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Submitted via Email only to:
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22nd December 2020

Dear Sir/Madam,

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN REVIEW – REGULATION 18 PREFERRED APPROACHES CONSULTATION, DECEMBER 2020

On behalf of our client Wates Developments Limited ('Wates'), we set out representations to the Maidstone Borough Council Local Plan Review, Regulation 18 Preferred Approaches Consultation. As requested, we have also enclosed the completed Consultation Response form.

6.6 Spatial Strategic Policies

Policy SP5 - Strategic Development Locations

Policy SP5 identifies a potential strategic development location safeguarded for delivering a new Leeds-Langley Relief Road (LLRR). The policy justification notes that the new road will link the M20 (Junction 8) and the A274 around Langley (para. 6.85).

The policy identifies two 'Strategic Development Locations' – the Invicta Barracks site and the Lenham Broad area for housing growth. Both of these locations, identified under part 1 (a and b) of the policy respectively, include a specified number of units, 1,300 and 1,000 units respectively. There is however no quantum of development identified for the safeguarded area for the new LLRR.

We welcome the identification of the LLRR within the policy. However as with other sites identified in policy SP5 at 1 a) and b) Invicta Barracks and Lenham, policy SP5 should include a firm allocation rather than a '*potential* strategic development location' and should clearly identify a quantum of development which will be acceptable in this location. Further to representations made to the 'Garden Communities' consultation in early 2020, we consider this figure should be 6,000 residential units.



In summary, policy SP5 should be amended to remove the potential strategic development location at part 2 of the policy. This should be replaced with a new Strategic Development Location in a new part c, identifying 6,000 units within the Leeds-Langley corridor.

Policy SS1, part 7 should be updated accordingly to reflect a firm allocation rather than a potential allocation.

Policy SP5(a) Potential Development in the Leeds-Langley Corridor

Policy SP5(a) identifies that development within the LLRR corridor, identified on the map on page 85, will be safeguarded for potential delivery of the new Leeds-Langley Road. The draft policy notes that *'Development Proposals which come forward in the defined corridor will be assessed for their potential to prejudice the delivery of a new highway.'*...and...*'proposals for new residential and commercial development coming forward in the defined corridor will need to be accompanied by a masterplan demonstrating how the development of the site potentially contributes to and does not inhibit the delivery of a Leeds Langley Relief Road.'*

It is difficult to understand how development proposals in the area could be assessed in this manner when not only has a route not yet been identified but that *'the case has not been made for a road.'* (para. 7.76).

The safeguarding of a large indicative area of search therefore effectively sterilises the search area from most development until such time as a route is defined. The identification of a potential LLRR was included in the adopted Maidstone Borough Local Plan (2017), policy LPR1 and paragraph 9.13. Adopted Policy LPR 1 specifically identifies that the Local Plan review may need to address whether the case for a Leeds-Langley Relief Road is made, how it could be funded and whether additional development would be associated with the road.

It is apparent that there is still significant work to undertake before a route is agreed. Draft policy SP5(a) notes that *'alternatives to a potential relief road will also be considered'*. The plan states that detailed costings, environmental and route appraisals and an assessment of future housing requirements that would necessitate and support the development have not yet been undertaken (para. 7.75). This would suggest that work on the road is not yet at an advanced stage. Without a clear decision on the route, the policy in its current form risks restricting development of the search area for a significant period.

Whilst it is noted that policy SP5(a) identifies further work will be undertaken on the safeguarding/route of the road between Regulation 18 and Regulation 19 production stages, given the further work required it seems unlikely that a route will be determined prior to regulation 19 stage, currently programmed for June 2021 (figure 2.2, LPR Timetable).

We welcome the identification that discussions between KCC, MBC, local landowners and other stakeholders will continue with the potential for a future AAP to be produced to guide development of the route in partnership with landowners and Kent County Council (para

6.89). However, the draft plan notes that there is currently no timeframe for this and there is additionally no development identified at the current time.

As identified in the draft Local Plan, there is a significant amount of land within the corridor which may be able to contribute toward the funding of the new route by both providing land and potentially financial contributions as part of the new development along any future route (para. 6.87). The inclusion of a major allocation within the area of search, with an approximate defined quantum of residential-led development -as proposed in Wates's Garden Settlements submission - would give greater certainty to the form and amount of development to support the new road. Such an allocation could include the requirement for the delivery of a new LLRR.

Currently policy SP5(a) allocates a wide indicative area of search for the new road with a potential development area to assist its delivery. It is considered the emphasis of the policy should be reversed to definitively allocate a strategic development area, with a defined quantum of development the delivery of which would be contingent on delivery of a new LLRR and with other specific allocation requirements, in a similar manner to policies SP5(b) and (c) for the Invicta barracks and Lenham sites respectively. This should include commercial development alongside residential. This proposed alteration would bring consistency to the three areas identified in the overarching strategic development policy SP5. The amendments to policy SP5(a) should consider how of the indicative area of search for the road will not lead to the unnecessary restriction of new development in the area given that significant further work is required before a decision on the route of the new road can be made. Currently, the policy restricts almost any development as application proposals will be unable to demonstrate how they potentially contribute to and do not inhibit the delivery of the LLRR given that:

- 1) no case has been made for the road (as stated in draft Local Plan para 7.76);
- 2) no assessment of whether future housing requirements would necessitate and support the construction of LLRR (para. 7.75);
- 3) route appraisals have not been undertaken (para. 7.75).

As currently worded it is not considered policy SP5(a) is 'sound' in accordance with paragraph 35 of the NPPF.

Land North of the A20

Land to the north of the A20 directly south east of the Woodcut Farm Employment allocation is also included in the indicative area of search. The Woodcut Farm allocation is for up to 49,000m² of mixed employment floorspace – B1 (now E), B2 and B8 use classes - with a designated landscaped area to its west. The site was granted outline planning permission in July 2018 for 45,295m² of commercial floorspace (B1 (now E) and B8 (MBC reference 17/502331/OUT).

The Woodcut Farm site is likely to meet qualitative need for a new, well-connected mixed use business park in the borough which can meet the anticipated demand requirements for office



space, small business spaces, stand alone manufacturing and small scale distribution as noted in the draft Plan (para.7.53).The plan notes the unique opportunity Woodcut Farm offers to provide a prestigious business park in this location which can provide a range of job needs over the lifetime of the new plan, up to 2037.

Given the importance of Woodcut Farm and the recognition of the site's ability to provide high quality employment space, the land to the immediate south west of this site forms a logical extension to this major employment development. The site, which was included in Wates' representations to the Garden Settlements consultation earlier in 2020, is in an approximate triangular shape formed by Musket Lane, Ashford Road (A20) and the M20 Junction 8 slip road. This area falls outside of the allocation currently but could provide approximately 7,500m² commercial floorspace which would complement the directly adjacent committed Woodcut Farm development and we consider should form an additional commercial allocation in order to assist meeting the Council's stated overall growth need for employment development of 101,555m² (table 1.1)

Increase in Housing Numbers

The draft Local Plan identifies a housing target of 1,214 units per annum during the plan period, until 2037 - 18,210 dwellings over the 15-year plan period, based on the Government's current Standard Methodology calculation (policy SS1). However, it is noted that the emerging plan housing target does not include a contingency amount. The reasons given for this are the current uncertainties around Brexit, Covid -19 and possible alterations to future planning regulations (para. 7.1). The Government's Planning Practice Guidance identifies however that there should be a buffer included in housing requirements to take into account potential fluctuations in the market and to ensure supply is sufficiently flexible and robust. Such a buffer should be included.

We welcome the identification that the housing target will be kept under review in the run-up to the Regulation 19 public consultation (programmed for June 2021) to ensure that the Publication version of the plan is based on the most up to date data.

We look forward to receiving confirmation that these representations have been received and registered. In the meantime, if you require any further information or clarification please do not hesitate to contact me on 07922 582704 or at tom.lamshead@eu.jll.com Please keep us informed of any further consultations on the emerging draft Local Plan and associated documents, using the contact details at the top of this letter.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Tom Lamshead'.

Tom Lamshead MRTPI MIPI
Associate Director
Planning, Development and Heritage
Jones Lang LaSalle Ltd