

Written Statement – session 12 – Transport & Infrastructure

1. We offer outline answers to the Inspector’s published questions.
2. We then draw together the analysis that informs our views.

Inspector’s Questions

3. Numbering is the Inspector’s.

Question	Comment
Qn12.1 Is Highways England now satisfied in respect of the cumulative impact on the M20 of development proposed in the Local Plan?	No comment
Qn12.2 Is there a statement of common ground between Highways England and MBC?	No comment
Qn12.3 If not, what additional evidence or modifications to the Plan would Highway England wish to see?	No comment
Qn12.4 Does the proposed change satisfy the first part of the objection?	“support schemes for mitigating the impact of development where appropriate on the local and strategic Road Network” should be amended to “support schemes for mitigating the impact of development where appropriate <u>where demonstrated to be reasonably necessary by KCC Highways</u> ”.
Qn12.5 Would a cross reference to the Infrastructure Delivery Plan (Document SUB 011) satisfy the second part of the objection?	It cannot When last reviewed, the Infrastructure Delivery Plan listed 160 discrete projects, with 93 not being costed (and the remainder adding up to just over £116m). It is held out as a “living document”. It is appreciated that projects will evolve and be updated (including their costs), but an IDP with almost two-thirds of projects un-costed is substantially incomplete and must challenge credibility. The Borough’s approach to IDP mirrors its approach to minerals and traffic issues with KCC i.e. a narrow focus on housing numbers, irrespective of other factors.
Qn12.6 Would SBC clarify what updating is needed?	No comment
Qn12.7 Does Highways England have any observations regarding improvements to M2 Junction 5?	No comment
Qn12.8 Hs (<i>sic</i>) the impact of Local Plan development on the A249 north of Maidstone been taken into account by MBC and other relevant authorities?	We doubt it, especially as Detling has not been considered as a site.

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<p>Qn12.9 Is there a statement of common ground between KCC and MBC?</p>	<p>Yes, but it is a diplomatic “fig-leaf”.</p> <p>KCC has stepped away from the very strong adversarial position in various letters it sent MBC, some of which excoriated MBC.</p> <p>Paragraph 5 states that: “MBC and KCC will continue to work together as the Strategy is reappraised in the future as part of the first review of the Local Plan with work to commence by 2022”. That gives no confidence in the outcome, given past performance.</p> <p>And “by 2022” presumably will result in an adopted review by, say, end-2024, with any remedial works , if feasible, then taking a few years to implement. That is just not reasonable or sustainable.</p> <p>“Traffic” in SE Maidstone, and other aspects of this Local Plan revealed to-date by this Inquiry, argue for a review to be <u>completed</u> over the next very few years – perhaps by end-2019, if not end-2018. Otherwise our Borough and County Town could be seriously damaged, when it is already struggling to maintain any sort of reputation as a shopping, working and living centre.</p>
<p>Qn12.10 Would KCC and MBC please provide an update of their respective positions in the light of the results?</p>	<p>No comment</p>
<p>Qn12.11 What is the likely first date by which any Leeds-Langley Relief road could become operational and if a route (and funding) were agreed such that it could be included in the first Local Plan Review, could it realistically be implemented before the end of the Local Plan period ?</p>	<p>We have strong doubts that (a) it will ever be completed and (b) if it is, it will be beyond this Local Plan period.</p> <p>We are also concerned that it may not be a panacea for all traffic issues in that part of our Borough and, in fact, could create additional problems by attracting more development around it.</p>
<p>Qn12.12 How might such a road be funded?</p>	<p>No comment</p>
<p>Qn12.13 In the interim, and before a route or funding has been identified for any relief road, should mitigation works be carried out on the existing network to address the impact of development that has already been committed?</p>	<p>No doubt “yes”, but mitigation is limited in impact, as KCC has, previously, advised. Nor will it address current problems or those derived from organic traffic growth.</p> <p>The one effective mitigation would be to defer building where transport infrastructure is already inadequate. However, MBC has forestalled that by granting permission for some 2600 new homes (some subject to S106 agreements). (That approach rings familiar with Kent’s Minerals Strategy, with planning permissions being granted in areas which Kent may wish to keep in reserve for future minerals extraction).</p>

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<p>Qn12.14 Do the above Representatives seek any specific changes to Policy DM24 that relate to their original representations and which they consider are essential to make the policy sound?</p>	<p>For development proposals, DM24 currently states: “Demonstrate that the impacts of trips generated to and from the development are remedied or mitigated, including where feasible an exploration of delivering mitigation measures ahead of the development being occupied”.</p> <p>“Where feasible an exploration” raises a concern that damage will be done to trip times and that remedy or mitigation will then be unavailable, ineffective or never happen.</p> <p>Particularly in SE Maidstone, but also in other key access points, the requirement should be “... impacts of trips generated will be remedied, with that remedy implemented ahead of the development being occupied”.</p> <p>Some of DM24’s wording needs to be more precise in policy terms. For example, what does “... supports the growth” and “iv fair and proportionate ...” and “xii Address ...” mean precisely?</p> <p>For development proposals, DM 24 also states: “Demonstrate that development complies with the requirements of policy DM5 for air quality”.</p> <p>DM5 is weak in terms of ensuring no worsening of the current situation and therefore DM24 should be amended to read: “Demonstrate that development complies with the requirements of policy DM5 for air quality, but with the requirement amended from mitigation to remedy in all instances”.</p> <p>DM5 itself should be modified so that it does not allow the deterioration of air quality in Air Quality Management Areas to be <u>minimised</u>, which still could be significant.</p>
<p>Qn12.15 Does KCC consider the policy unsound and if so, why?</p>	<p>No comment</p>
<p>Qn12.16 Has the further evidence gathering modified the views of KCC or MBC on this matter?</p>	<p>No comment</p>
<p>Qn12.17 Is there evidence from elsewhere in Kent or from other areas as to whether bus priority measures result in a shift from cars to buses and has that been factored in to any modelling?</p>	<p>No comment</p>
<p>Qn12.18 If the intention of Policy DM25 is to balance the transport system in favour of sustainable modes why would a scheme which benefitted public transport users but may disadvantage other road users not be consistent with national policy?</p>	<p>The fundamental policy conflict between the Local Plan policy on demand management and the KCC Highway Authority which controls the roads must be resolved to benefit air quality, accessibility and quality of life in the Borough.</p>

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Qn12.19 Do the current Local Transport Plan and the development plan currently support bus priority measures and, if so, what weight should they carry?	As immediately above
Qn12.20 If bus priority measures are not introduced how else can traffic impacts of already committed development be adequately mitigated in the present absence of any scheme for a new road?	No comment, other than noting that some major developments have only been approved subject to successful S106 negotiations. If such negotiations fail, for whatever reason, corresponding traffic impact would not materialise.
Qn12.21 Why has MBC reduced or abandoned park and ride schemes and would they not be needed to take full advantage of any bus priority measures?	No comment, other than “good point”!
Qn12.22A Can MBC now provide supporting evidence to justify the infrastructure priority lists included in Policy ID1, Criterion 4?	No comment
Qn12.23A Would MBC please comment on the request of the AONB unit to add to the criteria in ID1(4)?	No comment
Qn12.24 Are any further specific changes suggested to address the matters raised in the above representations and would they be needed for the Plan to be sound?	We assume that MBC will say “no”, but the plan would be challenged on “positively prepared” and “effective” aspects of soundness from an infrastructure perspective. MBC is focused solely on housing numbers, attempting to brush aside any potential hindrance to 18,560 being approved as not only the “needs”, but also the “target”. MBC just does not wish to give credence to any constraints, despite, apparently, having compiled a list of 21 candidates. It has been judged risky to put forward any constraints to reduce “needs” to a lower “target”, despite severe concerns, including funding concerns, raised by KCC and many Parishes.
Qn12.25 Would MBC please respond to the concerns raised about deliverability of infrastructure in the IDP?	The previous Leader of the Council has said words to the effect “no problem, funding will come along” and MBC is continuing in that vein. The Inspector will only hear platitudes from MBC that are intended to reassure that everything will be fine in the future. It will be residents who suffer the consequences in due course. Funding and, in some instances, physical feasibility are uncertain.
Qn12.26 Is KCC satisfied with the proposed changes?	No comment
Qn12.27 What is MBC’s response to the representation?	No comment

4. Below we summarise the evidence and analysis that has informed our views.

Traffic – current situation

5. Soundness of strategy and sustainability of development are important tests in the examination of the plan. Inadequate transport, traffic congestion and high levels of air pollution have long been major concerns in Maidstone. There is much evidence for this, but the following quotations from ‘The Sustainable Community Strategy for Maidstone Borough 2009 – 2020’ serve to illustrate:
 - a) “Overwhelmingly transport issues are a high priority ...”. (3.3.7 p. 16)
 - b) “The Borough suffers from high levels of traffic, which causes congestion problems, particularly in the town centre. This impacts on the economy and also has a negative impact upon air quality which can be damaging to the health of the local people”. (3.4.4 P.18)
 - c) “... the development of 10,080 new homes and increasing population growth by 24,800 by 2026 will be a challenge to public service providers, on a creaking infrastructure and may exacerbate existing problems such as peak hour congestion and air quality”. (3.5.6 p. 21)
6. MBC has since “refreshed” this Strategy without any noticeable consultation with the community, perhaps because the community view did not fit the local plan being developed.
7. The NPPF states that “The purpose of the planning system is to achieve sustainable development” and that “ ... to achieve sustainable economic, social and environmental gains should be sought jointly and simultaneously through the planning system.” (Para 8, our emphasis). Unfortunately this has not been the approach adopted in the development of this draft Local Plan.
 - a) The strategy of dispersal was first adopted when the housing requirement was 10,080 dwellings and very little analysis was undertaken of whether this was still the best strategy when the housing requirement was increased by around 90% to its current level.
 - b) In fact the Sustainability Appraisal’s extremely superficial assessment of the alternative housing and distribution options is a rewording of a 2007 study presumably based on the 10,080 housing growth proposed at the time. The Sustainability Appraisal also gives a misleading impression by stating that “each of the options concentrates the majority of housing development in Maidstone urban area”, whilst in reality the majority (some two-thirds) is allocated on Greenfield sites either in an extension into the rural parishes to the south east of Maidstone or at the RSC’s and Larger Villages.
8. The plan’s strategy has meant that about two thirds of the allocated housing growth will access on to the Sutton Road (A274) and the Loose Road (A299), two of the most congested roads in Maidstone, which join together at the Wheatsheaf Junction into one road giving access to the heavily congested town centre.
 - a) The Transport Topic Paper (Sub 06) at Table C2 shows that the Am link traffic flows on the A274 EB will increase by 100% to 800, and on the A229 Loose Rd (N) SB by 43% to 1650, over 2014 levels even if the 2031 DS4B option can be delivered.
 - b) This is, and will continue to aggravate the already severe air pollution problems around these routes, which run through an Air Quality Management Area.
 - c) The congestion along these routes and in the town centre also gives rise to significant rat-running on narrow rural roads through villages.
9. It is clear from the Sustainability Appraisals of the Plan that the transport impact of the scale and distribution of development was not rigorously modelled and tested, as it should have been given the significance of Maidstone’s transport problems. There has been a lack of co-operation with KCC, the highway authority, in the development of the plan, resulting in KCC’s objections to the Plan and the ITS.
 - a) This has resulted in the loss of many millions of pounds of potential developer contributions to resolving Maidstone’s strategic transport issues from the high level of planning permissions in the past few years. Instead, MBC has focused on mitigating

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the local impact of individual developments without proper consideration of cumulative effects (and background growth).

- b) Recently MBC employed its own, unaccountable consultants to force through large housing sites along the A274 against objections from accountable KCC highways experts.
 - c) MBC's consultants focused on individual junction improvements to mitigate, not necessarily remedy, the impact of proposed developments. Impact on the wider network, including rat-running through narrow village roads, was not addressed, nor "normal" traffic growth. Assumptions on modal shift and preparedness of bus companies to provide additional services challenge credibility, as does the assumed propensity of new residents along Sutton Road to use public transport.
 - d) The Wheatsheaf junction is a key pinch-point for which a remedy has escaped all parties, with mitigation apparently limited. Much of the growth feeding on to this junction via the A274 and A229 is either built, being built or permitted and severe congestion/air quality problems are already apparent and will worsen significantly before 2022-5.
10. NW Maidstone has its existing problems, exacerbated by developments that have been approved, and are progressing, along Hermitage Lane (where Maidstone's hospital is located).
11. Traffic is suffocating our County Town. As a retail and visitor centre, it is going down the league table. Business access is an issue. Our County Town is diminishing in stature.

KCC / MBC track record re traffic

12. Many aspects of infrastructure to support the Local Plan have raised concerns with KCC, but the key challenge is on traffic impact in SE Maidstone and, in general, MBC's Integrated Transport Strategy, from which KCC has disassociated itself.
13. Over the past year or so, KCC has adopted a very strong adversarial position towards MBC on SE Maidstone traffic.
14. A KCC letter appears at Attachment 1, but other letters were:
- a) 30th October 2015: Barbara Cooper / KCC Corporate Director to MBC/Alison Broom;
 - b) 15th April 2016: Barbara Cooper / KCC Corporate Director to MBC/Alison Broom;
 - c) 1st June 2016: Brendan Wright / KCC Strategic Transport & Development Planner to Maidstone Planning Department in response to application MBC/15/509015/OUT;
 - d) 13th July 2016: David Joyner / KCC Transport & Development Planning Manager, West Kent to Members at MBC's Planning Committee;
 - e) 23rd July 2016: Barbara Cooper / KCC Corporate Director to MBC/Alison Broom; and
 - f) there may be others that we are unaware of.
15. Some of the above letters excoriated MBC and all declared the severity of the traffic situation in SE Maidstone.
16. Should any other of the above be of interest to the Inspector, presumably KCC or MBC will be able to provide or, failing that, the Coordination Team would be pleased to do so.
17. At the very well-attended public meeting organised on 11th February 2016 by the two MPs who have parts of our Borough within their constituency, Cllr Matthew Balfour, KCC's Cabinet Member for Environment and Transport, took great pains to distance KCC from the Integrated Transport Strategy advocated by MBC at that time.
18. As an aside, Cllr Balfour had also prepared a paper dated 9th February 2016 that criticised MBC's approach to the Local Plan. Please see Attachment 2.

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Statement of Common Ground

19. This is a “fig-leaf”.
20. It is evident that KCC has stepped away from a major confrontation with MBC at the highest level. That may be due to the fact that KCC’s Leader is conflicted because he lives in SE Maidstone, but, to-date, he has been very proper in distancing himself from the matter.
21. This statement promises that “MBC and KCC will continue to work together as the Strategy is reappraised in the future as part of the first review of the Local Plan with work to commence by 2022”.
22. However, at the Hearing Sessions on Wednesday, 12th October, there was contention between those parties over whether a potential KCC objection to S106 agreements currently being negotiated and affecting SE Maidstone would or would not place a block on applications that MBC has resolved to permit, but which are not approved until those S106 agreements are in place.
23. Whether that “trip-wire” in the Statement of Common Ground was or was not intentional is not the issue; it signals that all is far from well in the relationship, which is unsurprising given MBC’s dismissive treatment of KCC, particularly on transport matters.
24. The Statement of Common Ground cannot therefore be allowed to mask the very strong adversarial situation, as evidenced in those letters KCC to MBC and cannot give confidence for the future.
25. As for “ first review of the Local Plan with work to commence by 2022”, the major sites in SE Maidstone (and in NW Maidstone) are proceeding apace.
26. “By 2022” presumably will result in an adopted review by, say, end-2024, with any remedial works, if feasible, then taking a few years to implement. In essence.
27. MBC therefore wants our Borough to absorb the front-loaded portion of 18,560 new dwellings with only relatively minor improvements to road infrastructure that already discourages use of our County Town for work, shopping or pleasure.
28. The Local Plan strategy was based on demand management of traffic using enhanced park-and-ride, encouragement of modal shift to public transport, cycling and walking, allied with increased town centre parking charges. This strategy has now fallen apart with the loss of park-and-ride sites, bus lanes and “the aspirations for sustainable mode share and public transport provision included in the 2031 DS2 model are very ambitious”(Amey ‘Visum Transport Modelling Report 2015), many would say completely over-ambitious. There is also a fundamental policy conflict, clearly stated in the Transport Seminar, about the demand management underlying the plan between MBC and KCC Highway Authority.
29. We therefore ask on behalf of the long suffering residents of Maidstone that the plan makes provision for:
 - a) Early action to be taken, starting in 2017/18, to mitigate the serious congestion and air quality issues likely to arise from already committed growth, and
 - b) Clear, effective policies and infrastructure programmes to resolve the existing issues before further major development is allowed to exacerbate them.
30. MBC had the opportunity to recognise a road-infrastructure constraint, as well as other constraints, to reduce that needs figure, perhaps very substantially, to a more realistic target that could be absorbed pending attention to constraints, with any gap being raised as part of the Duty to Cooperate with neighbouring Authorities. Even though everyone seems to have gone for “consuming their own smoke” as a comfortable, and procedurally easier, way forward, that should have been pursued with somewhat greater energy and intent.
31. To repeat, this Statement of Common Ground is a fig-leaf and, as written, will condemn our Borough to further decline as traffic becomes even worse in parts of our Borough, with, realistically, no remedy nor almost complete mitigation.



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**TO BE CIRCULATED TO ALL SPST
COMMITTEE MEMBERS**

**Growth, Environment
& Transport**

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23rd July 2015

Dear Alison,

Re: Maidstone Borough Council Local Plan

Following the Joint Transportation Board last night, I write to set out the County Council's position concerning the re-consideration of sites previously excluded from the Local Plan by your SPST Committee. Please ensure this letter is read out and considered at their meeting tonight.

As some Members may be aware, the JTB unanimously agreed upon the principles to be taken forward in the development of the integrated transport strategy. It also recommended (to your SPST Committee) that further work be undertaken on cost, feasibility and sustainability so that an affordable package of measures can be prioritised within the available funding. In view of this, I must make it clear that **to allocate any further sites in the Borough at this point before this work is complete would be premature**. This work may identify constraints and opportunities which the Plan will need to consider to be found sound. The most acute example of this can be seen in south and south-east Maidstone where there is now compelling evidence to demonstrate that the area is constrained by lack of highway capacity. A potential solution may well be available through the provision of a link road around Leeds and Langley, but further work is required and provision remains uncertain. Identifying further growth in this area whilst this is the case is therefore premature, and it may prove necessary to revisit it at the Local Plan Review stage when alternative, better, smaller sites near the link road may well be identified as preferable locations.

In view of the above, the County Council as Local Highway Authority **strongly objects to the allocation of any further housing sites at this point, as to do so would cause an unacceptably severe impact on the public highway without there being sufficient certainty that mitigation can be provided and most importantly funded**. This position is consistent with our response to the Local Plan in March 2014.

Letter to MBC / Alison Broom from KCC / Barbara Cooper

From a planning perspective, Members of the Committee are no doubt fully aware of the relevant paragraph (47) from the National Planning Policy Framework. This states that local planning authorities should ensure that their Local Plan meets the full objectively assessed need for housing. However, the same paragraph makes it explicitly clear that this should only be done as far as it is consistent with the policies set out in the Framework which includes policies relating to transport (paragraphs 29-41). **There is no basis in law or policy to simply use the identified need as a housing requirement.** The policies in the Framework must be considered as a whole and proper planning constraints, i.e. the capacity of the local highway network, must be applied to any assessment of housing need. The Framework is clear that where the cumulative impacts of development are severe, further development should be prevented and refused (paragraph 32). The evidence base in this regard remains incomplete subject to the further work identified by Members of the JTB and therefore the recommendations made to this Committee are wholly premature.

Notwithstanding all of the above, KCC fully recognises the urgent requirement to progress the Local Plan and is keen to assist the Borough Council in developing a sound understanding of the infrastructure required to support growth, the mechanisms for delivery and identifying where funding gaps exist. Work will be undertaken in partnership at pace to establish the viability of the transport package and need take no longer than 12 weeks.

If you require further information or clarification on any matter then please do not hesitate to contact me.

Yours sincerely,



Barbara Cooper

Corporate Director – Growth, Environment and Transport

Cc. Mr. R Jarman, Head of Planning and Development, Maidstone Borough Council
All SPST Committee Members



For: Matthew Balfour, CABINET MEMBER
Date: 9 February 2016
Subject: Maidstone Borough Local Plan Public Meeting
Priority: HIGH

SUMMARY:

- There is no policy or legal requirement for a local planning authority to meet its objectively assessed housing need. **Proper planning constraints (i.e. infrastructure) must be applied to any housing need assessment;**
- Local Plans have still been found sound by Inspectors where the housing target does not meet the housing need;
- The objectively assessed **housing need for the Maidstone Borough is the highest out of all Kent local planning authorities** (excluding Medway);
- Reliance on the 2017 Local Plan 'deadline' by Maidstone Borough Council is alarmist and exaggerated, undermining plan making principles and the delivery of sustainable development;
- Completed **residential development in the Maidstone Borough since 2005/06 is the highest out of all Kent local planning authorities** (excluding Medway);
- Completed **residential development in the Maidstone Borough since 2006/07 is the highest out of all local planning authorities in the counties of East Sussex, West Sussex and Surrey;** and
- **Kent County Council has consistently informed Maidstone Borough Council that the Local Plan housing target is not deliverable or sustainable,** providing clear evidence demonstrating the severity of its impact on the local highway network which is a **known constraint to growth.**

This briefing amplifies the above summary points by setting out a number of potential matters, issues and questions which may be raised at the forthcoming Public Meeting.

Q1. What is the likely Maidstone Borough Council 'line'? a) and b)

- a) The National Planning Policy Framework (paragraph 47) requires local planning authorities to meet the objectively assessed need for market and affordable housing. In the Maidstone Borough, the housing need is 18,560 dwellings for the period 2011-2031.

Paper from KCC / Cllr Balfour to public meeting (11-02-2016)

KCC position:

This statement is **misleading**. The Framework requires local planning authorities to meet housing need but only as far as is consistent with other policies in the Framework. This includes, for example, transport policies (paragraph 32).

The Government has been clear that the level of housing need (i.e. the 18,560 figure) should not simply be used as a "proxy" for the Local Plan housing target. A sustainable housing target can only be established following the application of proper planning constraints i.e. environmental, infrastructure etc.

Since May 2014 Kent County Council has informed the Borough Council on numerous occasions that there are known constraints to meeting this level of housing need in the Maidstone Borough.

- b) A new Local Plan for the Maidstone Borough must be prepared without delay as the Government has imposed a deadline of 'early 2017' before it will intervene and arrange for the plan to be written. This announcement was made in July 2015 by the Planning and Housing Minister.

KCC position:

The Borough Council's reliance on this 'deadline' is **alarmist**.

To date, there remains no further detail on the implementation of the deadline which is ostensibly less than one year away. The Planning and Housing Minister told a Communities and Local Government select committee in late 2015 that the Government would "not necessarily" prepare Local Plans itself.

As far as the County Council is aware, **no other local planning authority in Kent is preparing a Local Plan to this superficial timescale**. On the contrary, a number of emerging Local Plans across the County remain at an early stage in their preparation (i.e. Sevenoaks and Tonbridge and Malling), yet these local authorities are adopting a measured and pragmatic approach to plan making in order to deliver sustainable growth.

Q2. What has Kent County Council done to demonstrate that the level of growth planned for the Maidstone Borough is not sustainable?

Kent County Council has submitted a comprehensive response to each of the consultations on the emerging Maidstone Borough Local Plan in May 2014 and October 2015.

In addition, the County Council has written to the Borough Council on numerous occasions since January 2015, urging the former Cabinet and the current Strategic Planning, Sustainability and Transportation Committee to

consider the known constraints to growth in the Maidstone Borough. The County Council – as Local Highway Authority – has made clear that the quantum and spatial distribution of development proposed in the Local Plan would have an **unacceptably severe impact** on the local transport network.

[The evidence underpinning the County Council's position is summarised in the accompanying note produced by Kent Highways and Transportation.]

Q3. Are there examples where a Local Plan does not meet the objectively assessed need for housing?

Yes, the Chichester Local Plan 2015.

In the case of Chichester, the objectively assessed housing need was 505 dwellings per annum. However, the Local Plan identifies a number of proper planning constraints which were duly applied to this figure. The Local Plan now makes provision to deliver approximately 435 dwellings per annum, a **reduction of approximately 15%** on the original objectively assessed need figure. The Local Plan was found sound by the Inspector in May 2015 and was adopted in July 2015.

If, for example, a **15% reduction** to the objectively assessed need was applied in the Maidstone Borough, the housing target would be approximately **16,000 dwellings**.

Q4. How does the level of housing need in the Maidstone Borough compare to the level of housing need in other districts across Kent and Medway?

The objectively assessed housing need for the Maidstone Borough is the **highest** out of all Kent local planning authorities (excluding Medway):

Local authority	Plan Period	Housing need	Per Annum	Local Plan Status
Medway	2012-2035	29,463	1,281	Emerging
MAIDSTONE	2011-2031	18,560	928	Emerging
Dartford	2006-2026	17,300	865	Adopted*
Canterbury	2011-2031	16,000	800	Emerging
Ashford	2011-2031	14,540	727	Emerging
Dover	2006-2026	10,100	505	Adopted*
Tonbridge & Malling	2011-2031	13,460	673	Emerging
Swale	2014-2031	13,192	776	Emerging
Tunbridge Wells	2013-2033	12,960	648	Emerging
Sevenoaks	2013-2033	12,400	620	Emerging
Thanet	2011-2031	12,000	600	Emerging
Shepway	2006-2031	8,750	350	Adopted
Gravesham	2011-2028	6,170	363	Adopted

*Adopted prior to the introduction of the National Planning Policy Framework

Paper from KCC / Cllr Balfour to public meeting (11-02-2016)

The figures in the table represent the information available at 1 November 2015 based on emerging and adopted Local Plans.

Where a Local Plan is emerging, these figures should be treated with caution as they represent the unconstrained housing need figure and *not* the Local Plan housing target. The housing target can only be reached once proper planning policy constraints are applied to the need figure i.e. environmental, infrastructure etc.

In the interests of consistency, these figures will be reflected in the refresh of the Kent and Medway Growth and Infrastructure Framework later this year.

Q5. How does the historical rate of housing delivery in Maidstone compare to other local planning authorities in Kent and Medway?

In the last ten years (2005/06 - 2014/15) **annual average completed residential development in the Maidstone Borough exceeded** that of every district in Kent. This excludes Medway.

Local authority	Annual average residential completions 2005/06 - 2014/15
Medway	695
MAIDSTONE	648
Canterbury	599
Tonbridge & Malling	596
Swale	582
Thanet	497
Ashford	457
Dartford	448
Shepway	308
Dover	286
Tunbridge Wells	264
Gravesham	258
Sevenoaks	239
KENT average	432

Q6. How does the historical rate of housing delivery in Maidstone compare to other local planning authorities in East Sussex, West Sussex and Surrey?

Since 2006/07, **annual average completed residential development in the Maidstone Borough exceeded** that of every district in the counties of East Sussex, West Sussex and Surrey.

Please note that outside of Kent, records held prior to 2006/07 are incomplete and cannot be relied on for the purposes of this research note. The detailed evidence can be viewed at Appendix 1.

Paper from KCC / Cllr Balfour to public meeting (11-02-2016)

APPENDIX 1: annual average residential completions in East Sussex, West Sussex and Surrey, by local planning authority

East Sussex local authority	Annual average residential completions from 2006/07 to 2014/15
Wealden	477
Eastbourne	240
Lewes	234
Rother	218
Hastings	182*
EAST SUSSEX average	270

West Sussex local authority	Annual average residential completions from 2006/07 to 2014/15
Arun	509
Mid Sussex	492
Horsham	417
Chichester	388
Crawley	388
Worthing	257
Adur	127
WEST SUSSEX average	368

Surrey local authority	Annual average residential completions from 2006/07 to 2014/15
Reigate & Banstead	546
Elmbridge	295
Woking	267
Epsom & Ewell	266
Guildford	250
Tandridge	247
Spelthorne	237
Waverley	227
Mole Valley	219
Runnymede	201*
Surrey Heath	176
SURREY average	266

*Indicates where a figure is based on 2013/14 data due a lack of up-to-date information.