

## Written Statement – session 1B – Housing Needs (1)

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1. This submission is made as a member of the Co-ordinating Team comprised of: Kent Association of Local Councils – Maidstone Area, Joint Parishes Group, Maidstone CPRE, The Bearsted & Thurnham Society and Leeds Castle.

### MBC’s Objectively Assessed Housing Need (2011-2031)

2. OAHN is the key driver of proposed housing development.
3. Outline answers to some of the Inspector’s published questions are offered below.
4. Where no comments are offered, those made in another submission by members of this team are supported.
5. The context that has informed those answers then follows.

### Inspector’s Questions – session 1B – Housing Needs (1)

6. Numbering is the Inspector’s.

Question	Our Comment
Qn1.16 To what extent would past supply have influenced the household projections used in the Strategic Housing Market Assessment and should it be taken into account in these circumstances?	No additional comment offered.
Qn1.17 If the past supply included high density flatted development in Maidstone, as suggested, has the supply of available land been reduced as claimed, or would this source of supply be replaced by conversions of offices and other redevelopment in the town centre such that the supply will be maintained or increased?	Recent changes in Government policy with respect to office conversions gives considerable potential for new homes within Maidstone. Maidstone has not sought an article 4 Direction to remove this permitted development right.
Qn1.18 Is the projection of Average Household Size realistic?	No additional comment offered.
Qn1.19 Approximately how many people are expected to be accommodated in the dwellings that have already been (a) constructed or (b) committed since the start of the Local Plan period?	No additional comment offered.
Qn1.20 Does KALC dispute the evidence on affordability in HOU 003 and if so why?	No additional comment offered.
Qn1.21 What if any relevance does the Fordham SHMA in 2010 have to the submitted Local Plan?	No additional comment offered.
Qn1.22 How does the assessment of housing needs relate to the anticipated number of jobs and to commuting patterns into and out of Maidstone Borough?	GL Hearn has stated: <i>“The GVA forecast anticipates job growth of 14,400 jobs in Maidstone Borough over the 20 year period to 2031. This represents a potentially optimistic assessment of employment growth, and is above baseline forecasts”</i> . However, the draft plan gives little consideration, if any, to employment prospects for Maidstone’s residents outside the Borough, which, of course, will increase commuting and add to existing transport problems. In summary, there is a large mismatch

	between realistic job creation and proposed new homes.
Qn1.23 Why would the windfall allowance affect the calculation of housing <u>needs</u> ?	No additional comment offered.
Qn1.24 What is the basis of the claim that ‘Local Needs’ account for only 25% of the Objective Assessment of Housing Needs?	No additional comment offered.
Qn1.25 What are the implications for Maidstone of the latest Household projections?	The main implications are employment issues and adequacy of infrastructure. Further, there is the implication that there will be over-build (especially in the light of probable BREXIT implications), with further exponential projections then postulated at the first plan review. This is reinforced by the fact that building to the current OAHN is front-loaded i.e. another “spike” in population growth is likely.

**Context – inadequacies in assessment of housing need - summary**

7. The assessment of housing need has been a tortuous process over almost 10 years, with OAHN now almost double what was envisaged by MBC in 2010. That challenges credibility.
8. The Plan, as proposed by MBC, is based upon reports from G L Hearn (Housing) and GVA Grimley (Employment).
  - 8.1. Both of these reports are now out-of-date and have been prepared, as instructed, focused solely on the MBC area.
  - 8.2. Little or no regard was given to adjoining Authorities or the cross-boundary impacts of additional land supply (for instance Tonbridge & Malling – 95 acres and Ashford – Sevington site – potential for 160,000 sq m).
9. Credibility of the current OAHN requires challenge because it is allied with an assessment of employment prospects that raises issues and, further, does not take account of the potential impact of factors such as the proposed new Thames crossing at Dartford and the potential availability of alternative significant employment (and housing) sites.
10. Nor is there consideration of the potential impact of BREXIT on population projections. We do not know how this matter will affect the country. The fact that local people in the Maidstone area voted overwhelmingly for it needs to be addressed. There should have been a plan B having regard to the fact that the Government is suggesting that they will reduce immigration. Will this factor reduce the housing demand?

**Context – housing sites omitted from consideration**

11. The Plan does not take into account several other factors that will influence housing need or, on the other hand, will provide alternative sites that may or may not prove more attractive than the current proposals. For instance:
  - 11.1. For some reason, Detling has not been properly addressed or considered. This site inevitably, if handled correctly, will provide development opportunities for commercial and residential development. There are issues to consider but they can be resolved and a Local Plan should at least positively acknowledge the possibility and address the issues.
  - 11.2. While the Government looks for more opportunities to sell assets and raise cash, Maidstone Prison (6 acres) has been discounted or ignored as an additional longer-term residential site, even though Maidstone Barracks has been included.

11.3. There have been changes in planning policy in relation to conversion of office (B1) to residential conversion as a permanent permitted development right. MBC is fully aware “that there is an oversupply of poorer quality office stock in the town centre which is no longer fit for purpose”. MBC has not sought an article 4 Direction to remove this permitted development right and, by not putting any restrictions in terms of residential use, this automatic change of use should be treated as “housing stock” i.e. a potential residential site. At minimum, this should be used to boost windfall assumptions, if not, by contact with owners, to establish identified, viable sites.

**Context - failure to take account of Thames Crossing**

12. The route for a new Thames Crossing is currently being discussed. As with any road proposal, once the need is established the route will resolve itself. The Local Plan as prepared by Officers needs to anticipate the impact and benefits to the MBC community of the additional crossing. The fact that this will probably become the most important infrastructure project in Kent is not considered and does perhaps clearly demonstrate the failure to appreciate the impact.



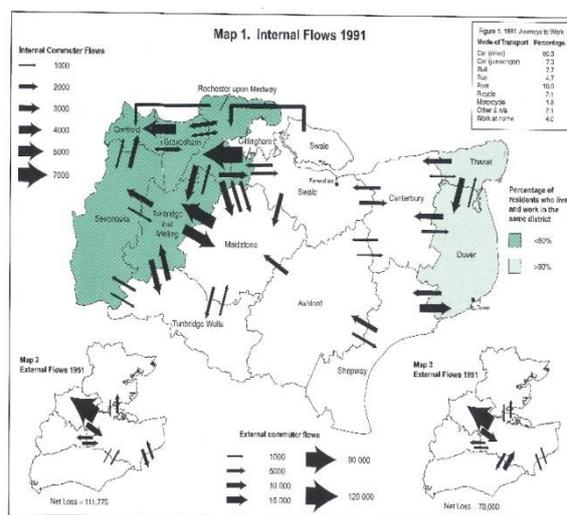
**Context – commercial sites not taken into account**

13. The commercial land supply considered was purely historic i.e. “of the 46 sites, 28 had been assessed as fit for purpose”<sup>1</sup>. Since 2014, there has been activity that needs to be considered as relevant in that there are currently more sites potentially available for development - in other words, the 28 sites have grown.

14. The assessments did not take account of redevelopment of brownfield sites, for example, in the Parkwood area which itself is likely to generate more traffic onto the already very congested Sutton Road.

15. There does not appear to have been a clear appreciation that there is, and has been for many years, “cross border” activity particularly from the MBC area to Aylesford (Tonbridge & Malling). This area, such as the Aylesford paper Mill site, will continue to provide job opportunities to MBC residents.

16. Maidstone HMA is “focussed on Maidstone but also extending into Tonbridge and Malling, reflecting strong household and work flows identified between the two areas. The study identified little cross-border movement between Ashford and Maidstone, which was attributed to the fact that both are strong employment centres in their own right.”<sup>2</sup>



17. We will refer to these issues in session 8 (Employment Policies and Allocations) and will address some of the Inspector’s questions, such as Qn8.1 (cross-border commuting), Qn8.26 (Waterside Park, effect of Woodcut Farm decision).

18. MBC appear to ignore the availability of land for commercial development outside the MBC district. They have considered that there will be a requirement to provide additional jobs (to

<sup>1</sup> MBC – Planning, Transport and Development Overview & Scrutiny Minutes – 21 October 2015

<sup>2</sup> GL Hearn – Maidstone Strategic Housing Market Assessment dated January 2014

match the new housing need) and have assumed that all these jobs have to be generated within the borough. This is one of the driving forces for the MBC Junction 8 policy. The reality is that the market clearly shows that established locations such as Aylesford are a preferred location to Maidstone. Maidstone does have Parkwood but this is not an area that lets quickly. "Parkwood Industrial Estate comprises a combination of industrial, distribution and retail uses. Occupiers include Ferrari, Interlink Express, DFS, Travis Perkins, Royal Mail, Plumb Centre and Selco. The area is also home to a number of car showrooms including Mercedes, Renault, Hyundai, Mazda and Honda." Its accessibility will only deteriorate because existing traffic congestion along the Sutton Road will suffocate it.

19. The plan has ignored the historic and current flows into Tonbridge & Malling and, to provide the job opportunities, MBC is now trying to promote The Kent Innovation Corridor which includes the Kent Medical Campus, where MBC hope to achieve "3,300 new jobs by 2027" to stem the flow. This facility will not achieve this objective significantly because of the need for the special qualifications required to work in a medical facility. The jobs being filled "next door" are for a different skill set.

### **Context – junction 8 & Woodcut Farm**

20. MBC policies are predicated in the mistaken belief that Junction 8 and Woodcut Farm are the answer to all MBC growth requirements for the period of the Local Plan. Woodcut Farm was, however, turned down by the MBC planning committee. This despite the fact that there was an attempt to influence members to support the application because MBC had included it in the local plan, that plan having been previously approved for submission by full council. In the report to members it was stated that it was a material consideration "that the Council has allocated the site for employment within the submission version of the Maidstone Local Plan (2011-2031) which is considered to carry significant weight and with which the proposals fundamentally accord".
21. Currently the MBC web-site is still promoting Junction 8 and Woodcut Farm in the publication "Maidstone Economic Development Strategy". The latter was approved after the Waterside Appeal, and before the Inspector's decision was published. It has not been updated to accord with the Waterside inspector's decision or the recent Woodcut Farm planning refusal.
22. Development at Woodcut Farm runs contrary to the Council's own policy for the protection of the setting of the Kent Downs AONB.
23. If this development is subsequently allowed, it will open the floodgates to further development along the M20/A20 corridor to the east of Maidstone. The rejection of the appeals to develop Waterside Park and its subsequent endorsement in the High Court strengthens the case for rejecting any development at Woodcut Farm because the latter is clearly part of the setting of the Kent Downs AONB.
24. The policy fails to consider the impact on the ANOB and the adverse impact on the existing jobs in the Maidstone area; more particularly, the impact on Leeds Castle. Development at Junction 8 would risk existing jobs in the Tourist & Leisure businesses. The net effect is the possibility that jobs will be lost!
25. There have been enough appeal and planning decisions to make the position clear to everyone. In simple terms it would be helpful going forward if the Local Plan designated this area as a "no go area" for future commercial development so that, when the Woodcut Farm decision is appealed, the Local Plan can be taken into account as a fundamental reason for upholding the planning committee's decision to refuse permission.
26. There is no reason to believe that motorway junctions are a panacea for commercial / industrial growth. For example, Junction 7 has failed to attract commercial (industrial) occupiers and MBC is now having to seek adjustments to its planning status to enable the land to be used. There was no demand and that enabled retail in the form of Next to obtain planning. Having acquired back

the park-and-ride site from MBC, the owners are seeking to utilise the land not for commercial but more retail in the form of a Waitrose store and perhaps a primary school to serve Bearsted.

27. If MBC had engaged properly for example with Ashford BC, the suggested need for employment sites could have been readily resolved in as much as they would have discovered the proposals that will be developed by Junction 10A (new motorway junction) by AXA – 160,000. sq m. Ashford will have an oversupply which can accommodate MBC's perceived undersupply.
28. It is also noted that there is no mention of any discussion with the Mayor of London. This omission clearly indicates the failure to consult with an organisation that is vital and could determine Maidstone's future.

### **Conclusion**

29. The Local Plan as currently drafted needs to be updated before being considered further so that, following eventual publication, it will pass the test of time.
30. The Local Plan as currently prepared is not acceptable to the majority of local people.