

**MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION
WRITTEN SUBMISSION BY CPRE KENT &
MAIDSTONE DISTRICT COMMITTEE OF CPRE KENT**

SESSION 3B - ALTERNATIVE STRATEGIC DEVELOPMENT

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

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?

No.

It is noted that the Regulation 19 Plan at table 4.1 'Meeting Objectively Assessed Housing Need' assumed 1026 dwellings from windfall sites. This has risen to 1600 in the submitted Housing Topic Paper [SUB 005] table 3.1 line 6. The figure does not include limited garden development estimated in the Topic Paper at paragraph 3.22 as having potential to provide some 280 dwellings over the plan period, and exclusion sites also are not included in the windfall figure and paragraph 3.22 sets out could provide an additional 100 dwellings. This may increase provision by around a further 400 dwellings.

The OAHN will also be affected by when as well as by how much - or if the Government is successful in reducing International migration to below 100,000 post 2020 by how much less is required.

The effect of the decision to leave the European Union, and the form that this will take, the ability to reduce International migration to under 100,000, a desire expressed by Government [less than the +165,000 assumed in the 2012-based National Population Projection NPP and +185,000 in the 2014-based NPP] and its impact on the economy, including housebuilding, household formation and international immigration may result in differing assumptions for ONS population projections and household projections, in both the West Kent Districts and Maidstone Borough.

In the circumstances it CPRE Kent considers that it would be prudent for an early review of the OAHN once the effect of leaving the European Union is understood.

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?

See response to Qn 3.1 above.

Given this significant change that could result in reduced demand for housing it would therefore be appropriate to leave this to the first review of the Maidstone Borough Local Plan.

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?

This is not the only uncertainty. There is also the decision to leave the European Union and the impact this will have on housing need post 2020.

Should the Ministry of Defence decide not to make the site surplus to requirements this should be a trigger to review housing need. Up to then there is no need to identify additional sites on the off-chance that the site will not be made available.

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Employment Strategic Alternatives: Woodcut Farm

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

In our response to the Regulation 19 consultation on Policy EMP1(5) Woodcut Farm we encouraged the Council to liaise with Tonbridge and Malling Borough Council on whether there were opportunities for vacant employment sites in the Medway Gap area which have good transport links to Maidstone to make provision towards Maidstone's employment land requirements. There should at least be discussion with Tonbridge and Malling BC.