

Helen Whately's speaking notes for Local Plan Hearing - 6th October 2016

- Thank you for giving me the opportunity to speak today about the proposed Local Plan for Maidstone.
- As MP for Faversham and Mid Kent, I represent 13 of the 26 wards in Maidstone Borough, and over 40% of the population.
- I am speaking today because many of my constituents are enormously concerned about this Plan. I have received hundreds of representations – letters, emails, visits to my advice surgeries, and over 100 people attended a meeting in February to share their views – for the vast majority, their concerns – about the plan. There are few topics which have aroused such a volume of communication or concern.
- This plan will guide development in and around Maidstone for many, many years, hence it's vitally important that we get it right. I have taken care to listen to the views of my constituents and I've also had discussions with the planning team at Maidstone Borough Council. I am mindful of both the need for more housing and the concerns among residents, particularly in rural areas, to preserve the countryside, character and heritage of this area.
- I submitted a formal response to the Regulation 19 consultation, which I understand the Inspector has read – thank you.
- It was agreed in advance of today that I would make a statement addressing the issues raised in my written response. However, I appreciate that you want to do this as a Q&A so I will follow that format.

Housing needs assessment

The first area I'd like to raise is my concern about the high number of houses set out for Maidstone which fails to take into account the very real local constraints.

You asked me by how much I think the housing target should be reduced, which development proposals I think should be taken out, and how any shortfall should be addressed – for instance, with a review of the plan involving work on addressing the infrastructure constraints, which would then enable the number to be revisited, or by shifting into other local authority areas.

While it would clearly be inappropriate for me personally to attempt to create a new local plan for the Borough, I will share with you the strongly held views expressed in the representations made to me by constituents on the question of the number of houses.

The Local Plan proposes to meet the objectively assessed housing need of 18,560 dwellings for 2011-2031. This is highest number for any local plan in Kent (excluding Medway)

Much of the development is proposed around existing villages including Lenham (+110% growth), Harrietsham (+28%) and Headcorn (+27%).

Understandably, residents are seriously worried about the impact that this quantity of housing will have on the character and identity of these villages as well as the surrounding landscape. I share these concerns and I strongly question whether these locations can be deemed sustainable for this level of housing.

The government has been clear housing need figures should not simply be used as a proxy for the Local Plan housing target. Rather, there are flexibilities built into the NPPF to ensure that the actual figure is reflective of local need and circumstance. Paragraph 14 of the NPPF states that Local Planning Authorities should positively seek opportunities to meet objectively assessed needs “unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole.”

My constituents have consistently raised with me the potential negative impacts that the proposed quantity of housing will have. These include:

- Firstly, transport – traffic congestion is already a problem. Journey times by car have already reached a level which my constituents tell me deter people from living, working or establishing businesses locally, and affects their quality of life.
- Despite having worked on a transport model with Kent County Council MBC commissioned and used its own transport modelling. Consequently the Integrated Transport Strategy supporting this plan has not been endorsed by Kent County Council. Kent County Council has expressed serious and classified the impact of the proposals on congestion as severe.
- The Integrated Transport Strategy ought to address this, yet residents are concerned that it does not propose anything like the level of investment in infrastructure that is required for this level of development, and includes unrealistic expectations for people to switch

from cars to other modes of transport. Not does it take account of the proposals for a new Thames Crossing and the likely impacts of this on the borough's road network.

- Kent County Council have called for a review to be included in the plan to allow the impact on the road network to be assessed and plans drawn up for more substantial road improvements. I support this proposal, and both Helen Grant and I have written to MBC saying so – as it reflects the views of many of my constituents that the proposed level of development is unacceptable without investment in infrastructure, and that the current plans particularly for roads are inadequate.

There are also serious concerns about the capacity of the sewage system to support this level of development. In the last few months I've been helping an elderly gentleman in Headcorn who was at the end of his tether with raw sewage leaking onto his garden and property because of antiquated system. And this is not an isolated incident, it's a well-known problem in Headcorn. The Local Plan should surely be an opportunity to look at the cumulative impact of development on the waste water infrastructure.

Finally – on constraints – there is the geography of this part of Kent.

84% of the proposed housing is to be allocated on greenfield sites. The council has told me this is because there simply aren't any more brownfield sites, but the upshot is that swathes of greenfield sites are being used – so we are losing previous agricultural land in this highly productive agricultural region.

Responding to the inspector's question about whether I think unmet needs should be built in other local authority areas: Parish councils have expressed to

me concern about limited cooperation between Maidstone and other councils and I would ask the Inspector to scrutinise the evidence on this. Clearly, it's right to look at sites across a wider area, and particularly opportunities to develop brownfield sites – in the light of the shortage of brownfield sites within Maidstone Borough and the clear steer from Government that brownfield sites should be developed rather than greenfield whenever possible.

I strongly believe that the 'constraints' I have outlined must be taken into account when considering the number of new homes, and sites on which they are to be built.

Junction 8 Employment Land Allocation

You ask if I seek the deletion of the Junction 8 employment site allocation.

- This is not an appropriate location for a large industrial site.
- I've had representations from numerous residents, local councillors, the CPRE, the Joint Parishes Group and the Bearsted and Thurnham Society on this.
 - The site is detached from the built-up area – most of the new housing is planned for the villages on the south side of the borough, meaning employees would likely access it by car (adding to congestion and pollution)
 - The site is an integral part of the landscape stretching from Bearsted towards Leeds Castle. An industrial development there would blight the approach to Leeds Castle, a national heritage asset attracting half a million visitors a year.

- And as you will know, the proposed site is in the setting of the AONB.
- I recognise that we need to make sure there are sites for new and expanding businesses in the borough. However - it's got to be in the right place – not in a swathe of open countryside, and preferably accessible by public transport.
- Clearly I seek the deletion of the site at Junction 8. It is not appropriate for me to come up with an alternative local plan, but I would urge alternative sites to be found in more appropriate locations, particularly in locations served by public transport.
- Development around Junction 8 has been rejected before – the Kent International Gateway development proposal was rejected in 2010 and the Waterside Park site nearby was rejected last year.
- The inspector at that appeal commented “In my opinion, the greatest impact on the setting of a heritage asset would be that on Leeds Castle and its park.... The intrusion of substantial industrial development into an otherwise well preserved setting seems to me to be particularly harmful.”
- The reasons for rejection of sites around Junction 8 in the past remain today. This is the wrong place for an industrial development.

Gypsy and traveller accommodation

You know I'm concerned about the proposals for Gypsy and Traveller and Travelling Showpeople Accommodation, on two counts (i) the shortfall in pitches proposed in the plan, with the unsatisfactory proposed solution of relying on windfall sites, and (ii) the assessment of the number of pitches

required, which was undertaken under the requirements of the 2004 Housing Act and has not been updated with the change in definition.

I have read the Council's paper on this point and appreciate the differences in methodologies between themselves and other councils. However, given the situation at the moment in parts of the borough, to say it's not worth looking at because the reduction in numbers would only be 'modest' is – for residents affected - not an acceptable response. Time and again we are seeing permissions granted, and though temporary, they are then re-granted when the temporary period expires... we are seeing permissions granted on the grounds of a lack of 5-year supply. This is leading to expansion of traveller sites in totally inappropriate locations, where we know planning permission for residential development would not be granted. In fact, that is the reason permanent permission has not been granted. But the council must take steps to bring this situation under control – through a reasonable assessed need and by identifying suitable sites. The local plan is the time to do that.

Engagement

You ask me if I seek any specific action on engagement.

You will know that the National Planning Policy Framework stresses the need for plans to “empower local people to shape their surroundings, based on joint-working and co-operation”. I’ve received a great deal of feedback from my constituents on engagement – or rather – their disappointment at the lack of engagement and when there has been engagement, their views not being taken on board.

For example,

The consultation at Regulation 18 stage was just four weeks long

This was the first time many would have seen a complete draft of the plan - so a critical consultation to establish residents’ views on the content of the plan, and whether they felt the content reflected their views as expressed during earlier phases of engagement. Some parish councils – including Langley, Headcorn – got in touch with me to share their frustration, telling me that because they only meet once a month, it was virtually impossible for their members to consider the plan content in full, discuss it with the communities they represent and have enough time to prepare a full response to submit to the borough council. Whilst I understand that there’s no legal minimum length set for this consultation period, Maidstone Borough Council itself suggests a six week period would be an appropriate length of time (as documented in their Parish Charter, which all parishes have signed up to).

We also have a number of parishes (such as Lenham and Headcorn) working actively on their Neighbourhood Development Plans – as you will know these aim to place communities at the heart of the planning system so that they can

shape development in their area that reflects both their community needs (including housing needs) and aspirations. Time and time again, I have been approached by those working on Neighbourhood Plans saying that their emerging plans are being ignored, despite them collecting clear and robust evidence. So they are being denied the opportunity to 'shape development in their area', despite great time, energy and money being invested by residents.

Overall, many of my constituents feel MBC has not effectively engaged the local community, at best paying lip-service to the requirement to engage and certainly not developing each iteration of the plan to reflect the views of local people. This is felt particularly by residents in the villages and rural areas where so much of the development is planned. I realise that there is a need to get the plan in place sooner rather than later, but it is not right to ride roughshod over the views of residents in order to do this, when this plan will have far-reaching impacts on peoples' lives and surroundings.

So what action do I seek on this? Clearly the period for consultation on Regulation 18 has passed. The brevity of that consultation is just one of the many examples of failure to truly listen and amend the local plan to reflect residents' views – ie the Borough Council's general attitude towards consultation. Given where we are now, I would urge the Inspector to himself rectify this failure, as he now has the opportunity to listen to residents' views during this hearing.

To conclude, I've voiced a number of issues this afternoon that my constituents have raised with me:

- People feel that their views are not listened to or taken on board
- The housing numbers do not take into account local constraints, particularly the inadequacy of infrastructure and the negative impact on communities and landscape
- The employment site at Junction 8 is simply inappropriate; and
- The plans for Gypsy and Traveller accommodation are flawed

I fully understand the need for more housing – I receive correspondence daily from constituents struggling to find housing in this part of Kent - but that does not mean that the people of this borough should accept a plan that is so flawed.

I had hoped that MBC would have addressed these concerns when I and many others raised them at the last round of consultation, but sadly this has not happened. We rely now on this stage to make sure the plan is improved, to better balance the need for housing and local constraints, and to take into account the views of residents across the borough.