MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION
WRITTEN SUBMISSION BY CPRE KENT &
MAIDSTONE DISTRICT COMMITTEE OF CPRE KENT

SESSION 9 – RETAIL AND MIXED DEVELOPMENT

1. TOWN CENTRE HIERARCHY AND THE IMPACTS OF DEVELOPMENT FOR MAIN TOWN CENTRE USES OUTSIDE DESIGNATED CENTRES

Issue (i) Whether the Local Plan policies for town centre uses are justified and effective and consistent with national policy

Qn9.1 For clarity as to what may be permitted, should policies DM17 include either a local threshold for the sequential test or refer to the Framework default threshold?

The NPPF paragraph 23 requires local plans to define a network and hierarchy of centres that is resilient to future economic change. Whilst the plan sets out policies for town centre uses and district centres and local centres a hierarchy has not been defined or neatly set out in one place.

The NPPF Annex 2 states that references to town centres includes district centres and local centres but excludes small parades of shops. Policy DM17 refers to town centre uses and states that *'Proposals for main town centre use should be located in existing centres unless: .. .'* and then sets out a sequential approach in 1i. NPPF Annex 2 sets out main town centre uses and these include retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities, the more intensive sport and recreation uses, including cinemas, indoor bowling centres; tourism development including theatres and concert halls. These are uses that are best suited in Maidstone town centre and not villages.

Policy DM17 sets out a sequential approach in line with guidance which could be applied to both Maidstone town centre and the district and local centres identified in policy DM18. This would be inappropriate for district centres and local centres. Many are located within residential areas where such uses would cause disturbance to residents. The Policy should clearly state that the sequential approach does not apply to the District and Local Centres.