

MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION

SESSION R2 – ALTERNATIVE SITES

REPRESENTATION R19579

WRITTEN STATEMENT ON BEHALF OF ECO BUILD PARTNERSHIP UK

1. These representations are made in support of the objections by Eco Build Partnership UK relating to an alternative or additional site for a housing allocation in the Local Plan. They will be developed at the hearing.
2. The Inspector has noted in his Agenda that alternative sites are unlikely to proceed further unless there is a shortfall in the development proposed in the plan or that other proposed development sites are unsuitable. The Representor would add to this that if an alternative site is clearly preferable to a proposed allocation when considering environmental constraints and national policy, the Inspector can properly find that the Plan is unsound without modification.
3. The Representor accepts that the matter would need to be referred back to the Council, and is likely to require further consultation, if it proposed alternative is to be adopted.
4. Because this scheduled hearing session is directly concerned with Broomfield Park, it is not proposed to address in this hearing statement the objections to other aspects of the plan. However, the representations should be considered in full.

Introduction to Broomfield Park

5. The proposal is for the extension of an existing village, and the consolidation and improvement of an existing employment site. The proposed site has a number of features which make it suitable for development and preferable to other sites in the plan. It is subject to few constraints. Indeed, it would be fair to characterise the only material constraint for this plan-making process to be the need for new highway infrastructure to serve the site.

6. The site lies to the east of Kingswood, a village which has a number of local facilities including a shop and a primary school. The site is separated and screened from the village by a belt of woodland which would be retained in the proposed allocation. To the north of the site lie the settlements of Leeds and Broomfield, and beyond them the A20 Ashford Road, M20 and the rail stations at Harrietsham and Hollingbourne.
7. The site is not subject to any national or international designations or development constraints. It is free from flood risk and has no air quality issues. Part of the site is previously development land, consisting of a number of B1 industrial units and open storage uses. The remainder of the site is greenfield, but of low agricultural quality. There is no best and most versatile agricultural land. Much of the land is now used for growing Christmas trees.
8. The proposal is for a “lifetime” development comprising affordable “starter” homes, family homes, and retirement homes. It is also proposed to deliver a consolidated and improved employment offer, retaining existing businesses and attracting new ones to a small modern estate. The proposals also include the provision of new village centre facilities for Kingswood, and potentially a new larger primary school to serve the existing village and the new homes. The proposal will also incorporate a biomass heat and power facility. There is an extant permission for such a facility within the site, but in the absence of a heat user (such as new residential dwellings) it is not viable to build it.
9. The site affords the potential for natural screening from the existing Kingswood village, allowing the amenity of existing residents to be protected, despite the close proximity to the village and its services. The belt of woodland to the west of the site would be retained. This includes areas of woodland which are subject to management through coppicing. The proposal would allow that coppicing to be formalised to an appropriate standard, and for parts of the woodland to be opened for recreation. There are no known ecological constraints outside the woodland which is to be retained.
10. The site is almost entirely enclosed by existing woodland belts to the north, east and west. The landscape and visual impacts of development in this location would be extremely limited given the scale of the proposed development.

11. The proposals anticipate the construction of a new bypass for Leeds, which will serve also to provide access to the north of the development. Proposals to bypass the historic centre of Leeds have a long history, with longstanding support from both the Borough Council and the County Council. There can be no question as to the desirability of providing such a bypass, in terms of relieving congestion, improving air quality, and improving residential amenity within Leeds and other settlements. However, it is apparent that without developer funding those proposals will not materialise. This allocation would allow for a substantial contribution to be made to the construction of the bypass. The proposed road infrastructure at the site would also relieve the historic village of Broomfield by providing a new means of access from Kingswood to the proposed bypass.
12. Like many sites under development and proposed in Maidstone's area, there is no direct access to a railway station. However, provision can be made for transport to train stations through electric buses. The new bypass is likely to include a cycle way which would provide a direct connection to the stations to the north of the site. Unlike many housing sites, this site includes on-site employment which reduces the need for access to train stations.
13. The representor accepts that this site cannot deliver substantial housing in the first five years of the plan period, and that the development will need to be phased because the capacity of the site is limited prior to the bypass becoming available. It is anticipated that the process of obtaining consent for the bypass and its construction will take some time. The bypass is likely to be deliverable within a period of 5-8 years from plan adoption.
14. However, the site itself is capable of delivering some housing and the consolidated and improved business units within the first 5 years from plan adoption within existing constraints. This will allow the benefits of the development to be delivered before the bypass is available. To that end:
 - a. Phase 1 of the development could comprise the redevelopment of the previously developed land to the south of the site, including the improvement of the existing accesses, and the creation of footpath links to the village centre. The redevelopment of this part of the site would include the consolidation of the employment facilities, the development of a care home, and the provision of a limited number (perhaps up

to 50, subject to detailed highways assessment) of new market and affordable homes. Whilst detailed analysis is required, such a scale of development is anticipated to be capable of being accommodated without adverse effects on the existing highway network;

- b. Phase 2 of the development would include the provision of infrastructure for the remainder of the site, including the potential development of a new primary school and village centre, such that there would be no constraints on swift housing delivery once access to the bypass is achieved;
- c. Phase 3 would comprise the bulk of the market and affordable housing delivery over a period of 5 years from the opening of the bypass.

15. The Representor invites the Inspector and the Council to give serious consideration to the potential for this site to deliver a substantial amount of housing in a sustainable fashion. The proposal meets key objectives of national policy:

- a. Delivering a mix of market and affordable homes for all stages of life in a desirable location that would be a pleasant place to live;
- b. Improving the sustainability of an existing village by the provision of new homes and facilities;
- c. Developing on previously developed land;
- d. Improving the quality of the employment facilities and providing jobs close to homes;
- e. Assisting in the delivery of much needed infrastructure, delivering further sustainability benefits;
- f. Avoiding development on nationally or locally designated landscapes;
- g. Avoiding development which would cause a net loss in biodiversity;
- h. Avoiding development on best and most versatile agricultural land.

Response to Inspector's questions

16. **QnR1.1** is addressed to the Council.

17. **QnR1.2:** the Representor will provide a hard copy plan to the Council and the Inspector showing the illustrative scheme.

18. QnR1/3:

- a. Attached to these submissions is a letter from David Parry FRICS of Savills explaining scheme viability in broad terms;
- b. If the Inspector recommends further work by the Council, the Representor can commission a more detailed assessment and seek up to date costs estimates from the County Council for the bypass scheme, but Mr Parry's letter is considered sufficient for these purposes;
- c. It should be noted that the proposed community facilities are indicative only, but they are typical of the scale and nature of facilities that would be expected in a housing scheme of this scale. The proposal for a new primary school reflects the fact that the scheme is likely to result in the capacity of the existing Kingswood Primary School being exceeded, although a detailed analysis has not been considered. Clearly if the existing school site was disposed of, the receipt to the education authority could contribute to the construction of a new school.

19. QnR1.4: an indicative phasing has been described above. It is likely that Phase 1 would be delivered without the bypass and in the first 5 years after plan adoption. The delivery of Phase 3 (the main housing development) would have to await the bypass and therefore is unlikely to come forward until 5 to 8 years from plan adoption. However, the provision of on-site infrastructure in an intervening Phase 2 would aid swift delivery of housing.

20. QnR1.5: Yes. The Representor does not accept the overall conclusions and would comment on each of the topics raised by the Inspector as follows:

- a. Access to centres: The assessment, on the basis of the criterion chosen, is correct in that the site is not adjacent to the urban area or a rural service centre. However, this issue goes to the preference in the Plan to concentrating development on the urban fringe, and ignores the fact that development on this scale will improve the sustainability of an existing village, consistently with NPPF paragraphs 28 and 52.

- b. Access to secondary school: The assessment is factually correct. Kingswood is served by a school bus;
- c. Proximity to employment: The assessment is incorrect, since the site has on-site employment which would be consolidated and improved. Again, the NPPF highlights the need to provide employment in villages;
- d. Proximity to bus stop: the proposed infrastructure for a development of this side would include bus stopping facilities. The assessment in this regards ignores the scale of the proposal;
- e. Proximity to rail: as described above, bus connections to railway stations can be provided. Such facilities are proposed for other sites under development in the Borough at present;
- f. Proximity to cycle routes: there will be cycle routes within the site. Whilst it is a matter for detailed design, the bypass is expected to include a cycleway;
- g. Proximity to Post Office and playspace: such facilities can be provided within the development boundary and are proposed as part of the village hub;
- h. Agricultural land: this assessment is not accepted. The proposals would not result in the loss of BMVAL;
- i. Archaeology: it is not known on what basis the Council's assessment was made;
- j. Ancient woodland: the adjacent AW would be managed and preserved, and accordingly its presence should not count against the proposal in sustainability terms;
- k. Local wildlife site: the site would be managed along with the AW.

21. **QnR1.7:** there is no formal evidence of local support which the Representor relies on but there is substantial support in the village for the improved facilities. Informally, several Maidstone Borough Councillors have expressed support for the proposal. The most important people

who cannot at the moment express support are the people who would love to live on this development, and of course, the wishes of the residents of Leeds and Langley for a bypass.