with no certainty of funding, such as the Leeds Langley Relief Road, will provide important focal points in the Review in order to establish whether growth could help facilitate their delivery.

The creation of sustainable new communities will logically require priority to be afforded to providing safe, convenient and attractive networks for pedestrians and cyclists, alongside frequent and accessible public transport services. Alongside this will be the need for any residual traffic impacts on safety or capacity to be mitigated through improvements to the highway network.

TQ13 – If your favoured option won't achieve the number of new homes needed, at the rate they are needed, what combination of options do you think would be best?

TQ14 – Have we identified the correct areas of focus for future masterplanning? What are the reasons for your answer?

Highways and Transportation: The County Council supports the focus that is being placed on achieving mixed land uses, pedestrian/cycle route connectivity and infrastructure provision as part of the masterplanning of new developments. These principles reflect the importance of achieving sustainable development and the need for growth to be supported by the timely delivery of improvements to transport infrastructure.

It should be noted however that there are other key design elements that will be critical to achieving high quality development. There should be a high degree of importance placed upon ensuring the design of the road layouts accords with the Kent Design Guide and its successor. Developments with roads that do not conform to the Kent Design Guide are often substandard in terms of their design and specifications and usually involve management companies that assume liability for maintenance. This in turn poses greater risks to residents in terms of highway safety, the effects of obstructive or displaced parking and potential for future disrepair. The County Council regards it to be essential that achieving road layouts in accordance with the Kent Design forms a key component of the masterplanning process.

The issue of car parking should be a key focus in view of the influence it can have on the quality of an environment. Establishing the appropriate level of parking provision and how this should be accommodated within a layout is important in preventing situations where streets are dominated or obstructed by parked vehicles.

The healthy streets approach employed by Transport for London in seeking to increase active travel and improve the quality and attractiveness of an environment should also form a part of the approach to masterplanning.

Sustainable Business and Communities: The County Council would also recommend that the need to achieve net zero carbon development should be specifically mentioned in the Local Plan Review. This will better reflect

the Government's revised Climate Change Act target for the whole of England to achieve net zero by 2050, as well as the Borough Council's aspirations for achieving sustainable growth.

TQ15 - Should the national space standards be incorporated into the Local Plan Review? What are the reasons for your answer?

TQ16 - How can the Local Plan Review best plan for the different types of housing which will be needed?

TQ17 – How can the Local Plan Review best plan for the accommodation needs of Gypsy & Travellers and Travelling Showpeople?

The County Council would like to see Gypsy and Traveller sites proposed in sustainable locations. Planned sites will need to 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 agrees with the points set out within the Local Plan Review, page 36. The County Council would welcome an opportunity to have a meaningful input to the Gypsy and Traveller Accommodation Assessment during its preparation

TQ18 – How can the Local Plan Review help ensure that local economic growth benefits everyone?

TQ19 – How can the Local Plan Review help sustain our town and local centres?

The County Council would welcome, through the Local Plan Review, a renewed focus on creating mixed use town centres that are sustainable, resilient and fit for the future, with policies that have sufficiently flexibility to enable town centres to respond to changes in market conditions. Town and local centres should be accessible, with user friendly public transport links, electric vehicle charging and car club provision.

TQ20 – How can the Local Plan Review best plan for the new infrastructure that will be needed to support growth?

Early engagement with local stakeholders and key infrastructure providers is vital. The County Council would welcome ongoing collaborative working with the Borough Council through the Local Plan Review process and implementation to assist in the delivery of sustainable growth in the Borough.

Highways and Transportation: The Local Plan Review should plan for future proofed infrastructure. For example, from a highways perspective, there is an anticipated rapid transformation of vehicle use towards electric, alternatively fuelled and autonomous vehicles and increasing use of shared / on demand vehicles. This transformation should be taken into account when planning new infrastructure to support growth. This can be achieved through collaboration with key stakeholders and providing the flexibility within policy to meet the changing infrastructure needs.

Sustainable Business and Communities: The Local Plan Review can also best plan for the new infrastructure through consideration of the changing nature of energy generation and supply. This includes continued engagement with UK Power Networks (UKPN) and South Gas Networks (SGN) as the energy sector will likely undergo rapid transformation during the Local Plan period. For instance, gas heating to new homes will be banned from 2025, and the current energy infrastructure will be moving away from large power stations towards a greater use of smaller, community scale, low/zero carbon power generation. This must be taken into account in the Local Plan Review to best plan for new infrastructure.

Public Rights of Way: As part of a collaborative approach to new infrastructure, the County Council requests that the KCC PRoW and Access Service is consulted in the initial design stages of a new scheme / infrastructure

project when new proposals may have an impact on the PRow network; or when it provides opportunity to enhance the existing PRow network. KCC will then be able, at an early stage, identify any PRow infrastructure requirements that are urgently required and consider the most appropriate method for delivering these works.

TQ21 – Have we identified all the types of transport measures? Which measures do you think we should prioritise?

Highways and Transportation: The majority of the potential types of transport infrastructure improvement have been identified.

However, a key omission is the absence of charging infrastructure to support the use of electric vehicles. This is essential to enable electric vehicles to become a more viable choice for residents and reduce the effects of vehicle emissions on air quality. Including improvements of this nature will accord with Policy 28 of the Department of Transport 'Road to Zero' strategy (July 2018), which highlights the imperative of *'Ensuring the houses we build in the coming years are electric vehicle ready. It is our intention that all new homes, where appropriate, should have a chargepoint available.'*

The range of options to achieve 'parking control' could also be broadened to include the provision of cheaper parking in areas outside of the town centre where there are opportunities for onward travel by walking and public transport.

The priorities attached to individual measures should be primarily driven by the strategic objectives of the Local Transport Plan and the focus of prioritising sustainable travel. Alongside this, there may be opportunities to resolve pre-existing local network constraints for the benefit of both existing and new communities.

Under most circumstances, the priority attached to an individual measure should correlate with the level of certainty surrounding funding and achieving its timely delivery.

Transport Policy: The County Council considers that the Local Plan Review has sufficiently covered the rail issues in Maidstone.

Public Rights of Way: The Local Plan Review should prioritise measures that encourage walking and cycling activity, ensuring that new developments provide high quality access infrastructure, with links to local amenities and the PRow & Access Network. These sustainable transport connections should ensure that residents are not dependent on private vehicle use for short distance movements. There is an increasing body of research and evidence to suggest that off-road routes encourage cycling participation levels, especially amongst families with young children. Development of high quality 'traffic free' cycle routes should therefore be a priority, to encourage active travel among younger generations and change long term travel patterns. These ambitious proposals could be achieved by upgrading the status of existing PRow or creating new routes, but Local Plan support will be required to deliver these improvements.

TQ22 – How can the Local Plan Review best integrate health and wellbeing into the planning of new development?

Public Rights of Way: The Local Plan Review should ensure that high quality, traffic-free walking and cycling routes are provided within new developments, which effectively integrate with the wider transport network. Walking and cycling links should provide realistic travel alternatives to short distance car journeys, offering direct and convenient access between residential estates, local amenities, shops, schools, open green spaces and major areas of employment.

Studies have shown that green spaces provide considerable health and well-being benefits for the public, but these spaces will face increasing pressures from new developments and a growing population. There is a risk that the attractive qualities of green spaces will deteriorate, unless appropriate steps are put in place to protect the sites and manage access. To cope with the increasing demands of a growing population, it is recommended that the Local Plan Review increases the level of open space provision required within new developments above that currently being sought.

The Local Plan Review should also consider the means of accessing these green spaces and recreational resources, so that the public are not dependent on vehicle transport for visiting the sites. Improved connectivity should encourage recreational and leisure activity, including access to country parks, honey pot sites and other facilities of high leisure use.

Sustainable Business and Communities: The provision of a well connected network of green and blue infrastructure can also provide multiple benefits for health, climate change adaptation for both flood and heat and air quality benefits, whilst also possibly having economic benefits. This should be reflected in the Local Plan Review across health, infrastructure and environmental themes.

Provision and Delivery of County Council Community Services: Reduce social isolation as well as crime and fear of crime through design of safe, inclusive and accessible public spaces and amenity for all.

TQ23 – How can the Local Plan Review best manage flood risk whilst still achieving the growth that is needed?

The adopted Local Plan does not refer to the role of KCC as Lead Local Flood Authority (LLFA). LLFAs were made statutory consultee within the planning process in April 2015 for major development in respect of surface water drainage. The recent revisions to the NPPF specifically state the need for Local Planning Authorities to have regard to advice provided by the LLFA. The current adopted Local Plan does not recognise the importance of consideration of surface water drainage alongside fluvial flood risk.

Though planning policy does recognise the need for implementation of sustainable drainage systems and specific housing allocations recognise the importance of surface water management, the adopted Local Plan is not considered particularly strong in addressing surface water drainage issues and its associated flood risk.

It should be noted that the Environment Agency does not have a role in relation to surface water management. This should be corrected within policy in the Local Plan Review – for example Policy H1(10) South of Sutton Road, should include a policy requirement that “Development proposals will demonstrate that any necessary new or improved foul and surface water including SuDS drainage infrastructure required to serve the development to ensure no increased risk of flooding off-site, will be delivered in parallel with the development, in consultation with Southern Water and the Environment Agency.” This policy should reference the LLFA and not the Environment Agency.

The County Council considers that the current adopted Local Plan does not recognise clearly, with a separate Policy, the need to deliver specific approaches to flood risk and surface water drainage provision. It is appreciated that the general housing site allocation policy (H1) identifies how flood risk is assessed and that specific housing allocations may identify where surface water drainage is also an issue.

The Local Plan Review needs to address (1) a current lack of flood risk and surface water drainage policy and (2) references within policies in the adopted Local Plan which do not include surface water flood risk.

A lack of flood risk and surface water drainage policy - it is important that the existing development and any new development accommodates areas of flood risk, make space for surface water runoff generated by the development and any surface water overland flow paths. High level assessments are provided through the Strategic Flood Risk Assessment which supports the Local Plan, and the expectation is that any new development proposal will assess impacts in relation to flood risk and surface water and provide appropriate mitigation such that flood risk is not increased on-site or off-site.

However, guidance is needed with respect to:

- a) Areas which have constraints within local drainage infrastructure (sewers and ordinary watercourses) where additional constraints on discharge may need to be pursued to address an existing situation and which may not be identified within allocations; and
- b) how flood risk and surface water should be managed and accommodated for delivery of multifunctional spaces and supporting objectives in relation to biodiversity and amenity as required by the NPPF.

The County Council would recommend that the Local Plan Review has consideration of the inclusion of a development management policy for flood risk and surface water drainage.

References within policies which do not include surface water flood risk - The adopted Local Plan specifies mitigation that may need to be provided, both in strategic policy and housing allocations. Information with Policy SP5 (Rural Service Centres) recognises the impacts of surface water flooding on these areas (Paragraph 4.76, page 40). Similarly statements within Policies SP7 (Headcorn), SP9 (Marden), SP16 (Yalding) which recognise in general that Flood Risk Assessments demonstrate the need for strict controls on the location of development within Flood Zones 2 and 3; yet fluvial flood risk is not the only type of flood risk which needs to be addressed with new development.

Policy SP7 provides for key infrastructure requirements for Headcorn that “additional capacity will be required in the sewer network and at the wastewater treatment works if required in the period to 2031.”

Recent development in Headcorn demonstrated how off-site flood risk could be considered in relation to new development discharging to existing watercourses. The County Council recommends that new development should:

- Account for the risks associated from surface water flooding, having regard to Environment Agency’s Flood Map for Surface Water; and
- assess impacts to local receiving watercourses and ditch networks which may have capacity constraints and connectivity issues.

The housing site assessment may indicate the need to assess surface water drainage where appropriate including H1(20) Wren’s Cross, H1(26) Tovil Hill etc. Policy H1 Housing site allocations requires Flood Risk Assessment in specific situations. It would be recommended that surface water flood risk is assessed in a similar way:

“Appropriate surface water and robust flood mitigation measures will be implemented where the site coincides with identified flood zones 2 and 3 or areas of surface water flood risk and shall be subject to a Flood Risk Assessment, including sites in Flood Zone 1 greater than 1ha in area, and shall incorporate sustainable drainage systems.” (page 96).

This policy also requires contributions towards infrastructure requirements.

It would be appropriate that the importance of consideration of drainage is also considered in the overall policies (SP7, SP9, and SP16).

TQ24 – How can the Local Plan Review best plan for the protection and enhancement of the borough’s environmental assets whilst still achieving the growth that is needed?

Under the latest revisions to the NPPF, paragraph 165, major developments should incorporate sustainable urban drainage systems. The systems should where possible deliver multifunctional benefits. Assessing drainage in conjunction with other provisions such as biodiversity enhancements for new development can better accommodate housing requirements and help achieve the growth that is required in a sustainable manner.

TQ25 – How can the Local Plan Review best plan for the conservation and enhancement of the borough’s heritage assets whilst still achieving the growth that is needed?

Maidstone’s heritage has great potential to contribute more effectively to the quality of life in the area. 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, the County Council has developed a Heritage Strategy for Dover District Council and Folkestone and Hythe District Council. The goals of these strategies are:

- 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 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

The County Council recommends that the Borough Council develops a similar strategy, which would also be compliant with the NPPF paragraph 126, in requiring local authorities to have a “positive strategy for the conservation and enjoyment of the historic environment.” The County Council would welcome further discussions on with the Borough Council on the development of a Heritage Strategy.

If the Borough Council does not wish to pursue a Heritage Strategy, then it is essential that the Local Plan Review underpins the conservation and enjoyment of the historic environment in all relevant sections. The sections will need to describe the contribution that the historic environment can make as well as the issues that need to be considered to ensure appropriate conservation of heritage assets. These should include:

- Building design (e.g. the need for new build to respect local character in terms of form, size, materials, massing and orientation)
- Settlement hierarchy and design (e.g. the benefits of new development respecting the layout of boundaries, roads and lanes so that they fit into the grain of existing settlement)
- Landscape and green infrastructure (e.g. using aspects of the historic landscape to promote connectivity and ensure that historic character is enhanced)
- Natural environment and coasts (e.g. recognising the wealth of heritage assets along the Medway and that these can take the form of settlement, maritime or military sites)
- Tourism and economy (e.g. identifying those heritage assets that can play a greater economic role in the area by promoting them as tourist sites or re-using historic buildings for new purposes).
- Sustainability and climate change (e.g. bringing together recent research by Historic England on the energy savings often inherent in existing buildings compared with the cost of demolition and new build but also the need for historic buildings to be treated sympathetically when energy improvements are being made)
- Flood risk (e.g. the need for SUDS permissions to take account of the impact they can have on historic structures and archaeological sites. Guidance on this is available from KCC Heritage Conservation)

Geodiversity should also be included in the Heritage Strategy. This includes fissures or possible cave sites which may contain Palaeolithic remains, for example, within the Loose Valley or areas to the west of Maidstone, Pleistocene river gravels, and also in relation to the character of the built historic environment and the sourcing of traditional building materials.

In addition to the Scheduled Monuments, Registered Parks and Gardens and Conservation Areas, Maidstone contains numerous heritage assets of local significance in the form of historic buildings, local parks and gardens, archaeological sites and monuments, most of which are included in the Kent Historic Environment Record. These local sites are critical to maintaining local character and need to be identified and conserved. An effective way to highlight significant local heritage assets is to develop a Local List of Heritage Assets. KCC is aware that the Borough Council has a list of Locally Listed Buildings, this should be developed further to include archaeological and landscape heritage assets to become fully effective. To further support the conservation of local heritage assets the Kent Historic Environment Record should be listed as a key information source in the Local Plan Review.

The County Council recommends that the Local Plan Review commits the Borough Council to working with stakeholders and partners to better understand, value, conserve and promote the Borough's heritage. This will maximise the ability of individuals and organisations to contribute their expertise but also ensure a shared ownership of the heritage. Examples of this could include a project with the Kent Gardens Trust as described above or a project to study and conserve the historic defences of Detling Airfield. Another good example would be a project to conserve the defences of the River Medway. During the Second World War the River Medway was the GHQ Stop-Line and still contains dozens of pillboxes and defence sites. The Borough Council could work with the Medway Valley Countryside Project, Historic England and the County Council to assess, designate, promote and protect this nationally important collection of heritage assets.

The Local Plan should also refer to the following key information sources:

- Kent Historic Environment Record, a database of archaeological sites, historic buildings and landscape features in Kent and Medway. See <http://www.kent.gov.uk>
- Historic town survey reports for Maidstone, Headcorn, Lenham, Marden and Yalding (2004). These reviewed the known archaeological and built heritage of the three towns and identified Urban Archaeological Zones of sensitivity. See http://archaeologydataservice.ac.uk/archives/view/kent_eus_2006/
- Kent Farmsteads Guidance (2012) for developers and planners considering development in the countryside. See <http://www.kentdowns.org.uk/publications/kent-downs-aonb-farmstead-guidance>
- Kent Historic Landscape Characterisation (2001). See http://archaeologydataservice.ac.uk/archives/view/kent_hlc_2014/
- Kent Compendium of Historic Parks and Gardens.

In relation to policies within the adopted Local Plan, the County Council would like to raise the following points:

Policy SP 18: The note accompanying policy SP 18 in the Local Plan Review suggests that the existing policy 'offers a general strategy for the conservation and enjoyment of the historic environment required by NPPF'. As above, the County Council considers that the Borough Council requires a full Heritage Strategy to comply with

the NPPF and simply re-stating the NPPF does not meet the requirement.

Policy DM 4: The County Council supports the suggested alteration to the existing policy to explicitly include the requirement for planning authorities to maintain or have access to a historic environment record.

TQ26 – How can the Local Plan Review best plan for the protection and enhancement of the borough’s biodiversity whilst still achieving the growth that is needed?

Biodiversity: The County Council would like to see the Local Plan Review ensuring that the Borough’s biodiversity and wildlife habitats are suitably protected and enhanced, including pollinator planting. The Local Plan Review should ensure there is a database of up to date ecological information available to inform planning applications, and applications should be submitted with the relevant ecological information.

The Borough Council should also note that Biodiversity Net Gain is to be mandated, which will be through the second part of the Environment Bill (the first reading is expected in October 2019). The Local Plan Review should ensure that it contains a mechanism to ensure that Net Gain is carried out in the Borough. The Borough Council has a Green Infrastructure Plan and there is need for that to link into the Biodiversity Net Gain requirements to ensure connectivity is retained and enhanced in the County.

The Borough Council should have consideration for the Kent Biodiversity Strategy and the revised targets and priorities should be reflected in the Local Plan Review. The Kent Nature Partnership intends on working with the districts over the coming year to help distil the Kent Biodiversity Strategy targets to the local planning level and identify specifically what contribution could be made.

TQ27 – How can the Local Plan Review best plan for an overall improvement in air quality in the Maidstone Air Quality Management Area, and manage air quality elsewhere, whilst still achieving the growth that is needed?

TQ28 – How can the Local Plan Review best reduce the generation of carbon emissions and mitigate for the effects of climate change whilst still achieving the growth that is needed?

Highways and Transportation: The areas worst affected by poor air quality are those alongside the primary road network within the urban area, where the effects of congestion are more pronounced. The Local Plan Review provides an opportunity to explore whether growth can deliver new infrastructure that will relieve these roads, either by providing alternative routes or improving the range of alternative travel opportunities that are available. The difficulty is in ensuring that the problem is not simply displaced to another nearby location and that any benefit is not eroded by the residual cumulative impact of the growth.

There is a high likelihood that an approach founded on the creation of new sustainable communities will be most effective in minimising additional travel demand on the congested urban routes that already have poor air quality.

Public Rights of Way: The County Council recommends that the Local Plan Review should have consideration of access and movement patterns across the Borough. A high quality transport network, which enables the public to move around quickly and easily, is an essential requirement for economic growth and prosperity. However, with reference to page 54 of the Local Plan Review, it is recognised that transport is now one of the largest emitters of carbon in the UK. Further, pollutants from motor vehicles can contribute towards a reduction in air quality, especially in congested areas of the road network. Measures to encourage walking and cycling should be accelerated, as they can provide low carbon modes of transport. The PRow network can provide opportunities for these sustainable forms of transport, especially short distance journeys, but local planning policy support, early engagement with developers and funding will be required to deliver these aspirations.

Sustainable Business and Communities: The County Council would encourage reference to the Kent and Medway Energy and Low Emission Strategy within the Local Plan Review

The County Council welcomes the addition of air quality modelling as part of the Local Plan Review and the identification of the need to link transport and air quality modelling. The County Council would support the development of an Air Quality Local Plan Development Plan Document as part of the Local Plan Review and agrees that actions to tackle air quality must be incorporated into initial designs of developments.

The County Council recognises that Issue 13 as published in the consultation document is also relevant for cross cutting objectives “health inequalities are addressed and reduced” and “deprivation is reduced”. This is because

actions to reduce carbon emissions are strongly linked to reduced fuel poverty and improved housing conditions. In addition, some of Maidstone's most deprived communities are at greater risk from climate change impacts, so failure to adapt could potentially exacerbate existing inequalities.

The Climate Change Act has been updated to include a carbon net zero by 2050, and this revised target needs to be updated within the adopted Local Plan that is currently referring to an 80% reduction.

The County Council would encourage the Borough Council to adopt a policy to 'reduce vulnerability' as opposed to 'avoiding increased vulnerability' to the range of impacts arising from climate change. According to current climate change projections (CP18), the Borough's vulnerability to climate change impacts, including heat, drought and flooding, will continue to increase so a business as usual approach is no longer appropriate. New developments present an ideal opportunity to reduce vulnerability to future climate change impacts, reducing the need for more expensive retrofitting at a later stage, and increase the long term sustainability of development.

KCC would encourage the adoption of high levels of building sustainability, with the setting of more stringent energy and water standards justified by the need to achieve the net zero carbon emissions targets of both the Borough and County Councils. Alternatively, the Local Plan Review could consider the identification of zero carbon development hubs, where more stringent energy and water standards are mandated to support and attract funding for trials and pilots of new technologies to encourage longer term innovation and investment in zero carbon technology and infrastructure.

The County Council supports the adoption of policies that require charging points to be built into all new developments. The Local Plan Review is also an opportunity to investigate and evidence emerging future trends in vehicle charging and ownership.

TQ29 - How can the Local Plan Review best provide for open space in new development?

Public Rights of Way: Research has found that populations with a relatively high level of physical inactivity have limited access to natural greenspace that is 'close to home'. Comparing areas with access to greenspace, deprivation and good health, there appears to be a correlation, where less deprived areas have better health and good access to green space. The Local Plan Review should address the imbalance of green spaces and improve opportunities to access this resource in deprived areas. Further, consideration will need to be given to the long term management of these open spaces, to ensure they have sufficient financial support for future maintenance and do not degrade over time.

Sustainable Urban Drainage Systems: The implementation of sustainable drainage systems is often associated with delivery of open space. The need and definition of open space within the Local Plan Review should therefore consider multi-functionality of green and blue infrastructure as required by the NPPF, paragraph 165. Assessing drainage in conjunction with other provisions such as biodiversity enhancements for new development, and any open space allocation, can mean that a more efficient design proposal is developed which can better accommodate housing requirements.

TQ30 – What community facilities do you consider are the most important to a successful new development?

The County Council would like to refer to Overarching Question 5 in respect of community facilities important to a new development.

TQ31 – Have we identified the extent of potential changes to the adopted Local Plan correctly? What alternative or additional ones do you suggest and why?

The Government's Clean Growth Strategy and the new 2050 net zero target should be fully reflected in the Local Plan Review (not just in the climate change sections) to reflect that sustainability should be central to good growth within the Borough.

About you

1. Are you...

- Male
- Female
- Other – please state

2. Which of the following age group do you fall into?

- 17 years and under
- 18-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65-74
- 75+

3. Which of the following best describes your race or ethnicity

- White (English/Welsh/Scottish/Northern Irish/British/Irish /Gypsy/Irish Traveller)
- Black/ Black British (African/ Caribbean)
- Asian/Asian British (Indian, Pakistani/Bangladeshi/Chinese)
- Mixed (White & Black Caribbean/ White & Black African/ White & Asian)
- Other

4. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?

- Yes
- No
- Prefer not to say