

## REGULATION 19 DRAFT PLAN FOR SUBMISSION DOCUMENT OCT 21

We consider this is a well-produced document covering many of the important issues for Maidstone in the foreseeable future. However, we believe that certain policies in this document require changes or attention as outlined below.

### **LPRSP2: Maidstone Urban Area**

#### **4) d) iv**

It appears that a lot of the information in this paragraph is out of date. Proposed healthcare infrastructure improvements to some GP surgeries quoted in this section have already been completed to meet the needs of the current population. GP practices in Maidstone are currently at capacity and there appears to be no cohesive strategic overview to provide adequate healthcare infrastructure for the projected increase in population in the urban area.

### **LPRSP6: Rural Service Centres**

#### **LPRSP6(A) : Coxheath**

There is an acknowledgement that GP practices in Coxheath are currently at capacity but the Local Plan refers to improving the infrastructure of the previous two practices, which were amalgamated a couple of years ago – *paragraph 2}c}*. No mention is made of the new medical centre currently being built on the impact of the practice acquiring additional patients from Loose.

### **LPRSP10(A): Housing Mix**

With the proportion of elderly people increasing rapidly in Maidstone, we note that the correct mix of housing needs to be considered carefully for this group. Para 7.11 states '*older people's housing need can be provided for by a range of housing types ....*' which appears to be reliant entirely on care and social help. What appears to have been missed is independent living solutions – for example, bungalows will be convenient for many and would encourage people to release larger properties required by families. In our Neighbourhood Plan HD Policy 2 the development of bungalows is particularly encouraged. We expect to see similar proposals included in the Plan.

### **LPRSP10(B) : Affordable Housing**

The logic of affordable housing allocations being directed to the high and mid value zones generally is inconsistent with the provision of services and infrastructure, which is concentrated in the low and mid value zones. Affordability targets should be based on the general policy of 40%. If affordability is an allocation criterion, this should be properly assessed on an individual site basis.

We note that Maidstone Borough Council has to build 1157 dwellings per year, of which 559 must be affordable, therefore making up 48% of the total. On that basis Maidstone town centre and the Invicta Barracks are going to have to provide a considerable contribution to this quantum. The policy as written does not show the proportion of affordable housing to be provided in the town centre.

### **LPRSP11(C): Town, District and Local Centres**

The continuation to omit Wheatsheaf Parade, which consists of six businesses in our area, means this important local centre to our area does not benefit from improvement policies to other retail centres in the Plan. This location needs to be added to the list as it is a well-used and important facility for local people.

### **LPRSP12: Sustainable Transport**

The wording of the key improvements listed in 7.82 is ambiguous in relation to Boughton Lane and the A229, and specifically does not mention other essential improvement works on the A229 corridor, including the Wheatsheaf and Armstrong Road junctions. These schemes are essential to go some way to mitigating the impact of approximately 1,000 additional homes in the south of Maidstone in this Plan.

Linton Crossroads and Heath Road are going to need major improvements to accommodate all the additional traffic from new developments (as mentioned under Policy LPRSP6(A) : Coxheath – paragraph 2)a) and the fact that Heath Road east-west is used as a ring road, so therefore traffic coming from south east Maidstone will also add to the congestion on the junctions on the A229. These junctions will be key for the future and will need urgent attention and major investment.

### **LPRSP13: Infrastructure Delivery**

This policy as worded is weak, difficult to enforce, and is not in the interests of the local population as demonstrated by existing developments without appropriate infrastructure. ALL infrastructure should be developed alongside physical development and should be a condition when giving planning consent to applications. 'Essential' and 'desirable' is a charter for developers to leave infrastructure development to the end of the building period and in some cases doing nothing, as has been seen in the past.

### **LPR SP14(C): Climate Change**

We acknowledge the inclusion of compulsory targets for renewable energy infrastructure. The current wording of 'support and encourage' is insufficient to meet targets for 2050. ALL new developments should be built to incorporate heat pumps, solar panels, car charging points and energy efficient insulation. This will ensure Maidstone is at the forefront of setting a target towards net zero emissions.

## **LPRSP15: Principles of Good Design**

'High quality design' is a subjective statement and should be strengthened with detail of what is required – eg minimum width of roads must be increased to allow for roadside parking and enough room for vehicles to pass through and prevent parking on grass verges and pavements; incorporation of trees on the roadside; ensure that building materials are in keeping with the local area. Bulk and mass should also be specified.

## **LPRSA270: Land at Pested Bars Road South of Maidstone**

As in our previous comments to the Call for Sites consultation, we are generally supportive of this site. However, this site lies within the green corridor between the Sutton Road and Loose Road as identified in the Council's Green and Blue Infrastructure Strategy (2017). Its importance as a local wildlife corridor should not be underestimated. Whilst the allocation of open space in this site is encouraging this must be targeted at the preservation of part of the linear corridor connecting from the Wheatsheaf roundabout through to the open countryside. Once again we emphasise the need for this minimum corridor width to be 50-70 metres. We request that this policy is reworded to include this requirement.

We support the Access and Highways section of this policy but ask that the wording is changed from *'....designed to avoid rat running ...'* to *'....designed to prevent any rat running, which would entail the closure of Cliff Hill Road and therefore prevent traffic levels that would adversely affect the rural character and safety of narrow surrounding lanes.'*

**Sean Carter**

**Chair North Loose Residents Association/Neighbourhood Planning Forum**

**8 December 2021**