

MAIDSTONE BOROUGH LOCAL PLAN REVIEW

DRAFT PLAN FOR SUBMISSION (REGULATION 19)

OBJECTION TO SOUNDNESS ON BEHALF OF LENHAM PARISH COUNCIL

POLICY LPRSP4(A) (1) and (2)

REALISTIC RATE OF HOUSING DELIVERY

LPC SEVEN

1. Policy LPRSP4 (A) (1) (a) states that housing completions are anticipated to commence in 2029. The Heathlands development is anticipated to provide a new and comprehensive suite of infrastructure provision, including an improved or new wastewater treatment facility. Lenham Parish Council suggest it will not be possible to go through the process of approval, design and implementation of the new development such that completions could commence as early as 2029.
2. Lenham Parish Council suggest that first completions are more likely achieved some ten years after the first adoption of the Local Plan Review. This is most likely to be 2033 at the earliest. Lenham Parish Council find the plan is overly optimistic and unsound in this respect.
3. Policy LPRSP4(A) (2) (a) states that 1,400 homes will be delivered within the period 2029 - 2037. To complete 1,400 homes over the eight years from 2029 - 2037 implies an annual build rate of 175 dwellings per annum (dpa). Lenham Parish Council suggest that this build rate is ambitious in the extreme and in reality, highly unlikely to be achieved. This plan is not sound in this respect.
4. The Inspector's Report on the Examination of the Maidstone Borough Local Plan is dated 27th July 2017. The Inspector considered build rates at Lenham in Paragraph 192 of this Report. The Inspector concluded as follows: ***"However, I consider that it would remain unrealistic in this village location to deliver even 135 dwellings each year for 10 years. I therefore consider that the Broad Location should be further reduced to 1000 dwellings, equivalent to 100 dwellings per annum in the Broad Location between 2021 and 2031."***

5. The following sites have been available with planning permission and have either been completed or are under construction during the period mid - 2017 to mid - 2021:

	<u>Available</u>	<u>Completed</u>
1. The Old Goods Yard (65 dwellings)	65	65
2. Old Ham Lane (82 dwellings)	82	72
3. Tanyard Farm North (145 dwellings)	145	0
4. The Paddocks (23 dwellings)	23	23
5. Tanyard Farm South (6 dwellings)	6	6
6. Maidstone Road (23 dwellings)	23	23
7. Glebe Gardens (10 dwellings)	10	10
8. Lenham Heath Forstal (10 dwellings)	10	10
9. Wealden Homes (Loder Close (0 dwellings)	0	0
10. Old Goods Yard, Phase 2 (50 dwellings)	50	0
	<u>464</u>	<u>209</u>

The completion of 209 dwellings over 4 years is a build-out rate of 52 dwellings per annum. This is despite the availability of large number of permitted sites over this time. None of the above planning permissions are affected by the more recently imposed constraint in relation to nutrient neutrality at the Stodmarsh Marshes.

6. Based on local knowledge of housing market conditions, Lenham Parish Council suggests a built-out rate of 100 dwellings per annum to be the ABSOLUTE MAXIMUM which could be achieved in the Parish. The Parish Council reserves the right to submit further details on this issue and on any other issues, as appropriate, during the Local Plan examination.
7. Lenham Parish Council has considered the situation which would arise in a new Garden Community with much of the supporting infrastructure promised but not available. The Parish Council can see no reason for the maximum Lenham built out-rate of 100 dwellings per annum to be exceeded.
8. The Lenham Neighbourhood Plan (LNP) was prepared in 2021 and releases 1000 dwellings across 7 sites.
9. The LNP provides for 1000 dwellings over the years 2021 to 2031, ie an average built-out rate of 100 dwellings per annum. Policy LPRSP4(A) (2) implies the construction of 175 dwellings on average over the years 2029 to 2037. For the years 2029, 2030 and 2031 there would be an overlap between the LNP and Heathlands, implying a delivery rate of 275 dwellings per annum in total within the Parish. Lenham Parish Council suggests that this build-out rate would be impossible to achieve. The Review is unsound in this respect alone.
10. As a consequence even if Heathlands were to be included in the review, Lenham Parish Council suggests it would be impossible for the project to deliver 1,400 houses by 2037. Based on a delivery of 100 dwellings per annum the maximum delivery which could be achieved from Heathlands would be 400 dwellings over the years 2033 to 2037.

11. Assuming a maximum of 400 dwellings could be achieved by 2037, the Heathlands project would take a further 46 years to be completed, ie until 2083. This project programme is very different to the thirty-year vision postulated in policy LPRP4(A) (8) (a).
12. There are good planning reasons not to commit the Borough spatial strategy to a project with a lifetime of fifty years when there is no certainty as to the situation which will arise regarding housing needs and locational requirements in the future.
13. Lenham Parish Council would support an allocation of some 400 or 500 dwellings post 2031 as part of the LNP First Review.
14. The allocation of 400 - 500 dwellings would be a continuation of the supply achieved in the LNP and would be strictly on the basis of the identified sites being genuinely available and delivering the requisite supporting infrastructure in a timely manner unlike more speculative projects such as Heathlands.