

Written Statement - Session 5A (follow-on)– Housing Supply Overview

1. This paper is submitted by the Coordinating Team.
2. MBC has submitted further information to the examination of its Local Plan in response to the Inspector’s Action Points 5.3 – 5.4, that is:

5.2	MBC to supply schedule of sites that were included in calculation of past windfall including what sort of site (greenfield/brownfield; inside outside settlement) size etc.	3 Nov 2016
5.3	MBC to provide a year on year housing trajectory rather than by 5 year periods	3 Nov 2016
5.4	MBC to provide written evidence to support the inclusion of sites in the housing trajectory and phasing. Inspector to consider how this may be dealt with in terms of eg written comments or a further hearing.	3 Nov 2016 After evidence received.

3. In addition, further information re Lenham and Invicta Barracks has been submitted

Windfall Sites

4. This is for sites with 5+ dwellings.
5. The detailed table in ED043 Appendix 1 is somewhat confusing.
6. For instance, in page 2, Coombe Road (MA06/1329) is shown as -65 net gain i.e. a reduction! The final entry on MBC’s planning portal for this site states:

An application for discharge of conditions relating to MA/10/1219 revision to plots 4-21 of planning permission MA/06/1329 (demolition of 122 existing dwellings, including 18 two bedroom houses and 104 three bedroom houses, and the erection of 112 houses, to include 5 two bedroom, 85 three bedroom and 22 four bedroom houses, together with 52 flats, to include 2 one bedroom and 50 two bedroom flats, and the provision of associated access road, car parking and landscaping) to provide 12 three bedroom houses and the removal of plots 1-3 in lieu of the previously approved 13 houses and 8 flats on this area of the site being details of condition 8, (brick wall details), condition 10, (architectural detailing), condition 11, (lighting details), condition 12, (materials for road surfacing) as shown on drawing nos. K08/0676/101/F, K08/0676/560/A and lighting lamphead details received 18/01/2012.

We struggle to see how that gives rise to a net loss of 65. In fact it reads like a nett gain of 43.

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7. Contrast that with, in page 2, Harbledon House (MA09/0883), for which the portal states:

Internal alterations to upgrade accommodation to 'decent homes' standard by turning 36 existing bed sits into 19 one bedroom flats. Removal of head of redundant existing lift shaft protruding through roof and infilling of roof covering to match existing. Installation of new double doors to replace an existing window to create a new pedestrian entrance into the existing building with new glass and stainless steel canopy over. Associated external paving to form new access walkway. Installation of 2 new disabled parking bays adjacent to new entrance and new vehicle crossover to Fant Lane. Removal of existing small canopy to existing entrance lobby and installation of small cantilevered canopy in-lieu as shown on drawing nos. 3360/01rev00, 02rev00, 03rev00, 04rev00, 05rev00, 3509/ 02rev02, 03rev02 and 06rev00 and design and access statement received 26/05/2009 and drawing no. 3509/01/rev03 received 22/06/2009.

That reads like a loss of 17 units (which is close to the submitted table's -18).

8. In page 8 there is also a concern. Land South of Wallis Avenue (MA12/1051) is listed as -31 i.e. a nett loss, whereas the portal states:

Erection of 18 flats and 51 houses together with 225m² of community/commercial space

That requires explanation.

9. In total, the above three applications are, together, represented in the table as a nett loss of 114, whereas the above indicates a gain of $(43-17+69) = 95$.
10. Over the 7 years of analysis, that represents a possible swing of $(114+9)/7 = 30$.
11. Instead of the declared average of 136 dwellings p.a., that implies 166.
12. Over the remaining 15 years of the Local Plan period, that amounts to an **extra 450** dwellings, removing the need for equivalent allocated sites.
13. If our above figures are wrong, we would appreciate an explanation.
14. When it is considered that small (i.e. 5 or less) windfalls are consistently delivered and significant (48 p.a.), it indicates that the trajectory's allowance in the table below is far below that evidenced by past experience; and it should be noted that it includes no windfall allowance until 2019/20 and no allowance for larger sites until 2021/22.
15. That is remarkable, given past evidence (and possible candidates such as the prison).

Annualised Housing Trajectory – original vs latest

16. The original trajectory (SUB001, page 291) depicted planned delivery of 18,560 dwellings, as required by OAHN.
17. MBC's assessment of Five Years' Housing Supply considers the immediately previous five years plus the next five years.

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18. Whether that is defensible against challenge is uncertain in the event that the next five years (only) show a deficiency against planned annual delivery (928 for this Local Plan).
19. Depending on chosen definition of Five Years' Housing Supply (i.e. past 5 years plus future five years or future 5 years only or right from the start of the plan period plus next 5 years), that original trajectory would, at some point in the future, not have a Five Years' Housing Supply.
20. The trajectory presented in ED043(A) Appendix 1 has plugged that potential gap by catering for 19,325 dwellings, with an even greater surge towards the start of the forward period. That is, an extra 765 dwellings above OAHN.
21. At the review point for the Local Plan (?2022), that will give rise to a self-inflicted "spike" in recent growth in dwellings, and therefore population. That could or would be used by future consultants to project forward an even higher housing requirement than currently postulated.
22. That is because they would probably repeat the oversight in the current GL Hearn report giving rise to 18,560, whereby corrections were not applied to past population statistics to allow for recent oversupply through very successful brownfield development,
23. MBC is not managing the trajectory for the advantage of the Borough's residents.

Annualised Housing Trajectory –latest

24. The declared trajectory is now:

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/15	2025/26	2026/27	2027/28 +
Total	1,143	990	953	761	637	287	265	164	214	304	45	0
Non implementation 5%	57	50	48	38	32	14	13	8	11	15	2	0
Extants (including 5% non implementation discount)	1,086	941	905	723	605	273	252	156	203	289	43	0
Allocated sites	35	331	594	723	857	791	604	535	435	385	205	100
Broad locations						75	85	85	85	85	495	695
Windfall allowance				48	48	116	116	116	116	116	185	185
Total	1,121	1,272	1,499	1,494	1,510	1,255	1,057	892	839	875	928	980

25. That profile just does not help our Borough.
26. As noted above, the above profile will deliver another spike over the next few years, just in time for the review of Local Plan in, possibly, 2022 and then, yet again, MBC will project exponentially forward as their consultants will argue that then-recent population growth demands it.

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27. As the rate of development then dips after 2022/3 we could then be in the position, as noted above, of not having a Five Years Housing Supply, giving rise to yet another round of speculative development not controlled by the Local Plan.
28. The high rate of development up to 2022/3 will increase traffic congestion, air quality and environmental problems before effective mitigation is even planned to be implemented.
29. The Coordinating Team has put forward the argument that past statistics that gave rise to GL Hearn's derivation of 18,560 for OAHN should be revised downwards (dramatically) because there was a spike in recent years due to very successful brownfield redevelopment.
30. In addition, perhaps there should not be a fixed figure of 928 for each year of the plan, but, rather, a smooth ramp-up, starting lower and ending higher than 928 in later years of the plan period. That would be more realistic. It would be more sustainable to lower the rate of growth up to 2022/3 and raise it in the later part of the plan period.
31. MBC is not managing the trajectory to more-closely align with a smooth absorption of OAHN, or,
32. rather, a somewhat lower target, whatever its eventual figure.

Lenham

33. The Coordinating Team notes the very substantial development proposals for this ancient village.
34. While the Co-ordinating Team does not take a position on specific sites, we do doubt whether such proposals are sustainable or desirable, especially given Dr Rebecca Driver's statistics relating to job creation in Rural Service Centres and travel-to-work distances.
35. Apart from that, we offer no comment.

Invicta Barracks

36. We offer no comment, other than the fact that any "gap" in identified housing proposals should be more than compensated for by an increase in windfalls – or by the large reduction in OAHN which we believe is justifiable.
37. Or by MBC exercising its Duty to Cooperate with neighbouring authorities to absorb some of the OAHN.

Our Members of Parliament

38. As the examination has heard, neither of the MPs whose constituencies include parts of our Borough is impressed with the Local Plan as it stands.
39. In fact, the contrary. They just do not understand why MBC persists with pursuit of the OAHN when clear constraints are apparent to derive a lower target.
40. The Attachment reports the latest input from our parliamentary representatives.



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Friday, November 18, 20

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Chief executive



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CARRY ON REGARDLESS



Helen Grant pulled no punches as she laid in to Maidstone Borough Council for burying its head in the sand over congestion.

Maidstone's MP was giving evidence at an inquiry into the Local Plan this week, declaring the County Town had reached breaking point and instead of addressing the problem the council has carried on with its housing development strategy regardless.

Mrs Grant's scathing comments came as Maidstone was hit by yet another week of crippling tailbacks.

A survey completed last year shows if the authority's proposed 18,560 homes are built and the road network is not improved congestion in the borough will increase by 40%.

FULL STORY PAGES 8-9