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1. Introduction

Background

1.1.1. Baker Associates were appointed in July 2008 to undertake a Strategic Housing Land Availability Assessment (SHLAA) for the administrative area of Maidstone.

1.1.2. In July 2007, Communities and Local Government (CLG) published the Practice Guidance "Strategic Housing Land Availability Assessment". The Guidance provides the government's view on how it considers SHLAA should be undertaken and therefore provides the basis for conducting such studies.

1.1.3. All the relevant stages of the SHLAA process has been followed in this study, and the study builds upon work already completed by the Council in previous work under a continuous monitoring process, in particular, previous Urban Capacity Studies (UCS) in 2002 and 2006, its Annual Monitoring Reports, and a 'Request for Potential Residential Sites' (RPRS) exercise, carried out in May and June 2008.

1.1.4. The work carried out, and the processes followed, by the Council in addressing housing land supply through previous Urban Capacity Studies, and through Annual Monitoring Reports have addressed requirements of previous government guidance.

1.1.5. The methodology followed Government Guidance – Strategic Housing Land Availability Assessment: Practice Guidance (July 2007) and was also guided by the SHLAA Protocol being prepared by the Kent and Medway planning authorities, which has been produced to provide a consistent interpretation of the practice advice in Kent. A common approach to the methodology was gained from working in partnership with key stakeholders, contributions from a Liaison Group set up specifically for the SHLAA and through discussions with the client.

1.1.6. The Practice Guidance emphasises the importance of a partnership approach. The Liaison Group comprised key stakeholders such as housebuilders, consultants, and local agents who were involved at the outset to help shape the approach. They provided expertise particularly on the operation of the housing market and provided the study with information on potential sites, including comment on deliverability.

1.1.7. In order to ensure a consistent approach, all sections of the study use a **base date of 1st April 2008**. Consequently the study provides robust evidence for the LDF, founded on the most recently available data.

1.1.8. The 'Request for Potential Residential Sites (RPRS)' exercise was carried out in May/June 2008 by the Council engaging with developers, agents, and institutional landowners, inviting suitable sites to be submitted for consideration in the study. This specified that sites both within and adjacent to the Borough's main settlements should be put forward for consideration.

1.1.9. The Council is in the process of carrying out other background studies for the proposed Maidstone Urban Extension, which was identified in the Maidstone Core Strategy Preferred Options paper in January 2007. The Practice Guidance identifies potential urban extensions as sources of sites, and sites within the area of search for the urban extension have been included within this SHLAA.

1.1.10. This site search process, together with the inclusion of sites from previous potential studies, unimplemented allocations, along with sites that are subject to pre-application discussions, has resulted in a total of 289 sites being identified within and adjacent to the study settlements, as well as those in countryside locations. Sites subject to an undetermined planning application and which have not previously been identified as potentially suitable for housing (e.g. in a UCS or through application discussions) have not been assessed because any conclusion in a SHLAA could prejudge the outcome of the application. If consent is granted, the yield will subsequently count as part of the housing land supply. Sites with a resolution to grant have also not automatically been included; these will feature in the future monitoring of consents. Sites with planning permission at the study base date are included in a schedule that contributes to the total SHLAA supply.

1.1.11. It is important to appreciate at the outset that the SHLAA is not intended to do the job of the LDF and make decisions in principle about the development of specific sites. Whilst it identifies potential housing land, it does not make judgements about whether this should be included in the LDF or whether it should form part of the 5 year housing supply. This assessment is being carried out to provide evidence for the emerging Core Strategy which will direct specific spatial distributions.

1.1.12. The intention is that this SHLAA will:

- identify **potential** housing sites; it is the role of the LDF to determine the distribution strategy and following that, which sites should be allocated for housing development;
- enable sites to be assessed on a consistent basis;
- not comprise a full site appraisal and is based on the best immediately available information, drawing on the professional judgement of all those involved;
- allow for new sites and revised information to be added to the database as it is reviewed regularly; and
- not prioritise between sites, which is the role of the LDF.

Relationship with RSS

1.1.13. The South East Regional Spatial Strategy (RSS) is still to be adopted. The Panel Report identifies a housing requirement for Maidstone for the 20 year period 2006-2026 of a maximum of 10,080 dwellings.

1.1.14. The Secretary of State published Proposed Changes to the draft Regional Spatial Strategy on 17 July 2008. Consultation on the changes ended on 24 October 2008. This expects Maidstone to deliver 11,080 dwellings for the period 2006 - 2026 (an annualised figure of 554 dwellings per annum).

1.1.15. This SHLAA considers the potential capacity of Maidstone Borough within this emerging regional policy context.

Document format

1.1.16. This document presents the findings of the study, the methodology used to arrive at these and therefore it's compliance with the Practice Guidance.

1.1.17. The report comprises:

1.1.18. Section 2 describes the methodology which was followed in preparing this study. It is based on the original methodology agreed with the Council and key stakeholders, including those in the Liaison Group reflecting the requirements of the Practice Guidance and the Kent and Medway SHLAA Protocol.

1.1.19. Section 3 sets out a review of the housing market in Maidstone Borough which has been prepared in consultation with developers and agents in the study area. The market appraisal is an important element of the SHLAA and has been used to provide the basis for understanding the local market and the future prospects for residential development.

1.1.20. Section 4 provides the first of the findings of the study, which is the stock of all sites with planning permission at the base date, 1 April 2008. Details of the sites with 10+ dwellings are included in Appendix 1, whilst sites with 9 dwellings and under are summarised as a total yield. The availability of the sites with 10+ dwellings was assessed by Council officers by direct contact with developers.

1.1.21. Section 5 includes a summary of the assessment of site specific opportunities for housing related to the study settlements. The summary findings are based on an assessment of identified sites arising from all sources. This includes both greenfield and brownfield sites within and adjacent the study settlements, including sites within the potential Maidstone Urban Extension. Sites which have been assessed but are judged not currently developable are listed in Appendix 2, including a reason for their rejection. Summaries of all of the sites which are considered to provide potential housing land within the study period are included in Appendix 3 and the detailed assessments of each of those sites are included in Appendix 4. Appendix 5 contains maps of all the study settlements showing plans of the identified potential sites. Appendix 6 contains maps of all the rejected sites in remote locations, that are not shown on the study settlement maps.

1.1.22. Section 6 considers the opportunity for the provision of windfall sites to come forward, after the first 10-year period. This analysis is based on past trends as well as present and emerging policy and an understanding of the local market.

1.1.23. Section 7 draws all of the previous information together to provide a review of the current situation and indicates the total potential housing land which is likely to be available within the plan period.

1.1.24. The review of the study indicates that there is no requirement to find further sites or assess broad locations, to meet the potential levels indicated in the emerging South East Plan.

1.1.25. Finally, Section 8 provides a summary of the findings of the study.

2. Study methodology

Introduction

2.1.1. The methodology set out below follows Government Guidance and builds upon the work undertaken by Baker Associates in numerous SHLAAs across the country.

2.1.2. The methodology also builds upon the work which was completed by Maidstone Borough Council, who consulted on initial stages of the methodology with the HBF and GOSE. The draft and comments received from the HBF and GOSE on the draft were taken into consideration, as well as the Kent & Medway Protocol. The draft methodology was then consulted upon with a wide range stakeholders, including developers, agents and landowners.

2.1.3. The approach consisted of three main sources of information drawn together to help identify the potential housing supply in the Borough, these were:

- a review of sites within the urban area of the identified towns and villages of the Borough to assess the potential housing yield from within settlements;
- a review of the land around and outside settlements, looking for potential areas of growth, including greenfield and previously developed land; and
- analysis and collation of housing data and housing information, to assess the deliverability and developability of existing housing permissions and potential windfall supply following the first 10 year period.

Core requirements of the assessment

2.1.4. Para. 14 of the Practice Guidance clearly indicates the core outputs of a SHLAA (Figure 1) and also a process checklist (Figure 2). The core outputs each require the study to identify opportunities for housing development. This requirement has been met from a wide range of sources which were identified and assessed including specific sites within the urban area and the identification of possible locations of growth outside the study settlements.

2.1.5. Each site was mapped on a GIS base and where it was considered to have potential for housing development, a yield was estimated. Constraints to development on sites were identified and recommendations on how these may be overcome made. All of this information has been provided in individual site pro-formas collated in an Access Database linked to the GIS map base.

2.1.6. Key to the assessment of all sites, particularly those contributing to the first five years of the plan, was a thorough test of deliverability, assessed by reference to a site's **suitability, availability and achievability**, as set out in PPS3 para. 54, as well as in the Practice Guidance. These tests provide a basis for the consideration of sites and in order to be considered deliverable for housing in the first 5 years, all three tests must be passed. In addition, an assessment was made as to whether sites were developable with reference to being a suitable location for housing with a reasonable prospect that it will be available for, and could be developed at, a specific point in time.

2.1.7. Figure 2 of the Practice Guidance provides a simple process checklist for studies. The first part of this is to ensure the involvement of key stakeholders in the process as set out in the following section.

Consultation

2.1.8. Consultation was undertaken with key stakeholders as part of the SHLAA. For the purpose of the Maidstone SHLAA a Liaison Group was established of key stakeholder interests to contribute to the process of preparing the SHLAA. This is a vital component of a successful SHLAA as stakeholders hold a valuable understanding of the market and delivery of homes in the Borough, and therefore their input can help ensure a more robust and credible study. Relevant stakeholders included representatives of developers, agents, planning consultants RSL and housing service representation as necessary. The form and purpose of these consultations was tailored to the needs of each stage and included:

- the RPRS letter sent to landowners, developers and agents in May 2008. This exercise undertaken by the Council brought forward 110 sites in total;
- consultation on the methodology and site assessment criteria. This included the site assessment form and the site assessment criteria of the methodology, drawing on Appendices 2 and 3 of the Kent and Medway Protocol;
- consultation with the individual members of the Liaison Group to assess the deliverability of specific sites, including assessment of the market, cost and delivery factors that impact on viability; and
- consultation with Ward Members.

2.1.9. In addition, key landowners, stakeholders, Borough Council development control officers and other organisations and individuals who have knowledge were contacted in relation to identified sites that were put forward for assessment.

Approach

2.1.10. The Practice Guidance provides an 8 stage process for undertaking the main body of the assessment, with two additional optional stages depending on the outcome of the initial work.

2.1.11. For the purpose of the work commissioned Baker Associates undertook stages 1 to 8 and provided for an allowance for windfalls after the first 10 years of land supply (PPS3, paragraph 59).

2.1.12. The methodology set out below reflects these stages of work and indicates the input required at each stage. It is considered that the “core requirements” of the guidance have been met through the application of this methodology.

Stage 1: Planning the assessment

2.1.13. The initial stage of work in the Practice Guidance relates primarily to the project planning required by the planning authority when scoping the study and considering the appointment of consultants, if the study is not to be undertaken in house. The majority of the work in this initial phase is undertaken prior to the appointment of consultants.

Time periods

2.1.14. The SHLAA matches the time horizon of the South East Plan, which is 2026. A base date for the study is not referred to in the Practice Guidance. However a date is required to act as a baseline against which to assess information. In this instance the base date was **1st April 2008**. This reflects the Council’s own monitoring records and ensures consistency between the SHLAA and the Annual Monitoring Report (AMR).

2.1.15. The yield from the SHLAA is set in a series of time bands which reflect deliverability during 2008-2013 (5 years from base date) and developability during 2013-2018 (years 6 – 10 from base date) and 2018-2026 (up till the end of the plan period). This arrangement assists the Council to calculate its 5 and 10 year housing supply.

Study extent

2.1.16. The study identified where sites were to be sought. The prime concern of planning policy is to develop sustainable communities. In general these locations were focused in existing settlements and the location for the majority of housing development focused on larger settlements where a range of services can be accessed.

2.1.17. However, the Practice Guidance states that the study should “aim to identify as many sites with housing potential in and around as many settlements as possible in the study area” (Para 7).

2.1.18. The Maidstone Core Strategy Preferred Options document identifies one main settlement (Maidstone), 5 potential Rural Service Centres and 21 potential larger villages, where development boundaries are defined as in the current Local Plan, within which new development is expected to take place.

2.1.19. Further work being undertaken since the Preferred Options consultation identified that 2 of the larger villages (Yalding and Coxheath) will be assessed as potential Rural Service Centres. Similarly there are two additional potential ‘larger villages’ (Hunton and Linton). For the purposes of the SHLAA, sites within and adjoining Walderslade were also assessed. The actual settlement hierarchy will be confirmed through further work being completed for the Core Strategy and not through the SHLAA.

2.1.20. In order to provide as much information as possible about sites with potential, the study therefore assessed sites **within and adjacent to** all of the following settlements. Sites not within or adjacent to these settlements were excluded at the first round of the assessment.

The main settlement of Maidstone, the 5 Rural Service Centres (identified in the Core Strategy Preferred Options), plus the two larger villages were assessed as potential Rural Service Centres:

- Maidstone
- Coxheath
- Yalding
- Harrietsham
- Headcorn
- Lenham
- Marden
- Staplehurst.

The larger villages:

- Boughton Monchelsea
- Boughton Quarries
- Bredhurst
- Chart Sutton
- Detling
- The Green, West Farleigh
- Grafty Green
- Hollingbourne (Eyhorne Street)
- Hunton
- Kingswood
- Laddingford
- Langley Heath
- Leeds (Upper and Lower Street)
- Linton
- Loose
- Nettlestead
- Platts Heath
- Stockbury
- Sutton Valence
- Teston
- Ulcombe

The urban area of Walderslade, which is not identified as a sustainable settlement within Maidstone Borough, but is an urban location related to a neighbouring

authority:

- Walderslade.

Suitable greenfield sites

2.1.21. The guidance provides little clarification of what constitutes a suitable greenfield site (or how broad locations for development are to be assessed and identified). The PAS advice makes it clear that it is not expected that every single field adjacent to every settlement will be looked at, but rather, those sites which have the best potential to meet requirement in terms of sustainable locations in relation to services.

Specific site size threshold

2.1.22. The Practice Guidance does not specify any threshold for the scale of sites to be surveyed. There is a logistical problem if there is no site size threshold, since it is impossible to identify all sites where owners will seek a change of use. Examples of this are plots in side or rear gardens, conversion of large houses or space above commercial premises into flats.

2.1.23. Para 25 of the Practice Guidance indicates that for site survey a "minimum size of site" may be chosen. This should reflect the local circumstances of the area and its housing market but also reflect the resources available to the study.

2.1.24. **A site size threshold of 5 or more units** was agreed for this study, taking account of the Kent and Medway Protocol, the Council's housing monitoring framework and the historic significance of sites of this size for the Borough's housing land supply, although small sites contribute through permissions, and as part of a potential windfall allowance after the first 10 years.

Stage 2: Determining which sources of sites will be included in the assessment of urban sites

2.1.25. The Practice Guidance requires that a wide range of sources for sites are considered for identifying sites to be included that are within the urban boundaries of the named settlement. The guidance includes the following groups:

Sites with unimplemented planning permissions for housing and those which are under construction

2.1.26. SHLAAs should estimate the yield from current supply in the form of uncompleted planning permissions. All the information contained in the Annual Monitoring Report (AMR) on all unimplemented planning permissions has been analysed and included in the SHLAA.

2.1.27. Sites have been assessed against the deliverability criteria, set out in Stages 7a, 7b, and 7c. For sites with permission, suitability is not in question. In order to assess availability and achievability, the landowner or developer was contacted for sites of 10+ dwellings to determine the likely start and completion dates, and to ensure there are no availability or viability issues. The likelihood of smaller sites being delivered was tested against past records of implementation, and against the performance of the housing market. A cautious approach has been taken, with a 10% deduction to allow for non-implementation of the sites with a capacity of 1 - 9 dwellings, which rate will be kept under review.

2.1.28. Where there was good reason to conclude that a different site dwelling yield to that contained in the Annual Monitoring Report was likely to be realised, a revised yield has been attributed.

2.1.29. This was most likely to be the case in the circumstances where there was an outline consent with no exact yield attached and if the AMR has reached a yield by the simple process of density multipliers rather than by a consideration of what the owner or developer intends to bring forward. Other examples include sites with detailed consent where it is known that developers or owners are actively considering a different approach.

2.1.30. Sites under construction were regarded as deliverable unless the site had a later phase, in which case it would be considered in its own right.

Existing housing allocations and site development briefs

2.1.31. All outstanding housing allocations, including those currently 'frozen' were considered as part of the desktop review and survey process. In addition, any sites with development briefs for housing prepared or agreed by the Council were considered as part of the site identification process.

2.1.32. Sites not currently in the planning process included a further range of sites and maximum number of opportunities for the provision of housing was investigated as part of the SHLAA. The Practice Guidance provides examples of potential sources, which is an indicative, but not necessarily exhaustive, list.

Vacant and derelict land and buildings

2.1.33. Buildings which are not in efficient and/or economic use have always been identified as part of housing potential studies. Some of these were identified through the RPRS by landowners or developers.

Surplus public sector land

2.1.34. Consultation with key public landowner groups was undertaken through the RPRS exercise. Key consultees in this respect have been the County Council and the Borough Council's own Property Services department.

Land in alternative uses

2.1.35. Some sites identified through the RPRS exercise and the previous Urban Capacity Studies are currently in non-residential uses, including car parks and commercial buildings. If sites are occupied, evidence is required regarding the process by which the site will become available for housing.

2.1.36. The SHLAA determines whether a site in non-residential use is potentially suitable and available for housing, as it does for all the SHLAA sites. Examples of such non-residential uses include recreation, employment or education. It does not make the final decision whether a site should more appropriately be retained in its current (or an alternative) non-residential use. That is a decision for the LDF.

Land in existing housing areas

2.1.37. The SHLAA has considered all land within residential areas which was identified as potentially suitable for housing development and opportunities through the previous Urban Capacity Studies and from the RPRS exercise. Garage courts, open spaces, and areas where there are large gardens providing infill opportunities were all considered as part of the study.

2.1.38. However, many of the spaces within existing residential areas are valued for the space that they provide and add to the character of the environment. Not all opportunities were therefore deemed suitable when they were considered in detail. Therefore sites such as informal public open spaces were considered but rejected through the assessment process.

Large scale redevelopment

2.1.39. In some areas agencies are able to bring together large scale opportunities for redevelopment which may increase the level of housing. No such opportunities are known within Maidstone Borough.

Land allocated (or with permission) for employment or other land uses which are no longer required for those uses

2.1.40. Sites allocated or with consent for other uses and which are no longer required for their approved use could be considered as part of the SHLAA.

2.1.41. The emerging Employment Land Review indicates there is a requirement for employment land sufficient to retain saved Local Plan Policies ED2 and ED1 employment sites. Therefore, on this basis, any such employment sites put forward were excluded from the first round of the assessment. It will be for the LDF to determine that ED1 and ED2 sites should be retained for employment use.

Sites in rural settlements and rural exceptions sites

2.1.42. Housing development outside of the main urban centre is generally considered to be less sustainable as it is more difficult to provide for a range of opportunities by a mix of transport modes. Paragraphs 2.1.19 confirms that the settlement hierarchy will be established through the Core Strategy.

Exclusions

2.1.43. The Practice Guidance clearly states (para 21) that types of land or areas may be excluded from the assessment, and any such proposals must be justified. With reference to the category 1 and category 2 constraints included in Appendix 3 of the Kent & Medway Protocol, sites which wholly or substantially fall within the following designations have been excluded from the first round of the Maidstone assessment:

- *Nature conservation*: Special Areas of Conservation (SACs), Sites of Special Scientific Interest. Government guidance indicates that such sites should be given a high level of protection through the planning system and that impact on an SSSI's notified features of interest should be avoided (PPS9 paragraphs 7 & 8). International sites have the highest level of protection (PPS9 paragraph 6)

- *Landscape*: Kent Downs Area of Outstanding Natural Beauty. AONBs have the highest status of protection in view of their landscape quality (PPS7, paragraph 21). The Kent Downs AONB covers an area of the borough to the north east of the M20. Generally the area is characterised by dispersed, smaller settlements. In view of the anticipated potential elsewhere in the borough, it was not expected at this first round stage that significant housing allocations would be required in the AONB. However sites that are within the village boundaries of settlements within the AONB were not excluded from the first round of the assessment.

- *Green Belt:* A small area of the borough in the vicinity of Nettlestead falls within the Metropolitan Green Belt. In view of the anticipated potential elsewhere in the borough, it was not expected for the first round of the assessment that significant housing allocations would be required in the Green Belt.

2.1.44. In addition, flood risk is regarded as a locally important issue. Greenfield sites which fall within flood risk zones 3a (high probability) and 3b (functional floodplain) were excluded from the study. (PPS25, Table D1).

Stage 3: Desktop review of information

2.1.45. An early part of the study methodology was the consideration of all sources of available information, which came from a wide range of sources, all considered in detail in Stage 2.

2.1.46. As sites were identified, from whatever source, they were mapped on the GIS base provided by the Council and linked to an Access Database which holds information on ownership (where known) as well as site description, constraints and planning history (if any).

2.1.47. All sites have been mapped and stored on GIS. Those which were subsequently rejected for whatever reason remain mapped and may be used in future reviews of the SHLAA if circumstances change. Where sites have been assessed as having potential for housing development the maps and database forms are presented in Appendix 4.

Stage 4: Determining which sites and areas have been surveyed to assess the land available within settlements

2.1.48. All sites coming forward from desktop studies and RPRS exercise were included in the site search as potential SHLAA sites. Developers, agents and landowners provided detailed information about their sites, which assisted the consideration of likely house types, and dwelling yield.

2.1.49. Greenfield sites adjoining settlements which were put forward by landowners/developers were surveyed in the same way as any other specific site within settlements. These included the large sites on the edge of Maidstone, including those within the identified urban extension area of search to the east/south-east of the settlement, as well as at the Rural Service Centres and larger villages (paragraph 2.1.20 refers).

Stage 5: Carrying out the survey of settlements

2.1.50. Site surveys were undertaken by a small number of experienced individuals from Baker Associates. This ensured that there was a consistent approach to recording information and assessing sites. All sites which were considered to have potential to be suitable for a development for 5 dwellings or more were visited and assessed.

2.1.51. Site details were recorded including site characteristics and its surroundings. This was then transferred to a database which was used as the basis for reporting. This exercise is the most substantial part of the study and draws on all the information generated from the various sources, as well as those coming forward from third parties as a result of consultation.

2.1.52. Any sites that are currently in an alternative use, with no evidence or obvious prospect of being available for housing, or where constraints mean that they will not be suitable for housing development were rejected as not being developable.

Stage 6: Estimating the housing potential of each site

2.1.53. For each site which is considered to provide an opportunity for housing within and adjacent to settlements, a yield has been attributed. For some sites proposals were sufficiently advanced that a yield was already indicated by developers. However, for many sites a yield was needed to be properly assessed.

2.1.54. The starting point for this was the generation of indicative yields through the use of density multipliers. This provides an indication of the likely levels of housing provision depending on assumed density levels.

2.1.55. Every site is different and therefore the density multiplier is only an indication of likely yield. Typical site template layouts were used as a basis for considering appropriate and alternative layouts and therefore yields. These included, for instance, two types of low, medium and high density examples, and the nearest 'fit' was chosen to suit individual site characteristics. This provided an initial layer of analysis which led to sketch layouts in some cases to assist in reaching conclusions about dwelling yield.

2.1.56. PPS3 guidance (para 47) states that 30dph should be used as the national indicative minimum density. Some densities in the site schedules are below this density because the gross area has been used to calculate density, whereas net developable areas are often much less than the gross area. In these cases, a reference to the net developable area is made in the yield analysis and conclusion.

2.1.57. Where sites overlap, the yield was ascribed to only one of the sites to avoid double-counting. The site analysis forms in Appendix 4 specify the sites for which this has occurred.

2.1.58. In the particular case of intensification, and particularly the development of back gardens, there is Council concern at the potential loss of open space, and inappropriate development taking place in sensitive areas. Some back gardens have been targeted for redevelopment for flats, meaning a greatly increased density, which was encouraged by the operation of PPG3. Care was taken not to assume over-development in such cases.

2.1.59. Now that PPS3 is less prescriptive about density, each case where this is encountered was carefully considered for adequate evidence about yield, and that development is likely to take place. In addition, the character of the area was taken into account in reaching conclusions about dwelling yield. This was informed both by market intentions, and also by officer views. In some cases where schemes have been rejected because of overly intense development, but where the principle of development is not challenged, a lower yield had been suggested.

Stage 7: Assessing when and whether sites are likely to be developed

2.1.60. The Practice Guidance seeks to consider all sites in one of three categories:

- **deliverable** – available now and with a reasonable prospect of development within 5 years. These sites are considered to have housing potential and are identified in this study as being provided within the period 2008 - 2013
- **developable** – sites suitable for housing and having a reasonable prospect of being delivered within the period of the plan. These sites are included within this study and identified to come forward in a timeframe after 2013
- **not currently developable** – these are the identified sites which, for whatever reason, are not likely to come forward for housing in the foreseeable future.

2.1.61. This exercise included assessment of the market, cost and delivery factors that impact on the viability and deliverability of sites.

Stage 7A: Assessing suitability for housing

2.1.62. Factors which make a site suitable for housing were considered throughout the assessment process. Review of relevant policy constraints and planning history indicates the potential restrictions to development and may identify physical problems or impacts on issues such as landscape character.

2.1.63. During site visits the potential physical limitations of sites and the conditions which will be experienced by potential occupiers can all be judged. Issues of access, infrastructure provision, adjoining land uses, contamination and flood risk were all assessed through review of available data and discussions with relevant stakeholders.

Stage 7B: Assessing availability for housing

2.1.64. Many sites which were considered during the assessment are being promoted by land owners or developers either through previous planning applications or informal approaches to the Council. Further sites have been promoted through the LDF process or as a response to the RPRS exercise, both indicating availability.

2.1.65. In each of these cases the land owner had to be identifiable and their intentions made clear. Where it is made clear that there are difficulties of delivery these were investigated.

2.1.66. For other sites identified through the site survey process, landowners were sought and contacted wherever possible to ensure that sites were realistically available. It was not, however, possible to identify and contact every single landowner and in these instances a view was taken as to the likelihood that development will come forward.

Stage 7C: Assessing achievability for housing

2.1.67. The Practice Guidance is clear that achievability relates to the economic viability of a site, and this was determined through a consideration of the market, as well as the particular circumstances of each site.

2.1.68. A market assessment forms a key part of the methodology of this study and we undertook discussions with developers and agents regarding the local market conditions in the area for different types of housing. A draft market assessment was discussed with the Liaison Group set up for the project, to further inform an understanding of the local market. Individual developers and agents provided invaluable comment on specific sites and the operation of the market throughout the study.

2.1.69. The SHLAA considers how the market responds with different house types for different sites and different areas, as well as land values for competing land uses (not just residential), sales rates, selling prices, and the efficiency of residential land use. This information enabled us to predict, with as much certainty as possible, the type of housing, and therefore the likely yield, for each site, as well as the likely viability of marginal locations. This process was an essential part of assessing the deliverability of each site opportunity, and the time band for likely development.

2.1.70. We have always considered viability to be critical, and used in-house expertise enabling the assessment of economic viability. This has been considered in the context of a consideration of the housing market, set out in section 3, which draws conclusions about prevailing residential land values generated by housing schemes, but does not aim to estimate contributions to any package for community and strategic infrastructure that may be sought in the future; this will be the subject of further detailed work by the Council.

2.1.71. Much of the time-consuming research was into current developments, including the particular house types being built in different locations, dwelling specification, selling prices, and construction costs. Consultation took place with developers of current schemes, RSLs, and surveyors and agents involved in land sales and acquisition.

Stage 7D: Overcoming constraints

2.1.72. In certain locations the potential for development was limited by certain constraints. In some cases this was due to the lack of available infrastructure such as highway capacity.

2.1.73. For each site which was considered to provide an opportunity for housing development potential constraints were identified and solutions to overcome them identified. The likelihood of infrastructure investment or change affecting constraints occurring was considered, in order to assess whether a site was currently developable or not, and if the change took place, when it might become developable.

Stage 8: Review of the assessment of sites

2.1.74. Following site visits and review of site data, all information was collated and reported to the Council in the form of a schedule of potentially accepted and rejected sites, with justifications.

2.1.75. Each of these sites has been mapped and provided to the Council as a GIS layer and linked access database. A summary table indicates the unique reference number for the site, its address and also the reason that it is considered developable or non-developable.

2.1.76. All sites which are considered to provide potential for housing has been listed in the site yield summary table in Appendix 3. This indicates each site by unique reference number, provides an address, site area and an assessment of the likely yield to come forward from that site.

2.1.77. This information is supported by individual site analysis forms which set out the collected information for each site and the analysis used to arrive at a housing yield for the site. The figures for the provision of housing on identified sites is compiled and compared with the requirements for housing arising from the RSS.

2.1.78. If the SHLAA identifies fewer housing land opportunities, including suitable greenfield sites, than is required by RSS, the Practice Guidance recommends two potential sources to provide further housing provision. These are set out as concurrent stages.

Stage 9: Identifying and assessing the housing potential of broad locations (if required)

2.1.79. If the RSS requirement had not been fulfilled though the initial review of the sites identified in Stages 1 to 8, the Practice Guidance suggests that the potential of broad locations will be investigated. This approach would have combined a desk based assessment and site survey to provide an estimate of housing potential on both greenfield and brownfield broad locations across the Borough.

Stage 10 Determining the housing potential of windfall (where justified)

2.1.80. The government's expectation is that housing should come forward as far as possible on identified sites. However, information is not perfect and it is always likely that sites will come forward which have not previously been identified.

2.1.81. The advice note published by the Planning Advisory Service, January 2008, advises that, in broad locations within settlements, where development through infilling and redevelopment is encouraged by policy, an allowance for future development based on past rates can be included in a SHLAA. By virtue of being promoted by policy, and in a broad location, and included in a SHLAA, this kind of development is, according to PAS, no longer considered as windfall.

2.1.82. However, this PAS advice is in direct conflict with PPS3 and the practice guidance which is still definitive. Until such time therefore as CLG clarifies this issue about windfall type development, this SHLAA makes no windfall allowance in the first 10 years of the study period.

2.1.83. For the period 2018 - 2026, a windfall allowance has been made based upon current information held on past rates of completion on previously developed sites, site specific opportunities identified through this study and assessment of urban character and planning policy.

3. Market assessment

Introduction

3.1.1. The SHLAA Practice Guidance advocates a partnership approach working together with stakeholders such as house builders and local agents to help shape the approach, and to assist in the assessment of the deliverability of sites, and how market conditions may affect viability.

3.1.2. Therefore, in reaching conclusions about whether and when sites will come forward, and for which kind of dwellings, it is first essential to assess the suitability of each of the identified sites for housing development, taking account of:

- the characteristics of the site
- alternative possible land uses
- environmental and policy constraints to development such as nature conservation value
- physical development constraints such as access, flood risk, and ground conditions
- market considerations.

3.1.3. A key element in understanding where, how much and what type of housing is likely to come forward in any particular area is the operation of the local housing market. Understanding the economics of the local market is identified as a central component of a SHLAA by the practice guidance and the input of house builders and local property agents is important to this understanding.

3.1.4. Therefore in preparing this study a brief overview of the current state of the housing market has been undertaken, and has been utilised in considering the likely type and number of dwellings which will come forward on identified sites, in line with advice in para. 41 of the practice guidance.

3.1.5. Accordingly, the assessment of opportunities has been assisted by consultations undertaken during the work with people familiar with the areas and knowledgeable about the operation of the local markets, such as the local agents and house builders, some of whom took part in the Liaison Group meetings particularly in the context of taking account of the market. In this way, the SHLAA was able to build up knowledge of the factors affecting the likely type of development on different sites, and when it might be expected to be completed.

3.1.6. In order to assess the likely dwelling yield for each site, the owner or developer, in some cases also a member of the Liaison Group, was contacted to confirm development intentions. The Liaison Group was not specifically consulted on every site in the SHLAA, since the approach ensures that direct consultation takes place with the owner or developer of each site.

3.1.7. The assessment has tried to take account of a variety of 'deliverability' factors, particularly in the first five-year period, when sites should be demonstrably suitable, available and achievable. These factors include access, ownership, adjacent land uses and economic viability in the light of local market considerations, though exhaustive investigations have not been possible in every instance.

3.1.8. Those familiar with the housing market over the long-term appreciate that any analysis is a view at a particular time. The market will undoubtedly vary over the period considered by this study, and it should be reviewed at regular intervals. This is particularly relevant at the time of this study at the start of an economic recession.

3.1.9. Due to the current market downturn resulting from the reduced availability of credit apparent since September 2007, developers, agents and private housing developers confirm a significantly downturned local housing market. The three largest volume housebuilders have temporarily stopped land acquisition in response to reduced demand for new housing, preferring instead to rely on their current land banks. Developers are in particular wary of large schemes of flats, volume sales of which were highly dependent upon the buy to let market that relies on short-term capital growth, and which were frequently financed by mortgage schemes that would no longer be viable. No one can predict the length or severity of the current downturn, but its effect will evidently be to limit market capacity in the short term.

3.1.10. Property experts predict that after a period of re-adjustment underlying demand will return to recent levels, albeit at re-structured prices, which will affect the relationship between viability and the structure of community gain packages. The Council may want to consider flexibility in order to stimulate the market. The market emphasises that there must be a balanced delivery of a mix of house types, and an over-reliance on one type of dwelling, creates over-supply and low demand problems.

3.1.11. Because of these recent market difficulties, there is now evidence that residential land values have decreased by around 50% since September 2007, depending on individual and local circumstances. The most obvious change in the land market is that developers are less willing to compete against each other to acquire sites, and 2009 is likely to see a further softening of price due to this reduction in demand.

3.1.12. A number of recent nationwide research reports corroborate this position: Savills reported in December 2008 that transaction levels in all markets are at an all time low, down by between 60% and 65% from the peak of September 2007. In the new build market, this figure could be as much as 80%, unless very substantial price cuts have been made.

3.1.13. The consequence of this is that the price of new homes has fallen faster and further than the mainstream UK market. While average house prices fell by some 16.6% in the year to January 2009, according to the Nationwide indices, new build prices have typically fallen by 15% to 25%. In some markets, an overhang of unsold stock means values have fallen even further.

3.1.14. Knight Frank's Residential Development Land Index showed similar falls in the value of residential sites over the past year. In November 2008, the Nationwide reported an annual 13.9% fall in average house prices (monthly 0.4%), significantly less than that seen in October when house prices fell by 1.3%. In January 2009, the Halifax states that for 2008 as a whole, prices fell 16.2%, down to the levels of August 2004.

3.1.15. The position in Kent reflects the situation across the country, with annual price decreases ranging from 4% to 20%, with Maidstone at 15.7% (Land Registry of England and Wales, February 2009).

3.1.16. Land trading has, with few exceptions, completely halted, as buyers for standard development sites with planning permission have all but disappeared. However, deals have been salvaged by restructuring to include joint ventures, build licences and phased payments, thus minimising the loss of overall value.

3.1.17. Not only have rates of sale slowed dramatically and achieved prices fallen rapidly, but developer confidence in future price movements remains negative. Land values have fallen sharply, in urban areas by 52% since September 2007. Values are now 43% lower than in 2001, according to the Savills land price index. The similar sized fall of 48% in the value of greenfield development land during the last year is more rapid than was seen in the early 1990's when development land values fell by 60% over a two year period, at a time when house prices fell by 20% over a longer period.

Future prospects

3.1.18. The return of investment activity in the UK residential sector will be an early indicator of a change in market sentiment. Given that constraints on access to debt are likely to continue to suppress demand from the buy to let sector, equity investors are likely to be the first to respond to signals of an impending upturn.

3.1.19. Expectations are that a renewal of equity investment will be concentrated first in prime central London, London, the South East, together with the more affluent university cities, where housing scarcity is greatest, with good prospects of long term capital and rental growth.

3.1.20. Once the market does turn, first time buyers will re-enter the market, driven by the renewed affordability of owning over renting, with shared ownership schemes in high demand, for example, the government's Homebuy scheme.

3.1.21. The government's house building targets set in the summer of 2007 of 3 million new homes by 2020 in England appear now to be impossible to achieve, with just 75,000 likely to be started in 2009. Residential development will not proceed until site values increase sufficiently to incentivise owners to release land. This will happen in due course as the market recovers, and developers are seeking to re-negotiate the terms of Section 106 requirements to achieve viability.

3.1.22. Land with higher infrastructure or remediation costs will experience a deeper and more prolonged downturn in residual site values. This may have significant implications for deliverability conclusions. Many complex sites will currently be unviable, and assumptions have been made about delays in delivery.

3.1.23. Property experts expect a gloomy 2009, with a recovery possibly starting in late 2010 - 2011. The government's rescue package may not have averted recession, but intervention and policy initiatives look set to ease liquidity slowly. This will improve mortgage availability and increase residential market turnover towards levels more usually seen in a downturn, rather than the historic lows currently being experienced. Interest rates have already fallen sharply and it is anticipated further cuts as the economy weakens. The rate was cut from 2% to 1.5% in January, to 1% in February, and to 0.5% on 5 March 2009.

Medium/long term prospects

3.1.24. Whilst short-term demand has fallen, medium and long-term demand is still considered by the market to be strong. This is underpinned by government policy to deliver a much increased level of housing to meet a national shortage, arising from a continuing high level of new household formation. In the medium term, the housing land market in the Maidstone area will continue to be comparatively strong for most house types in all locations, whilst housebuilders and private vendors will adjust prices to align with demand. The difference between this and previous recessions is that it was largely caused by a lack of available financing, as opposed to a dramatic fall in actual demand.

3.1.25. It is considered that, due to the historically strong land values in the area, it is unlikely that many sites will remain unviable in the medium term because of abnormal development costs or competing land uses, although some flat schemes in the centre of the town are likely to be delayed for some time.

3.1.26. No-one can predict accurately how long a recovery in the market will take, but most accept that markets operate in cycles. The last housing recession started in 1990 and did not recover until about 1995, but was caused by different economic circumstances.

3.1.27. Most experts consider that within about two years, a recovery will be under way. In those circumstances, land values will start to recover, and most abnormal development costs and community gain packages to be absorbed without falling below the value for alternative uses, such as general employment and warehousing land. Whilst economic viability is currently a significant issue, over the medium term there is unlikely to be delivery problems for the housing sites identified in this study. Viability issues and likely revised start dates have been built into site assessments and completion programmes.

3.1.28. In some parts of the country (including Kent) Councils are preparing temporary policies to allow developers to negotiate a flexible approach to planning gain contributions, including reduced or deferred payments. This is intended to ease viability problems and assist in maintaining delivery.

3.1.29. Each identified site has a dwelling yield attributed based on the characteristics of the particular site, as well as a consideration of the market. For some sites proposals will be sufficiently advanced that a yield will already be indicated from either a masterplan or from a planning application. However, for many sites a yield has been assessed. The starting point for assessing yield was the generation of indicative yields through the use of density multipliers, which provides an indication of the likely levels of housing provision.

3.1.30. However, every site is different and therefore the density multiplier is only an initial indication. In some cases, indicative layouts of typical sites have been used as a basis for considering appropriate developments and therefore yields.

3.1.31. SHLAAs are about informing the decisions to be made in the LDF about the relationship between housing provision and supply based on what is possible and what is desirable, but also what is probable. There are very many factors affecting whether an opportunity should be used and is likely to be developed, and design considerations are only one part of this spectrum of relevant issues. The design that proves to be 'right' for a site when it is eventually developed may well be different from, though just as appropriate as, what is suggested during the study, and for this reason, regular monitoring by the LPA is an essential element of the SHLAA.

3.1.32. Set out below is a selection of schemes currently, or soon to be, on the market. These were sourced from the surveys, from discussions with the Liaison Group, from local newspapers, developer's websites, and generic websites such as The Right Move.

Table 1: a selection of current housing developments

Developer/agent	Location	Dwelling types
INplace	Fairmeadow, Maidstone	1 bed flats, £42k 30%shared ownership, based on OMV of £140k
Maidstone Housing Trust's Regeneration Project	Brishing Lane, Parkwood	1bed flats, £117k
Crest Nicholson	Carmine House at Heath Road, Coxheath	1 & 2- bed flats, 3-bed terrace, £145k - £215k
Page & Wells	Hayle Mill Road, Maidstone	£150k **-** £220k 2 bed house
Bryant Homes	Sutton Road, Maidstone	2-bed flats, 2-bed terrace , 3-bed terraces,£165k - £250k
Wards	West Street Harrietsham	3-bed terrace, £165k
Wards, Connells	Postley Road Maidstone	2-bed flats, from £180k, 4-bed semi, £270k
Page & Wells	Western Road Maidstone	3 - bed houses, £195 - £215k
Geering & Colyer	Queen Elizabeth Square Miadstone	3-bed town houses, 1000 sq.ft, £200 - £230k
Abbey New Homes	Weavering Street Bearsted	3-bed semis, £220k
Rydon Homes	Marden Road Staplehurst	2 & 3 bed townhouses, from £250k
Jones Homes	Sittingbourne Road, Maidstone	4 bedroom terraced £275k
Jones Homes	Farleigh Lane Maidstone	4-bed town houses from £300k
Ward & partners / Bellway Homes	Ragstone Place, Ware Street, Bearsted	4/5 bedroom terraced house**,** from £310k - £400k
Savills New Homes	Tallow Court, Headcorn	2 bed traditional Kentish cottages, from £355k - £400k
PJ Livesey	Hayle Mill Road	Grade 2 LB conversion, 1-3-

		bed flats, £280k - £425k
Page & Wells / Wow Properties	East Farleigh	4 & 5-bed detached, £490k - £530k
Page & Wells	Bell Lane, Bearsted, Maidstone	4 & 5- bed £540k - £560k

3.1.33. Extensive discussions with developers and agents sought views on the state of the housing market, land values in different parts of the study area, sales vales, the types of development targeted by developers on different sites, and sales rates. The house building industry generally still works in imperial rather than metric measurements, and rather than confuse the situation with a mixture of both, or use metric for the sake of convention, we have opted here to use imperial measurements, such as sq. ft. and acres.

3.1.34. The following individuals and organisations assisted discussions:

Elizabeth Rix, Bovis

Philip Aelen, DHA Planning

Huw Edwards, Barton Wilmore

Man Sze Lau, Redrow Homes

David Lander, Boyer Planning

Heidi Kuppers, Rydon Homes

Mick Drury, Bret Drury Land and Planning

Ben Simpson, Drivas Jonas

Nigel Carr, Kier Property

Catherine Hughes, Catherine Hughes Associate

Anthony Hawkins, Bell Cornwell Partnership

Mark Linnington, RPC Land & New Homes

Liz Wrigley, KCC

Tracy-Ann Day, Cluttons

Peter Court, Bovis Homes

Graham Norton, Wealden Homes

Robert Stevenson, John Bishop Associates

Nick Brandreth, Lambert & Foster

David Pares, Sibley Pares

Brendan Ferrill, Maidstone Housing Trust

Martin Davison-White & John Taylor, Page & Wells

Andrew Wilford & Huw Edwards – Barton Willmore

Roger Hutton , Howard Hutton Associates

David Edwards, Taylor Wimpey

Marcus Baldwin, Hollamby Estates

Kevin Coleman, JB Planning

Tony Rix, Anthony Rix Chartered Surveyors

John Littlemore, Head of Housing, Maidstone Borough Council.

3.1.35. Maidstone's Housing Needs Survey (2005) identified an annual affordable housing shortfall of 962 units. This level of annual need is far higher than recent average annual build rates of 556 dwellings. In fact, the need represents 173% of Maidstone's total annual housing land supply. The provision of 962 affordable housing units per year is clearly not deliverable or sustainable.

3.1.36. Accordingly, the adopted Affordable Housing DPD (2006) seeks to negotiate a minimum 40% affordable housing provision for all new residential units on suitable sites. Of the 40% affordable housing, not less than 60% of units should provide for new rental (representing 24% of the total site yield) and 40% of dwellings should provide for shared ownership, shared equity and discounted market rent properties.

3.1.37. The Housing Strategy confirms the supply of new affordable homes as one of the Council's key housing priorities, and it concludes that affordable housing need can be best met through the provision of social rented housing.

3.1.38. The position is exacerbated by the continuation of the right to buy. The view of the Council's Housing Enabling Officer is that there is a continuing high unmet requirement for affordable housing, and particularly for social housing for rent.

Residential land values

3.1.39. Housing land values have collapsed in the last 18 months, with few developers contemplating the acquisition of sites. Land values are currently theoretical because of the current problems in the housing market, which means that few, if any, developers are contemplating further land purchases, preferring to build out sites currently under construction. If, as the Savills land index reports, land values have fallen by about 50%, the range will be about £750,000 to 900,000 per acre, assuming there are any purchasers who can secure finance. Anecdotal evidence suggests that actually achievable land values might currently be much lower.

3.1.40. At the peak of the market in September 2007 open market land vales reached about £1.5 million to £1.8 million per net developable acre, depending on the precise location and suitability to a particular market. Land values tend to be higher in the attractive suburbs of Maidstone, and in favoured villages, where higher sales prices can be achieved. Plot values for flats reached about £60,000. It may be 3 to 6 years before land values recover, but most experts consider that sales will start to recover during 2010 - 2011.

Coverage, saleable floorspace

3.1.41. In order to establish housing land values, assumptions need to be made about the likely saleable floorspace of the dwellings, in order to generate an overall sales turnover. The total floorspace is referred to as ‘coverage’, which measures the efficiency of a residential scheme, and evidently varies according to individual type of scheme. This is not simply a matter of housing density, but the amount of saleable floorspace that is accommodated in a unit area, and which governs the sales turnover, and hence the land value, of a housing scheme.

3.1.42. For example, a development of 16 units/acre (40 dph) could be a mix of 2 and 3-bed 2-storey units at 600-800 sq. ft each, giving an overall coverage of only 11,200 sq. ft. per acre (sfa). This would be regarded as inefficient coverage. However, the vast majority of housing schemes are now relatively efficient, ranging from around 15,000 to 18,000 sfa for predominantly 2 - 2.5 storey development, and up to 18,000 - 24,000 sfa for 2.5 - 4 storey scheme.

3.1.43. An efficient scheme of 16 units /acre (40 dph) would be likely to include a mix of larger 3-bed units with a higher average floorspace of say 1050 sq.ft, which would result in a scheme of 16,800 sfa, as opposed to 11,200 sfa for the previous example above for 2 and 3-bed units. A recent trend is that developers are finding, with the relaxation of density standards encouraged by PPS3, coverage is reducing to an average of about 16,000 sfa. There is often a diminishing return on the third storey in townhouses, since lower sale prices per sq.ft are achieved, and there comes a point where a higher land value can be generated on traditional 2-storey dwellings.

3.1.44. With that proviso, coverage has a major effect on sales turnover, and in turn, land value, which is a consequence of the relationship between sales turnover and development costs, profit, and overhead. Total turnover, and hence, land value, is dramatically increased by greater coverage. It must also be understood that the overall scheme and its density must be designed to accord with the character of the surrounding area.

Sales prices and rates

3.1.45. In terms of achievable sales prices, the open market for housing schemes in the Maidstone area generally varies from around £190 up to £260 per sq. ft (down from £220 - £300 per sq.ft.) in the more attractive areas, and for up-market specifications. The schemes that generate the highest sales values are those in the favoured suburbs of Maidstone such as Loose, Barming and Bearsted, as well as attractive villages like Yalding, Marden, Staplehurst, Marden, Lenham and Harrietsham.

3.1.46. Values are also affected by the size of the site, reflecting return on capital employed across a period of time, the cost of financing a purchase compared with the time taken to receive all site sales value. As a guide, in volume housebuilder terms, a small to medium site would be in the range of 100 to 300 dwellings that a developer can complete in 2 - 4 years, and is generally built out by a single developer. Larger sites will contain 300+ units, and will often be built by 2 - 6 developers sharing the infrastructure burden, and encouraged by land swapping. Sales, or build rates obviously have a major effect on the overall financing, and most volume housebuilder projects will seek to achieve around 40 - 50 sales per year under ‘normal’ market conditions in order to justify the land economics upon which the land purchase is based, although currently this is not possible. On larger sites (of, say, 6 developers), and allowing for RSL activity, this would result in some 400 - 500 dwellings per annum being completed.

3.1.47. Currently, sales are much reduced, with 1 or 2 sales per month being common, which if replicated across the year, will result in annual rates of around 15 dwellings per year, which would be disastrous particularly for the volume house builders who require high volume sales across the country to justify overheads and to maintain economies of scale. Smaller developers have attempted to minimise sales rate falls by price adjustment to reflect market demand. The volume builders have the ability to offer considerable incentives to purchasers, including shared equity, whereby the developer retains a share (typically 25%), until such time as the property has increased in value to enable the purchaser to take 100%.

3.1.48. Sales rates are not only governed by the capacity of the market, but also, particularly in flat schemes, by achievable construction programmes. Value is also obviously affected by development costs, physical as well as costs derived from planning and other legal agreements.

3.1.49. A summary of the market in terms of the theoretically achievable land values, sales price per sq. ft, coverage and house types is shown in the table below:

Table 2: summary of housing market indicators

Land value / net dev acre/ha	**Sale price/ sq ft/m**	**Sales rates per year**	**Coverage sq ft / acre sq.m/ha**	**Target house types by market**
£750k - £900k/ acre £1.85m - £2.2m/ha	£190 - £260 £2050 - £2800/ sq.m	15 - 30	16,000-18,000 3675 - 4130 sq.m/ha	Underlying strong market (temporarily depressed) for traditional 2, & 3 bed properties with gardens, and 4 & 5-bed detached dwellings in the right location. Current weak market for flats particularly on large schemes.

3.1.50. In summary, and as has been noted, the housing industry is in recession, but most experts consider that over the medium term a recovery will be under way. Land values will recover, and in a few years' time most abnormal development costs, (such as piled foundations, or remediation of contaminated land), and community gain packages, will be able to be absorbed without falling below the value for alternative uses, such as general employment and warehousing land. This SHLAA is a study over the 18 years to 2026, and whilst economic viability is currently a significant issue, over the medium term there is unlikely to be delivery problems for the housing sites identified in this study. Viability issues and likely revised start dates have been built into site assessments and completion programmes.

3.1.51. Viability is an issue that may start to be raised by developers in negotiating planning obligations if the market does not recover, or indeed falls back still further. The other unknown issue is the effects of the Community Infrastructure Levy, and the additional costs of implementing the Code for Sustainable Homes. Code level 3 is required to be delivered by 2010, level 4 by 2012, and level 6 by 2016. CLG's Cost Analysis the Code for Sustainable Homes (July 2008) estimated additional construction costs for level 6 vary from £16,775 for a flat, to £31,125 for a detached house, which will put further strain on viability.

3.1.52. Through the Core Strategy, the Council will need to investigate further the viability of its selected development strategy based on the identification of the strategic and other infrastructure that must be provided. The Council should endeavour not to set these infrastructure requirements through whatever mechanisms at too high a level that may impede the viability of sites.

3.1.53. As an overall conclusion, and despite the recent downturn, a summary of the views of agents, private housing developers and housing associations confirms a relatively strong underlying local market for both open market and affordable housing, which is temporarily depressed, but which is anticipated to be relatively strong in the foreseeable future. No-one can predict accurately how long a recovery in the market will take, but most accept that markets operate in cycles. The last housing recession started in 1990 and did not recover until about 1995, but was caused by different economic circumstances.

3.1.54. The SHLAA has taken account of the current recession in reaching conclusions about the phasing of development, and when housing completions will be delivered on each site. The Council will need to monitor carefully the housing market over the coming years in order to be able to respond in whatever way is appropriate to assist in the provision of housing across the market area.

4. Sites with Planning Permission for housing

Introduction

4.1.1. A major change from the previous system of UCS is the inclusion of sites with existing consent for housing development. The inclusion of this material is intended to provide a comprehensive view of the likely housing coming forward within the Borough and Figure 4 of the practice guidance illustrates the possible sources arising from sites within the planning process.

4.1.2. The permissions figures used are taken from the borough wide total in the AMR (December 2008), and therefore include all available dwellings with permission at 1st April 2008, across the Borough both within and outside all settlements.

4.1.3. Sites with planning permission for housing provide a separate source of provision as they are the most deliverable in relative terms, having overcome already all planning barriers to development. Sites with a capacity of 2,868[1] (net) dwellings had planning permission at 1st April 2008.

4.1.4. The study methodology confirms that all sites under construction at this date are regarded as deliverable (see paragraph 2.1.30). The number of dwellings on such sites is 1,146 (net). The analysis of sites where construction had not started was then undertaken. This assessment was split between sites of 10+ dwellings and sites of less than 10 dwellings.

4.1.5. Appendix 1 lists the sites with consent for 10+ dwellings which had not been commenced at 1st April 2008 base date. These sites have consent for a total of 1,288 (gross) dwellings. Council officers contacted the applicant/agents for these sites to determine whether and when the consent was likely to be implemented. The individual developer or landowner provided market evidence confirming when completions might be expected. This exercise revealed that sites with permission for some 80 dwellings were unlikely to come forward bringing the assessment of deliverable consents to **1,208 dwellings (gross) (1,196 net).** Reflecting the confidence in the medium term housing market set out in para 3.1.50, 883 have been attributed to the first five year period, and 325 dwellings within years 6 - 10.

4.1.6. The implementation of non-started sites of less than 10 dwellings was then considered. These sites have consent for 526 dwellings (gross). Council officers analysed the past rate of implementation based on the expiration of planning consents for sites of this size in the Borough. Taking a cautious approach which will be reviewed, the SHLAA accordingly applies an implementation rate of 90% to extant consents on sites of less than 10 dwellings. This brings the assessment of deliverable consents to **473 (gross) dwellings (401 net).**

[1] AMR (Dec 08) figure of 2,910 includes in error 94 dwellings on sites where consent had lapsed and excludes consents for 52 dwellings which are unlikely to be implemented.

4.1.7. Each planning consent is limited by condition requiring commencement within 3 years or 5 years. The market for such sites remains strong in the Borough in the medium term, and it is therefore considered that there is no reason to suppose that the majority will not come forward during the next 5 years.

Table 3: Yields from sites with planning consent at 1st April 2008

		2008/9 to 2013/14	2014/15 to 2018/19	Total (gross)	Total (net)
Dwellings on sites under construction at 1/4/08		1,226	0	**1,226**	**1,146**
Dwellings on sites not-started at 1/4/08					
	10+ dwellings[2]	883	325	**1,208**	**1,196**
	< 10 dwellings[3]	473	0	**473**	**401**
TOTAL		**2,582**	**325**	**2,907**	**2,743**

Summary

4.1.8. Analysis indicates a yield of 2,907 (gross) dwellings from sites with planning permission at 1 April 2008, 2,582 of which are predicted to be implemented for development within 5 years.

4.1.9. The figures provide a clear indication of the total provision of housing which should come forward, discounting sites where the developer has indicated that the site is unlikely to be implemented and applying a discounting rate to sites with consent for less than 10 dwellings.

4.1.10. It will be for the Council to continually monitor the provision of housing land and completions in order to confirm that the figures are being achieved.

- [2] See implementation assessment in Appendix 1
- [3] Implementation rate of 90% applied

5. Site Specific Sources

5.1.1. The identification of a range of sites from various sources is discussed in earlier sections. From this wide range of sources, 289 sites (both greenfield and brownfield) were identified. Each was mapped on the GIS base and linked to an Access Database which stored information about the site and assessment of its potential for housing.

5.1.2. All the sites within and adjacent to the study settlements were visited and assessed by the consultant team and discussed with the relevant officers of the Council. A number of sites identified through the study, mostly promoted by land owners or developers through the RPRS exercise, were outside the built up areas in the open countryside, and for this reason they were considered to be unsuitable for development.

5.1.3. The list of the sites assessed as being developable is included in Appendix 3, and each is considered in detail in Appendix 4. For each site, consideration of its particular characteristics, assessment of the local market and owner expectations all combined to provide a likely yield for the site and, in line with the practice guidance, was indicated in one of three time periods.

5.1.4. Where potential sites overlapped and deemed developable, the yield has been ascribed to only one of the sites and this is explained in the relevant the site schedules in Appendix 4.

Overcoming constraints

5.1.5. Of the 289 sites considered, 198 were rejected as unsuitable, unavailable or unachievable, and these are included in the list of rejected sites in Appendix 2. There are a wide range of reasons or constraints why a site might not be currently developable. These include:

- physical reasons, such as flood zone, unsatisfactory access, or gradient
- policy or conservation reasons that protect an alternative use
- availability reasons
- multi-ownership issues where a number of years need to be allowed for site assembly
- infrastructure issues, usually on large complex sites where a significant amount of initial infrastructure needs to be completed before residential completions can begin to flow
- economic viability reasons where the starts on many sites have been delayed to allow for economic recovery.

5.1.6. If it is considered that one or more of these constraints can be overcome within the study period, a comment is made in the reason for rejection drawing attention to the fact that regular monitoring should review the constraint. The period anticipated for development is dealt with by delaying the completion period until sufficient time has elapsed to overcome the constraint.

Location and types of accepted sites

5.1.7. The SHLAA database categorises sites according to location and type of site, enabling complex interrogation which will allow the Council to test many different development distribution permutations. The table below summarises the locational distribution for the sites accepted in principle:

Table 4: Accepted sites - type and location

SB - settlement boundary PDL - previously developed land GF - greenfield

MUE - Maidstone urban extension OC - open countryside

Site location	total	Maidstone	Potential Rural Service Centres	Potential Large Village	Open countryside
Inside SB - PDL	20	15	3	2	0
Inside SB - GF	0	0	0	0	0
Inside SB - GF allocation	6	2	3	1 (site 250)	0
Adjacent to SB - PDL	8	4	3	1	0
Adjacent to SB - GF	39	10	25	4	0
MUE	13	13	0	0	0
OC - PDL	2	0	0	0	2
Total sites	88	44	34	8	2

Potential yield from sites within settlement boundaries

(PDL and Greenfield, including Local Plan allocations)

5.1.8. The 26 sites within settlement boundaries have a potential dwelling capacity of **2462 dwellings** (net) in the period to 2026. Of these, 1505 dwellings are on brownfield sites, and the remaining 957 dwellings are on greenfield sites, comprising the outstanding greenfield Local Plan allocations outside the MUE area, (sites 126, 162, 163, 211, 249 and 250). The two greenfield Local Plan allocations at Sutton Road (sites 145, 127 and 161)) are excluded from the 957 total, and considered below as part of the potential MUE area. Based on the individual site assessments, 1,334 dwellings are projected to come forward in the first 5 years, 918 in the 5-10 year period, and 210 in the 10+ year period. The yield can be broken down further, as detailed in Table 5 and Table 6 below:

Table 5: Summary yield from accepted sites within study settlements (PDL and greenfield)

Period/Settlement	**2008/9 – 2012/13**	**2013/14 – 2017/18**	**2018/19 – 2025/26**	**2008/9 – 2025/6**
Maidstone (PDL)	882	568	0	**1450**
Maidstone (greenfield)	240	350	210	**800**
Maidstone (Total)	1122	918	210	**2250**
Potential Rural Service Centre (PDL)	36	0	0	**36**
Potential Rural Service Centre (greenfield)	150	0	0	**150**
Potential Rural Service Centre (Total)	186	0	0	**186**
Potential Larger Villages (PDL)	19	0	0	**19**
Potential Larger Villages (greenfield)	7	0	0	**7**
Potential Larger Villages (Total)	26	0	0	**26**
TOTAL (net dwellings)	**1334**	**918**	**210**	**2462**

Table 6: Summary yield from accepted sites within the potential Rural Service Centres

Potential RSC	**2008/9 – 2012/13**	**2013/14 – 2017/18**	**2018/19 – 2025/26**	**2008/9 – 2025/26**
Coxheath	0	0	0	0
Harrietsham	116	0	0	116
Headcorn	20	0	0	20
Lenham	0	0	0	0
Marden	0	0	0	0
Staplehurst	50	0	0	50
Yalding	0	0	0	0
Total	**186**	**0**	**0**	**186**

Potential yield from sites accepted for the SHLAA outside settlement boundaries (PDL and greenfield, excluding the potential Maidstone Urban Extension – MUE)

5.1.9. The 50 sites outside and adjacent to the study settlements which have been accepted for the purposes of the SHLAA have a potential dwelling capacity of **4320 dwellings** in the period to 2026. Of these, 3649 dwellings are on greenfield sites and 671 dwellings are on brownfield sites. This excludes the number of sites within the proposed Maidstone Urban Extension area which are discussed below.

5.1.10. It should be noted that two of these sites comprise a major brownfield site lying outside, and not adjacent to, a study settlement (sites 212 & 281- the Syngenta works near Yalding) for which the Council has previously prepared a development brief promoting mixed use development. This site could provide a potential yield of 195 dwellings.

5.1.11. From 2008/9 - 2012/13, it is estimated that there could potentially be 1765 completions, then 2495 completions in the period 2013/14 – 2017/18, and finally there could be a further 60 completions between 2018/19 and 2025/26.

5.1.12. These figures can be broken down further, as detailed in the tables below:

Table 7: Summary yield from accepted sites outside settlement boundaries

Period/Settlement	**2008/9 – 2012/13**	**2013/14 – 2017/18**	**2018/19 – 2025/26**	**2008/9 – 2025/26**
Maidstone (PDL)	31	0	0	**31**
Maidstone (greenfield)	685	720	0	**1405**
Maidstone (Total)	716	720	0	**1436**
Potential Rural Service Centre (PDL)	95	300	40	**435**
Potential Rural Service Centre (greenfield)	801	1315	20	**2136**
Potential Rural Service Centre (Total)	896	1615	60	**2571**
Potential Larger Villages (PDL)	10	0	0	**10**
Potential Larger Villages (greenfield)	73	35	0	**108**
Potential Larger Villages (Total)	83	35	0	**118**
Outside settlements (2 sites)	70	125	0	195
TOTAL (net dwellings)	**1765**	**2495**	**60**	**4320**

Table 8: Summary yield from accepted sites adjacent to the potential Rural Service Centres' settlement boundaries

Potential RSC	2008/9 – 2012/13	2013/14 – 2017/18	2018/19 – 2025/26	2008/9 – 2025/26
Coxheath	88	280	20	388
Harrietsham	170	60	0	230
Headcorn	245	470	40	755
Lenham	63	70	0	133
Marden	185	385	0	570
Staplehurst	115	320	0	435
Yalding[4]	30	30	0	60
Total	**896**	**1615**	**60**	**2571**

Potential yield from the proposed Maidstone Urban Extension

5.1.13. An area of search to the south / south-east of Maidstone was identified in the Core Strategy Preferred Options Report of January 2007 as a potential Maidstone Urban Extension (MUE) and supported by technical analysis and consultation recorded in the background documents, notably the Preferred Location for Future Development, Background Document: BD2, January 2007.

5.1.14. The SHLAA provides an overview of sites that are demonstrably available, and either deliverable or developable across the study period, with an estimate of the potential dwelling yield. The analysis of the sites within the area of search should be viewed in this context.

5.1.15. 13 component sites were submitted by landowners to the Council within the area of search to the south / south-east of Maidstone. This includes the two greenfield Local Plan allocations at Sutton Road (sites 145 and 127) and Langley Park Farm West (site 161) which fall within the area of search. In order to provide a logical means for assessment, the sites have been grouped together in three broad areas, A, B, and C, shown on the

[4] not including sites 212 & 281 - Syngenta

settlement and individual site plans. Area A lies immediately north of Sutton Road, adjoining the urban area, east of the Shepway area and west of Otham village. Area B lies adjacent and to the east of the Parkwood employment area, south of Sutton Road. Area C is east of Otham village and north of Sutton Road and would logically form phase 2 of a development after Area A.

5.1.16. Some sites within these three areas have not been promoted through the RPRS exercise and availability cannot therefore be demonstrated but it would be illogical to exclude them from consideration, since they lie between two promoted sites. It is anticipated that if the Council eventually select these areas for development is probable that these 'omitted' sites would come forward.

5.1.17. In order to assess developability, viability, and likely development periods for the 3 component areas, a broad assessment of the dwelling capacities of the potential Areas of Search for the Urban Extension has been prepared, by means of a 'land use budget'. This applies a methodology used elsewhere in England for urban extensions in similar circumstances. This enables a calculation of gross to net residential land areas, the basis of which is set out below:

- Dwelling occupancy 2.3 persons per dwelling
- Employment land 8% of gross site area
- Employment density 20 sq. m. per job
- Community/local facilities 0.8ha per 1000 persons
- Primary school 2.5ha per 1500 persons
- Secondary school 8ha for greater than 6000 persons or 2500dwellings
- Parks & open space 0.6ha per 1000 persons
- Pitches 1.6 ha per 1000 persons

5.1.18. Area A covers about 180 ha, and land budget calculations indicate that the dwelling capacity could be in the region of 4600 dwellings. This is based on a net area of about 92 ha at an average net density of 50 dph. Assuming adoption of the Core Strategy by late 2011, planning permission could be granted by about mid-2013, and with a lead-in period for infrastructure provision, completions could start in about 2014/15. These timescales will be subject to more detailed analysis by the Council.

5.1.19. Having discussed likely development rates with promoters of strategic urban extensions of this size, and in particular the likely lead developer of this potential urban extension, the average completion rate should be in the region of 330 dwellings per annum (dpa) over the whole development period, with a gradual build-up rate in the first 3 years, peaking at 350-400 dpa in the middle period, so the total of 4000 units might be completed by April 2026, depending on the recovery of the housing market, and assuming up to 5 developers on site, plus RSLs.

5.1.20. If Area B was developed at the same time as Area A, the completion rate for each area would be halved. This is because, being adjacent to each other, they would effectively operate as one site, and the capacity of the market for one large site is considered by professionals to be in the region of about 350-400 dwellings annually, with about 5 developers each producing 60-70 dwellings annually on average, including affordable units. So if both Areas A and B were being built at the same time, the completion rate for each would be about 175-200 dpa.

5.1.21. Area B covers about 104 ha, and land budget calculations indicate that the dwelling capacity could be in the region of 2700 dwellings. Based on the same timing assumptions as for Area A, completions could start in about 2014/15. The average completion rate should be in the region of 350-400 dwellings per annum (dpa) with a gradual build-up rate in the first 3 years, so the development of about 2700 units might be complete by about 2023, depending on the recovery of the housing market, and assuming an average of 5 developers on site, plus RSLs. If Area B was developed at the same time as Area A, the completion rate for each area would be halved, as explained above.

5.1.22. Area C covers about 170 ha, and land budget calculations indicate that the dwelling capacity could be in the region of 4300 dwellings. This is based on a net area of about 86 ha, at an average net density of 50 dph. Based on the same timing assumptions as for Area A, planning permission could be granted by about 2013. It has been noted that Area C would logically be preceded by Area A, and since it has been assumed that Area A will not be completed before 2026, there is little prospect of any completions within Area C before then. In those circumstances, at an average completion rate of 350-400 dwellings per annum (dpa) Area C's 11 year development programme for 4300 dwellings might be from 2027 to 2039.

Summary

5.1.23. In the MUE areas there are 13 sites which have a total development potential of 11,600 dwellings. If Area A is developed independently, 1000 units could be completed between 2013 and 2018, with a further 3000 between 2018 and 2026. The remaining 600 units would be completed by 2028.

5.1.24. If Areas A and B are developed concurrently, it is anticipated that 1000 units could be completed between 2013 and 2018, with 3000 between 2018 and 2026. The remaining 3300 together with the 4300 dwellings from Area C, could be completed post-2026, over a development period of about 20 years.

5.1.25. The overall total dwelling potential is set out in the table below:

Table 9: Summary yield from sites within the proposed Maidstone Urban Extension (MUE) area:

Period/ MUE area	**2008/9 – 2012/13**	**2013/14 – 2017/18**	**2018/19 – 2025/26**	**Total 2008/9-2025/26**	Post 2026
Area A (individually)	0	1000	3000	**4000**	600
Area B (individually)	0	1000	1700	**2700**	0
Areas A & B (concurrently)	0	1000	3000	**4000**	3300
Area C	0	0	0	**0**	4300

6. Housing potential of windfall

Introduction

6.1.1. PPS3 makes it clear that housing should come forward on identified sites, and that allowances for windfall should not be made in the first 10 years of land supply (2008 - 2018), unless there are exceptional circumstances where LPAs can provide robust evidence of genuine local circumstances that prevent specific sites being identified. Therefore, no allowance is made in the first 10 years of the study period.

6.1.2. For the period beyond the first 10 years from the base date, windfall development is likely to continue as it has done historically, so this study projects a reasonable windfall allowance on previously developed sites within the study settlements for the 8-year period between 2018 and 2026.

6.1.3. Windfall provision within the Maidstone area has traditionally provided a significant proportion of the housing supply, much of previous development coming forward from the redevelopment of sites and buildings previously in non residential uses. In the context of a strengthening market in the medium term following a recovery from recession, a supply from this source is very likely to continue.

6.1.4. Furthermore, it is not possible for this study to identify every site that will come forward for residential development. Indeed, the study has not even attempted to identify small sites (those yielding less than 5 dwellings) as to seek to do so would mean identifying sites of a scale down to individual housing plots, living over the shop units and/or sub-division of smaller buildings. In order to arrive at an appropriate estimate of future yield on both small and large sites consideration of previous completion figures has been made.

6.1.5. The analysis below is based on figures provided by the Council regarding housing completions from 2004/5 to 2007/8. Past completion rates are used as a basis to consider the likely future level of windfall housing development on previously developed land. The figures for completion rates used in the analysis below exclude sites outside development boundaries which may have come forward in the past and any dwellings coming forward on allocated sites. It is considered that the conditions from 2004/5 to 2007/8 are unlikely to be much different to 2018 - 2026, since by 2018 the economy should have recovered to normal conditions.

Findings

6.1.6. The table below illustrates completion trends for both small (1-4 dwellings) and large (5+) sites in the study settlements over the last 4 years.

Table 10: Past completion rates on PDL windfall sites (2004/5 – 2007/8)

Location	Site Size (no. dwellings)	Completions 04/05 to 07/08	Annual average
PDL within Maidstone	>5	287	72
	5+	1593	398
PDL within other settlements	>5	114	28
	5+	184	46
Total		**2178**	**544**

6.1.7. This table shows that in Maidstone small sites have been completed at an average rate of 72 dwellings per annum (dpa), whilst larger sites delivered significantly more averaging almost 400 dpa. In other smaller settlements, the small site completion rate was 28 dpa, and large sites contributed 46 dpa. It should be noted that the dwelling figures are for previously developed sites only and specifically exclude 'greenfield windfalls'.

Table 11: Sources of PDL completions on windfall sites (2004/5 – 2007/8)

Location	Site Size (no. dwellings)	Completions 04/05 to 07/08			Total Completions
		Non residential to residential[5]	Residential to residential[6]	Within Curtilage[7]	
PDL within Maidstone	>5	71	139	77	287
	5+	1239	264	90	1593
PDL within other settlements	>5	24	35	55	114
	5+	77	62	45	184
Total		**1411**	**500**	**267**	**2178**

6.1.8. Future housing provision on small previously developed sites within settlements will continue to come forward and the market will seek to identify opportunities where

[5] Change of use, demolition (non-residential) & redevelopment
[6] Sub-division, conversion, demolition (residential) & redevelopment
[7] On garden land, demolition of outbuildings & redevelopment

possible. The planning policy framework currently restricts the supply of land outside of settlements and this will continue to focus developer attention within settlement boundaries. There is no reason to suppose that, for small sites, windfall development will not continue at similar rates in the future, and accordingly, a windfall allowance is calculated as 70 dpa for Maidstone and 25 dpa dwellings for the remaining study settlements, for the 8-year period between 2018/19 and 2025/26, equating to a total annual rate of 95 dpa.

6.1.9. Large windfall site completions averaged 444 dpa, mostly in Maidstone, over the 4-year period April 2004 to April 2008. This was a particularly buoyant period for housebuilding, except in the second half of the 2007 - 2008 period, so it would not be appropriate to replicate these completion rates.

6.1.10. Throughout this period greenfield Local Plan housing allocations were 'frozen' from release, and therefore unavailable for development, in response to a continuous supply of consents and completions from windfall sites and brownfield allocations. Furthermore, it should be borne in mind that potential windfall supply for year 10 onwards will be in the context of 'new' allocations coming forward through the LDF.

6.1.11. On the other hand, it is in the nature of large urban areas that there is a continuous process of renewal, and sites and buildings will be redeveloped for a variety of uses including dwellings. This renewal process is less likely to be replicated over the long term in the rural settlements since there is a small and finite supply of suitable sites for change of use to residential. There is no good reason to suppose that this will not happen in Maidstone itself, with a large stock of outdated buildings. Table 11 confirms the significance of the redevelopment of non-residential sites in the town; some 78% of the supply from large PDL windfall sites in Maidstone since 2004/5 has come forward from this source.

6.1.12. For comparison purposes, this SHLAA has identified large pdl sites in Maidstone with a capacity of 882 units for the period 2008 - 2013, and 628 units for the period 2013-2018, an average of 151 dpa. All these sites are 'windfall' type sites, that is, they have not been identified and allocated through the development plan to date.

6.1.13. The SHLAA has been through a process of rejecting sites for various reasons which all appear in Appendix 2. Some of these are in principle suitable for redevelopment for residential or mixed-use development, and represent sound evidence of typical sites that may come forward during the period 2018 - 2026. There will also be others of course that are not able to be currently identified. Since there is no certainty about this process, but a good probability, a cautious approach is advocated.

6.1.14. Such a cautious approach would direct that large windfall sites will continue to come forward but at a reduced rate. Projecting a windfall allowance for Maidstone town alone, instead of the past rate of 398 dpa, or the rate indicated by the SHLAA for 2008 - 2018 of 151 dpa, a lower rate of 50 dpa is suggested, to take account of uncertainty. Of course, if actual achievable rates are higher, these will be counted against requirements as they gain permission, and should be monitored against progress in regular SHLAA reviews. This will provide a yield of 400 units between 2018/19 and 2025/26.

Summary

Table 12: Estimated yield from windfall development, 2018/19 – 2025/26

	Annual rate	**Total predicted dwellings**
Small sites 1 - 4 dwellings	95	760
Large sites 5+ dwellings	50	400

7. Review of the Assessment

7.1.1. The SHLAA Practice Guidance requires that figures for the anticipated level of housing provision in the period to 2026 are presented in order to be compared with the requirements set by the Regional Spatial Strategy (RSS).

7.1.2. The South East RSS is still to be adopted. The Panel Report identifies a housing requirement for Maidstone for the 20 year period 2006-2026 of a maximum of 10,080 dwellings, whilst the Proposed Changes expects Maidstone to deliver a minimum of 11,080 dwellings.

7.1.3. The supply from all other sources discussed in the preceding sections, is set out in Table 13 below, and detailed in Appendices 1, 3 and 4. In addition, the SHLAA base date is 1st April 2008 and therefore the number of completions (1706 dwellings) between 1st April 2006 and end of March 2008 need to be taken into consideration.

Table 13: Summary yield (net) from completions, consents, accepted SHLAA sites and windfall assessment

		Maidstone	Potential RSCs	Potential large villages	Total
Completions 06/07 and 07/08					**1706**
Planning consents	Sites under construction				1146
	Sites not started: 10+ dwellings				1196
	Sites not started: >10 dwellings				401
Sub total					**2743**
Potential yield from PDL sites within settlements	Years 2008/9 – 2012/13	882	36	19	937
	2013/14-2017/18	568	0	0	568
	2018/19-202/26	0	0	0	0
Sub total		**1450**	**36**	**19**	**1505**
Potential yield from greenfield sites within settlements (the outstanding greenfield Local Plan allocations)	Years 2008/9 – 2012/13	240	150	7	397
	2013/14-2017/18	350	0	0	350
	2018/19-202526	210	0	0	210
Sub total		**800**	**150**	**7**	**957**
Potential yield from sites outside settlements (including MUE)	Years 2008/ -2012/13	716	896	83	1695
	2013/14-2017/18	1720	1615	35	3370
	2018/19-2025/26	3000	60	0	3060
Sub total		**5436**	**2571**	**118**	**8125**
Syngenta site, Yalding	70 units 2008/9 - 2012/13				**70**
	125 units 2013/14-2017/18				**125**
Total SHLAA sites yield (excluding completions & consents)		**7680**	**2689**	**212**	**10782**
Total windfall	2018/19-2025/26				**1160**
Total SHLAA yield sites + windfall					**11942**
Grand total SHLAA sites + consents + completions + windfall	**16,391**				
Comparison with RSS requirement of 10,080	**6,311 in excess**				
Comparision with RSS requirement of 11,080	**5,311 in excess**				

7.1.4. The total potential land supply for housing is therefore 16,391 dwellings, to set against the RSS requirement of either 10,080 or 11,080 units. Accordingly, the SHLAA has identified a sufficient supply of housing land to meet both levels of housing provision. This includes the release of sites beyond the existing built-up areas as individual sites as well as a major potential urban extension. In these circumstances, it will therefore not be necessary to carry out an assessment of broad locations to meet any shortfall (Stage 9 of the Guidance).

7.1.5. The 2006 Urban Capacity Study (UCS) identified 72 sites from within the settlements with the potential to provide for 5,077 dwellings up to 2026, which included 7 'frozen' allocation sites This figure is considerable higher than the findings of this Maidstone SHLAA, for which the equivalent yield is 2,462 dwellings on sites within settlements including the greenfield allocations, only 48% of the amount estimated by the UCS. The main reason for the difference is due to the fact that the SHLAA Guidance requires demonstrable evidence that sites are deliverable, that is, achievable, suitable and available. If sites are not deliverable, they need to be demonstrably developable which means that they must be in a suitable location have a reasonable prospect of being available and likely to be developed at a predictable point in time.

7.1.6. Many of the sites included in previous urban capacity studies were not demonstrably deliverable or developable, and so have been rejected (Appendix 2). In accordance with Government guidance, the Council cannot rely on undevelopable sites to satisfy RSS requirements. Typical reasons for rejecting sites previously included in the UCS are:

- No evidence of availability, for instance, being in an alternative use with no owner intention to develop for housing in the foreseeable future
- No active promotion of a site, despite being in principle suitable for housing, in which case no reliance can be placed upon delivery.

7.1.7. Such sites that are in principle suitable for housing may become available in the future and for this reason they should be carefully monitored by the Council in SHLAA reviews, since they could contribute to future housing land supply.

Risk Assessment

7.1.8. The Guidance recommends that Stage 8 includes an overall risk assessment that considers whether sites will come forward for development as anticipated. Each site has been assessed in the context of an inquisitive database. This first assesses the principle of whether a site should be accepted or rejected as a potential site taking account of the exclusions set out in stages 1 and 2 of the study methodology. If it is initially accepted, a site is subjected a detailed appraisal that assesses:

- Policy restrictions
- Physical constraints
- Potential impacts of the development

- Suitability for housing in principle
- Availability of the site in discussion with the developer
- Achievability and viability in discussion with the developer
- Market assessment
- Dwelling yield attributed by year, taking account of the market

7.1.9. This painstaking analysis has taken account of every known current risk that might affect the delivery of a site and it is therefore considered that this process represents an appropriate assessment of risk.

8. Summary

8.1.1. This report has followed the process for undertaking a SHLAA set out in the CLG Practice Guidance in order to identify as many sites with housing potential in and around the settlements of Maidstone Borough. It has sought to do this in an inclusive and objective manner, consulting with land owners, developers and local agents, Ward Councillors, as well as with officers of the Council.

8.1.2. It has considered all sites coming forward from previous studies along with sites promoted from a widespread call for sites. Additional sites have been identified through survey such that this study provides as comprehensive a review as possible.

8.1.3. The SHLAA is intended as part of the evidence base for the LDF and the inclusion of any site within this study does not imply that any particular scheme will be included in the LDF or granted permission. Sites are considered based on available information and those considered to be deliverable and developable are generally acceptable as housing sites in principle in the context of the SHLAA.

8.1.4. The total number of dwellings on sites which can come forward on identified sites as set out in Section 7, made up of sites completed (1706), sites with planning permission (2743) specific brownfield sites within the study settlements (1505), is 5,954 units, (excluding the five 'frozen' greenfield allocations - 957). With the addition of a windfall allowance of 1,160 units, the potential total becomes 7,114 dwellings.

8.1.5. The RSS requirement of either 10,080 or 11,080 is greater than this, so some greenfield land beyond the existing built up areas must be released to meet the shortfall of between 2,966 and 3,966 units. The study has identified potential sites on land beyond the existing built up areas with a capacity of 9,277 dwellings. The SHLAA thus provides reliable evidence for the Council to achieve the most sustainable selection of sites for inclusion in the LDF to meet its requirements.

8.1.6. The study has not sought to identify specific sites which may provide 4 or fewer dwellings in the study settlements. There is a logistical problem if there is no site size survey threshold, since it is impossible to identify all sites where owners will seek a change of use. Examples of this are plots in side or rear gardens, conversion of large houses or space above commercial premises into flats. However, many such small windfall type sites are included in the study as small permissions in Section 4. In addition, an allowance of 760 dwellings for the 8 year period 2018 - 2026 is suggested for small windfall sites in Section 6, plus a further allowance for large sites for the same period of 400 units.

8.1.7. A key element of this study should be a regular review, possibly as part of the AMR exercise, and it is through this monitoring that the Council should identify how specific sites progress towards development, which other sites, including those rejected in this SHLAA, come into the system and how progress is being made towards fulfilling the requirements of the RSS.

8.1.8. This study should provide the basis for future monitoring and enable the Council to manage the future release of land as required.

Appendix 1
Sites with planning permission

Appendix 2
Table of rejected sites

Appendix 3
Site yield summary table

Appendix 4
Opportunity site analysis forms and location plans

Appendix 5
Settlement Maps

Appendix 6

Site maps for rejected sites not adjacent to study settlements