

Maidstone Local Development Framework
Core Strategy Development Plan Document – Preferred Options
Representations prepared by Bloomfields Ltd
on behalf of
Thurnham Parish Council
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Core Strategy Policy CS7 - Strategic Infrastructure

- 1.1 The Aims of Policy text includes provision for the South East Maidstone Strategic Link Road (SEMSL) in order to regenerate and open up development locations in and around the outer SE quadrant of urban Maidstone.
- 1.2 The text advises that the scale and pace of new development is dependent on the provision of new infrastructure to meet the needs that it generates. The text confirms that major new developments should not proceed in the absence of the necessary strategic infrastructure including the SEMSL.
- 1.3 The Core Strategy as currently proposed is not considered to be sufficiently flexible to enable it to deal with changing circumstances. The Council's preferred Development Strategy is dependent on the construction of the SEMSL. There is however, no mention in Policy CS7 or any other supporting Core Strategy policies or text that the Local Planning Authority has carried out an assessment of the risk of the infrastructure not being provided and the consequences of this failure for the Core Strategy as a whole in terms of delivering the Borough's future housing and employment provision.
- 1.4 Whilst the Aims of Policy text states that the provision of new infrastructure will require periodic review and phased implementation over the plan period 2006 – 26, there is little or no evidence of this in relation to the proposed SEMSL.

- 1.5 The policy fails to clearly identify the delivery mechanism and timescale for the implementation of the road link. There is no indication as to how much the road will cost, whether there is any public sector funding available or whether the whole road is to be funded by the private sector.
- 1.6 Given the uncertainties associated with the identification of individual sites at the Core Strategy stage of the Local Development Framework process, there is no evidence that there is the necessary commitment from the private sector or any other body to fund the road link and the other infrastructure required to sustain the scale of development proposed.
- 1.7 It is unclear from the Council's strategy whether the whole road would have to be built to accommodate the level of development proposed, or whether it could be built in phases linked to specific development thresholds in terms of the number of dwellings and commercial floor space that would be permitted at each stage.
- 1.8 Given the serious risk of non or only part implementation of the SEMSL during the plan period, the Core Strategy fails to identify any contingency arrangements for securing the funding of the road or alternative infrastructure provision in the event that the SEMSL cannot be delivered within the required time scale.
- 1.9 The Core Strategy fails to acknowledge the uncertainties associated with the provision of infrastructure, particularly the SEMSL and that major changes may be required, entailing a formal review of the preferred strategy to ensure the delivery of the Borough's housing and employment growth targets.
- 1.10 On a more detailed matter, the Aims of Policy text state that new strategic infrastructure (and transport links) necessary to enable development to meet the plan objectives must be provided in a timely manner. The text subsequently confirms that major new developments should not proceed in the absence of the necessary strategic infrastructure.

- 1.11 This however conflicts with the text of Policy CS7 which states “*An underlying principle will be that where infrastructure work is identified as necessary, no development will occur until the relevant infrastructure has been phased or provided*” (our emphasis).
- 1.12 There is a significant difference in the meaning of “phased” and “provided.” “Phased” implies that the infrastructure is to be implemented over a period of time, whilst the term “provided” implies that there is a firm commitment that the infrastructure will physically exist on the ground before any development takes place. There is therefore direct conflict in the wording of these two elements of the Core Strategy. This is a further illustration of the uncertainties surrounding the provision of the infrastructure associated with the Council’s preferred option for major residential and employment growth to the south east of the town. It is essential that no development is permitted prior to the necessary infrastructure, including the SEMSL, being in place and fully operational.

Core Strategy Policy CS2 – Spatial Form of Development

- 1.1 The text to Preferred Option Policy CS2 advises that the Government has identified Maidstone as a “New Growth Point” which will result in some 10,080 new homes being proposed for the borough over the next 20 years, subject to this level of growth being confirmed by the South East Plan.

- 1.2 The Borough’s preferred approach to meeting this housing requirement is to create a new mixed use development to the south-east of Maidstone town. This will require a minimum “critical mass” of development of some 5,000 dwellings with associated employment opportunities, community facilities and public transport links to the town centre. In addition, small-scale housing proposals (up to 100 dwellings) at the edge of the town are to be tested for their sustainability.

- 1.3 It is considered that the Council’s approach for identifying an appropriate spatial development strategy is too rigid and inflexible. It fails to consider a more balanced distribution of development, including a wider choice of locations within the Borough. The Council’s preferred approach is also high risk, since it seeks to concentrate a significant amount of new housing and employment growth in one area that it is dependent upon the provision of extensive infrastructure, including the South East Maidstone Strategic Link Road (SEMSL) prior to any development commencing. The timing and funding of this infrastructure is uncertain, which calls into question the feasibility and deliverability of the Council’s preferred approach for providing the Borough’s future housing and employment needs. If for example the SEMSL is not provided, it will not be long before the supply of existing residential planning permissions is exhausted and the Council will have serious problems in meeting its annual housing delivery target.

The lack of flexibility in the Council’s Preferred Approach, does not allow for any contingency arrangements to be put in place, to act as a fall back position, should it not be possible to provide the necessary infrastructure required for the

development south east of the Maidstone urban area to proceed on the scale envisaged.

- 1.4 It is also questionable, whether the provision of the entire additional infrastructure required to support an urban extension represents the most sustainable and appropriate use of resources.

- 1.5 The Council's preferred approach will not assist with the regeneration and development of the town centre and other areas within the Borough, but rather will result in the creation of a satellite extension some distance from the town centre and existing urban areas served by its own infrastructure. There is a strong probability that such a proposal will compete with the town centre and other parts of the Borough in terms of employment provision and result in the further loss of business occupiers from these areas, as they move out to more accessible locations due to the lack of investment in transport and associated infrastructure within the town centre and existing urban and rural areas.

Core Strategy Policy CS6 – Housing Land Requirement

- 1.1 Consideration should be given to achieving a more balanced distribution of housing land allocations throughout the Borough, than is currently proposed by the Council's Preferred Spatial Strategy.
- 1.2 Greater emphasis should be placed on meeting the Borough's housing requirements through smaller scale allocations within and adjacent to the urban area of Maidstone and at appropriate locations elsewhere in the Borough to be determined at the Land Allocation Stage of the Local Development Framework process.
- 1.3 Assuming a Growth Point Target for the Borough of 10,080 dwellings, the Council's urban capacity study (2006) identified a shortfall of 2,912 dwellings based on the following assumptions:

	Growth Point Target	10,080 dwellings
Less	Units with planning permission	2,091
	Potential from accepted sites (including 3,450 from previous local plan allocations)	4,687
	Potential from other sources e.g. flats above shops, sub-division of existing dwellings	390
	TOTAL POTENTIAL	7,168
	<u>Short fall against Growth Point Target</u>	<u>2,912</u>

- 1.4 The need for 2,912 dwelling is considerably less than the 5,500 dwellings required to sustain a major urban extension to the south east of Maidstone. The requirement of 2,912 new dwellings could be more easily accommodated within the Borough without the need for major urban extensions to the south east of the

Town. This could be achieved through smaller scale additions to the urban area and to Rural Service Centres (RSC's). Given the scale of housing required, this could be achieved without changing the character of the RSC's.

- 1.5 Such an approach would also remove the need for the large-scale infrastructure provision associated with the urban extensions to the south east of the Maidstone urban area. This in turn would remove the uncertainty of whether sufficient residential development could actually take place within the time frame identified by the Core Strategy, given its dependency on the provision of infrastructure which has no definite funding or authorisation in terms of an agreed route or level of service provision.
- 1.6 The land to the south east of Maidstone should only be considered as an option for future residential development on the scale envisaged in the event that the South East Plan identifies Maidstone as suitable for significantly higher levels of residential provision in the region of 12,000 – 15,000 dwellings over the 20 year period to 2026. Notwithstanding this, it would still be necessary to ensure that all appropriate infrastructure is in place prior to any development commencing.

Core Strategy Policies CS3 - Employment Land Requirements and CS4 - Qualitative Employment Issues

- 1.1 Whilst we do not object to the level of economic growth identified by the Core Strategy, the location of future employment land releases as outlined by Policy CS2 is considered to be inappropriate. Policy CS2 seeks the release of land close to the motorway network to the north and south east of Maidstone in an attempt to make the area more attractive for new and existing business occupiers. This is considered to be at the expense of existing employment areas within the Borough. Such a strategy is also likely to encourage travel by car rather than more sustainable forms of transport.

- 1.2 Whilst it is understandable that the Council would wish to increase the prosperity of the Borough, it is important to ensure that its plans are both realistic and deliverable. The text to Policy CS3 refers to the need to reduce out - commuting and the desire for a university establishment within the Borough. It should be noted, however, that a lot of those who do commute, do so to London, but it is quite unrealistic to assume that Maidstone Borough can compete with London as a centre of employment.

- 1.4 With regard the desire to develop knowledge based industries, there are already a number of centres locally and throughout Kent which have established similar hubs – Kings Hill, University of Greenwich at Medway, University of Kent at Canterbury and Pfizer within Dover District. There is a limit to how many higher education institutions and knowledge based employment centres can be accommodated within a specific geographical area such as Kent.

- 1.5 A further consideration associated with the desire to attract high quality knowledge based employment to Maidstone is that the workers within such industries require a high quality living and working environment. They will not want to work in offices located within a busy transport corridor containing the M20 and CTRL. Similarly, they will want good quality housing and easy access to a town centre, not one that is characterised by excessive traffic congestion, run down office buildings and poor public transport links to centres such as

London. Attracting knowledge-based industries to the Borough is not simply about making land available next to a motorway junction. This is a much more holistic process which requires significant improvements to the quality of a whole range of basic functions and services throughout the Borough, and not just at selected locations.

- 1.6 It is considered that greater emphasis should be given in the Core Strategy to meeting the existing needs of the work force to ensure that suitable land and premises are made available within and immediately adjacent to the existing urban areas and Rural Service Centres to meet the immediate and future employment needs of the economically active population. A key feature of any strategy should be the regeneration and maximum utilisation of existing employment areas together with their associated infrastructure, before consideration is given to the development of peripheral greenfield sites.