

MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION

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SESSION 3B – ALTERNATIVE STRATEGIC DEVELOPMENT

Deadline for Statements: Thursday 15th September.

Please refer to the Inspector's Procedural Guidance Notes for information on the provision of hearing statements.

Inspector's Agenda with Matters, Issues, and Questions

1. Introduction

- 1.1. The Spatial Strategy Topic Paper [SUB 007] sets out the Council's reasoning behind its chosen spatial strategy.
- 1.2. Part 2 of the Sustainability Appraisal Report (Feb 2016) [SUB 002(B)] describes the alternative strategies that were considered in order to deliver in full the objectively assessed needs. Appendix II [SUB 002(C)] sets out the Appraisal of those alternatives.
- 1.3. Many representations are critical of aspects of the spatial strategy. But this is typically linked to specific concerns about the overall scale of development proposed and the local consequences in terms of environmental effects and/or the pressures on transport and other infrastructure. These will be examined at other hearings relating to local areas and relevant subjects.

Issue (i) Whether the plan is justified as the most appropriate spatial strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Housing Strategic Alternatives

- 1.4. The Local Plan seeks to make full provision of housing to meet the Objectively Assessed Housing Need of 18,560 dwellings. Many Representors have objected to one or more proposed housing allocations on various

grounds including transport and infrastructure constraints, flood risk, environmental impacts or deliverability. Some Representatives consider the assessed needs to be too low and others that they are too high. That matter will be considered at other sessions. In the event that it is concluded that for these or other reasons there would be a shortfall of supply against assessed needs, the Council may be asked to identify alternative sources of supply.

Qn3.1 Should it be concluded that there would be a shortfall of supply against the OAHN, , what alternative means would be available for making up a shortfall if that is measured in: (a) hundreds or (b) thousands?

Qn3.2 What scope may exist for addressing any shortfall by provision outside the Borough boundary and how might that be accommodated having regard in particular to the timescales of the preparation of other Local Plans?

- 1.5. The officer report to committee on 16 April 2016 stated that the Invicta Park Barracks had not been declared surplus by the MoD and that no reliance could be placed on the site being available. Officers were said to be in active dialogue with the MoD.

Qn3.3 What is the updated position in respect of the availability of the Invicta Park Barracks site?

Qn3.4 Should the Ministry of Defence determine (before the Examination is completed and the Report submitted) that the Invicta Park Barracks will not be surplus to requirements during the Plan period, how should the consequential loss of 1,300 dwellings in the later period of the plan be addressed?

- 1.6. In the preparation of the Local Plan 5 alternative strategies (H1-H5) were considered for housing in the sustainability appraisal.

- 1.7. H3 corresponds to the chosen strategy to deliver 18,560 dwellings. It includes specific housing allocations, and 3 'Broad Locations' for further development.
- 1.8. H4 would deliver the same number of dwellings but without the 3 'Broad Locations' and with a new settlement south east of the urban area.
- 1.9. H5 would be similar to H3 with the same number of dwellings and 2 of the Broad Locations but without a new settlement or the Lenham Broad Location and with that housing instead dispersed across the rural service centres.
- 1.10. H1 and H2 would each provide for 19,600 dwellings with H1 providing more dwellings in the rural centres and H2 including a new settlement for 4,500 dwellings south east of Maidstone. Both include the 3 Broad Locations.
- 1.11. A new settlement had previously been considered in the preparation of the draft Core Strategy and in 3 of 6 alternatives considered in an earlier sustainability appraisal in March 2014. Some of those alternatives proposed lower levels of housing provision than the objectively assessed needs and did not identify means of addressing that shortfall.
- 1.12. The alternative strategies that included a new settlement would have depended on major infrastructure investment including the new road between the A20 and A274 which Kent County Council and some other Representatives consider necessary to address congestion in Maidstone and rat running through country lanes.
- 1.13. The Topic Paper concludes that the need for significant new infrastructure associated with a new settlement whilst retaining a viable development would be likely to adversely affect the delivery of the Local Plan and lead to reduced or delayed infrastructure.
- 1.14. Golding Homes Ltd (R1950) continues to promote the development of a new settlement for 5,000 dwellings to the south east of Maidstone which would include a 'substantial contribution' to a Leeds-Langley Relief road and represent an alternative strategy. The following grounds are cited:

- a) A claimed absolute shortfall in land supply for housing
 - Double counting between schemes that have commenced and which are shown for future delivery
 - Inclusion of duplicates and time expired consents on a list of consented schemes
 - Query as to whether demolitions have been netted off
- b) The need for additional affordable housing (considered at Hearing Session 2B)
- c) The need for provision for self-build housing (considered at Session 2B)
- d) A reduced need for harmful development around the rural service centres
- e) The publication by DCLG of 'Locally-Led Garden Villages, Town and Cities' which indicates Government support for garden villages of 1,500-10,000 homes including a limited amount of funding. (Bids were due by 31 July 2016).

Qn3.5 Can Golding Homes show examples of the claimed housing supply shortfall?

Qn3.6 What is the Council's response to the Golding allegations in relation to housing supply?

Qn3.7 The estimated cost of a Leeds-Langley Relief Road has been put at £50-£80m. Can Golding estimate what 'significant contribution' could be made to that road by their proposed development and what other sources of funding would be needed?

Qn3.8 When might such a road be available for use?

Qn3.9 The Local Plan period runs to 2031. When would the first delivery of housing in a new settlement occur and how much housing could be delivered by 2031?

Mixed Development Strategic Alternative

- 1.15. At the former Detling Aerodrome west of the A249 Binbury Park Estates/ Quinn Estates (R19419) propose an alternative development of: 1,250 new dwellings on 40ha; a 'commercial hub of regional significance' on 24ha; a 'significant country park' of 100ha; and a park and ride car park of unspecified size. Reference is also made to education and community facilities. That would be a development of strategic scale. The site lies within the Kent Downs AONB.
- 1.16. The Representors claim that Kent County Council supported development at this location in their Regulation 18 comments and also note that the Inspector for the Waterside Park appeal referred to Detling Aerodrome as a possible alternative employment location. The Representors acknowledge that this would be a major development in a designated AONB. The representations are accompanied by a Landscape Issues Report and a Site Access Review which proposes a new roundabout on the A249. The Representors consider that the development would have a less adverse impact on the landscape than the Woodcut Farm strategic employment allocation (EMP1(5)). They consider that the Borough Council has provided inadequate reasons for not selecting the site for development.
- 1.17. The National Planning Policy Framework at paragraph 116 provides that *'Planning permission should be refused for major developments in designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.'* Considerations include (in summary) an assessment of:
- need, including in terms of national considerations and the impact on the local economy
 - the cost of, and scope for, developing outside the designated area or meeting the need in some other way
 - any detrimental effect on the environment, landscape and recreational opportunities and the extent to which it can be moderated.
- 1.18. The Representors consider that the development is justified by exceptional circumstances which are described as: delivering employment land in a

'highly accessible site'; the provision of additional housing with 'minimum visual impact' ; a new and safer access to the Kent Showground; and an additional park and ride site to alleviate traffic congestion at the junction of the A249 and the M20.

- 1.19. According to the Final Qualitative Employment Site Assessment Report [ECON 002] Detling Aerodrome/Airfield is currently in mixed employment use of mixed quality with a site area of 13.45ha.
- 1.20. Part of the site (Detling Airfield) was assessed as a potential employment site (ED-3) in the Sustainability Appraisal alongside the Regulation 18 consultation [SUB 002(E)]. It scored red for proximity to a train station, for cycle access, for proximity to a bus stop (there is a bus service on the A249) and for landscape character impact, and amber under several other criteria including the location in the Kent Downs AONB. The SHEDLAA concluded that the site is remote from the workforce and that there would be 'impacts on the AONB'.
- 1.21. The conclusion of the SHEDLAA Report [HOU 007(A)] for the larger site (site ref HO3 313) was that the quantum of development proposed would result in unacceptable harm to the landscape and be contrary to the advice in the Framework.
- 1.22. A proforma site sustainability appraisal for housing development on a 177.5ha site adjacent to Detling Aerodrome (Site Ref HO3 313) was included in an addendum to the SA Technical Appendix A produced for the Council and received by the Inspector on 2 August 2016. At 30 dph, the estimated yield was 5,325 dwellings (rather than the 1,250 proposed in the Regulation 19 representations). The site is described as predominantly agricultural land and an existing industrial estate. The site is scored red for: distance to services and facilities; distance to a railway station; and an adverse landscape impact in the AONB that is unlikely to be appropriately mitigated. The site scores amber under a number of other headings.

Qn3.10 What areas of land do the Representors propose for which land use?

Qn3.11 How does the 177.5ha site in the SA relate to the 70.44ha site referred to in the R19419 representations and where do they overlap?

Qn3.12 How much employment floorspace could be provided?

Qn3.13 Why did the SA addendum consider a wholly residential development rather than the mixed development sought by the Representors?

Qn3.14 The submitted Local Plan seeks to meet the assessed needs for housing and employment outside the designated AONB. How do the Representors address Framework criteria for major development in the AONB and especially the second bullet point of paragraph 116?

Qn3.15 How would the Council assess the major mixed development proposal against the Framework tests?

Qn3.16 Detling Airfield is included in Policy DM21 as an employment site to be retained. What scope would there be under that policy to redevelop or intensify that site for business use?

Employment Strategic Alternatives

- 1.23. Policy EMP1(5) proposes a strategic allocation of an employment site for 49,000 sq m of employment at Woodcut Farm. This is due to be considered at a hearing on Employment Matters. However a recent decision of the Council's Planning Committee has potential implications for this site which merit earlier consideration, including whether alternative provision is needed.
- 1.24. According to the Minutes, the Planning Committee on 30 June 2016 resolved by a majority of 7 to 6 to refuse planning permission for application 15/503288 for 46,623 sq m of employment on the allocation site for the following reason:

"The proposed development would be harmful to the character and appearance of the countryside, Special Landscape Area and the setting of the Kent Downs Area of Outstanding Natural Beauty. It would also cause less than substantial harm to the setting of the Grade II listed building "Woodcut Farm" and any public benefits are not considered to outweigh this harm. The development would therefore be contrary to saved policies ENV21, ENV28 and ENV34 of the Maidstone Borough-Wide Local Plan 2000 and advice within the National Planning Policy Framework 2012".

Qn3.17 What are the implications of this decision for the Local Plan allocation?

Qn3.18 How does the Council propose to address those implications and would this involve any alternative proposals?