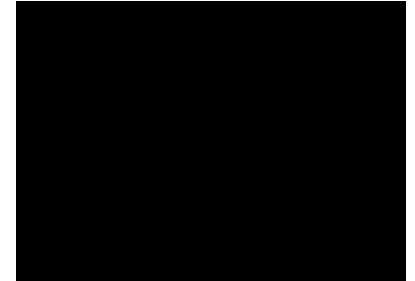


10 December 2021



Planning Team
Maidstone House,
Kings Street,
Maidstone,
ME15 6JQ



Submitted via email: ldf@maidstone.gov.uk

Dear Sir or Madam

MAIDSTONE BOROUGH COUNCIL LOCAL PLAN REGULATION 19 CONSULTATION DOCUMENT. REPRESENTATIONS MADE ON BEHALF OF HEATH ROAD HOMES

Thank you for the opportunity to participate in the Maidstone Borough Council Local Plan Regulation 19 consultation. These representations have been prepared on behalf of our client, Heath Road Homes, who has an interest in the site at Kent Ambulance HQ, Coxheath. Our client completes the acquisition of the site in Summer 2022 upon the departure of the current occupier. A site location plan is included for reference at Appendix A.

Our client are encouraged to see that MBC feels that the wider site could be delivered for a larger development during the plan period. This is reflected in draft allocation Policy LPRSA364 – Kent Ambulance HQ, Coxheath. The allocation sets out a development capacity of approximately 10 dwellings. The copy of the draft allocation is attached at Appendix B.

Given the site's sustainable location, surroundings and size, we consider that the site's development capacity could be further optimised and that approximately 25 dwellings could be comfortably provided.

1. Site and Surrounding Area

The site is located in a centre of Coxheath, within Maidstone Borough Council (MBC). It extends to approximately 0.36 hectares and is broadly rectangular in shape. It comprises one rectangular building on the northern part and extensive car parking (88 spaces) on the remainder. The building extends between 2-3 storeys with pitched roofs. The surrounding context comprises residential, community, commercial and village centre uses/amenities.

The site benefits from rights of way across the adjoining Health Centre site to the North which has direct access from the adopted Highway onto Clock House Rise (the Crest Nicholson Development adjacent). The nearest bus stop is located to the north on Heath Road which provides services to Maidstone every 20 mins. The closest train stations are East Farleigh (4 km), Yalding (6 km), Marden (9 km), Maidstone Barracks (8 km) and Maidstone East (8 km).

The site is situated within Flood Zone 1. The Site is not situated within a Conservation Area nor is it in close proximity to any, however it is within close proximity to a Grade II Listed Building - The Holy Trinity Church located to the north east.

The building on site is currently used as the head office for the South East Coast Ambulance Service. This use has a 24 hours operation. The site does not comprise protected employment land within the adopted or emerging local plan.

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A summary of the recent and relevant planning history for the site and surrounding area is set out in Appendix C.

Pre-application advice was sought in October 2021 in relation to the redevelopment of the existing car parking at the site for 9 residential houses with associated landscaping, ecological enhancements and parking. Overall the meeting was positive and an application is being prepared.

2. Relevant Policy Context and Emerging Local Plan

Given the age of the Local Plan (2017), MBC are undertaking a Local Plan Review and MBC has published its draft for Regulation 19 consultation. The Borough Council has published the draft for submission version of its Local Plan review (Regulation 19). The aim is to submit to the secretary of state in Spring 2021. The council aims to adopt the new local plan in early 2023.

Since it was adopted the National Planning Policy Framework (2021) has been revised as well as a number of relevant matters – as referenced where applicable below.

The NPPF covers plan making in Chapter 3, with Paragraph 16 setting out what plans should comprise.

- a) be prepared with the objective of contributing to the achievement of sustainable development;*
- b) be prepared positively, in a way that is aspirational but deliverable;*
- c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) be accessible through the use of digital tools to assist public involvement and policy presentation;*
and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)*

Paragraph 35 sets out that a plan is “sound” if they are positively prepared; justified; effective; and consistent with national policy.

Draft Allocation (Policy LPRSA364)

The draft allocation in the Regulation 19 Local Plan for the site is for re development for approximately 10 dwellings under Policy LPRSA364 – Kent Ambulance HQ, Coxheath (see Appendix B).

The allocation specifies that the layout will need to ensure that residential buildings are successfully integrated with adjacent non-residential uses and their operations are not adversely affected. It also states that the development should be accessed from John Day Close in order to enable better integration with the adjacent residential area and to avoid potential conflicts associated with an access through the adjacent medical site.

With regards to landscaping, the draft allocation states that the existing tree/hedgerow margins should be retained or enhanced in order to provide the opportunity for biodiversity habitat creation/enhancement and that a Phase 1 Habitat Survey will be required, which may as a result require on and/or-off site mitigation for the existing habitat of local fauna/flora. Any development on the site is also required to provide new open space in accordance with Policy SP13(B) & INF1.

3. Suitability of the Site

The thrust of planning policy and guidance is to secure sustainable patterns of development and regeneration through the efficient re-use of previously developed urban land, and through concentrating development in accessible locations. This is encapsulated in the presumption in favour of sustainable development set out in

the NPPF. Furthermore, the NPPF states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses.

The site is deliverable in the short term (0-5years). It is available upon the relocation of the existing office uses in Summer 2022, it is brownfield land and it provides a suitable and sustainable location (see above) for a new residential led development. Furthermore, Heath Road Homes is a delivery vehicle set up to deliver this site especially, therefore securing a realistic prospect that housing will be delivered.

4. Housing Capacity and Need

MBC has calculated their minimum housing need using the new 'standard method' introduced in the NPPF and this results in a local housing need for **1,157** dwellings per annum in Maidstone Borough, which equates to **17,355** dwellings over the proposed 2022-37 plan period for the Local Plan Review.

However, they have also taken into account current allocations and permissions (Extant Supply including 2017 allocations, broad locations and other extant permissions), forecast windfall completions, and contributions from broad locations beyond the 2017 Plan period, which have the potential to meet some of this target amount. On this basis, the revised minimum housing need identified in the Draft Local Plan is **5,064** units.

The Council's latest 5 Year Housing Land Supply position published in April 2021, which indicates that Maidstone have 5.6 years' worth of supply. Very good levels of housing delivery are also evidenced in the latest government housing delivery test, with a score of 146%.

Regardless of this positive position, there is no upper limit set in respect of housing targets or demonstrating deliverable housing site, as windfall sites are also considered beneficial. Nationally there is a clear identified need for boosting the supply of new homes (Paragraph 60), as well as focusing development on previously developed land (PDL) (paragraph 119).

The site presents an excellent brownfield opportunity and there are very good prospects to optimise the delivery of housing, further than the draft allocation identifies. Our client has instructed pH+ Architects to assess the capacity of the site, and in their professional opinion 25 units, in a combination of houses and flats could be achieved, in a well-designed manner.

On this basis we recommend that the draft allocation is amended to reflect a more ambitious number of housing on the site: approximately 25 units.

5. Other Key Considerations

Affordable Housing

Draft Policy LPRSP10(B) updates the Council's approach to affordable housing matters. Viability considerations should be woven into the policy whole more clearly.

It is noted that the new tenure split proposed comprises 75% social and affordable rented and a minimum of 25% first homes. Other intermediate products are no longer specified. Intermediate housing should not be removed entirely as they provide alternative housing in particular discounted rented products and other discount ownership products- which aren't restricted to first time buyers.

It is noted that whilst first homes is the Government's direction of travel, it is not reflected in the NPPF which was updated earlier this year. Paragraph 65 only mentions "affordable home ownership" products. Furthermore Planning Practice Guidance therefore advises that "If a planning application for a major housing site in which 25% of the affordable homes are First Homes does not deliver enough First Homes to meet the 10% affordable home ownership expectation in the NPPF, additional affordable home ownership homes may be provided on top of the First Homes provision, in order to meet this expectation" (NPPG Paragraph: 023

Reference ID: 70-023-20210524). Given that the NPPG advises that other alternative products are acceptable this should be incorporated into the draft Policy.

Parking and Access

Draft Policy LPRTRA4: Parking advises that KCC standards will be applied. The inclusion of part 3 of the policy is encouraging for individual sites, to ensure that site specific local circumstances are taken into account.

In terms of access to the aforementioned site allocation, draft Policy *Policy LPRSA364* sets out that access should preferably be from John Day Close. This wording is too prescriptive and should say that access “could be” from John Day Close. This needs amending as negotiations and layout changes to other land to facilitate this would need to be held with private landowners which present an uncertainty over the preferred access point.

Ecology

Draft Policy LPRSP14A Natural Environment sets out that a minimum of 20% biodiversity net gain should be secured on new residential sites. Whilst we acknowledge the Council’s ambition above the 10% in the Environment Bill, this blanket minimum requirement is considered to be prescriptive as it does not take into account site by site circumstances or viability matters, nor does it suggest a transitional or phased approach to this new requirement.

Given that this is a new requirement for developments, the policy should be more flexible to target the 10% as standard, in line with the Environment Bill, and set a strategic target at 20% to encourage developer to achieve more. Development viability should also be acknowledged, for targets beyond 10% BNG. In addition, the policy should confirm if this target is applicable to minor an major residential scheme.

6. Summary and Future Participation

The principle of residential development on the site is established through the draft allocation, as well as through the positive pre-application feedback provided by MBC relating to car park element of the site for 9 houses. Given that the wider site is now considered to be developable, it is felt that a more ambitious capacity of 25 dwellings should be contained within the allocation to optimise this brownfield site. 25 dwellings would make a more valuable contribution to the housing need within the borough.

These representations have been prepared on behalf of Heath Road Homes in relation to Kent Ambulance HQ, Coxheath, they complete on the acquisition of the site in Summer 2022 upon the departure of the current occupier. We strongly encourage officers to uplift the residential capacity of the site’s allocation. The site can deliver new housing within the short term and can make a significant and positive contribution towards addressing Maidstone’s identified housing needs. Furthermore the site is available and deliverable in the short term, and our client’s desire to redevelop without delay is evidenced by the commencement of pre-application discussions with MBC.

I trust that the above is of assistance in the preparation of the Local Plan. I would be grateful for confirmation of receipt of these representations, and would welcome the opportunity to engage further with the preparation of the draft Local Plan.

If you have any queries or would like to discuss further, please feel free to contact me.

Yours sincerely



Laura Fletcher-Gray
Associate Director



Cc. G. Charles, City and Suburban
K. Altieri, Maidstone Borough Council

Enc. As above

Appendix A- Site Location Plan



Appendix B – Policy LPRSA364 – Kent Ambulance HQ – Coxheath

POLICY LPRSA364 – KENT AMBULANCE HQ, COXHEATH

Land at the Kent Ambulance HQ is included as a draft allocation for the development of approximately 10 dwellings.

Design and layout

- The site layout shall ensure that residential buildings are successfully integrated with adjacent non-residential uses and their operations are not adversely affected.
- Design of the site will need to ensure neighbouring resident's amenity is protected.
- Development proposals will be of a high standard of design incorporating the use of vernacular materials.
- Development should preferably be accessed from John Day Close in order to enable better integration with the adjacent residential area and to avoid potential conflicts associated with an access through the adjacent medical site.
- Site design and layout shall be informed by a local historic impact assessment.

Landscape/Ecology

- A phase 1 habitat survey will be required, which may as a result require on and/or-off site mitigation for the existing habitat of local fauna/flora.
- Should site characteristics limit the potential for on-site biodiversity benefits, it may be appropriate to make contributions to biodiversity enhancement schemes within the surrounding area.
- Existing tree/hedgerow margins should be retained/enhanced in order to provide the opportunity for biodiversity habitat creation/enhancement.
- Should site characteristics limit the potential for on-site biodiversity benefits, it may be appropriate to make contributions to biodiversity enhancement schemes within the surrounding area.

Access, Highways and transportation

- Provision of a suitable access point that meet standards and safety provisions.
- Access should preferably be taken from John Day Close.

Open Space

- The development shall provide new open space in accordance with Policy SP13(B) & INF1.
- Where it is not feasible, due to site characteristics to provide an appropriate level of on-site amenity space for residents in accordance with Policy SP13(B), the scheme shall make appropriate financial contributions towards off-site provision/public realm improvements within the locality in accordance with Policy SP13(B).

Utilities Infrastructure

- Connections to the nearest points of the network (with adequate capacity) will be required for all utilities.
- The developer should ensure that appropriate consultation with the underground utilities operator takeplace.

Appendix C- Recent and Relevant Planning History

LPA Ref	Description of Development	Status	Date of Decision
07/2179	Creation of additional parking and external lighting as shown on Drawing No 02, 03, scale 1:500 block plan, 1:1250 Ordnance survey based site location plan and Design and Access Statement received on 24 January 2008.	Application Permitted	Fri 29 Feb 2008
05/1994	Replacement of existing 3 number air cooling units at ground floor level with a single air cooling unit (with re-use of existing pipe run) as shown on drawings numbered CS-007043 001Ex, 57(M)200 and unnumbered plans and details received on 22/09/05, 13/10/05 and 14/10/05.	Application Permitted	Mon 21 Nov 2005
86/0855	Change of use of nurses home to centralised ambulance control headquarters and training school with community care facilities	Outcome not available. Status provided by MBC "Objections" - No documents available by MBC or KCC.	Wed 24 Sep 1986

Recent planning applications in the area:

LPA Ref	Description of Development	Address	Status	Date of Decision
18/503194/FULL	Demolition of existing restaurant and erection of 14no. two bed retirement apartments providing Assisted Living for over 55 year old persons, with associated parking, turning and amenity space.	118 Heath Road Coxheath	Refused	Mon 24 Sep 2018 Refused: on design, townscape/character quality and visual impact concerns; no affordable housing.
19/501775/FULL	Demolition of existing restaurant and erection of 14 no. retirement apartments for over 55 year old persons with associated parking turning and amenity space. (Resubmission)	118 Heath Road Coxheath	Granted- won at appeal after LPA Refusal.	LPA: 5th December 2019 Appeal: 23 September 2020. Matters in dispute: loss of community facility; and character and appearance.