



Gladman Developments Ltd

Maidstone Borough Local Plan Examination

Session 3B Alternative Strategic Development

Qn3.1 Should it be concluded that there would be a shortfall of supply against the OAHN, what alternative means would be available for making up a shortfall if that is measured in: (a) hundreds or (b) thousands?

- 1 The OAHN is considered by Barton Willmore, in their Matter 2A statement on behalf of Gladman, to be in the region of 19,600-20,400 units. In Table 3.1 of SUB 005 the Council claims a supply of 19,325. On the basis of the Barton Willmore OAHN there would therefore be a shortfall of between 300-1,000 units. However, as is discussed in this statement and our Matter 5A statement we consider that some of the sources of supply within the context of overall plan deliverability are highly questionable.
- 2 The shortfall in supply must be considered in the context of the position of ensuring the deliverability of the plan. Gladman have concerns regarding the deliverability of a number of the key aspects of the Councils current supply, not least of which are the proposed number of office to residential conversions, the redevelopment of the Invicta Barracks and the proposed strategic allocation at Lenham. Gladman consider that all of these are unlikely to deliver the number of units envisaged within the plan period. It is therefore likely, even putting aside the issue of OAHN, that the shortfall in housing supply will be in the thousands of units.
- 3 Gladman consider that there are a range of sustainable sites which could meet the shortfall in the housing requirement. To the Council's credit it has recognised that there was a shortfall in the submitted plan and has already begun to deal with it, for example Gladman have been granted planning consent for 62 units at a site in Headcorn (15/507424/OUT), which was previously assessed as not suitable as part of a larger site parcel in the SHEDLAA. The same opportunity exists at a site promoted by Gladman at Maidstone Road, Marden, which was again rejected as part of a wider assessment in the SHEDLAA.
- 4 Furthermore, there exists a range of potential options for further site allocations on the urban fringes of the main settlement of Maidstone and its immediately surrounding, and conjoined,

urban areas such as Barming. Such areas are highly sustainable and benefit from existing public transport links and access to services. A range of options in the various sustainably tiers of settlements therefore exist for the required additional housing growth.

- 5 It is therefore our view that a reconsideration of some of the key underpinning pieces of evidence, for example the SHEDLAA, and a further call for sites would identify a range of sustainable development opportunities in and around the key sustainable settlements within the higher tiers of the hierarchy for Maidstone. Our experience in Headcorn and Marden indicates that the short comings in the SHEDLAA mean that there could be very extensive additional capacity in the Rural Service Centres as well as on the edge of Maidstone and its surrounding urban area. Delivery of additional capacity in such locations would be in accordance with the identified strategy of the plan in policy SS1.

Qn3.2 What scope may exist for addressing any shortfall by provision outside the Borough boundary and how might that be accommodated having regard in particular to timescales of the preparation of other Local Plans?

- 5 Gladman do not consider that there is any evidence to justify Maidstone exporting its housing need outside of its boundaries at this stage, should the Council seek to do so any approach would need to be the subject of significant evidence and SA testing to demonstrate the need for such an approach, and conversations would need to be undertaken with neighbouring authorities through the Duty to Cooperate.
- 6 Gladman do not consider at present that the evidence prepared by the Council is sufficient to justify such a conclusion. For example the SHEDLAA prepared to underpin the allocation and assessment of sites is badly flawed, in our submission statement we highlighted issues with regard to sites in both Headcorn and Marden, which have been assessed as being part of much larger parcels of land. The site at Headcorn, as discussed previously, has now been granted planning permission by the Council, the planning permission was formally issued on the 24th August 2016. Gladman therefore believe that a review of the SHEDLAA and a further call for sites exercise would reveal considerable additional residential capacity to meet the shortfall predicted. It is essential that such an exercise be carried out prior to the consideration of moving housing needs to surrounding districts.

Qn3.4 Should the Ministry of Defence determine (before the Examination is completed and the report submitted) that the Invicta Park Barracks will not be surplus to

requirements during the Plan period, how should the consequential loss of 1,300 dwellings in the later period of the plan be addressed?

- 7 As discussed above Gladman consider that as a first point of call a review and consultation, including a call for sites, into the SHEDLAA should be undertaken. Our own experience of the site assessments suggests that such a review will reveal significant additional capacity. Only once such an exercise has been undertaken will it be possible to consider if additional remedial measures should be undertaken.