



Managing Growth in the Maidstone Borough

The Kent Council Council Response
to Housing Allocations in the
Draft Maidstone Local Plan
(Regulation 18) Consultation



April, 2014

Vision

The following represents Kent County Council's over-arching future vision for the Maidstone Borough:

A Vision for Maidstone in 2031

Maidstone will deliver sustainable growth and regeneration commensurate with its role as the 'County Town' of Kent. Our aim is for Local Plan policies that will deliver an appropriate number of new dwellings and commercial spaces, supported by necessary infrastructure in line with the expected demand and the desire to maintain amenity and quality of life.

The Maidstone town itself will be maintained as a vibrant place with appropriate facilities including retail, recreation, employment, entertainment and will act as a hub for civic activities, transport and commercial activity. Maidstone will continue to provide larger order services to nearby settlements/villages.

Surrounding Maidstone town will be appropriate green spaces and open countryside, with particular emphasis on protecting the key important areas (such as the Kent Downs Area of Outstanding Natural Beauty) as well as important open countryside locations at the edge of the settlements. The ongoing and incessant urban sprawl of Maidstone into the countryside must cease.

Rural services centres, larger villages and smaller settlements will each play their role by accommodating suitable growth to protect their viability and to ensure that infrastructure is appropriately provided. In locations where growth and development has reached its critical mass, or where development is unsuitable, appropriate protections should be established to ensure that the lifestyle of existing residents is preserved.

All development will be in accordance with appropriate design principles, incorporating the desires of local residents through neighbourhood and parish plans, in accordance with the principles of Localism.

Summary

This discussion document represents part of Kent Council Council's response to the Maidstone Local Plan (Regulation 18) Consultation. The formal consultation for the Local Plan commenced on March 21, 2014 and will conclude on May 7, 2014 and this document will be presented with other submissions to represent KCC's consolidated view of the Draft Local Plan.

This response addresses two key aspects:

1. An objection to the 'housing target' for the emerging Maidstone Borough Local Plan; and
2. An objection to the over-arching spatial strategy for the distribution of development, particularly housing, throughout the plan period.

KCC's Preferred Approach to Maidstone Local Plan

Kent County Council considers that there are significant alterations needed to the Draft Maidstone Local Plan as exhibited for public consultation.

The current Draft Maidstone Local Plan provides allocation for 17,100 dwellings. Taking into account the existing 4,200 approved dwelling sites this leaves a requirement for 12,900 new dwellings over the plan period (2011-31). However, the Strategic Housing Market Assessment (SHMA) undertaken by Maidstone Borough Council proposes a housing 'need' of 19,600 homes – this would equate to a need for approximately 15,400 new homes, on top of the 4,200 already approved dwellings. As such, the Draft Local Plan, as proposed, will be promoting development of somewhere between 12,900 and 15,400 new homes, in addition to the 4,200 dwellings which have been approved since 2011.

KCC submit that this is undeliverable and unsustainable and will diminish the quality of life for existing residents.

In order to address these concerns, the fundamental changes to the Draft Local Plan include:

1. Reducing the housing target to a more sensible figure of approximately 14,500 homes;
2. The inclusion of not only existing approved sites but also windfall sites to reduce the number of new homes required;
3. The deletion of some of the allocated urban fringe sites with significant infrastructure constraints;
4. A reduction in housing in some of the villages and settlements in the Borough;
5. The establishment of clear policies to enforce a 'green belt' style arrangement to protect the open countryside at the defined boundary of the Maidstone Urban Area, and to provide appropriate 'buffer' between the Maidstone Urban Area and nearby

villages, preventing urban coalescence, and adopting sound town and country planning principles;

6. Establish appropriate design principles within the emerging Local Plan to ensure that new developments are designed to be consistent with their locality and the 'fit in' with existing housing. Any development in villages and other settlements should give weight to relevant Neighbourhood Plans and should be undertaken in conjunction with the Town/Parish Council and/or appropriate neighbourhood/community groups.

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Background

Summary

Over the last few months, various aspects of the Draft Maidstone Borough Local Plan have been made public. This has included a formal 'call for sites' process, the production of a Strategic Housing Market Assessment and information about various locations to be allocated for future housing/development. The formal 6 week Regulation 18 public exhibition of the Draft Local Plan commenced on March 21st, 2014 and will conclude on May 7th, 2014. This is the first time that the full, comprehensive draft has been exhibited for public comment.

Summary of the KCC Position

As part of this response, Kent County Council wishes to make the following key points:

1. An appropriate, reduced 'housing target' for the Draft Maidstone Borough Local Plan needs to be established. Given that Maidstone Borough has provided its 'fair share' of housing over the last decade, and has undertaken appropriate planning to primarily provide that development on previously developed sites, KCC questions whether it is fair that the Borough will be penalised in having to deliver more houses because of a previous record of housing delivery. How does this accord with sensible and reasonable planning. KCC contends that an appropriate housing target should be in the region of 14,500 houses over the plan period (2011-2031).
2. The proposed spatial distribution of housing is unsustainable and unsuitable. Large Urban extensions as proposed will result in new centres of population that are not supported by adequate infrastructure and will be remote from key services. Road infrastructure, existing traffic congestion, potable water supply and sewerage provision present significant constraints to development around Maidstone. Pursuing urban sprawl will result in significant harm to the character of the urban area, is counter to appropriate and sensible urban planning and threatens coalescence with adjacent rural settlements. It is the position of Kent County Council that a pattern of housing development must be achieved that focusses on two primary locations:
 - a. The existing urban area of Maidstone itself – that is, land within the **existing** urban area. Preference would be those sites that are within close proximity to the town centre due to the existing infrastructure and services available.
 - b. In many cases, additional, appropriate development in villages and rural settlements provide a critical mass for infrastructure - for instance for schools, community facilities, local retail and other services, thus providing an overall community benefit.

KCC notes that sites on the edge of the existing urban area are the least suitable in terms of sustainability and infrastructure. KCC would like to see a 'green belt' style arrangement around the existing urban area of Maidstone, preventing the ongoing sprawl of the town into the surrounding villages, with housing provided in appropriate villages at a level capable of supporting investment in infrastructure (highways,

education, community facilities and so on), in accordance with neighbourhood plans developed with local communities.

Summary of Housing Numbers

The following tables represent a summary of the KCC proposed housing target for the Maidstone Local Plan, against the existing targets from the Draft Maidstone Local Plan.

Summary of Maidstone Borough Council Proposed Housing Targets	Dwellings
Current Identified Housing 'Need' by Maidstone Borough Council	19,600
Current Allocations proposed within the Maidstone Draft Local Plan which is currently on consultation.	17,100
Sites to be deducted from target by MBC: <ul style="list-style-type: none"> Delivered/Approved sites since 2011 	(4,200)
Total of new home sites required by Draft Maidstone Local Plan as currently on exhibition	Approx. 15,400 (if 19,600 figure is used) Approx. 12,900 (if 17,100 figure is used)

KCC Proposed revised target (2011 to 2031)	Dwellings
Proposed revised Housing target	14,500
Sites to be deducted from 'target': <ul style="list-style-type: none"> Windfall Sites (1,660) Delivered/Approved sites to date (4,200) 	(approx. 5,860)
Total New Home Sites required by KCC proposal	8,640

In summary, the Maidstone Borough Council proposed housing targets will require somewhere between 12,900 and 15,400 additional home sites to be provided throughout the plan period (2011-31). It is the view of Kent County Council that that housing 'target' should be lowered (to approx. 14,500). Taking into consideration already approved/completed sites, as well as an appropriate allowance for windfall sites, a revised target for 'new' sites is a more appropriate 8,640.

The Role of KCC in the Process

The role of Kent County Council in the process is essentially as a provider of key infrastructure. Obviously the development needs/targets and broad locations for housing require investment in infrastructure to support such growth. KCC, as the authority responsible for highways, education, social care and community facilities, plays a key role in the process, and each of the districts must work with KCC to ensure that their housing allocations are deliverable in infrastructure terms under the duty to cooperate legislation.

The Role of Parish/Town Council's in the Process

Parish and Town Council's (as well as residents groups and other similar organisations) can play a key role in developing the Local Plan. These groups are often responsible for developing neighbourhood plans and are best placed to know the issues of their local area/village/settlement. Their expertise and knowledge should be relied upon by District Council's in developing Local Plans so as to ensure that their expertise is incorporated within the emerging plan. The District and County Council's should seek to work with Parish Council's to achieve appropriate outcomes rather than imposing Local Plan policies on them.

Housing Numbers

Housing Policy Prior to the National Planning Policy Framework

Prior to the introduction of the National Planning Policy Framework (NPPF), the quantum of housing for each district was determined at county or regional level. For many years this was through Structure Plans (such as the Kent & Medway Structure Plan, 2006) and then the Regional Spatial Strategy for the South East (the 'South East Plan' 2009).

These documents allowed planning authorities to have more oversight in the planning system at a regional/county level and permitted a more strategic view of the spatial distribution of housing and development. These 'higher order' strategic documents allowed housing targets to be determined across a wider area and decisions to be made about appropriate locations for housing at that level.

This process ensured that housing was in the most appropriate locations and also ensured delivery of infrastructure to support growth. These strategies promoted housing growth primarily in the identified 'growth areas' of Kent - which included Ashford/East Kent, along with the Thames Gateway. These growth areas were allocated to take the bulk of Kent's housing target, reducing pressure on other areas (such as Maidstone, Tunbridge Wells and Sevenoaks, for example).

In short, the Kent Structure Plan, and later the South East Plan provided a wider spatial strategy for the allocation of housing and infrastructure.

Move to 'District Based' Housing Needs Assessment (NPPF)

With the abolition of the South East Plan (March 2013) and the introduction of the National Planning Policy Framework, district councils became the responsible bodies for determining housing need in each of their districts/boroughs. The over-arching, broad scale spatial distribution of housing (ie broad housing targets from the South East Plan) were replaced by essentially two mechanisms:

1. Each district authority would be responsible for undertaking its own '**housing needs assessment**' to determine the level of housing 'need'; and
2. In the event that a district does not consider that they can accommodate all of their 'identified housing need', they will essentially work with their neighbours under '**duty to cooperate**' to establish where that housing will be located.

The 'Duty to Cooperate'

The 'duty to cooperate' places a duty on local planning authorities, county councils, parish Councils and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross-boundary matters.

The National Planning Policy Framework and Guidance makes it clear that local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.

It is, therefore, essential that Maidstone Borough Council works proactively with Kent County Council and Parish/town Council's in order to ensure that the final Local Plan not only achieves an appropriate housing target, but also ensures that development is located appropriately taking into account infrastructure needs and the eventual amenity of development in the Borough.

The Emerging Maidstone Borough Council Local Plan

Over the past few months, Maidstone Borough Council has been working towards their revised Draft Local Plan. The Draft Local Plan commenced public consultation (Regulation 18 Consultation) on March 21st, 2014 in a 6 week process that will run until May 7th, 2014.

Key aspects of the emerging Draft Maidstone Local Plan:

- Maidstone Borough Councils own '*Strategic Housing Market Assessment*' (completed by consultants GL Hearn) has identified 'housing need' of 19,600 homes across the Borough over a plan period.
- The public consultation Draft Local Plan identifies housing allocations amounting to approximately 17,100 homes (2,500 homes short of the identified 'need' of 19,600 homes).
- In conjunction with the consultation process MBC are also undertaking a 'call for sites' seeking information on sites that have the potential for housing development in the Borough.
- The Local Plan has a proposed plan period of 20 years (2011-2031). As such, any completed housing developments or previously allocated sites can be deducted from the total required. Housing completions in the period 2011 - 2013 and consents granted up until October 2013 account for 4,200 homes. As such, housing sites for an additional 15,400 are required (to meet the total identified need of 19,600). These completions/consented sites are included in all calculations within the Draft Maidstone Local Plan.

Maidstone's Identified Housing Need

Although it is commented that 'housing need' is calculated at the district level, the methodology is clearly set out in government policy. One of the very first tests that a district must overcome in the Local Plan Examination process is to satisfy the Inspector that they have followed the appropriate government guidance and established the correct 'housing need'.

Maidstone's identified housing need was established by work undertaken by consultant GL Hearn. The completed Maidstone '*Strategic Housing Market Assessment*' was released in January 2014 and showed an 'identified housing need' of 19,600 homes for the 2011-2031 plan period.

KCC believes that the system used to calculate MBC's 'housing need' is fundamentally flawed relying on historic delivery rates to predict future growth trends. Maidstone has had considerable growth, far in excess of the South East Plan targets, and its infrastructure is creaking. Therefore to continue to predict this trend in to the future given the current pressure on Maidstone's infrastructure is flawed and unrealistic.

Comparison to Previous Housing Targets

The following table sets out the current 'housing need' for Maidstone Borough in comparison to other (previous) targets:

Policy/Strategy Document	Maidstone Borough Housing Target		Notes/Additional Information
	Target for Plan Period	Required Yearly Housing Delivery to Meet Target	
Kent & Medway Structure Plan 2006	6,500 (2001 – 2016)	433	Superseded by the Regional Spatial Strategy in May 2009
The Regional Spatial Strategy for the South East (The South East Plan), May 2009	11,080 (2006 – 2026)	554	Abolished in March 2013
Current identified 'need by Maidstone Borough Council, January 2013	19,600 (2011 – 2031)	980	77% increase on South East Plan target
Maidstone average yearly delivery (2006 – 2013)	-	883	60% increase on South East Plan target.
KCC's proposed housing target (14,500)	2011-31	725	31% increase on South East Plan target.

Consideration of the Housing Target

In consideration of the housing target for the Maidstone Borough, the following important key aspects must be considered. KCC considers that these matters play a key role in determining what will eventually be the housing figure for the Maidstone Borough:

Previous Maidstone Borough Housing Delivery

It is noted that MBC has a track record of over-delivering against adopted housing targets. Until 2009 the yearly housing target for the Borough was set out in the Kent & Medway Structure Plan 2006. This required an annual delivery of 433 homes to meet the requirements of the Plan.

From 2009 until early 2013, the South East Plan set a housing figure that required the delivery of 554 homes per annum.

It is important to note that, on average, the Maidstone Borough has delivered more than 880 homes each year since 2006. This equates to more than 200% of the Kent & Medway Structure Plan target and 160% of the South East Plan target.

On this basis, there are two important considerations:

- For the past decade the Borough has far exceeded its annual housing target.
- Has the 'over-delivery' of housing over the past decade skewed the analysis which leads to the current level of identified 'housing need'?

KCC sees this as an important consideration in determining what the eventual housing target should be. Despite the housing 'needs' analysis indicating a figure of 19,600 homes over the plan period (equating to a required delivery of approx. 980 per year), KCC believes that this figure has been skewed by in-migration and population growth which has resulted (in part) due to the high rate of housing delivery in the past. In establishing a housing figure moving forward, consideration should be paid to the fact that Maidstone has over-delivered on annual targets. The reward for this previous delivery should not be more housing resulting from skewed population statistics. If Maidstone had not delivered ANY housing over the past decade, it could be argued that in-migration and new household formation would have been significantly restricted, and the Borough would now be considering a lower level of housing for its emerging plan.

It is the view of KCC that the method of calculating 'housing need' as required by NPPF and central government guidance is poorly considered. Those boroughs/district who were brave enough to promote growth in the past will have encouraged in-migration and population growth (through the provision of new homes) – this in turn would result in demographics that lead to higher 'housing need'. In hindsight, it would have been advantageous for Maidstone Borough to have under-delivered housing over the past 2 decades, which would skew the now required 'need' towards a lower number. In addition, the current mechanism of determining 'housing need' and house targets on a district-by-district basis fails to accord with appropriate planning for infrastructure and investment for economic growth, which are developed at a more strategic level.

It is KCC's contention that because Districts/Boroughs have been pro-active in housing delivery in the past, they should not be subject to continual high delivery rates into the future. Indeed the challenges of infrastructure provision alone makes this approach entirely unsustainable and so contrary to the principles of the NPPF.

Previous Brownfield Development

In the five years from 2007 to 2012, 87% of housing development in Maidstone Borough was on brownfield land. KCC views this as an appropriate response to development of new housing.

However, based on this suitable housing delivery, and the delivery of housing over and above previous targets, much of the brownfield land has been utilised. Where there are still previously developed sites available, KCC will support the development of such land as a priority. However, it is apparent that, if a housing target of 19,600 is set, a significant proportion of new homes will be on greenfield land.

Given that Maidstone Borough has provided its 'fair share' of housing over the last decade, and undertaken appropriate planning to primarily provide that development on previously developed sites, KCC questions whether it is fair that the Borough will be 'punished' for this by development of greenfield spaces and further questions how this accords with sensible and reasonable planning. Borough and District authorities that have been proactive in housing delivery, delivering above their required housing targets, and making suitable use of brownfield land now appear to be burdened by excessive housing requirements that will destroy valuable green open spaces. This will have a significant and lasting impact on the Borough.

Windfall Sites

KCC believes there are questions as to whether appropriate consideration has been made to windfall sites. Maidstone Borough Council has previously issued Annual Monitoring Reports which do not take account of windfall sites and this was recently challenged by one of the Parish Council's and high level legal advice sought.

In March 2014 DCLG published the final version of the consolidated planning practice guidance. It makes clear that local planning authorities should identify a supply of specific, developable sites or broad locations for growth, where possible, for years 11-15. However Local Plans can pass the test of soundness where local planning authorities have not been able to identify sites or broad locations for growth in years 11-15 which often can be the most challenging part for a local authority.

Windfalls can now be counted over the whole Local Plan period. A windfall allowance may be justified in the five-year supply if a local planning authority has compelling evidence. Local planning authorities now have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area (using the same criteria as set out in paragraph 48 of the National Planning Policy Framework).

As part of this consideration of windfall sites, there are estimates (from early 2013) indicating that as many as 1,660 dwellings could be delivered through windfall sites in the first five years of the Local Plan. Maidstone has had a long history of windfall sites coming forward, and indications are that this will continue to be the case. It is KCC's view that this needs to be appropriately considered in developing a housing target for the Borough.

What Should the Housing Target Be?

The key consideration for Kent County Council is whether the housing target is acceptable in terms of infrastructure. As previously noted, KCC is the authority responsible for highways, schools, adult education as well as social and community facilities. In addition, there are a range of other serious infrastructure implications that lie outside the remit of KCC (sewer and water capacity, for example, which we know are an issue for parts of the Borough). Other considerations including designated Areas of Outstanding Natural Beauty, ancient woodland, the setting of villages, as well as the importance of open countryside and separation of settlements must also be considered.

Essentially, a reduced housing target would need to be based on evidencing the fact that developing any more sites would be unviable and unsustainable. With this in mind, there are a range of methods of determining an appropriate housing target. The following table sets out, as a comparison, various alternatives to the identified 'housing need' of 19,600 homes:

Policy/Plan/Document	Housing Number	Required yearly delivery
Draft Maidstone Local Plan Consultation (March 2014) identified housing need	19,600 (20 year plan period)	980 per year
Housing allocations within the Draft Maidstone Local Plan (March 2014)	Approx. 16,500 (20 year plan period)	825 per year
Maidstone Borough Council's 'working target' in developing the Local Plan (2013)	14,800 (20 year plan period)	740 per year
South-East Plan (abolished March 2013)	11,080 (20 year plan period)	554 per year
South East Plan target plus 25%	13,850	693 per year
Maidstone Borough Council previous housing delivery (2006-13)		883 per year
KCC Proposed Housing Target (2011-31)	14,500	725 per year

Kent County Council considers that a suitable housing figure for the plan period (2011-31) should be in the region of 14,500 homes. This accords with Maidstone Borough Council's own assessment of housing need from the report to the Maidstone Borough Council Cabinet on March 13, 2013. At the meeting, the report noted:

'Maidstone is well placed to defend a strategy largely influenced by the 10-year trend in order to cover a whole economic cycle. The 10-year historic trend for Maidstone demonstrates a need for 14,800 dwellings between 2011 and 2031...'

At that time there appeared to be some question as to whether 14,800 dwellings was above the level which could be delivered within the Maidstone Borough.

'... the borough's capacity to deliver this target must also be thoroughly examined through the new SHLAA [Strategic Housing Land Availability Assessment]. When this work is completed, the Council will be able to demonstrate whether it can deliver 14,800 dwellings, or if environmental constraints will lead to the setting of a lower target for Maidstone borough.'

Summary on Housing Target Considerations

It appears that, as late as March 2013 Maidstone Borough members and officers were in accord with KCC Members in noting that a housing figure of 14,800 homes was appropriate for the borough over the plan period. Consideration was also left open that perhaps 14,800 was overly optimistic, and that an even lower figure may be most appropriate.

On the basis of information mentioned on the previous pages, it is the position of KCC that a housing target of between 14,500 and 14,800 homes should be the basis of the Local Plan.

The tables on the following page provide a summary of the current Maidstone Borough Council housing target against that which is proposed by Kent County Council.

The following table provides a summary of the Maidstone Borough Council proposed housing numbers from the Strategic Housing Market Assessment (SHMA) and the Draft Maidstone Local Plan (consultation papers March – April 2014):

Summary of Maidstone Housing Targets	Dwellings
Current Identified Housing 'Need' by Maidstone Borough Council	19,600
Current Allocations proposed within the Maidstone Draft Local Plan (as at March 2014)	17,100
Sites to be deducted from target <ul style="list-style-type: none"> • Delivered/Approved sites since 2011 	(4,200)
Total of new home sites required by Draft Maidstone Local Plan	Approx. 15,400 (if 19,600 figure is used) Approx. 12,900 (if 17,100 figure is used)

The following table represents Kent County Council's preferred housing target for the Maidstone Borough:

KCC Proposed revised target (2011 to 2031)	Dwellings
Proposed revised Housing target	14,500
Sites to be deducted from 'target': <ul style="list-style-type: none"> • Windfall Sites (1,660) • Delivered/Approved sites to date (4,200) 	(approx. 5,860)
Total New Home Sites required by KCC proposal	8,640

In summary, the Maidstone Borough Council proposed housing targets will require somewhere between 12,900 and 15,400 additional home sites to be provided throughout the plan period (2011-31). It is the view of Kent County Council that that housing 'target' should be lowered (to a level of approximately 14,500). Taking into consideration already approved/completed sites, as well as an appropriate allowance for windfall sites, a revised target for 'new' sites is a more appropriate 8,640.

Spatial Distribution of Housing

Where Should Housing Be Located?

Apart from discussions about housing numbers, a key consideration is **where** the housing is located within the Maidstone Borough.

In this respect, it is the opinion of KCC that the spatial strategy put forward in the Maidstone Draft Local Plan needs to be reconsidered.

The Spatial Strategy of Maidstone Borough Council

The spatial strategy set out by Maidstone Borough Council in the emerging Draft Local Plan has taken into account the 'settlement hierarchy', promoting a significant proportion of growth within (and adjacent to) Maidstone urban area as well as growth in key rural service centres. In order to achieve these outcomes, a number of sites on the edge of Maidstone have been put forward as the most appropriate location for future housing development.

In the past, housing allocations have been traditionally located on the 'edge of existing urban areas', (i.e. urban sprawl), as these were considered the most sustainable locations for development. Such an approach was even advocated in the South East Plan.

However, this approach assumes that existing urban centres are relatively small/compact – and that such 'edge of urban area' allocations would be near to the employment, education, social and community facilities of the town centre. It also requires sufficient capacity in terms of infrastructure in the existing urban area. In many instances (Maidstone included) such an approach is no longer appropriate.

As urban settlements have grown larger, edge of urban area extensions (such as those proposed in north-west and south-east Maidstone) are now located a significant distance from the town centre. KCC's view is that this approach is unsustainable in infrastructure and planning terms.

The proposed edge of centre sites are entirely separate from any rail services and from motorway links – so even those not accessing employment or services in Maidstone town centre (but commuting to other locations, such as Medway towns, Ashford, other employment centres or central London) will almost be certainly required to use private vehicles to access rail services and motorway connections.

As such, development in these 'edge of urban area' locations will result in housing developments which promote extensive travel by means of road transport (primarily private vehicles), in an area where road infrastructure does not have capacity and cannot easily be improved.

Urban Periphery Sites

KCC maintains serious and significant objection in relation to the reliance on urban periphery sites at the edge of Maidstone for significant housing delivery. As the authority responsible

for infrastructure delivery (including highways, education, social care) as well as having a key role in matters such as landscape character, sustainable urban drainage and ecology, KCC has very significant concerns with these proposals. This objection has been raised with MBC consistently over the past 12 months.

It is the consolidated and consistent view of KCC that large urban extensions offer the least suitable and sustainable options for housing development for a number of key reasons as set out below.

Transport Infrastructure

In infrastructure terms, such developments will result in the establishment of significant housing estates and new centres of residential population that are not supported by adequate infrastructure and are remote from services.

A number of proposed urban periphery sites are located some 3 miles (almost 5km) from Maidstone Town Centre. This is beyond the distance that would be considered suitable for the promotion of walking and/or cycling as a primary means of transport. It is clear that unless significant changes are made such developments will create a very high reliance on private vehicles for transport. Even with a reasonable uptake in the use of public transport, the current lack of capacity on key radial routes means that additional car base traffic from these urban edge developments will have a major impact on the functioning of Maidstone's transport system. As MBC is aware there is already significant congestion on all roads serving Maidstone Town Centre particularly from the south and south-east, which will have a detrimental impact on the transport system. Over the past few months the proposed development scenarios and transport impact resulted in the Maidstone Local Transport Plan being completely rejected by Kent County Members who represent wards within Maidstone Borough.

These urban periphery locations are entirely separate from any rail services and motorway links. This means those not accessing employment or services in Maidstone town centre, but commuting to other locations, such as Medway towns, Ashford, other employment centres or central London, will almost certainly be required to use private vehicles to access rail services and motorway connections.

As such, development in these locations will result in housing developments which promote extensive travel by means of road transport (primarily private vehicles), in an area where road infrastructure simply does not have capacity.

This is completely at odds with the direction of the National Planning Policy Framework, which states that *'the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel'* (para. 29) and that in developing Local Plans local planning authorities should therefore *'... support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport'* (para. 30).

Para. 34 of the NPPF states that *'Plans and decisions should ensure that developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised'*.

It is our view that for the Maidstone situation, the proposed allocation of large development sites at the edge of the urban boundary is entirely contrary to the direction of NPPF and not only fails to provide housing development that offers suitable transport options, but directly exacerbates current problems.

To date, there is no acceptable Integrated Transport Strategy for Maidstone between MBC and KCC, the Highway Authority. There is no evidence from the Highways Agency that junctions 5 to 8 on the M20 have sufficient capacity to accommodate the urban expansion proposed by MBC.

Other Infrastructure

Even a cursory review of infrastructure (including infrastructure that falls outside of the control of KCC) reveals similar, significant concerns. In terms of sewerage provision for example, the Halcrow study (which was commissioned by MBC) notes that:

'Wastewater from development sites located to the east and south of Maidstone town, if simply connected into the existing sewerage network, would have to pass through the sewers in the town centre, to reach the pumping station. Given that these sewers have no spare capacity to accept additional flow, the system would need to be upgraded before such development could take place.'

The report goes on to note the technical (and cost) implications of providing appropriate sewerage capacity to the area, including upgrading the sewerage network through the town centre to cater for additional development as well as potential augmentation of the Allington pump-station on which the system relies.

The Halcrow study notes that:

*'... given the size and location of some of the **potential development sites in the south-east area adjacent to Maidstone town, the limited capacity of the existing sewerage infrastructure in the town will act as a significant constraint.***

This position is reiterated by work undertaken by consultants Amey during late 2013 which noted that:

'The foul water sewerage system within Maidstone has little or no capacity to accept additional flows. As Aylesford WwTW is located to the north west of the Maidstone, the majority of flows will be required to flow through the town to reach the treatment works, this represents issues for future development.'

Leeds Road Upgrades

It is the view of KCC that long term, forward looking planning needs to be considered to overcome the transport infrastructure issues for Maidstone. On this basis, KCC is willing to support the establishment of Leeds Road upgrade, which offer a considerably more affordable alternative than previously proposed 'by-pass' routes. This scheme is required in order to make some headway into improving access from southern parts of the Maidstone Borough to the M20. Such support for the Leeds road upgrades are on the basis that an appropriate urban boundary be established at the edge of the Maidstone urban fringe.

Settlement Pattern

Apart from physical infrastructure issues, there are a number of other key concerns that KCC has in relation to Maidstone Borough Council. Pursuing urban periphery sites results in significant harm to the character of built form, and is counter to appropriate urban planning. Developments in these locations will erode the rural character at the edge of the Maidstone

urban area and lead to significant outward reaching extension to the built-up confines of Maidstone approaching coalescence with rural settlements and neighbouring Local Authorities. Establishment of sprawling residential development in these locations, separate from the services, facilities, transport infrastructure and employment opportunities of the town centre are unlikely to result in creating healthy, inclusive sustainable communities with appropriate social interaction, as required by the National Planning Policy Framework (NPPF para. 69 – 70)

Affordability

The final point in relation to urban extension sites is the issue of viability vs contributions towards infrastructure. These urban extension sites are likely to be significantly constrained in terms of viability. This is as a result of costs which will be expected to be borne by the developer in moving the sites forward. The cumulative impacts of these costs are likely to be used by the developer as leverage against other contributions (provision of affordable housing, or education, for example through CIL and/or Section 106). It is the view of KCC that allocating such sites will lead to a “trade-off” in contributions, where overall less financial contributions are capable of being made towards community facilities in order to protect the viability of the developments. This often leaves a significant shortfall in infrastructure which must be borne by the County Council. Such situations can be avoided where more suitably located sites are allocated at the outset.

Villages and Settlements

There is capacity within many of the villages and settlements of the Maidstone Borough to accommodate some limited new housing development – in fact, many of the parish Council’s are supportive of this approach and have themselves developed Neighbourhood and Parish plans which set out appropriate locations for development (in many instances, the Parish Council’s have been working with developers to bring forward appropriate sites, and to ensure that developments are appropriately designed to take into account the infrastructure needs.

Two important points are raised here:

1. Development in villages and rural settlements must take into consideration the capacity of existing infrastructure to serve the development (highways/transport, water/sewer and schools/community facilities); and
2. In many instances, the parish Council’s have already identified their infrastructure needs (including need for community and social facilities, further education, affordable housing and open space). In some cases Parish Council’s have been working with developers to bring forward schemes that not only provide additional housing, but also make provision for these important items of infrastructure. In many instance the Parish Council’s are not adverse to development, but want to work with the Borough Council to establish appropriate development, supported by suitable infrastructure.

What are the Alternative Options?

The alternate options for housing development in the Maidstone Borough include more of a focus on suitable locations within outlying settlements/villages **in order to achieve managed organic growth**. This would establish a defensible boundary to the edge of Maidstone itself, with the protection of the open countryside at the edge of the urban area.

In infrastructure terms, there is difficulty in servicing a continually expanding urban area, as road, water and sewerage infrastructure quickly reaches capacity with continual additions of housing at the urban periphery.

In addition, limited growth in rural service centres and villages leads to a lack of quantum in many villages to support essential community infrastructure. In some instances an appropriate amount of growth in individual settlements may provide the critical mass for investment in new/additional community facilities, enabling rural service centres and villages to remain sustainable through a programme of managed growth to support local shops and businesses. For example, small additions to some villages lead to an ongoing pressure placed on schools, without ever providing the appropriate critical mass for either school extensions or the establishment of a new school premises.

Many of these settlements already have extremely good services and facilities (Lenham, Harrietsham, etc) and have ready access to road and rail infrastructure. This provides the basis for infrastructure improvement and the opportunity for creating developments and real 'communities' with appropriate infrastructure, rather than sprawling housing developments at the edge of the urban area where residents generally access services, facilities, employment, shopping and recreation facilities situated some distance from where they live.

Even some of the smaller villages have potential to accommodate a small amount of growth and such development is something that is supported by KCC, although it must be noted that some villages may have already reached their 'critical mass' and there are situations where no further development would be appropriate.

The development of outlying villages many also assist in retention of green spaces between settlements. Cumulative developments of small numbers of homes in village locations will reduce the demand for continued outward sprawl of Maidstone into the open countryside.

It is the view of KCC that a small number of houses developed in each village could be accommodated and well planned, coming forward in identified neighbourhood and parish plans across the Borough. This would allow local involvement in the location and type of development which residents see as appropriate to their village/settlement.

It is estimated that around 1,000 homes could be accommodated in small villages and settlements over the 20 year life of the plan. This equates to a total of just 50 per year, or around 2 dwellings per village per annum (if shared amongst 25 settlements).

Based on the above, it is the position of KCC that development should focus:

- a) On land within the existing Maidstone urban area (particularly those close to the town centre); and
- b) Within other villages/settlements.

For these reasons, Kent County Council strongly objects to a range of allocations on the edge of the existing Maidstone urban area.

Protection of the Countryside Adjoining the Urban Periphery

An important aspect of the approach being promoted by Kent County Council is the protection of green open spaces and rural areas on the edge of the Maidstone urban area. In essence, KCC would like to see the establishment of a 'green belt' type arrangement – providing a defensible boundary to the Maidstone urban area.

This is an important aspect of future planning for Maidstone itself, preventing the coalescence between Maidstone and outlying settlements. Without such protection, the ongoing outward expansion of Maidstone threatens not only to consume open countryside but also continues to erode the distinct nature of each of the nearby settlements.

Summary of Spatial Distribution Considerations

It is the position of Kent County Council that the spatial distribution of housing as part of the Maidstone Local Plan should:

1. Establish a defensible boundary to the Maidstone urban area and prevent the continuing inappropriate outward sprawl of the Maidstone town;
2. Establish a 'green-belt' type arrangement to protect green open spaces and open countryside at the edge of the Maidstone urban area;
3. Establish a spatial housing distribution that focusses on development either within the existing Maidstone urban area or rural service centres and other villages.
4. Establish appropriate design principles within the emerging Local Plan to ensure that new developments are designed to be consistent with their locality and the 'fit in' with existing housing. This includes well landscaped boundaries to soften the impact of new housing developments on existing properties. Any development in villages and other settlements should be in with due consideration to any relevant Neighbourhood Plan/s and in conjunction with the Town/Parish Council and/or appropriate neighbourhood/community groups.

Kent County Councils Preferred Approach for Maidstone Local Plan

KCC's Preferred Approach to Maidstone Local Plan

Kent County Council considers that there are significant alterations needed to the Draft Maidstone Local Plan as exhibited for public consultation. The fundamental changes to the document include:

1. Reducing the housing target to a more sensible figure of approximately 14,500 homes;
2. The inclusion of not only existing approved sites but also windfall sites to reduce the number of new homes required.
3. The deletion of some of the allocated urban fringe sites with significant infrastructure constraints;
4. The establishment of clear policies to enforce a 'green belt' style arrangement to protect the open countryside at the defined boundary of the Maidstone Urban Area, and to provide appropriate 'buffer' between the Maidstone Urban Area and nearby villages, preventing urban coalescence, and adopting sound town and country planning principles;
5. Continue the focus on delivering housing within the existing Maidstone urban area and in smaller villages and settlements that are capable of accommodating growth.
6. Establish appropriate design principles within the emerging Local Plan to ensure that new developments are designed to be consistent with their locality and the 'fit in' with existing housing. Any development in villages and other settlements should be in accordance with the Neighbourhood Plan and must be undertaken in conjunction with the Town/Parish Council and/or appropriate neighbourhood/community groups.

Summary of KCC Proposals

KCC Proposed revised target (2011 to 2031)	Dwellings
Proposed revised Housing target	14,500
Sites to be deducted from 'target': <ul style="list-style-type: none"> • Windfall Sites (1,660) • Delivered/Approved sites to date (4,200) 	(approx. 5,860)
Total New Home Sites required by KCC proposal	8,670

The Draft Maidstone Local Plan already contains proposed allocations for 12,962 sites. In the views of KCC, this exceeds those that are required for the plan period. If a more sensible and sustainable housing target was adopted then the need for an additional 8,670 homes would be required. Based on this work, approximately 3,000 home sites could be deleted from the current plan – protecting valuable open countryside, and leading to more appropriate outcomes for the Maidstone Local Plan.

Specific Development Locations to Which Kent County Council Raises Objection

There are a number of sites/allocations in particular where Kent County Council has concerns over allocation for housing, this includes:

Site	MBC Policy Reference	KCC View
Springfield, Royal Engineers Road and Mill Lane –	Ref H1 (11)	<p>It is the view of KCC that further consideration needs to be given to allocation of this site for housing and whether it is appropriate to lose the entire site from commercial use to residential use.</p> <p>MBC propose that this site is suitable for 950 dwellings – perhaps a lower number of dwellings may be appropriate as part of a mixed use scheme.</p> <p>Housing to be reduced to 650 dwellings</p>
Invicta Barracks, Maidstone	H3	<p>It is the view of KCC that, although the site is suitably located for development, appropriate consideration must be given to a number of matters, including the likelihood that the site will come forward for development, appropriate design considerations, protection of environmental/heritage significance and appropriate design.</p>
South of Sutton Road, Langley	H1 (10)	<p>Objection – this site should be removed from the Draft Local Plan. The site is located on the urban periphery of Maidstone and is removed from the services and infrastructure of the town centre. The site lies more than 3 miles from the town centre. Development of this site will lead to an increased reliance on car-based transport, which will be exacerbated by the distance to appropriate retail, employment, recreation and social infrastructure. Further, development of the site will lead to the loss of open countryside, increased urban sprawl and will lead aid in the coalescence of the outer edge of the Maidstone urban area with other settlements.</p>
Bicknor Farm, Sutton Road Otham (this includes land to the east of Bicknor Farm, not the land to the west of Bicknor Farm which has been previously considered by MBC for housing development.)	H1 (9)	<p>Objection – this site should be removed from the Draft Local Plan. The site is located on the urban periphery of Maidstone and is removed from the services and infrastructure of the town centre. The site lies more than 3 miles from the town centre. Development of this site will lead to an increased reliance on car-based transport, which will be exacerbated by the distance to appropriate retail, employment, recreation and social infrastructure. Further, development of the site will lead to the loss of open countryside, increased urban sprawl and will lead aid in the coalescence of the outer edge of the Maidstone urban area with other settlements.</p>
<p>Inappropriate development sites in villages such as:</p> <ul style="list-style-type: none"> • Marden • Steplehurst • Coxheath • Headcorn 	Various	<p>It is the position of KCC that housing allocations in villages must be selected in conjunction with the appropriate Parish Council and in accordance with relevant Neighbourhood Plans.</p> <p>A reduction of allocations by around 20% should be made in each of these villages.</p>

Kent County Council notes that it would be possible to remove/amend these allocations and still maintain a housing target of between 14,500 and 14,800 homes.

Each of these sites is dealt with separately on the following pages.

Springfield, Royal Engineers Road and Mill Lane – Maidstone Borough Policy Ref H1 (11)

The development of this site for housing will result in the loss of a prime local employment site, located within close proximity to the town centre. The impact of residential development of the site in highways terms must also be examined in greater detail.

It is the view of KCC that this site might perhaps be best put to a mixed use scheme – retaining some of the employment uses whilst still providing for a significant number of dwellings.

Invicta Barracks, Maidstone - Maidstone Borough Policy Ref H3

With regard to the Invicta Barracks site, KCC raise the following matters which require further consideration:

- The barracks – currently Army accommodation and military buildings – was only recently categorised by the Ministry of Defence as “retained” (report dated 2011). It is therefore unclear whether the site is (or will be) available for development. This needs further investigation, as a site that the MoD intends to retain for military purposes will obviously not be suitable, nor available, for housing development.
- The role of the barracks site as open space/parkland with near proximity to the town centre must be considered. There is also some question as to whether the site may have ecologically significant species.
- There are potentially significant heritage implications given the nature of buildings on the site.

South of Sutton Road, Langley – Policy Reference H1 (10) AND

Bicknor Farm, Sutton Road Otham – Policy Reference H1 (9) (Land to the east of Bicknor Farm)

KCC maintains serious and significant objection in relation to the reliance on urban periphery sites for significant housing delivery. As the authority charged with infrastructure delivery (including highways, education, social care and so on) as well as having a key role in matters such as landscape character, sustainable urban drainage, ecology and the like, KCC has very significant concerns with these proposals. This objection has been raised with MBC consistently over the past 12 months.

It is the consolidated and consistent view of KCC that large urban extensions, such as those which are proposed to the south-east of Maidstone, offer the least suitable and sustainable options for housing development for a number of key reasons.

In infrastructure terms, such developments will result in the establishment of significant housing estates and new centres of residential population which are separate from of the infrastructure and services that the new residents will rely upon. Whether this is access to

retail and professional services, entertainment, employment or recreational activities – in order to access these services residents will inevitably need to travel.

The Sutton Road sites on the south-east Maidstone periphery, for example, are located some 3 miles (almost 5km) from the Maidstone Town Centre (by the most direct route of travel). This is beyond the distance that would be considered suitable for the promotion of walking and/or cycling as a primary means of transport. It is clear that unless some significant interventions are made such developments will create a very high reliance on private vehicles for transport. As MBC is well aware there is already significant congestion on Sutton Road, (including the 'Wheatsheaf junction') and all roads serving Maidstone Town Centre from the south-east.

The location is entirely separate from any rail services and from motorway links – so even those not accessing employment or services in Maidstone town centre (but commuting to other locations, such as Medway towns, Ashford, other employment centres or central London) will almost certainly be required to use private vehicles to access rail services and motorway connections.

As such, development in this location will result in housing developments which promote extensive travel by means of road transport (primarily private vehicles), in an area where road infrastructure does not have capacity and cannot easily be improved

This is at odds with the direction of the National Planning Policy Framework, which states that *'the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel'* (para. 29) and that in developing Local Plans local planning authorities should therefore *'... support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport'* (para. 30).

Para. 34 of the NPPF states that *'Plans and decisions should ensure that developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised'*.

It is our view that the proposed allocation of large developments at the edge of the urban boundary is entirely contrary to the direction of NPPF and not only fails to provide housing development that offers suitable transport options but directly exacerbates the problems.

Even a cursory review of infrastructure (including infrastructure that falls outside of the control of KCC) reveals similar, significant concerns. In terms of sewerage provision for example, the Halcrow study (which was commissioned by MBC) notes that:

'Wastewater from development sites located to the east and south of Maidstone town, if simply connected into the existing sewerage network, would have to pass through the sewers in the town centre, to reach the pumping station. Given that these sewers have no spare capacity to accept additional flow, the system would need to be upgraded before such development could take place.'

The report goes on to note the technical (and cost) implications of providing appropriate sewerage capacity to the area, including upgrading the sewerage network through the town centre to cater for additional development as well as potential augmentation of the Allington pump-station on which the system relies.

The Halcrow study notes that:

*'... given the size and location of some of the **potential development sites in the south-east area adjacent to Maidstone town, the limited capacity of the***

existing sewerage infrastructure in the town will act as a significant constraint.'

Apart from physical infrastructure issues, there are a number of other key concerns that KCC has in relation to this approach. Pursuing urban periphery sites results in significant harm to the character of built form, and is counter to appropriate urban planning. Developments in this location will erode the rural character at the edge of the Maidstone urban settlement and lead to a very significant outward extension to the built-up confines approaching coalescence between Maidstone with Langley. Promoting sprawling residential development in these locations, separate from the services, facilities, transport infrastructure and employment opportunities of the town centre are unlikely to result in creating healthy, inclusive communities with appropriate social interaction, as required by the National Planning Policy Framework (NPPF para. 69 – 70)

Inappropriate Development in Villages/Settlements

KCC, along with Parish Council's and other community groups from across Kent accept that there is capacity within many of the villages and settlements of the Maidstone Borough to accommodate new housing development. Many of the Parish Councils are supportive of taking an appropriate quantum of development and have themselves developed Neighbourhood Plans which set out appropriate locations for development. In many instances, the Parish Councils have been working with developers to bring forward appropriate sites, and to ensure that developments are appropriately designed to take into account the infrastructure needs. It is clear that the Parish Councils are not adverse to development, and recognise the importance of new development in maintaining an appropriate population to support the viability of shops, services, schools and other local facilities.

It has become apparent to KCC that Maidstone Borough Council has not listened to the Parish Council's in the development of housing allocations in the Draft Local Plan. Parish and Town Council's (as well as residents groups and other similar organisations) can play a key role in developing the Local Plan. These groups are often best placed to know the issues of their local area/village/settlement. Their expertise and knowledge should be relied upon by District Council's in developing Local Plans so as to ensure that their expertise is incorporated within the emerging plan. The District should seek to work with Parish Council's to achieve appropriate outcomes rather than imposing Local Plan policies on them.

Two important points are raised here:

1. Development in villages and rural settlements must take into consideration the capacity of existing infrastructure to serve the development (highways/transport, water/sewer and schools/community facilities); and
2. In many instances, the parish Council's have already identified their infrastructure needs (including need for community and social facilities, further education, affordable housing and open space). In some cases Parish Council's have been working with developers to bring forward schemes that not only provide additional housing, but also make provision for these important items of infrastructure. In many instances the Parish Council's are not adverse to development, but want to work with the Borough Council to establish appropriate development, supported by suitable infrastructure.

It is the view of KCC that the preparation of the Draft Local Plan has been fundamentally flawed, as it has not taken into account the views of the Parish Council's and has not considered the views of representatives of villages such as Coxheath, Staplehurst, Headcorn and Marden.

Example: The Coxheath Neighbourhood Plan

One small example of the lack of engagement with the local community was recently demonstrated by representatives of the Coxheath Parish Council.

Coxheath Parish Council have been preparing a Neighbourhood Plan for their village. A Plan which embraces new development, including identification of specific housing sites for around 200 homes. The Parish Council are aware that new development will assist in supporting new infrastructure for their village, and have also developed some ideas on the new community infrastructure that they require to support such additional housing.

Further, the Parish Council have been working with specific land-owners to bring forward not only housing development, but to ensure that such development appropriately contributes to the village by provision of appropriate open space and infrastructure.

Given their open acceptance of new housing, and desire to ensure that such development leads to appropriate infrastructure to support the village, Coxheath Parish Council were disappointed when the allocations in the Draft Local Plan had no relationship with the extensive work that they had put into getting their Neighbourhood Plan right.

Sites that the Parish Council had identified for housing were not allocated for housing in the Draft Plan, no mention was made of the required community infrastructure.

KCC must raise concern over the mechanism of engagement with local community, when Neighbourhood Plans, endorsed by the Parish Council and which support housing allocations are ignored, and alternate sites put forward that bear no resemblance to the needs of the village.

Alternate Housing Sites

In order to provide a range of alternate development scenarios for consideration and discussion with Maidstone Borough Council, Kent County Council has developed a range of alternate site allocations which may be considered in forming amendments to the Draft Maidstone Local Plan.

KCC note that these sites are NOT required to meet a revised (and more sustainable) housing target. However, recognising that there is a consultation process to be undertaken, as well as ongoing testing of viability and planning issues for individual sites, these sites are put forward to promote discussion between KCC and Maidstone Borough Council as to some alternative options which are available and should be considered.

The following table presents a summary of the sites which are being put forward as options – note that these are sites which have not been allocated in the Draft Maidstone Local Plan.

Location	Maidstone Housing Allocations (excluding already completed or approved sites)	Potential Housing Numbers (Identified in this paper)
East of Church Road, Maidstone	Not allocated	450
Former Detling Aerodrome	Not allocated	1,000 (mixed use)
Other Villages*	Not allocated	Up to 1,000
Leeds/Kingswood	Not allocated	750

* A small number of houses developed in each village could be accommodated and well planned – coming forward in identified neighbourhood and parish plans across the Borough. This would allow local involvement in the location and type of development which they see as appropriate to their village/settlement. It is estimated that around 1,000 homes could be accommodated in small villages and settlements over the 20 year life of the plan – this equates to a total of just 50 per year – or around 2 dwellings per village per annum (if shared amongst 25 settlements).

The above equates to a total a dwelling yield of 3,200 – giving Maidstone Borough Council options to present alternative sites for consideration in the Local Plan process to those with significant infrastructure constraints, such as south-east Maidstone.

Each of these sites is dealt with on the following pages

Land to the East of Church Road, Maidstone

- **Potential allocation of approx. 450 homes**
- **Put forward as a proposed allocation during the ‘call for sites’ but was rejected by Maidstone Borough Council**
- **Appropriate highways access would be needed to ‘unlock’ the site. KCC are willing to work with Maidstone Borough Council towards this.**
- **Potential issues due to Grade 1 Listed Building located on the site and views/setting of the church**

Summary:

- Put forward as part of the ‘call for sites’ but rejected by Maidstone Borough Council.
- The notes from Maidstone Borough Council about why the land was rejected state that the site was seen as not suitable for residential development because:

‘Site is located in the open countryside. Development would cause harm to the open character of the countryside and would negatively impact on adjacent listed buildings.’

- Land to the west of Church Road was taken forward as a proposed housing allocation, but land to the east of Church Road was discounted as a housing site on the basis of Highways Impacts and impacts if development in the open countryside. Further discussions with Maidstone Borough staff indicate that the location of a listed heritage item was also a consideration.
- However, the site offers a potentially significantly improved housing location as an alternative to land further to the east along Sutton Road. Although still an urban extension, would be more in keeping with providing a defined urban edge to the eastward extension of Maidstone. Housing allocations, as currently proposed by Maidstone Borough Council, will result in this land being adjacent to housing sites on its western, southern and northern boundaries – as such it would appear to make sense to allocate this parcel of land for housing itself – providing a more defined eastern edge to the Maidstone built up area.
- If this site were allocated, it would potentially draw a ‘line in the sand’ and prevent any further eastward expansion of Maidstone. In this respect the site could be seen as an alternative to sites further to the east (along Sutton Road), and would ensure that a defensible urban boundary was established for the built-up area of Maidstone.
- Allocation of the site would still maintain separation between Maidstone urban area and the village of Otham.
- The site is surrounded by existing residential development to the north, proposed housing allocations and existing residential development to the west and approved housing development to the south. As such, the land is essentially ‘boxed in’ by residential development and would therefore have significantly less of an impact on the countryside than proposed allocations along Sutton Road.

KCC Cost/ Infrastructure Issues:

- Highways - The major significant cost would relate to gaining vehicular access to the site and associated highways costs. However, there are existing allocations to the south of this land (adjoining Sutton Road) and there are a range of options available to provide appropriate highways connections. In addition, the potential issues related to highways management along Sutton Rd towards Maidstone would need to be considered.
- Education - Provision for additional education provision would need to be made.

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Church Road East Potential Housing Developments

155000

155000

154000

154000

153000

153000

152000

152000

151000

151000

Legend

Name

 KCC

 Approved Housing Sites

 AONB



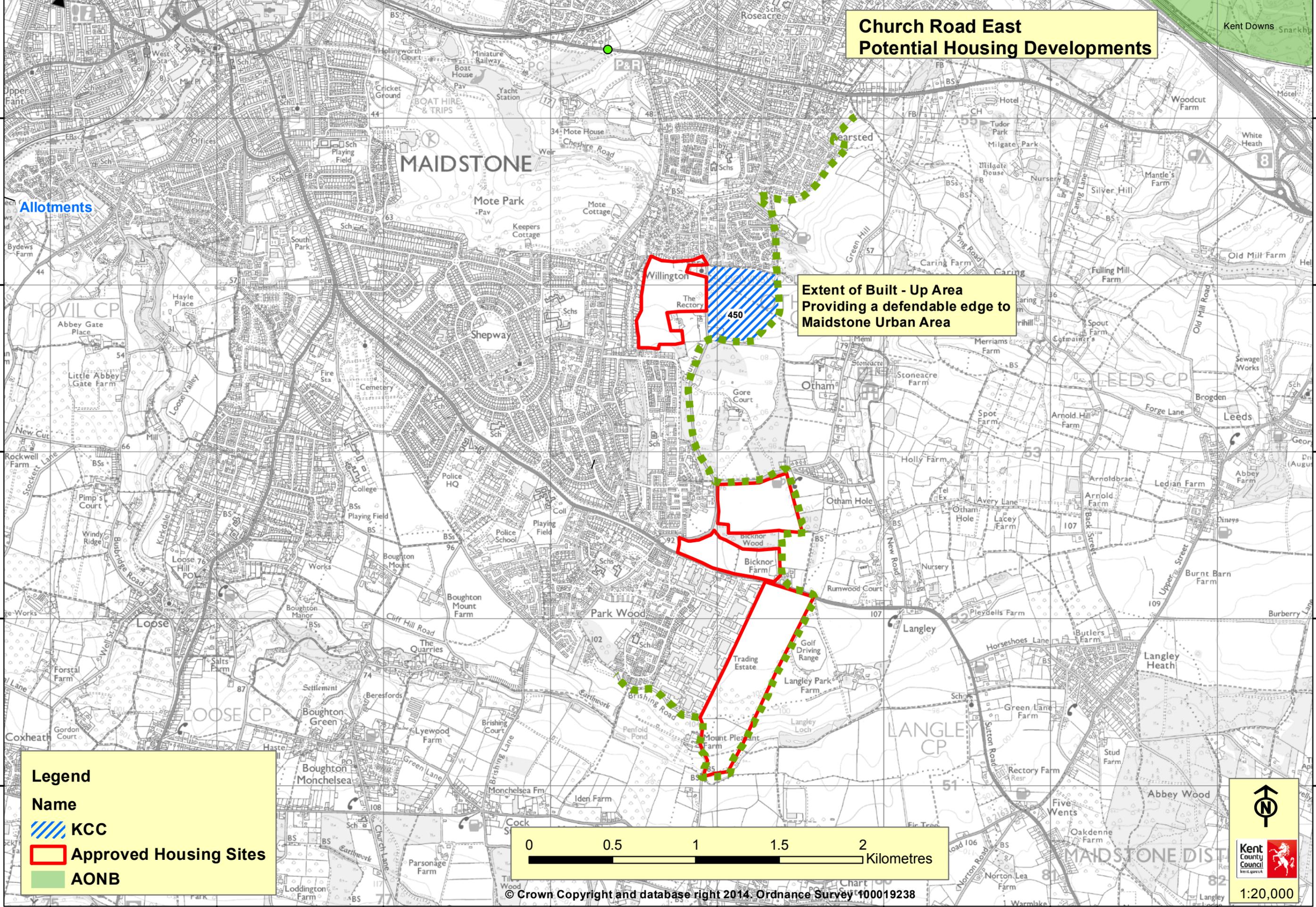


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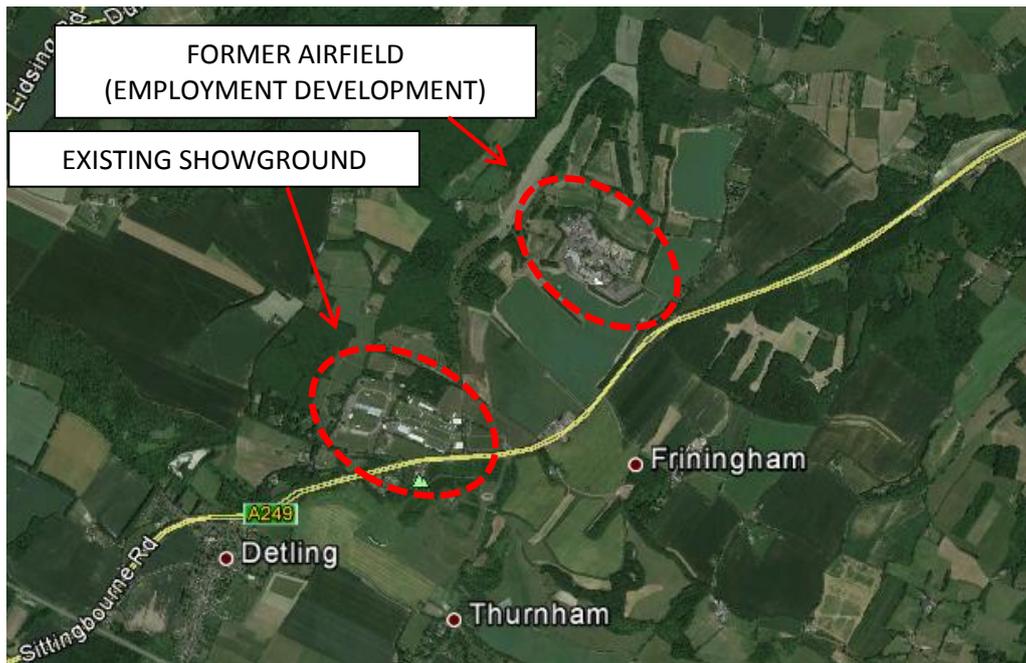


Former Detling Aerodrome

- **Potential for extensive housing or mixed use development (potential for 1,000 homes)**
- **Further potential for expanding development outside the existing footprint of the former aerodrome (although, this would require development of greenfield land, within the AONB).**
- **Site located within the Kent Downs AONB, although is a brownfield site.**

Summary:

- Former airfield which has a long history of light industry/business use.
- Has long been seen as a potential location for future development – including potential for either housing or further industrial use.
- Located within the Kent Downs AONB, although it is a previously developed site.
- Any development would have to consider options including whether to abandon employment uses entirely and also whether to extend the site into undeveloped land surrounding, or whether to constrain development to the existing (previously developed) areas.
- One key issue will be access, and development of the land will require significant improvements to the access point from the A249 (Detling Hill). However, any augmentation of the access could be used as an opportunity to develop a revised/new access with to the Showground (which also has issues in terms of the safety and efficiency of vehicular access point).
- Potential to create a larger development with shared access with showground.
- Need to resolve landscape issues and issues with Kent Downs AONB impacts.



KCC Cost/Infrastructure Issues:

- Highways – cost of a new junction is estimated at around £4 million. The additional cost of providing an access road south to the showground is around £1 million. Highways improvement would need to consider the wider implications and impacts on the junctions where the A249 meets the M20 and M2.
- Education & Community Infrastructure – depending on the nature of development in the locality, and the quantum of housing eventually proposed at the site, provision for access to education and community facilities would be required.

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Former Detling Aerodrome Potential Mixed Use Developments

Mixed use site -
retailing, employment
and up to 500 dwellings

Potential additional housing
site - up to 500 dwellings

Potential new junction

Legend

- Mixed Use
- Housing
- AONB

0 0.25 0.5 0.75 1 Kilometres



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Organic Village Growth

There are a number of small settlements across the Maidstone Borough that could potentially accommodate a small number of homes without adverse impacts on the amenity of the locality. If each small settlement was to accommodate a handful of dwellings, this would 'take up' some of the housing development and negate the need to have as many large housing allocations across the Borough.

In many instances, the inclusion of a small number of dwellings would assist in infrastructure investment – spreading the impacts on highways, for example, across a wider area in order to reduce impacts at particular key locations. In some instances, a small number of homes may increase viability and vitality of smaller settlements, providing support for local pubs/shops/services that may otherwise find difficulty in continuing to serve a small, localised population.

A small number of houses developed in each village could be accommodated and well planned, coming forward in identified neighbourhood and parish plans across the Borough. This would allow local involvement in the location and type of development which residents see as appropriate to their village/settlement.

It is estimated that around 1,000 homes could be accommodated in small villages and settlements over the 20 year life of the plan. This equates to a total of just 50 per year, or around 2 dwellings per village per annum (if shared amongst 25 settlements).

Kingswood (with Leeds Road Upgrade)

- **A parcel of land to the north-west of Kingwood was put forward as part of the call for sites, but rejected by Maidstone Borough Council**
- **Potential for around 1,000 homes**
- **Would require the location to be ‘unlocked’ in terms of access/highways**
- **Further to unlock other sites through completion of the Leeds Road upgrades.**

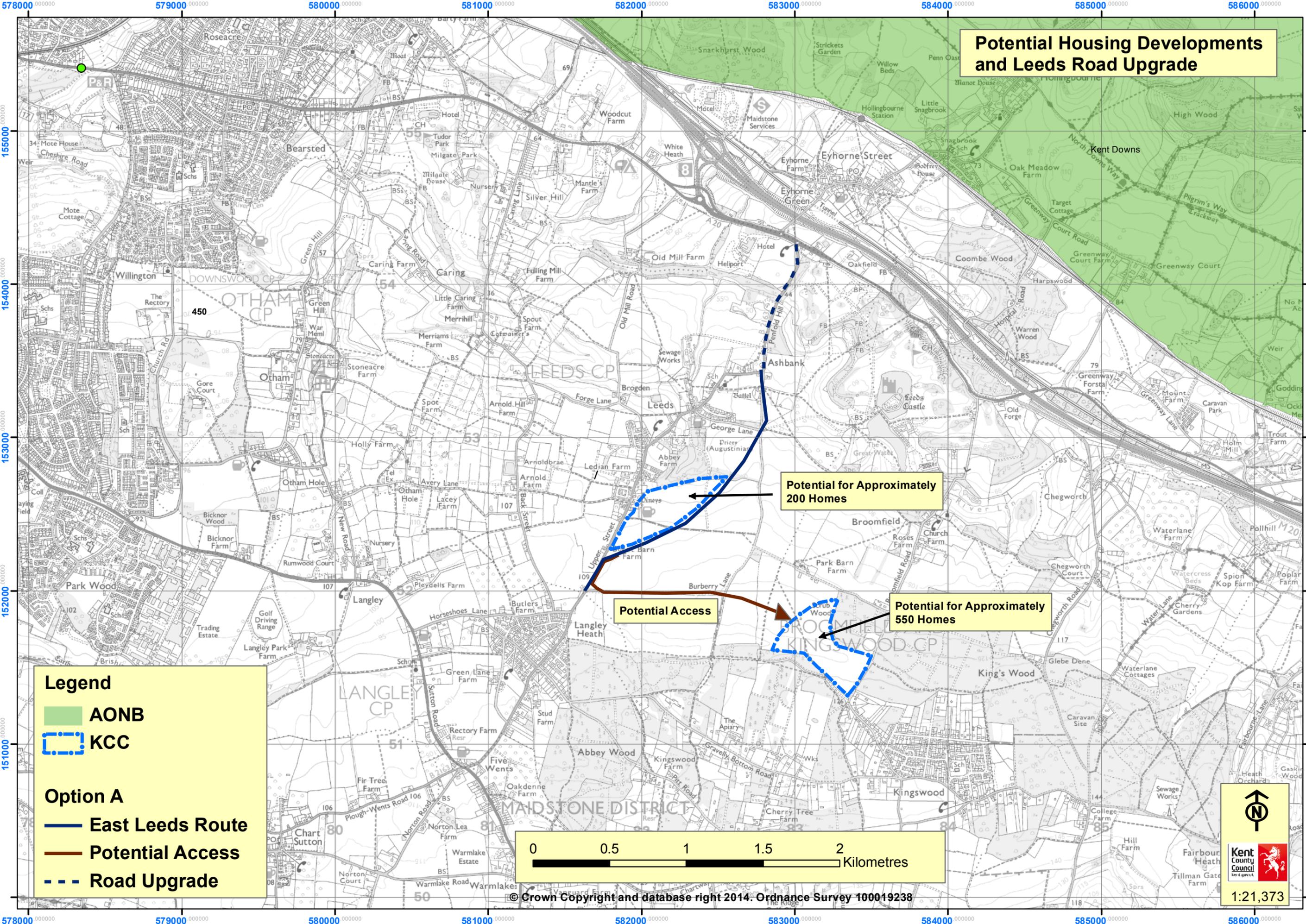
Summary:

- Sites near Kingswood were put forward as part of the Maidstone Borough Council’s ‘call for sites’. The sites were rejected on the basis that they are in the open countryside, and also that they relied on upgrades to transport arrangements which were not likely to be delivered.
- Kingswood is surrounded by patches of woodland, which would need to be considered in any design/allocation.
- The development would need highways upgrading, and could be serviced by a connection to a future Leeds-Langley Bypass. The cost of the bypass would have to be weighed against the ‘unlocking’ of development land.

Cost/Infrastructure Issues:

- Highways – the most significant cost for a Kingswood extension would be highways connections. An option for the Leeds Road Upgrade is presented in the following section.
- It is estimated that the Leeds Road Upgrade would cost in the order of between £15million and £20million (depending on route and a range of other options). The work will consist of new sections of single lane carriageway, sensibly landscaped and designed, as well as appropriate upgrades to existing highways at the northern and southern ends.
- A ‘spur road’ from the Leeds Road to service a Kingswood extension would be in the region of £4-5million.

Potential Housing Developments and Leeds Road Upgrade



Potential for Approximately 200 Homes

Potential for Approximately 550 Homes

Potential Access

Legend

- AONB
- KCC

Option A

- East Leeds Route
- Potential Access
- Road Upgrade



1:21,373

Conclusion

KCC have significant concerns with Maidstone Borough Council's proposed Local Plan to 2031, which can be summarised as follows:-

- The housing target for the Local Plan period to 2031 must be reduced to a realistic and sustainable number, Kent County Council considers that a target of between 14,500 and 14,800 is most appropriate;
- In determining the housing target and the location for future dwellings, Maidstone Borough Council must take into account previously developed sites along with windfall sites that are likely to come forward, this would equate to a need to allocate approximately 8,670 new home sites (rather than the 12,900 to 15,400 which is required under the current proposals by Maidstone Borough Council
- Urban sprawl must stop – key infrastructure is already at or above capacity now;
- The Maidstone urban area has grown to its maximum size and must be protected by green open countryside to prevent coalescence with adjacent rural settlements;
- Rural service centres and villages must be allowed to grow organically via growth managed locally through Neighbourhood/Parish Plans – the expertise and knowledge of the Parish Council's must be engaged to ensure a robust plan is developed;
- Localities with appropriate existing infrastructure to support growth, such as good rail and road links and sufficient school accommodation, must be prioritised, thereby minimising impact on the public to support growth;
- To date, there is no agreed Integrated Transport Strategy for Maidstone between MBC and KCC, the Highway Authority;
- There is no evidence from the Highways Agency that junctions 5 to 8 of the M20 have sufficient capacity to accommodate the urban expansion proposed by MBC.