

Maidstone Green Party

Response to Maidstone Borough Council's consultation on the Local Plan Review Preferred Approaches

Firstly, we are deeply concerned about the timing and brevity of this consultation. It was launched to run from before the date of the end of the national lockdown for covid, i.e. 1st December 2020 however as the council is aware, Maidstone immediately entered Tier 3 with the tightest restriction. This is very likely to reduce knowledge of and access to the consultation and therefore the process is challengeable. Furthermore the consultation in being run in the three week run up to Christmas, a generally accepted poor time for consultation and a time that will further suppress engagement by the public. We are concerned that this poorly timed consultation will not reasonable standards of engagement, particularly from hard to reach groups, and is therefore flawed.

With regard to the Local Plan Review Preferred Approaches (LPRPA) itself:

Climate change and the ecological emergency

Given that this is the largest emergency facing humanity and that the council has acknowledged this, it is surprising that the LPRPA does not frame itself around carbon / pollution reduction, resource reduction, and restoration / mitigation.

Climate change is paid lip service to only and it is clear that the council has not understood the impacts or requirements. Policy SP15(C) Climate Change commences with the words "Adopt a strategy for growth" demonstrating the council's fundamental lack of understanding about the connection between the environment and the economy.

The building of an average home uses 100t CO₂e. The LPRPA requires that 18,210 homes are built, this will require the emission of 1.8 million tonnes of CO₂e which would not be in keeping with the council's aim to be carbon neutral or that climate change is an emergency.

As economist Kenneth Boulding is quoted as saying: "Anyone who believes in indefinite growth in anything physical, on a physically finite planet, is either mad or an economist."

This is a key failure of the LPRPA.

Greenfield vs brownfield

With the worsening climate and biodiversity crises and the need to localise our economy and food production MBC should cease all plans for development on greenfield sites. There is significant space for development on brownfield sites across the borough however the council has failed to identify enough of these in this review.

We therefore welcome the removal of Marden from the garden village plans but request that Lidsing and Lenham, plus all other greenfield sites are removed too.

We are surprised that the Maidstone East site is not proposed for a mix of high density housing alongside some employment use and suggest that this should be reconsidered.

We note that Junction 8 is earmarked for industrial use. This is a greenfield site and does not have public transport links. Industry should not be sited at this place.

Density, affordability and size of housing

There is a need for homes that are affordable, close to public transport, employment and other infrastructure. The LPRPA does not provide adequate numbers of affordable or social housing but proposes the majority of new homes to be larger homes which is not in line with the needs of the population.

We suggest that higher density homes in the borough are required, particularly as the policy for rural density of 30 dph results in large houses rather than the affordable ones that are most needed. A far higher proportion of new homes should be affordable: at least 40% should be affordable and a further 40% should be social housing owned and run by the council.

Transport and air pollution

Increasing the number of people living in the borough requires an increase in the ability to travel. Climate change and pollution mean that there is a need to drastically reduce the number of cars on the roads. This requires significant infrastructure investment in public transport, walking and cycling plus homes near employment.

This is not evident with your document and therefore should be an underlying principle.

Maidstone has the second worst air pollution in the south east yet current plans are to increase car volumes further. Electrification of cars remains a significant distance away in time and affordability; it also must not be seen as a like for like replacement for petrol and diesel vehicles – there is simply not enough electricity or the ability to dispose of used batteries. MBC need to radically rethink its approach to transport.

Greenspaces

Higher density homes increases the need, and availability of, green spaces. The LPRPA should prioritise space for recreation and allotments.

Youth

There is a fundamental lack of support for young people in Maidstone. The LPRPA should consider allocating funds and space to provide activity and experiential learning for teenagers.

Housing numbers

The council is planning for a far higher number of houses than the base increases in population would suggest are needed. This is clearly to encourage movement of people to the area which has a higher GDP per capita than other areas, i.e. it is being done purely for economic growth.

The impact of the increasingly VUCA world of Brexit, climate change and ecological emergencies calls into question any long term housing growth of this nature.

The council should return to central government to rechallenge the housing allocations for the borough on this basis.

Employment

We are concerned about employment in the borough. The current collapse of high street shopping and night time entertainment around the country combined with Maidstone's reliance on this as core industry puts Maidstone at high risk of significant unemployment rises.

We think that the LPRPA should prioritise employment on existing brownfield areas, ensuring that all employment is reachable by walking, cycling or public transport. We suggest that MBC takes this opportunity to rethink its employment strategy to prioritise employment towards the needs of the future rather than returning to shopping and nightclubs.

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