

## **Maidstone Borough Council Local Plan (2011-2031) Examination**

**Inspector: Mr. Robert Mellor BSC DIPTRP DIPDBE DMS MRICS MRTPI**

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6th December, 2016

Mr. Rob Jarman,  
Head of Planning & Development,  
Maidstone Borough Council,  
Maidstone House,  
King Street,  
Maidstone ME15 6JQ

Dear Mr. Jarman,

### **Housing Supply Hearing Session R4 - Action Point R4.2**

#### **H2(1) Town Centre Broad Location**

I refer to the above hearing session at which there was discussion about the possibility of changes to how the Town Centre Broad Location is defined. This would be in order to deal with the issue of an overlap between the Borough-wide windfall allowance and the identification of sources of supply within Maidstone town centre. However it would also address uncertainty as to which sites are relied upon to deliver housing within the town centre.

My preference at the hearing was to 'red-line' those parts of the Broad Location from which housing supply could be expected as the result of redevelopment later in the Plan period. Those sites could be the subject of specific allocations at the Review stage of the Plan. Outside those locations but within the town centre additional supply would comprise: other sites allocated in the Local Plan (not part of the Broad Location allowance); prior notification office to residential conversions (also part of the Broad Location); and other windfall from unidentified locations.

In response Maidstone BC has suggested that it is too difficult to identify the site specific parts of the broad location and have instead suggested a diagrammatic indication of 3 locations on an OS-based inset map which however would not form part of either the Policies Map or the Key Diagram. However this is unsatisfactory as diagrams should be confined to the key diagram in accordance with national policy (and as proposed at Lenham). Other spatial policies should be defined on the Policies Map as required by the Regulations.

The town centre boundary is too vague about the sources of the housing supply. At Lenham the development options are more limited and that Broad Location can be defined as the parish with subsequent allocations to arise from masterplanning. In the town centre there is a far greater range of options as to how and where development can come forward which risks considerable uncertainty as to how and where housing will be delivered.

The locations within the town centre therefore require definition on the policies map so that it can be identified whether housing that comes forward is part of the Broad Location allowance or other windfall. That also applies to the suggested 50 dwellings in unidentified locations that have been included in the Broad Location. That is obviously a form of windfall allowance. Whilst a windfall allowance can be defined for a specific area if supported by relevant evidence, there must be clarity as to which forms of development are included in that allowance, not least to allow for monitoring and 5 year supply calculations.

I do not consider it appropriate to add an allowance for housing at Mote Road to the Broad Location figure. That site is proposed by PC/91 and PC/94 to be the subject of a mixed use allocation RMX1(x) for residential and office development. As residential development could come forward within 5 years it would be preferable to include figures for the residential and office supply from that site in the adopted plan as part of the allocation. It should not be part of the Broad Location.

My suggestion would therefore be that:

- 1) Broad Location housing supply from The Mall and the Riverside Quarter sites be defined on the Policies Map using boundaries drawn from the Town Centre Study (CEN 002). There is a precise definition of The Mall site in that document. I suggest that the Riverside Quarter site is widely drawn but that it should exclude the

Baltic Wharf site if that site is to have a separate policy. These boundaries could be adjusted if specific developments are allocated there at review stage.

- 2) The Town Centre boundary be retained specifically to depict a separate area based windfall allowance for office to residential conversions. That would be additional to the Borough wide windfall allowance that applies both within and outside the town centre. Only office to residential conversions within the town centre would be counted against that figure for monitoring purposes. As these sites would come forward through the prior notification route they are unlikely to be the subject of future allocations.
- 3) The other unidentified 50 dwellings be removed from the Broad Location figures and added to the existing Borough-wide windfall allowance. All windfall in the town centre except office to residential conversions would be counted against that allowance, as would office to residential conversions outside the town centre.

Yours sincerely,

**Robert Mellor**

Inspector

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c.c. Ms. Cheryl Parks, MBC