



MAIDSTONE BOROUGH COUNCIL LOCAL PLAN EXAMINATION IN PUBLIC

RESPONSE FROM THE KENT DOWNS AONB UNIT

SESSION 2B – HOUSING POLICIES DM11-DM15

Issue (iii) Whether policy DM13 sets justified thresholds for the inclusion of affordable housing in developments.

Q 2.18 Should a different threshold be applied in the AONB or for Local needs sites?

Should it be determined that Policy DM13 should be amended to alter the threshold for affordable housing to developments of 10 dwellings or more, the AONB Unit strongly contend that the lower threshold of five units or more should be retained in respect of developments within the AONB.

Affordable housing to sustain local AONB communities is needed and should be secured in rural areas and in particular on developments within AONBs where average house prices are high and access to affordable homes is restricted. Lloyds TSB (in 2012) has found that two thirds of AONBs have higher house prices that the regional average. There is already a crisis in rural areas compared to urban areas where only 12% of housing stock is classified as 'social' compared with almost 20 % in towns and cities. At the same time earnings in the countryside are well below those in urban areas.

Therefore, particularly in rural areas and especially within AONBs, there remains a need for social provision of affordable homes as there will be a sector of rural community who will simply not be able to qualify or afford mortgages on market housing. Without an adequate supply of affordable housing within AONBs there is the risk that this will undermine the ability of those on the lowest incomes to live and work within the AONB and settlements will become predominantly for commuters or second home owners.

The lack of affordable or rented housing within the AONB is recognised in the Kent Downs AONB Management Plan, and the provision of suitable provision of affordable housing supported by policy VC3 of the Kent Downs AONB Management Plan which states that:

Initiatives which are in line with existing policies of the Local Planning Authority that increase and improve the supply of affordable housing for (i) those with proven local needs, and (ii) workers whose activities directly contribute to the purposes of the AONB designation, will be supported where it is demonstrated that the proposals are of high quality design, limited quantity and scale and are built to the current best environmental standards.

The introduction of a lower threshold in the Kent Downs AONB would accord with the national PPG at para 031 Reference ID 23b-031-20160519, where it is confirmed that in designated rural areas, local planning authorities may choose to apply a lower threshold:

“For designated rural areas under Section 157 of the Housing Act 1985, which includes national parks and areas of outstanding natural beauty, authorities may choose to implement a lower threshold of 5-units or less, beneath which affordable housing and tariff style contributions should not be sought. This will also apply to all residential annexes and extensions. Within these designated areas, if the 5-unit threshold is implemented then payment of affordable housing and tariff style contributions on developments of between six to ten units should also be sought as a cash payment only and be commuted until after completion of units within the development.”

Q 2.26 Is affordable housing of all types needed in the countryside and villages?

As set out in the Kent Downs AONB Units response to Qn 2.18, in rural areas and especially within AONBs, there remains a need for social provision of affordable homes as there will be a sector of rural community who will simply not be able to qualify or afford mortgages on market housing. Reducing the requirement for affordable housing in rural areas on housing sites, thus reducing affordable housing supply is likely to result in a greater need for affordable housing elsewhere, through the development of ‘exception sites’. Such local needs housing, permitted under policy DM14 has the potential to impact on the character of villages and the countryside, including the Kent Downs AONB and its setting. It is therefore considered entirely appropriate to maintain a requirement for 40 per cent affordable housing on housing sites in the rural area. To do so would be entirely consistent with para 50 of the NPPF which confirms that where it is identified that affordable housing is needed, policies should be set for meeting this on site.

Q2.37 Policy DM14 – Is the amended wording proposed by the AONB Unit necessary for soundness and is it covered by other Local Plan policies in any event?

The Kent Downs AONB Unit is concerned that as currently worded Policy DM14 is unduly restrictive in respect of the provision of affordable housing in the AONB, requiring that when located within or affecting the AONB, “the necessity for development must be proven to outweigh the purpose for which the designation is made”. This wording is not considered to help facilitate the delivery of much needed affordable housing in the AONB. This restrained approach is not considered to be in accordance with the NPPF which is only so restrictive in respect of major developments. It is therefore considered that a less restrictive approach is adopted that allows new local needs housing, but in order to ensure harm to the AONB is minimised, an additional criterion should be added that secures a high quality design and measures to mitigate harm to the AONB.

Such an approach would be consistent with para 115 of the NPPF which requires that great weight should be given to conserving landscape and scenic beauty in AONBs, as well as para 113 of the NPPF which requires that Local Planning Authorities set out criteria based policies against which

proposals for development affecting landscape areas will be judged. It would also be consistent with policy VC3 of the Kent Downs AONB Management Plan, which advises that “initiatives which are in line with existing policies of the Local Planning Authority that increase and improve the supply of affordable housing for those with proven local needs will be supported where it is demonstrated that the proposals are of high quality design, limited quantity and scale are built to best current environmental standards”. The national Planning Policy Guidance supports the evidence and principles established in AONB management plans being taken into account in local planning authorities Local Plans.

It is not considered that the policy wording in policy SP17 adequately covers this matter; in relation to AONBs, this policy requires that the distinctive character of the Kent Downs will be rigorously conserved, maintained and enhanced where appropriate. Policy DM13 relates to the development of ‘exception sites’ and by its nature may result in a development that does not fully comply with the requirement under SP17 for the conservation and enhancement of the AONB. It is therefore essential for policy DM14 to include criteria which ensures that harm to the AONB is minimised.

