



## Maidstone Garden Communities

Deliverability and Viability Assessment

FINAL  
DRAFT

On behalf of **Maidstone Borough Council**



Project Ref: 48561/001 | Rev: A | Date: August 2020

---

Registered Office: Buckingham Court Kingsmead Business Park, London Road, High Wycombe, Buckinghamshire, HP11 1JU  
Office Address: 33 Bowling Green Lane, London, EC1R 0BJ  
T: +44 (0)203 824 6600 E: PBA.London@stantec.com

## Document Control Sheet

**Project Name:** Maidstone Garden Village Assessment

**Project Ref:** 48561

**Report Title:** Deliverability and Viability Assessment

**Doc Ref:** B

**Date:** August 2020

	Name	Position	Signature	Date
<b>Prepared by:</b>	Jo Lee	Senior Associate		
<b>Reviewed by:</b>	Richard Pestell	Director		
<b>Approved by:</b>				
<b>For and on behalf of Stantec UK Limited</b>				

Revision	Date	Description	Prepared	Reviewed	Approved
A	04.08.20	DRAFT	JL	RP	
B	18.08.20	Final Draft			

This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

## Contents

<b>1</b>	<b>Introduction .....</b>	<b>1</b>
1.1	Approach .....	1
<b>2</b>	<b>Method.....</b>	<b>2</b>
2.1	Process.....	2
2.2	Deliverability Assessment .....	2
2.3	Viability Assessment.....	5
2.4	Structure of the report .....	5
<b>3</b>	<b>Lidsing / North of M2.....</b>	<b>6</b>
3.2	Deliverability Assessment .....	6
3.3	Employment.....	6
3.4	Transport .....	7
3.5	Infrastructure .....	9
3.6	Placemaking and governance .....	11
<b>4</b>	<b>Heathlands .....</b>	<b>15</b>
4.2	Deliverability Assessment .....	15
4.3	Employment.....	15
4.4	Transport .....	16
4.5	Infrastructure .....	18
4.6	Placemaking and governance.....	21
<b>5</b>	<b>North of Marden.....</b>	<b>25</b>
5.1	Deliverability Assessment .....	25
5.2	Employment.....	25
5.3	Transport .....	26
5.4	Infrastructure .....	28
5.5	Placemaking and governance .....	34
<b>6</b>	<b>Viability Assessment .....</b>	<b>37</b>
6.1	Introduction .....	37
6.2	Land value .....	38
6.3	Costs .....	38
6.4	Affordable housing and housing mix .....	39
6.5	Headline findings .....	39
6.6	Summary .....	40
<b>7</b>	<b>Conclusions &amp; Recommendations for the Draft Plan .....</b>	<b>42</b>
7.1	Introduction .....	42
7.2	Leeds Langley .....	<b>Error! Bookmark not defined.</b>
7.3	Heathlands .....	42
7.4	Land North of Marden .....	46
7.5	Land North of Lidsing .....	49

7.6      Recommendations..... 52

**Appendices**

Appendix A      Method Statements and Questions  
Appendix B      Viability Report (Aspinall Verdi)

DRAFT

DRAFT  
This page is intentionally blank

---

# 1 Introduction

## 1.1 Approach

- 1.1.1 Stantec, formerly Peter Brett Associates, has been commissioned by Maidstone Borough Council ('the Council') to assess the deliverability and viability of garden community-scale proposals (i.e. over 1,500 homes), that have proceeded through the Stage 1 Garden Communities assessment. This report follows on from the Suitability Assessment that was undertaken by Stantec in April 2020. Because of the importance of testing the proposals, and the Council's involvement in promoting one, we are asked to independently review the submissions and draw conclusions based on the technical evidence provided to us and supplemented by promoters in response to our detailed questions.
- 1.1.2 The report provides an independent view and high-level qualitative assessment of the proposals and their likely deliverability. Where possible a quantitative assessment has been undertaken to measure what is being provided against what is required, as set out in national and local garden communities guidance. Cost information has been sought to enable a high-level viability assessment to identify whether the proposals are likely to be able to pay for everything required to fulfil Garden Community principles and specifically ensure that any abnormal costs are included within the financial modelling. The aim is to identify the key issues and risks and which proposals represent a deliverable and viable scheme that could be progressed for consideration in the Local Plan. This report will consider whether there is enough information provided and whether there are any 'showstoppers' that mean it may not be appropriate to take forward the sites, as potential garden community-scale proposals, at the current time.
- 1.1.3 This high-level review does not score, or directly compare the proposals but rather identifies the key elements which are fundamental to their deliverability and viability, for allocation, or not, in the Council's Local Plan Review. Caution is required in treating any conclusions as the final word on any of the proposals. We recognise that the proposals are all at very different stages and are not the final product. Even if they are not taken forward to the next stage, we acknowledge they could well be pursued independently either now or in the future.
- 1.1.4 As 'framing' for this work, it is important that the Council, and developers, do not underestimate the challenge of delivering a new community and the importance of demonstrating deliverability at an early stage. This is important to ensure that any proposal(s) included in the emerging Local Plan are based on robust and reliable evidence. Any risks should be identified early to ensure that any scheme taken forward addresses these in partnership with the Council and avoids being found unsound at a future Examination in Public.

---

## 2 Method

### 2.1 Process

- 2.1.1 Stantec independently reviewed the 7 garden community scale proposals in April 2020. This Stage 1 Assessment reviewed the suitability of the schemes and was part of the SLAA evidence base and was based on the same suitability criteria that all sites are considered against.
- 2.1.2 Following the Stage 1 Assessment four proposals were considered suitable for further assessment of deliverability, achievability and viability, subject to further work and clarification of various outstanding issues. These are:
- Lidsing / North of M2 (C4S Refs 245 & 330)
  - Heathlands (C4S Ref 289)
  - Leeds Langley Corridor (C4S Refs 058, 085, 143, 167, 168, 176, 177, 187, 193, 195, 207, 208, 239, 250, 255, 263, 274, 279, 317)
  - North of Marden (C4S Refs 031 & 309)
- 2.1.3 Following early discussion about the Leeds Langley Corridor it was agreed by land promoters in the area that while there may be merit in exploring the potential of a new Garden Community as a part of the options appraisal of the corridor, there was unlikely to be a specific, worked up, garden settlement proposal available for analysis at the current time. As such this site will be considered as a potential Broad Location by the Council for inclusion within the Plan, and is not assessed in this report.
- 2.1.4 We have worked with the three remaining promoters to understand their proposal and explore the key issues, risks and costs against the garden community principles and the requirements of existing and emerging policy. The approach has been iterative to explore the issues through a series of questions and discussions and seeking to get clarity, agreement and robust evidence where possible. This Stage 2 Assessment has been split into five deliverability topics and a separate viability appraisal.
- 2.1.5 The next stage of the process is for the Council to consider all the evidence, including on garden communities and other SLAA sites to inform their spatial strategy. Committee on 8 September will consider this report, and others and decide whether any/all of the garden community proposals should be included as part of their preferred option for their Local Plan.
- 2.1.6 If any of the proposals are included as a preferred option considerable work will be required between the promoter and Council officers to develop the scheme further. In many cases there is not enough detail included in the submissions and this will need to be resolved to ensure that all elements of the offer are properly included, particularly relating to social and community infrastructure, sustainability and climate change as well as long term governance and stewardship and to achieve maximum land value capture.

### 2.2 Deliverability Assessment

- 2.2.1 The following topics have been used to structure the assessment and develop method statements:
- Housing (including affordable housing)
  - Employment
  - Transport

- Infrastructure
- Placemaking and governance

2.2.2 The method statements set out a series of structured questions addressing general, as well as site specific, issues for each of the topics. The method statements and questions are included at Appendix A. They identify the key tests that will be used to evaluate the proposals on a consistent basis, and set out the issues to be addressed for each topic. To guide the evaluation, we consider:

- How existing national policy will be met, including the NPPF, NPPG, Garden Communities Prospectus and Homes England toolkit;
- How the TCPA Garden Community principles will be achieved;
- How local policies will be met, such as 40% affordable housing, and the requirements in policy DM19 in relation to open space, and how other benchmarks and evidence base documents are being used;
- How emerging policy requirements, such as those recommended in the Strategic Housing Market Assessment (SHMA) and Economic Development Needs Assessment, as well as the evolving requirement for 20% biodiversity net gain to be delivered; and
- How engagement with specific stakeholders, such as Highways England, Kent County Council, education authority, CCGs, AONB Unit, neighbouring authorities and others has informed the proposals.

## Housing

2.2.3 For housing, we tested the schemes against the emerging 2019 Strategic Housing Market Assessment (SHMA) as well as the existing policy position and SHMA. The market and affordable mix is relevant for the viability assessment, so is also considered as a key part of the viability chapter below.

## Employment

2.2.4 A sustainable Garden Community needs to provide access to local jobs for new and nearby populations. For employment land there is no one correct quantum of employment needed to align with the garden community principles. A 1:1 ratio of new homes to jobs is often taken as the starting point – but this is only a starting point. The key principle that each new community should make a meaningful effort to provide local employment opportunities because *“Without providing the right employment, community facilities and range of housing, new garden villages risk becoming dormitory commuter suburbs – the antithesis of the Garden City idea”* (TCPA, Garden Village Introductory Guide).

2.2.5 Also, pragmatically, new employment land is often delivered alongside new large-scale housing schemes because ‘standalone’ employment is not always viable; especially where infrastructure is needed to open up the site. So, we would expect any major housing scheme to consider whether complimentary employment can be delivered – regardless of whether it is a new community or not.

2.2.6 The Council has recently refreshed its employment evidence; Economic Development Needs Assessment to support its Local Plan Review, and this evidence was provided to assist the promoters with their considerations. The employment demand per household for Maidstone is currently 1.3. The evidence ‘signposts’ strong demand and a current lack of supply in the Borough for light industrial and warehousing floorspace, particularly in the small to medium size bands suitable for small and growing firms. This indicates that speculative industrial development is currently viable, which indicates a healthy market, but office development is more challenging. We would expect Garden Community promoters to consider how to match



---

job opportunities to the profile of new residents and to explore the options for providing the type of space that is in demand, including freehold opportunities. We expect the promoter to ensure new provision is net additional and that it must not displace employment from Maidstone town centre. They should comment on the viability considerations of the proposed employment provision in the context of the delivery of the overall scheme.

- 2.2.7 While the employment land focus is on the B class uses, there is also a need to assess the delivery of non-B class jobs, as these contribute to the economic and social well-being of the community. We would expect consideration of the contribution made by non-B class jobs to overall job numbers.

## Transport

- 2.2.8 For the transport topic we have assessed the detailed transport evidence provided by the promoters. This assessment considered each scheme independently responding to the evidence provided. We tested the assumptions, proposals, gaps and costs and identified key issues and areas for further discussion with the promoters on a case by case basis.

## Infrastructure

- 2.2.9 The scope of the infrastructure topic is social and community infrastructure, with a particular focus on local authority-maintained schools, primary healthcare, and community facilities. We consider various categories of open space and sports provision. We also consider retail and services, such as health related services like pharmacies or dentists. Finally, we include commentary on existing utilities infrastructure, insofar as it relates to design considerations onsite (rather than loadings or capacity issues).
- 2.2.10 The social objective is one of the three overarching and interrelated objectives of sustainable development. The NPPF (2019) states the purpose of social objective is *'to support strong, vibrant and healthy communities...with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being'*.
- 2.2.11 The TCPA acknowledges the linkages between the social objective of sustainable development, and Garden City Principles. Importantly they include:
- 'Land value capture for the benefit of the community.'
  - 'Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.'
  - 'Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.'
- 2.2.12 We note it is therefore important not only that schemes have considered their obligations to provide social and community infrastructure, but that integration and placemaking have informed their locations. The assessment considers the evidence provided and whether what is proposed meets the requisite policy requirements and standards, identifying where further work and information will be required.

## Placemaking and Governance

- 2.2.13 For the placemaking and governance topic we focused on the qualitative aspects of design and layout, climate change, governance, stewardship and engagement. These are essential for the delivery of a sustainable garden community. The assessment was based on TCPA and Maidstone's garden principles, emerging policy as well as good practice. Questions to promoters were based on the following principles:
- promotes high quality design that responds to the locality and provides a unique character

- responds positively to the landscape, heritage and other constraints, contain mitigation as appropriate and utilises opportunities
- responds positively to its surroundings and enhances its relationships with neighbouring places
- embeds climate change, energy efficiency, reduced emissions and innovative technology in its design and layout
- demonstrates active engagement with the local community, stakeholders and prospective residents
- ensures long term governance/maintenance and legacy in perpetuity

2.2.14 The assessment of these issues sought to identify whether there are any gaps and particular risks with the proposals. The key objective is to ensure that the costs of delivering these elements are properly and comprehensively included within the viability assessment. For example, we would expect that high-quality design and sustainability solutions are reflected in appropriate build costs. Consequently, there is considerable overlap between this topic and the viability work.

## 2.3 Viability Assessment

2.3.1 It is fundamental that early in the process the delivery of benefits are identified and costed to ensure that they are properly included and will not be watered down later in the process. While change over time does occur, for example policy or legal expectation of development changes, or abnormal costs are amended, it is essential that the critical issues are identified early, so that the risk of unknowns are properly considered at this early stage.

2.3.2 The Viability Report is appended as a separate and standalone report undertaken by Aspinall Verdi, See Appendix B. A summary of the key findings are include in Chapter 6. To inform the viability assessment all promoters completed a cost proforma to capture essential information for input into the viability model. Despite this information was provided on an individual basis and in different formats. A number of discussions were held to clarify questions arising and enable a consistent assessment to be undertaken. Where necessary averages have been used to allow comparison.

2.3.3 The viability report provides a high-level review to establish whether the inputs and assumptions are reasonable and whether their approach to viability and delivery is realistic.

## 2.4 Structure of the report

2.4.1 In the next chapters we consider each proposal in turn. For each proposal we provide a brief qualitative overview of the deliverability, against each of the themes set out above, and an assessment of what we consider to be the key issues, gaps and risks.

2.4.2 While we have attempted to assess each proposal against the same standards and questions, the information is often incomplete or simply absent which means we cannot adopt a standardised assessment of deliverability, but we look to cover any obvious gaps when forming our view of key issues.

2.4.3 A summary of the Viability Report, as well as the housing and affordable housing issues are included in a separate chapter supported by the Report in Appendix B. This is followed by conclusions identifying the main issues for each proposal.

---

## 3 Lidsing / North of M2

- 3.1.1 This proposal is promoted by Hume Planning Consultancy Ltd on behalf of the landowners F D Attwood & Partners for up to 2,400 residential units completed by 2035, including specialist accommodation, 20ha of employment land, and other social infrastructure and services comprising a local centre, primary school and sports fields, on 124 ha of land north of the M2, primarily comprising a number of fields in the Lidsing area.
- 3.1.2 At stage 1 the key issues identified were:
- transport proposals and their viability;
  - essential duty to cooperate relationships with Medway; and
  - the impact on the AONB.
- 3.1.3 These issues have been addressed and further information has been provided, although it is noted that the detailed technical evidence in relation to landscape, ecology, arboriculture, heritage, archaeology, flood risk, ground condition, air quality, utilities and topography has not been provided. For example, at Stage 1 the Council identified that the site is on a historic routeway and may contain remnants of a military defence balloon site, which should be preserved in situ. While there are unlikely to be any showstopping issues, and the site is large enough to address individual elements within the design, this and other technical details will need to be addressed going forward.

### 3.2 Deliverability Assessment

- 3.2.1 An assessment was made of deliverability against the topic areas as set out in the method above and using the approach and questions contained in the method statements attached at Appendix A. The key findings and issues are set out in the sections below.

### 3.3 Employment

- 3.3.1 The masterplan includes a 20 ha business park located at J4 of the M2. However, the developer's submission was not clear what form this could take, for example, whether the 20ha would be promoted for large B8 units or a B1(a) office park or mixed employment.
- 3.3.2 Although the scheme is only indicative at this stage, we looked for further details because we acknowledge some forms of employment development may not be appropriate. For example, we were concerned that large B8 may not be appropriate given proximity to the AONB and a large B1(a) office park could undermine nearby Medway Council's town centre strategy.
- 3.3.3 In the process of engagement with the promoter, they were referred to the recent Maidstone employment evidence and that from Medway and asked, with reference to this evidence, if they could refine their proposal to help our analysis. With this evidence in mind a new indicative mix is now suggested:
- 10 ha of light industrial and general industrial;
  - 7 ha of smaller scale warehousing; and
  - 3 ha for offices.
- 3.3.4 The promoters are offering employment uses in a range of unit sizes with significant provision of small units (50-100 sq m) and are open to the potential for some to be released for freehold sale.

- 
- 3.3.5 This mix of uses, predominantly addressing the industrial and warehousing sector where demand and need is strongest is welcome. As is the focus on smaller unit sizes. This is needed on two counts, firstly it is what the evidence says is needed and secondly it has a better chance of avoiding harmful impact on the AONB landscape.
- 3.3.6 On the latter point it is relevant that in our work elsewhere in Kent we have seen some very large regional distribution warehouses recently built in locations less optimal than J4 of the M2. However, such regional distribution centres tend to be 15 m+ tall and a solid mass that would be very difficult to 'hide' in a sensitive landscape.
- 3.3.7 The proposed B class floorspace produces an estimated B class job total of 2,675 that even without the non-B element exceeds the TCPA guide 1:1 ratio. This therefore is very positive.
- 3.3.8 The provision of 3 ha of office space in this location is particularly an issue for the Medway towns given the site's proximity to them, in terms of making town centre office less attractive to provide and also in terms of the supply of labour. The promoter is yet to have a discussion with Medway economic development and planning teams, and this should be done as the very next step. However, in this respect it is relevant to note that in the 2018 Future Medway Development Strategy consultation document Medway have promoted their land holding on the adjacent site at J4 for B1 uses.
- 3.3.9 In conclusion, the location, scale and type of employment uses proposed are aligned with the needs of the Borough as set out in the employment evidence, and subject to discussion with Medway, would not compete with the employment provision in the Medway towns. The motorway junction is a highly desirable location for developers and occupiers of all forms of employment space, and the employment evidence confirms that development in that location is viable and therefore there is little doubt, subject to avoiding unacceptable harm to the setting of the AONB the land for employment will be deliverable.
- 3.3.10 The next steps are for discussions to be conducted by the promoter with Medway and more detailed consideration of height, scale and massing in the context of the AONB.

## **3.4 Transport**

- 3.4.1 The Lidsing Garden Community is primarily predicated upon providing access to the M2 motorway via a new arm to the existing M2 Junction 4 roundabout, and the benefits that this could bring to vehicle traffic linkages with Gillingham, Lordswood and Hempstead together with opportunities for better public transport integration between these communities. Assessment of deliverability is based on details presented by the promotor, and their consultants C&A in submissions made in January and June 2020, including responses following engagement with Stantec. Reference is made to the submission package from the scheme promotor and subsequent details provided by C&A ref. 18-053-0001 Rev A.
- 3.4.2 In terms of the principal means of access to the strategic motorway network, details have been presented showing the link and creation of a fourth arm to M2 Junction 4, requiring the formation of a new link road within the AONB (considered elsewhere in this report) and a new bridge crossing of the M2 itself at Maidstone Road. The existing bridge takes a north/south alignment away from the promotor's land, therefore necessitating removal of the bridge and replacement with a new structure in a southeast/northwest alignment. Such a structure would require significant engineering both for the removal of the existing bridge and placement of a new one.
- 3.4.3 The details provided by the promotor include feasibility drawings to what is considered a 'Stage 1 outline design' standard, based on the requirements of the Design Manual for Roads and Bridges (DMRB). The link road between Junction 4 and the Maidstone Road realigned bridge is shown to assume relaxations 3-steps below DMRB standards, however it is questionable if the DMRB would apply to this section of road or whether the Kent Design Guide standards for a Local Distributor Road would be more appropriate. In any event, it is our judgement that there are no impediments to the delivery of the fourth arm link to Junction 4,

---

the link road and bridge to a standard that would be acceptable to the Highway Authorities. These elements of the proposals are therefore considered feasible and deliverable.

- 3.4.4 C&A has provided a cost breakdown for the replacement M2 bridge at £5m. However, the cost of removal of the existing bridge has not been outlined, and this could be significant along with associated traffic management and lane rental costs could double the build cost estimate. In the absence of a promotor figure being available it is believed that a cost of £10m should be allowed for the bridge scheme element.
- 3.4.5 Vehicle traffic linkages to the north assume all purpose and public transport only options. With respect to the former, two options are presented:
- Access through Gibraltar Farm land, understood to be under the control of Medway Council; and
  - An alternative access via land under the control of the promotor utilising parts of Ham Lane and Shawstead Road, through land currently subject of a planning application lodged with Medway Council for c.800 homes.
- 3.4.6 The Gibraltar Farm access land ownership and ransom issue is dealt with elsewhere in this report and is not dealt with further in this section. In terms of highway design, details presented by C&A for the potential Gibraltar Farm access confirm that a connection can physically be made to a standard in general compliance with the Kent Design Guide and Manual for Streets, as used by Medway Council in decision taking processes. This access route is considered to be the optimum location and type, being a direct linkage towards Chatham and laid out presently to a local distributor road standard and incorporating good pedestrian, cycle and public transport facilities and would be preferable in terms of delivering appropriate access to serve the garden village.
- 3.4.7 With respect to the alternative access via Shawstead Lane, presented by the promotor in the event that the Gibraltar Farm link cannot be provided, no drawings or details are provided for this proposal, nor are any land holding details. Stantec consider that this route is a sub optimal alternative to Gibraltar Farm. This presents a weakness in the promotor's submission and should be provided to demonstrate, at a high level, that adequate land is available to provide improvement that meet the requirements for a Local Distributor Road.
- 3.4.8 A third option, comprising a potential link to Westfield Sole Road has been explored with C&A via telephone conference, however C&A confirmed that the promotor does not control adequate land along this corridor to facilitate route widening suitable to accommodate a Local Distributor Road. It is the view of C&A that this route could potentially provide options as a bus/walk/cycle link, assuming general traffic use can be extinguished.
- 3.4.9 With respect to the effects that such an access strategy would have on traffic flows, discussion has been had between the promotor and Medway Council with reference to the Aimsun macro simulation traffic modelling currently being undertaken in support of the emerging Medway Local Plan. No further detail on the outcome of this meeting or implications of the site traffic on the Medway model have been presented. It is assumed that through the Duty to Cooperate protocols Maidstone and Medway Council, and Highways England can commence discussions and carry out traffic modelling at such time the proposals are suitably progressed. This may necessitate further interventions by the promotor, for instance to restrict access through the site using urban design or other measures. It is noted that the promotor has not engaged with Highways England to date.
- 3.4.10 Whilst the level of work and detail undertaking Aimsun assessment is beyond the scope of information normally required at this stage of the Local Plan, the promotor should be required to undertake this work at the earliest possible next stage so as to ensure that any adverse impacts arising from the access strategy are adequately dealt with. The creation of a new fourth arm to Junction 4 of the M2 motorway does not raise any immediate concerns, but the effect of a new link into Gillingham and the traffic that this could attract does need to be carefully considered and dealt with through route management strategy.



- 3.4.11 At the request of Stantec, further detail has been provided by the promotor on public transport access to Hempstead and improvements to bus services following engagement with Arriva. The promotor recommends that the existing service 113, running from Chatham to Hempstead and Wigmore, is diverted into the proposal site via the new bus only link to Hempstead Valley Drive, and is upgraded from two-hourly frequency to half-hourly. The linkage suggested for bus only to Hempstead Valley Drive utilises former road linkage, which is understood to remain highway, therefore is shown to be deliverable.
- 3.4.12 This route is promoted as the key route linking the site to the nearest town centre(s) and would be expected to be the main transport provision for secondary school children in particular, where it is probable that some 2.5 Forms of Entry (FE) (equating to 500+ children) travel demand could be generated by the site. Clearly this number of children, if they all took the bus, could not be accommodated by a half hourly service, therefore further consideration would need to be given to increasing peak bus provision.
- 3.4.13 Such provision could be made by laying on a school only services, or alternatively the 166 service that runs through Lordswood could be brought into the site along Westfield Sole Road (converted to bus only as above) to provide the site with access by two separate services and a frequency of one bus every 15 minutes. Such a level of service would be akin to 'turn up and go' frequency therefore reliance on timetabling would be reduced. The promotor's transport consultant has accepted this proposal verbally. It is of note that their discussions with Arriva are based on current demands and journey patterns rather than the emphasis being put on the more sustainable patterns likely to arise from the pandemic and working towards Net Zero Carbon and the objectives of the Garden Villages Prospectus.
- 3.4.14 The level of employment proposed for the submission land equates to one job per household. The travel demand from this can be provided for mostly on foot or by cycle, with no requirement for public transport internal to the site. Details provided in the C&A work confirm that bus linkages can be looped within the site, therefore through master planning at the application stage distributor roads can be planned that ensure the main employment uses and the whole of the residential offer are adequately served by bus. Given the majority, if not all of the employment need, can be delivered on site or very close by, and accessed on foot, the demand for sustainable bus access to other employment on site could be accommodated by the level of service outlined above. Importantly, bus provisions would need to be made on first occupation, and that is clearly deliverable using the 113 and 166 overlap as evidenced in C&A and Arriva discussions, albeit the frequency would be expected to build as development comes forward. Certainly the overlap of the two services could be expected to deliver a half hour service from the first development phase.

### 3.5 Infrastructure

- 3.5.1 Information has been sourced predominantly by the Lidsing Garden Community Brochure Update Summary (Reference Document 3) prepared by Hume Planning Consultancy and received on 15 June 2020.
- 3.5.2 Population estimates at different age groups are impacted by the proportions of affordable housing, and the dwelling mix. The developer proposes a total of 2,100-2,400 C3 dwellings at the settlement, with a density ranging between 35-40 dwellings per hectare. The upper limit of 2400 has been used in the breakdown of affordable housing presented in the promotor's submission, with 1,440 market units (60%), and 960 affordable units (40%). The dwelling mix proposed would be: 341 1-bedroom units (14%), 715 2-bedroom units (30%), 888 3-bedroom units (37%), 456 4-bedroom units (19%).

### Education

Summary of Proposals		
	Provision	Reasoning

<b>Nursery</b>	Not referenced in documents	
<b>Primary</b>	2 FE new school	The proposals suggest that at minimum a 2 FE school would be provided, with an option to either extend this to 3 FE if required or extend the 0.5 FE Bredhurst Primary
<b>Secondary</b>	Exact provision not identified	Secondary places are proposed to be provided on a 2-ha site to the north of the boundary if site is appropriate. If not, a different form of offsite provision would be proposed.
<b>Sixth Form</b>	Not referenced in documents	

- 3.5.3 A summary of proposed education provision is discussed in sections 4.28-4.31 of Reference Document 3. It makes note of a discussion between the promoters and Medway Council's Education Adviser.
- 3.5.4 The proposals include a new 2 FE primary school, which would theoretically accommodate 420 primary age children. The promoter suggests that the surplus child numbers at this age group, that could not be accommodated at the new school could be accommodated in a 1 FE extension of this school, or an extension of the existing 0.5 FE Bredhurst C of E Primary School to 1 FE, funded by the garden settlement development. It is stated that the latter option is preferable to the promoter. This school is approximately 430m from the boundary of the settlement where Forge Lane crosses the M2 and would require comprehensive pedestrian and cycle provision to be provided.
- 3.5.5 The need for secondary or sixth form places from the proposed development are not referenced specifically in the provided material. Reference Document 3, in section 4.31, makes reference to the 8ha site to the north of the settlement boundary historically identified for education. If this school is brought forward, we can assume that this would meet the requirements for secondary and sixth form places from the garden settlement, and beyond. If this school site option does not come forward, the promoter states the site owner will offer an alternative secondary school site within their land holding elsewhere in Medway in consultation with the education provider.
- 3.5.6 The position on co-locating multiple school levels in a through-school is not presented in the submission. It is not clear where the new primary school would to be located, if not the 'Potential Education Site' just outside the site boundary to the north of the proposed garden settlement on the submitted masterplan (Document 4). No specific primary school location has been identified on this masterplan.
- 3.5.7 We note that the exact housing numbers, mix, and so on, are not confirmed, which means that the child yield is also expected to change. However, without being provided with results of child yield calculations, and the workings themselves, it is difficult to verify the suitability of the provision.

## Primary Healthcare

- 3.5.8 There is mention of a GP surgery, but exact provision is not identified, and it is not clear what engagement has taken place with the CCG. Further details are required if this is progressed to the next stage.

## Community Facilities

- 3.5.9 There is general mention of community facilities, but the exact provision is not identified. There is no detail specified in the masterplan or documents and it is unclear what is to be provided. Further details are required if this is progressed to the next stage.

---

## Open Space, Play Space, Sports Pitches

- 3.5.10 We assume that open space provision will be provided in accordance with DM19. Exact provision is not identified, and no detail is included. However, it is clear that there is space within the site for approximately 50% green infrastructure, landscaping and open space and therefore the appropriate standards for each category will be able to be met. It will be important that provision across the site meets the existing and emerging policy standards, and that there is no undersupply of more formal sports pitches, in favor of more informal areas.

## Retail and Services

- 3.5.11 No specific information has been provided on services, outside the identification of the general location of a village centre that will include a small number of retail units, close to the existing pub, with doctor's surgery. More detail is required to ensure that these requirements are properly provided within the scheme.

## Utilities

- 3.5.12 Utilities are described in Reference Document 4 in sections 4.32-4.34. The document states: "High level discussions have been held with utility providers and there are no known infrastructure issues." It adds "As a location close to the existing urban areas of Hempstead and Lordswood utility infrastructure connections are nearby and will not involve long distance service connection costs." Given the promoters successfully planning application for housing development on land to the north of this site, it is appropriate to assume that they have a reasonable understanding of the utilities provision within the area and across this site.
- 3.5.13 Limited information is provided about exactly what social, community and open space infrastructure is to be delivered on site, where and how. While there is a stated commitment to meet the policy requirements that exist, and this is possible within the site boundary, no detail is provided. The AV Viability Report identifies that the overall costs included for this proposal are low. This includes a far lower Section 106/CIL contribution on a per unit basis, which is meant to provide for all requirements including education, health, management and other costs. In addition, they include a low contingency at only 3% which should cover BCIS build costs, externals, infrastructure, site preparation (if appropriate), S106 (if it is included as a construction cost i.e. school) and professional fees.
- 3.5.14 If this site is taken forward, considerable further work is required to understand what is proposed, what assumptions are used, what social, health, community and open space will be provided to ensure that accessible services and open spaces are provided to meet the future need and support the garden communities' health, social and cultural well-being. This will also need further consideration of the costs to ensure these are properly included.

## 3.6 Placemaking and governance

- 3.6.1 In response to our method statements and questions a summary response has been provided addressing the key issues and drawing together the new information. No detailed technical reports have been provided, however, it is clear that various consultancies have been involved in the background work. The landowner's promotion, and successful appeal for the development of Gibraltar Farm, just north of this proposed site, means that they have a good understanding of the general constraints and planning policy issues in this location, albeit that that site is in Medway and this current land is in Maidstone.
- 3.6.2 While no land budget has been provided it is possible to assess the amount of land provided as green infrastructure, landscaping and open space. Sixty ha of land is considered the net developable area out of 120 ha on the main site, and with an additional 25 ha on the land south of the motorway to be planted as woodland for mitigation and improvement in the AONB for the junction works and replacement bridge. Using these calculations, and the provision of



---

20 ha for employment there is around 50% open space within the proposal. While the land is available to deliver adequate, policy-compliant open space, very little detail about the types of open space provided. This will need to be addressed in more detail as the masterplan develops going forward.

- 3.6.3 In terms of biodiversity net gain the proposal is clear that the land is of negligible intrinsic ecological value and provides significant potential to meet the existing 10% requirement, and they will work with stakeholder partners to reach the 20% target through the variety and mosaic of habitats and new areas of woodland using native species. We do not have the evidence to demonstrate that this can be definitively provided, on site, although given the size of the land area, and promotion of considerable woodland to the south, we assume this is the case. We cannot conclude that it cannot be delivered, and this will need to be explored in more detail at the next stage of the process.
- 3.6.4 The masterplan has been updated with key green network connections to local destinations. Connectivity with Medway is important because for functional and practical purposes this will need to knit into the urban fabric of Medway. We recognise that Maidstone does not have a local landscape designation in this area, but any large garden community development in this location does need to be mindful of the Capstone and Horsted Valley Area of Local Landscape Importance (ALLI) designation in the Medway Local Plan. The principle of this green wedge and the relationship with the Country Park remains relevant despite no corresponding designation on this site. Consequently, the relationship with the ALLI will need to be considered and sensitively addressed in any masterplanning to ensure green links are provided and accessibility enhanced.
- 3.6.5 The most challenging issue is the incursion into the AONB in the construction of the 4<sup>th</sup> arm of the motorway junction to the south and provision of new road, and bridge across the motorway. Initial comment from the AONB Unit recognises that although the M2 acts as a strong barrier which is well treed and restricts views from the site into the AONB. However, the new arm would be major development and consequently it would generate an objection in principle. However, they recognise that it would need justification to set out how the benefits of the roads, and other development proposals, are balanced and whether this outweighs the harm. In addition, they would encourage a 'Green Bridge' if the site was to come forward, which may have cost implications.
- 3.6.6 Our landscape consultant confirms that the motorway forms a logical southern boundary to the site. Additional land has been put forwards to provide woodland buffering to the south of the motorway to reduce potential visual and landscape harm. Agreeing that the M2 forming a strong linear boundary to the AONB designation that reduces intervisibility with the landscape within the AONB. While there is an incursion his view is that this is accompanied with a significant area of woodland planting to provide a visual barrier and character element to this part of the proposals. This will also provide a boost to biodiversity.
- 3.6.7 The landform generally lends itself well to the proposed development with potential views from the south be seen in the context of the existing built form and transport corridor. However, the landform closer to the M2 sits at a slightly lower level so mitigation planting along this edge may be less effective.
- 3.6.8 The area of land that has been proposed for employment development will have large scale buildings with greater massing than that of residential situated on it. The proposed land for employment development that is situated to the north east is currently shown on plans with a green outline. This may mislead the reader into thinking that the space would be used for green infrastructure and should be simply shown as an area with no potentially ambiguous colouring.
- 3.6.9 It is important to encourage permeability with the Country Park to encourage use by existing and potential residents in the area. This can be achieved with a strong green infrastructure to encourage walking and cycling.
- 3.6.10 In terms of design, no more detail is provided than contained within the original submission. This refers to quality placemaking, a well design high quality attractive place to live, work and

---

enjoy which will create a strong sense of community. Local settlement patterns have been reviewed and applied to create integration with the existing features using placemaking clues. An average density of 40dph is applied across the site, but there is no indication of how this will vary across the site, or within the village centre and neighbourhoods. In addition, there is little detail about what the neighbourhoods may look like and how this will be designed to deliver a high-quality product. This is particularly the case since the masterplan has been updated but the associated concept areas, previously included on page 53 of the submission document, has not been changed. It is not clear how high-quality design will be guaranteed and built into the scheme. This is a key expectation going forward and build costs should reflect this high-quality product. While they include higher costs in their appraisal the AV Viability Report is unclear how this premium has actually translated into higher build costs and on what basis this has been done, either 5% or £5 psf on top of BCIS<sup>1</sup>. Further clarification of this is required at the next stage.

- 3.6.11 In terms of climate change and sustainability the original proposal contained a specific section on this topic and went the furthest in recognising the importance on this in terms of resource efficient design, orientation, design materials for thermal insulation and other aspects of water efficiency, waste and locally sourced materials. The key issue is whether these elements have been properly costed and included within the build costs and viability assessment. None of the proposals explicitly include this as part of the viability assessment. The overall costs for this proposal are low. Specifically, the externals included within this proposal are only 13% of the build costs, whereas AV would expect 15%, in addition there are not enough infrastructure allowances and the S106/CIL allowance is by far the smallest of the proposals. This implies that there is not enough costs in to provide adequately for these types of climate change and sustainability requirements.
- 3.6.12 The promoters provide detail on their proposed governance and stewardship arrangements and want to use the Chilmington Green Model. This uses a Community Management Organisation (CMO) to own, manage and maintain public assets and use partnership arrangement setting charges and legally binding covenants to cover all services. They propose to potentially work with the Kent Wildlife Trust to manage the strategic green infrastructure. As with others there is little financial information provided and considerably more detail will be required going forward to understand how the CMO will work with the landowner retaining a freehold interest in the village centre, employment sites and strategic green infrastructure. It is not clear what costs have been explicitly included but management costs are included within the S106/CIL allowance. Given that Lidsing provides a much smaller per unit contribution it is likely that adequate costs for this have not been adequately included. This will need to be addressed in more detail at the next stage to ensure that this element is not compromised in the delivery of necessary social and community infrastructure through the S106/CIL contribution.
- 3.6.13 This proposal is still only a very high-level concept, with limited detailed issues considered and no community engagement having taken place. While this is understandable and proportionate given the stage in the process it will be an essential element going forward. The adjacent communities of Hampstead and Lordswood are within Medway and Bredhurst village is to the south in Maidstone. The location of the site, within Maidstone, but on the boundary with, and functionally integrated to, Medway provides another significant challenge for the delivery of the site.
- 3.6.14 The relationship with Medway is a key issue, because the site straddles the boundary where the access and roundabout improvements are required and is required to secure a good quality link through to North Dane Way. We understand that Medway Council hold a ransom strip preventing new access onto North Dane Way. While this has been factored into the Viability assessment, this is a significant cross boundary issues that will need to be addressed. Delivery of a high-quality sustainable garden community in this location requires both Council's to work together. As part of the Duty to Cooperate discussions are essential.

---

<sup>1</sup> See para 6.13 of AV Viability Report

---

We understand that discussions have started. The failure to work together is a significant risk to the delivery of this project.

DRAFT

---

## 4 Heathlands

- 4.1.1 This proposal is promoted by Maidstone Borough Council for around 4,000 dwellings and associated mix of uses including employment, education and community facilities and open space on 314 ha of land at Lenham Heath.
- 4.1.2 The proposal has changed considerably since the original call for sites promotion.
- 4.1.3 At stage 1 the key issues identified were:
- Scale of the proposal and boundaries of the site
  - Detailed design issues and management / delivery proposals
  - Provision and delivery of employment
  - transport proposals and their viability
  - Detailed evidence to fill gaps and provide more information
- 4.1.4 These issues have largely been addressed and substantially reviewed masterplan has been provided. The proposal is considerably smaller and covers a different land area, with uses moved around. Considerably more information, in terms of technical reports have been provided, although these largely relate to the earlier 5,000 unit scheme. Although some updates have been progressed and synthesised into a new masterplan and design framework, there is still missing areas of understanding and evidence. This is particularly pertinent to the western parcels due to the change of location from a Country Park to residential development and therefore its potential increased impact on the AONB. This area also contains a newly allocated minerals site, and contains a Waste Water Treatment Works (WWTW). In addition, the indicative future growth area to the north where the access roads to the A20 are located does not benefit from any detailed technical evidence.
- 4.1.5 For the purposes of the viability work we asked the promoter to consider testing a smaller scheme – excluding these parcels in the west of the proposal, around the WWTW and Minerals site. This smaller, 3,000 unit scheme is tested in the viability report as a ‘worst case’ scenario because they are considered to be either not available for development or they are available but subsequent work shows they cannot viability be delivered. In addition, the viability work also considers the implications of locating an additional 1000 homes on the northern land around a new station, without the need for significant additional infrastructure or costs.

### 4.2 Deliverability Assessment

- 4.2.1 An assessment was made of deliverability of the 4,000 unit scheme against the topic areas as set out in the method above and using the approach and questions contained in the method statements attached at Appendix A. The key findings and issues are set out in the sections below.

### 4.3 Employment

- 4.3.1 The original documentation provided no information at all on the potential employment provision at Heathlands. The question therefore to the promoter was ‘what on-site employment provision do you propose?’ The emerging employment evidence was provided to assist their consideration of what would be appropriate.
- 4.3.2 In response the promoter has submitted an employment statement that identifies 20,000 sq m of B class space will be provided, and that this will deliver 420 jobs in the B1c/B2 and B8 use classes. The floorspace will be provided as a mix of small (<230 sq m) and small/medium

---

sized (>1,000 sq m) units for industrial and warehousing activity. In addition, there will be 3,000 sq m of office, in the form of managed workspace that will provide space for 200 workers, providing space for the self-employed, those spending some time working from home. All this, in terms of types of use and formats, is positive and accords with the need identified in the Council's Employment evidence. The proposal will also deliver 230 non-B class jobs. But our issue with what has been promoted is its scale, it is the equivalent in terms of jobs to around only 10% of the Garden Community's labour force. The 850 job total is below the TCPA guide 1:1 jobs to houses ratio and represents a lost opportunity to make a much larger contribution to the Council's employment land needs. Given the location is in the 'sweet spot' for the provision of employment uses, and as we know from the Council's employment evidence that industrial/warehousing development in this location would be viable, we expect it has the potential to deliver a lot more employment land.

- 4.3.3 The promoter also assesses where the 4,000 Garden Community-resident labour force will work. They do this based on travel to work patterns in the last census for the discrete area of the Lenham and Charing MSOA. This identifies that jobs in the towns of Maidstone and Ashford will account for a major share of the labour force. Heathlands sits equidistant between the two on the M20, that are a key area of influence for employment for Garden Community residents. The promoter concludes that when the proportion that will work from home and those in a trade who do not have affixed point of work are taken into account, the area (Lenham/Charing) has high self-containment (70%).
- 4.3.4 We have concerns with this approach, and consider that it gives a misleading 'picture' of travel to work patterns in the immediate Heathlands area. The census data is now very dated, but much more fundamentally the travel to work statistics selected to 'apply' to the Garden Community (the Lenham and Charing MSOA) relate almost entirely to the travel to work patterns of residents living in the two settlements that critically both contain rail stations. The area in-between Lenham and Charing – Heathlands is by comparison remote from public transport and centres of activity, and we suspect that the travel to work profile for that LSOA would be very different, far less contained with far higher rates of car-borne distance commuting.
- 4.3.5 An important next step is for the promoter to look more closely at the travel patterns, as we are concerned that local travel to work patterns will show that a significant part of the labour force will commute out to work, and the objectives of internalising trips and providing self-containment, in line with the garden community principles will not be met. It is inappropriate to base the travel to work profile for Heathlands on the Lenham and Charing MSOA without an absolute commitment for the provision of a Heathlands rail station and improved bus services. There are clear overlaps with the transport implications that are considered in the Transport section below.
- 4.3.6 In terms of the scale of employment provided, clearly more is needed and justified in this location, and we invite the promoter to make a much bigger contribution to meeting the Borough's employment land needs.

## **4.4 Transport**

- 4.4.1 The Heathlands transport proposals are set out in the Transport Assessment (TA) produced by RSK, accompanying masterplan proposals presented by Barton Willmore. These proposals were originally for 5,000 homes, and the TA written on that basis, however the residential number has recently fallen to 4,000 dwellings. Stantec has engaged in discussions with RSK, with questions raised and requests for further information being included at Appendix A.
- 4.4.2 The Heathlands proposals comprise a new stand-alone development, the site currently being divorced from existing bus, rail and employment provisions. Given the location of the site there is a risk that without adequate public transport provisions residents would automatically look to the private car for travel to work, school, shops etc. and this would have significant detrimental effects on the environment, highway capacity etc. and would not meet the primary aim of a Garden Village community.



- 
- 4.4.3 The RSK TA assumes that the Garden Village is underpinned by public transport provisions including bus (extension of service 10x running Ashford to Maidstone), a shuttle service to Lenham and Charing rail stations and eventually a new rail station serving the development on the Ashford to Victoria rail line. Section 9 of the TA provides trip analysis (based on TRICs multi-mode and National Travel Survey (NTS) data), based on a standard TA approach utilising average trip rates from comparably located sites across the UK, allied to journey purpose data from NTS which is UK wide.
- 4.4.4 Whilst the approach taken is typical for a Transport Assessment, there are implications that this would underestimate the issue of travel off site in this case, particularly for public transport and other non-car modes. It is likely that this scheme would generate 6500 employees, assuming 65% of employed would be active on any one day (a reasonable assumption) this would generate some 4225 employment trips per day each way (arrivals and departures) shared on and off site. Whilst it is acknowledged that some of these employees would be part-time or shift workers the majority would be expected to travel in the morning and evening peak periods (0700-1000 and 1600-1900 hrs) with the scale of off-site travel after accounting for the limited on site jobs (assuming 750 trips) being in the order of 3,500 trips. It is noted that Table 9.3 of the RSK TA assumed employment trip internalisation at only 2%.
- 4.4.5 The offsite walking trips set out in table 9.6 of the RSK TA assume that there are destinations locally for employment and schooling etc. that are within walking distance, however these are limited to the secondary school in Lenham which would be some 2.5 kilometres from the centre of the site on foot. It is expected that without better public transport a large proportion of the 370 AM peak hour walking trips offsite would be undertaken by (parent escort) car.
- 4.4.6 Typically, TRICs data shows that in the morning peak period, some 40% of all vehicle trips would take place in the peak hour 0800-0900. If applied to all journey modes this would give rise to 1,400 trips per hour for employment alone, a high proportion of which have the potential to be undertaken by car if the public transport offer for the site is not carefully planned and provided.
- 4.4.7 Combined with the significant off-site demand for secondary schooling and other journey purposes it is evident that peak hour journey demands could well exceed the levels calculated in the RSK TA, which assumes car and public transport trips would number approximately 1,600 in the AM peak. The RSK figures are believed to underestimate the scale of offsite travel demand due to the national nature of TRICs and NTS data not reflecting jobs data for Maidstone and the South East and the propensity for new garden village developments to attract a younger demographic who are more likely to be economically active. Case in point here is Kings Hill, to the west of Maidstone, which although there is access to a rail station within a 2 miles (West Malling, accessible by shuttle bus) and significant amount of onsite employment, still sees vehicle trips rates (offsite) of more than 0.5 vehicle trips per dwelling in each peak hour, double those equivalent rates shown in RSK's Table 9.6 (a simple calculation would derive a trip rate of 0.26 external car trips per dwelling in the morning peak hour). As with Heathlands secondary schooling at Kings Hill is offsite.
- 4.4.8 The Kings Hill example gives a perfect view into the future if a walkable rail station is not provided within Heathlands from a very early stage. It is more than certain that without the station, offsite vehicle impacts could be double those outlined by RSK, and that would lead to car reliance and ingrained unsustainable travel patterns, contrary to the Garden Communities Prospectus and government guidance. Even in a best case some 1,000 trips in each direction on the A20 to Ashford and Maidstone would lead to significant traffic problems and impacts.
- 4.4.9 It is not the case that buses could take up the slack if a station was not provided. Demand for more than 1,000 public transport trips per hour would take some 12 double deck buses to accommodate if completely full, or an even greater number of smaller shuttle buses to Lenham or Charing rail stations, notwithstanding the interchange issues fitting bus and train timetables together efficiently. Lenham rail station is less than 500 metres walk of The Lenham School meaning that rail between the site and the nearest secondary school is not an unreasonable prospect if not delivered by bespoke bus service. It is therefore our conclusion

that a rail station, delivered from the first phases of development would be critical to the delivery of a sustainable development that meets the requirements of the guidance.

- 4.4.10 With regard to deliverability and feasibility of a new rail station Stantec has requested that RSK provides examples of the type of facility likely to be required, which they have latterly provided confirming likely costs of around £12m. However, there is no evidence provided of any engagement with Network Rail or Southeastern on the acceptability and deliverability of a station, therefore immediate actions by the promotor are required to remedy this. At the next stages the promotor should further develop their sustainable travel package and start work towards a plan to deliver the necessary walking, cycling, bus and rail infrastructure and services necessary to be in place early in the site's gestation.
- 4.4.11 In terms of the wider transport effects of the proposals, issues surrounding community severance at Harrietsham and capacity issues near M20 junction 8 in particular have been highlighted to RSK for further consideration. The TA and later response from RSK confirms that interventions would be required at a number of junctions and locations to mitigate the effects of the development traffic, which could be accommodated within highway land at those points. Stantec agrees that whilst not identified in detail interventions should be feasible along the A20 given it is a former trunk route with generous highway verges allowing for improvements to be made at the cost of the developers.
- 4.4.12 RSK has sought to justify the costs associated with provision of site accesses and other such key infrastructure as bridges over the 'classic' and HS1 rail lines and motorways, and Stantec is reasonably content with these.
- 4.4.13 The scheme no longer includes a new junction on the M20 motorway, and as currently proposed it does not meet the required threshold for its delivery. We understand the Council are undertaking strategic work with Ashford Borough Council to explore this going forward. The extension of the site into the northern parcels around the proposed station could assist in increasing growth here and making a case for a future junction.
- 4.4.14 Stantec has identified to RSK that cycle infrastructure improvements can be made along the A20 linking with both Ashford and Maidstone. This would allow those willing to cycle to access employment within 7 or 8 miles, with eBikes and other new technologies likely to come on stream (eScooters etc.) opening up sustainable travel opportunities to a greater number of residents. Again, such measures would be required from the first phase of development where the greatest opportunity exists for sustainable travel behaviours and patterns to be locked in. Further work is required by the promotor on foot links to Lenham and Charing where currently there are potential land ownership constraints restricting the ability to make improvements.

## 4.5 Infrastructure

- 4.5.1 Information in this section has been sourced predominantly from the summary of infrastructure provision for the proposed garden settlement provided by the promotor.

### Education

Summary of Proposals		
	Provision	Reasoning
<b>Nursery</b>	The submission states that nursery provision would be included with primary provision.	It is not stated how many nursery places or FE would be provided at the primary schools.
<b>Primary</b>	2 x 3 FE primary schools	The submission notes that the extent of Primary provision has been calculated on the established local formula of 1 FE per 700 dwellings, which equates to circa 6FE (based upon circa 4,000 dwellings).

<b>Secondary</b>	No on-site secondary school is proposed.	The submission notes substantial spare capacity at the existing Lenham Secondary School. The assumption of uptake of this capacity would be assured through off-site financial contributions from development.
<b>Sixth Form</b>	No specific provision referenced.	

- 4.5.2 The submission notes that the extent of Primary provision has been calculated on the established local formula of 1 FE per 700 dwellings, which equates to circa 6 FE (based upon circa 4,000 dwellings). An FE is 210 children, so we assume that the two proposed 3 FE primary schools would therefore have capacity to accommodate up to 1260 primary school-aged children.
- 4.5.3 The assumption of one required FE per 100 dwellings is clearly a broad one. Normally we would expect a more nuanced method for determining FE based on child yields, which would incorporate levels of affordable housing and dwelling mix. This may be yet to come as proposals are progressed.
- 4.5.4 The latest masterplan shows the proposed locations of the two primary schools, both amounting to 5.8 ha, adjacent to the two smaller local centres towards the eastern and western ends of the proposed scheme.
- 4.5.5 No onsite secondary school provision is proposed in the scheme. The submission notes substantial spare capacity at the existing Lenham Secondary School. The assumption of uptake of this capacity would be assured through off-site financial contributions from development. We assume that this has been determined in consultation with the education provider. The number of secondary school age children, or the number of FE, have not been provided in the submission.

## Primary Healthcare

Summary of Proposals		
	Provision	Reasoning
<b>GP Surgeries</b>	No onsite provision proposed.	The submission notes the intention to utilize existing capacity at the nearby GP practice.

- 4.5.6 The submission notes the intention of the promoters to utilise capacity at existing nearby associated GP practices, which are the Len Valley Practice and Glebe Medical Centre. It provides workings based on the commonly used ratio of one GP per 1800 new residents, which based on enrolled patient numbers, being 9423 for 6.1 GPs, is 1:1544.
- 4.5.7 The submission assumes that the benchmark population increase for the requirement of a new GP surgery is 12,000, requiring 6-7 GPs. The population is currently estimated to be 9,600, therefore would not require a standalone facility. The submission proposes that the proposed scheme should benefit from this spare capacity, before providing funding for an extension of services at the nearer of the two surgeries at Len Valley Practice. The submission suggests that the associated practice has been engaged in preparing this information. It is not known if the West Kent Clinical Commissioning Group has been engaged and presented with these preliminary findings.
- 4.5.8 A more detailed study into the delivery model and how it is going to be provided, together with discussion with the CCG and practices, will be required if the site goes forward.

## Community Facilities



Summary of Proposals		
	Provision	Reasoning
<b>Community Facilities</b>	1 x community facility in the district centre; 1 x community space in a local centre	No specific benchmarking or engagement mentioned
<b>Libraries</b>	Offsite contributions to Lenham Library	No specific benchmarking or engagement mentioned

- 4.5.9 The submission proposes one community facility centrally located in the district centre, and another smaller community facility in one of the two local centres. The former is described as a 'community hall', which suggests a more traditional kind of community space which can accommodate large gatherings. The latter is described as a multi-functional space, co-located with a working hub. The submission describes the agglomeration benefits of co-locating a community hub and co-working space, potentially alongside a café and exhibition space to create a more versatile offering.
- 4.5.10 Location of community facilities in centres maximises accessibility through sustainable modes of transport such as public transport, cycling and walking, and as such this is positive for the settlement.
- 4.5.11 The submission states that financial contributions would be made to support off-site library provision at Lenham Library. It is not known if any alternatives have been explored or any consultation undertaken with the library provider.

### Open Space, Play Space, Sports Pitches

Open space category (DM19)	Provision
<b>Amenity Green Space</b>	6.72 ha required by DM19
<b>Provision for children and young people</b>	2.40 ha required by DM19
<b>Publicly accessible outdoor sports</b>	15.36 ha required by DM19
<b>Allotments and community Gardens</b>	1.92 ha required by DM19
<b>Natural/Semi-natural areas of open space</b>	62.40 ha required by DM19

- 4.5.12 The submission describes a 47 ha Country Park which includes the Great Stour River corridor, shown on the southern side of the M20. The park would be largely severed from the garden settlement but connected through two access points. These accesses are crucial to ensure safe and attractive routes from the residential areas across to the Country Park.
- 4.5.13 The settlement itself would have a central green space with sports fields to the south of the district centre. There would be numerous other green spaces dotted throughout the development, including the local centres, serving as routes, buffers, ecological corridors, etc. The submission states that the area of green and blue infrastructure would amount to 153.88 ha.
- 4.5.14 The masterplan document shows open space and sports fields located at each of the local centres next to darkened building footprints, suggesting that these may be part of the schools, perhaps with some provision for use by the wider community outside school hours.
- 4.5.15 The submission includes a summary of the open space provision according to Policy DM19, based on a population of 9,600. The area requirement for each type is summarized in the table above, but it should be noted that it is not specified in the document how and in what location each of the requirements would be satisfied across all categories, or if a commitment is being proposed to this provision as a minimum. Altogether these open space category areas amount to 88 ha so would theoretically easily be accommodated within the 153.88 ha

---

proposed, with some significant overprovision in some categories. It will be important that provision across the site meets the existing and emerging policy standards, and that there is no undersupply of more formal sports pitches, in favour of more informal areas.

## Retail and Services

- 4.5.16 The submission describes retail and community facilities as co-located within the district centre. Little detail is provided and more is required but we acknowledge the co-location of retail and community facilities is a positive attribute of the proposals.

## Utilities

- 4.5.17 There is an existing 1.91 ha Waste Water Treatment Works towards the western end of the proposed garden settlement. This would remain in the garden settlement and would be enhanced with a landscape buffer to reduce impacts on neighbouring uses. However, no evidence is provided of discussions with the waste water provided about locating residential units around this facility. There is also no detail provided of the necessary 'cordon sanitaire', or any odor analysis to understand exactly how big a buffer is required, the types of planting and how close any residential uses could be located.
- 4.5.18 The submission states the majority of underground wastewater infrastructure following the same alignment as existing roads. There is an area around the sewage treatment plant where the sewer lines traverse north/south across open land rather than following a road, however, these areas are proposed to be retained as open space rather than be built upon.
- 4.5.19 The proposal includes high level information relating to the provision of social and community infrastructure. While this provides adequate reassurance that the policy requirements can be met on site, there is little detail provided about the population assumptions used to calculate the infrastructure obligations which will need to be met. If the site is to be taken forward further detail is required about exactly what is to be provided, where and how it is to be delivered. It is also important that adequate costs have been included within the viability appraisal to meet these obligations and ensure that accessible services and open spaces are provided to meet the future need and support the garden communities' health, social and cultural well-being. These are listed individually within the appraisal and would appear to be reasonable assumptions, in addition Heathlands includes the highest overall costs figures, although 3% is included for contingency and there are no abnormal costs listed. Given that there may be costs associated with contaminated land and minerals this is a risk. In addition, the Waste Water Treatment Works represents a risk at present because it represents an unknown element that will need to be properly addressed in any scheme if it is taken forward.

## 4.6 Placemaking and governance

- 4.6.1 In response to our method statements and questions on deliverability (Appendix A) a significant amount of information, including technical studies, a new masterplan and design concept brochure as well as numerous matter statements dealing with the specific topics have been submitted. While the questions have not been answered directly, drawing on all the new information provided it is possible to make some judgements about what is now proposed, in relation to placemaking and governance, to identify what the key issues are likely to be going forward and what risks remain.
- 4.6.2 The scheme provides 49% green and blue infrastructure and now relocates the Country Park to the south of the motorway. The proposal commits to providing 20% biodiversity net gain on site.
- 4.6.3 The Country Park and green corridor along the River Stour is welcomed and should provide the opportunity to provide adequate filtration to mitigate the issue of leachate of phosphates and nitrates from the River Stour, that is of considerable concern to Natural England.

- 
- 4.6.4 Our landscape consultant comments that the spread of the built development footprint into the western area of land to the north of Chilston Park (which is designated as registered parks and gardens) will likely create additional landscape harm. This western boundary will require further thought and need to be rationalised to reduce any potential harm. There is also a potential gap issue between the proposed site and the settlement edge of Lenham. The previously identified edge was more suitable in landscape terms.
- 4.6.5 The eastern boundary will require a similar level of assessment to consider where it will be best located in line with what is currently situated in the landscape.
- 4.6.6 The boundary of the potential future growth areas to the north of the railway line will need to be assessed to better understand the potential landscape and visual effects that may affect receptors. It is noted that the landscape's topography falls away from the A20. It may be better to consider the entire space between the railway line and the A20 as opposed to just part of the fields due to the current lack of field boundaries that indicate enclosure and offer a best location.
- 4.6.7 A linear stretch of around 5km of the North Downs Way National Trail (NT) that falls within the zone of theoretical visibility suggesting that there is potential for visual harm. This NT falls within the Kent Downs AONB and runs almost parallel with the proposed sites northern boundary, in a broadly east to west orientation. This would represent a very sensitive receptor within the local landscape as the user of the NT will be paying particular attention to their surrounding landscape.
- 4.6.8 The AONB offers a challenge, and initial comments from the AONB Unit state that large scale development here could potentially be very damaging to the setting of the Kent Downs AONB. The views out of the AONB, and particularly from the NT are critical to its value and public enjoyment and is one of its special characteristics and qualities. If development were to come forward it would need to carefully locate uses onto the less visible areas and use appropriate mitigation strategies and planting.
- 4.6.9 In terms of design and layout the proposal commits to delivering to Building for Life 12 standard and delivering high quality design, using design codes. However, the blended BCIS costs used are the lowest of the proposals and it is not clear that this includes adequate uplift for a high-quality product. The AV viability Report notes that there is an additional allowance made for pre-lims which are already counted, so duplicated. This will need to be clarified in the next stage. The proposal seeks to create three compact communities linked by a network of green infrastructure, based on the landscape features and heritage assets, and a figure of 8 loop. The average density across the site is 40dph although a range of densities is proposed in each neighbourhood, achieving higher densities of up to 75dph around the district centre and reducing to about 25dph in the east around the existing properties. While the existing properties remain a significant challenge to the scheme, the red line plan now excludes many in the South East. The scheme now seeks to provide a 10m landscape buffer around the properties and heritage assets that have been identified within the proposal. There will be some impact on residential amenity, and it is by far the most populated of all the proposals. This will need to be sensitively dealt with and designed going forward and has not been subject to any consultation.
- 4.6.10 There are still a considerable number of land parcels that are not included within the ownership or control of the promoter and which are fundamental to achieving the design and masterplan proposed, specifically the dedicated bus, pedestrian and cycle route to Lenham as well as the inclusion of the employment area. While Homes England are supporting this scheme and could use their Compulsory Purchase Powers to deliver these parcels, this is not explicitly included with their letter accompanying the submission. Uncertainty about the inclusion of all the land within the red line remains a key issue going forward and risk to the delivery of the scheme.
- 4.6.11 In terms of climate change and sustainability the proposal seeks to embrace sustainable construction and low carbon solutions with new technology embedded within it. However, there is little detail or specifics provided. None of the proposals include costs for this,

---

however, it is notable that this proposal has the highest combined per unit figure for externals, infrastructure and S106/CIL costs<sup>2</sup>. Despite this there is limited contingency and no abnormal allowance included. Care should therefore be taken to ensure that adequate costs are included at the next stage to deliver the sustainability and climate change solutions promised.

- 4.6.12 The Governance arrangements are set out in the delivery model matter statement. A master developer model is envisaged that would bring in development partner(s) to build out phases. A partnership arrangement with Homes England will be used that would achieve land value capture, create a stewardship structure and management arrangements through a trust and management board that would use charges and income to reinvest into the community for infrastructure and community projects. Little detail is envisaged about the funding arrangements, revenue stream, costs or maintenance and management of assets, although it is presumed that this would be part of the management company responsibilities. As with all the schemes there is no explicit cost for governance. This is to be collected through the service charge within maintenance passed to the Trust once building is complete. Going forward further detail will be required to ensure costs are properly included and specifically that all necessary infrastructure can be provided up front or at the relevant stage in the process.
- 4.6.13 No information has been provided on engagement and the strategy for this going forward, however, this scheme is not alone in this. However, given the number of residential properties within the site, engagement needs to be undertaken to understand the masterplanning solutions and whether these will impact on the deliverability of the scheme, or the extent of the developable area to be included within the proposal. This is a key issue and will be expected to be part of any strategy for taking sites forward.
- 4.6.14 There are a number of issues that may reduce the developable area of the site. These are set out below and the implications considered in the overall conclusions:

### Minerals Allocation

- 4.6.15 The revised masterplan now includes the western land parcel for development, rather than as a Country Park, as it was previously proposed. This area is covered by the Chapel Farm Mineral allocation in the soon to be adopted Kent Minerals Plan. Consequently, it is allocated for soft sand extraction and this would need to be undertaken before any possible development is constructed on the site. This raises several important issues as follows:
- The development of this part of the site is only possible after extraction, which is likely to be in 25 years' time;
  - There will be active quarrying, with all the noise, dust, disruption and traffic that this entails through the developing new community while it is being established; and
  - There will be requirements for filling and land stabilisation that is currently unknown and has not been evidenced. It will be necessary for costs to be established as well as timescales.
- 4.6.16 Technical evidence to support the development and cost of developing this area has not been provided. Further work is required to demonstrate that this is realistic in a reasonable time frame and viable in this location.

### Waste Water Treatment Plant

- 4.6.17 There is an existing WWTW on the Western parcel. While a buffer is proposed, there is no detailed evidence about the odour, cordon sanitaire or other treatment, such as nitrate leaching, required to ensure this can be properly accommodated within the scheme and surrounded by housing. Further information is required, and this represents a risk that land

---

<sup>2</sup> See table 6.2 of the AV Viability Report

---

may be reduced, as well as costs, or contingency increased. This together with the minerals workings means that there may be an impact on values of the properties in this area and consequently viability.

### Heritage and Archaeology

- 4.6.18 There is considerable archaeology across the site, which has led to an amendment of the masterplan. There are several unknown elements on the western parcel that, although appear to be of low importance, require further investigation. This will need further work and could reduce the developable area.
- 4.6.19 The masterplan proposed a 10m buffer around residential properties and setting of heritage assets, however this has not been designed in detail, and while this would not be expected at this stage in the process, we note there has been no discussion or agreement with the potential properties concerned. Given the implications on existing residential amenity it is essential that public engagement is undertaken to explore whether there are implications on delivery and the developable area.

---

## 5 North of Marden

- 5.1.1 This proposal is promoted by DHA Planning on behalf of Countryside Developments for a strategic garden expansion of around 2,000 dwellings and associated education, health, retail and open space facilities.
- 5.1.2 Considerable information was originally provided including ecology, heritage, landscape, ground condition, topography, utilities, ground condition and air quality, arboriculture survey, transport assessment and safety audit. Further information was also submitted in Jan 2020 which included a review of education and community facilities and assessment of mitigation.
- 5.1.3 At Stage 1 the key issues identified were:
- affordable housing provision
  - net positive benefits to Maidstone and Marden
  - red line boundary and parcels included
- 5.1.4 It is by far the most developed proposal. However, the original concern was that it is not providing the positive public benefits required of a true garden community and that it is not going above and beyond providing for its needs as a new development. Further information has been provided that justifies their approach and explains how it will contribute to the objectives of Marden Neighbourhood Development Plan, however no significant changes have been proposed to address the issues raised.

### 5.1 Deliverability Assessment

- 5.1.1 An assessment was made of deliverability against the topic areas as set out in the method above and using the approach and questions contained in the method statements attached at Appendix A. The key findings and issues are set out in the sections below.

### 5.2 Employment

- 5.2.1 In terms of the provision of employment space, the Vision document only identified a small work hub facility to be housed within the transport hub next to the station, with no other B class employment generating facilities provided on site. The Vision document identified that employment opportunities for the new labour force would be found in nearby existing employment and service centres in Marden and in Maidstone. This level of employment provision is clearly inconsistent with Garden Community principles, and unacceptable for a community that will deliver 2,000 houses and a labour force of around 2-3,000.
- 5.2.2 In response to this we asked the promoter how the Garden Community could be considered as a sustainable new community when virtually all the new residents are expected to commute out for work, and how could the Garden Community take the opportunity to address some of the Borough's identified commercial needs.
- 5.2.3 In the case of Marden, the Council's emerging employment evidence provides a helpful assessment of the Wheelbarrow/Pattenden Lane Industrial Estate that lies immediately to the west of the Garden Community site, and the two employment allocations that adjoin Pattenden Lane – land south of Claygate and land west of Wheelbarrow Industrial Estate. The existing Wheelbarrow/Pattenden Lane Industrial Estate is "a good quality site" and was found to be fully occupied. Land south of Claygate is a 2 ha site that could support 6,600 sq m of B class floorspace, and land west of Wheelbarrow Industrial Estate is a 3 ha site that has recently been part developed (Boddingtons Brewery facility) with the remaining site area heavily constrained by the large pond at its centre, which must call into question the potential for any of the anticipated 7,600 -9,500 sq m B class floorspace to come forward.



- 5.2.4 The Garden Settlement promoter has not increased provision but has clarified that half of the 8 ha site set aside for a secondary school, could accommodate potential employment use as an alternative to education should the County Council decide the school is not needed, which it has. Four hectares of the school site is identified to deliver 16,000 sq m of mixed B class uses, most of which would be B2 / B8 and the mix would generate 626 jobs. With the 83 jobs in the serviced office hub by the station the B class jobs total stands at around 700. With an estimate of between 245 – 322 non-B jobs, the total jobs provided would be around 1,000. While this is starting to get to a better number of jobs on site, further work is needed to ensure the employment is located in the right part of the site.
- 5.2.5 The promoter uses the Borough-wide Census results to profile travel to work for the Garden Community labour force of at least 2,000. 40% are forecast to commute out of Borough, 20% work from home and the remaining 40% work in the Borough, some of whom could take up jobs within the new Garden Community.
- 5.2.6 We are concerned with this approach as we do not consider it appropriate to apply the Borough-wide travel to work profile to the Marden area, and a finer grain analysis (MSOA) should be used.
- 5.2.7 More fundamentally our view is that given the Garden Community will generate a substantial labour force (of the same order of size as that currently existing in Marden village) there is a pressing need to provide B class jobs on site, and provision must therefore be a requirement, not something conditional on the school not going ahead. Further, while 4 ha is not considered small, in the context of the Wheelbarrow Industrial Estate (18 ha) it is modest, and given the strong demand in the Borough, the popularity of the Wheelbarrow Industrial Estate and the limitations of existing allocated land to expand, we would like to see the whole 8 ha school site identified for employment. As the Council's evidence shows industrial uses are attractive to the market and viable, and the 'school' site is well located to join up with the existing Industrial Estate.
- 5.2.8 We also question the relatively high proportion of office within the proposed uses. We understand that inclusion of offices helps the job numbers (400 of the 625 jobs are office), but we consider it better to address what we know to be the outstanding need in the Borough – small to medium light industrial and warehousing rather than office that is better provided in the Work hub and in Maidstone town centre. As explained by the TCPA this is exactly why there needs to be flexibility in the application of the guidance, and not rigid application of the 1:1 ratio.
- 5.2.9 With almost no new employment promoted on site, and the current local portfolio of employment sites already well occupied, each additional worker must commute off site and out of the village. The TCPA, in their document "Understanding Garden Villages: An Introductory Guide" warns that *"Without providing the right employment, community facilities and range of housing, new garden villages risk becoming dormitory commuter suburbs – the antithesis of the Garden City idea"*. This would appear to be the major risk here and further work needed to try and mitigate this by exploring to what extent trips can be internalised within the local area and the need for car trips offsite reduced. Given the considerable transport implications and overlaps these issues are also considered further in the Transport section below.
- 5.2.10 The next steps are for the promoter to affirm their commitment to providing employment uses as part of the Garden Community, to expand the area of land identified for employment uses and to confirm that the floorspace to be provided should be small to medium B1c/B2/B8.

### 5.3 Transport

- 5.3.1 The Marden transport proposals are set out in the Transport Assessment produced by DHA Planning, accompanying masterplan proposals put forward by Countryside Properties. Stantec has raised several questions that have been put forward to Countryside (Appendix A), with updates being provided by DHA and Countryside.

- 
- 5.3.2 DHA has provided a significant amount of detail with their submission comprising a detailed Transport Assessment (scoped with KCC) and associated infrastructure designs for on and off site accesses and mitigation. Reporting confirms that discussions have been undertaken with Nu-Venture buses and Network Rail, as well as KCC Highways and Transportation. The approach taken in the DHA Transport Assessment is along the lines of a standard Transport Assessment (TA) as would be befitting of a standard housing planning application. Initially Stantec identified several gaps in the approach in relation to what would be expected for a Garden Village settlement, as per the Prospectus, where subsequently further detail has been presented for review.
- 5.3.3 Several weaknesses were raised with DHA, in particular relating to planning for sustainable transport and reduced car use. Further submissions from DHA confirmed a desire to reduce car driver mode shares from over 50% down to 30%, citing the Essex Garden Communities, Harlow and Gilston Garden Town as examples of how this could be achieved. However, DHA have not carried out any numeric qualification of how their suggested measures would translate to improved mode shares, particularly in relation to journeys to employment. It is questionable whether a half hourly service would be adequate to cater for the needs of employees wanting to access Maidstone, if that is proven to be a significant journey attractor (no details are shown other than for vehicle traffic) with only a 'finger in the air' suggestion being provided by Nu-Venture buses.
- 5.3.4 It is likely that reliance would be on rail to provide public transport access to employment, with the likelihood being that future residents, many of whom would be of a younger demographic, would travel to London to gain access to higher quality employment. The site is likely to look more towards London, Tonbridge and Ashford than Maidstone, which can be accessed easily by rail and therefore it is Stantec's view that bus transport would be secondary. It is incumbent on the promotor to provide further detail to aid the effective planning for bus transport, particularly if they, as the submission states, are seeking to drive down car driver mode share to 30% and reduce reliance on the private car. This should include detailed mode share calculations and bus service capacity and viability calculations.
- 5.3.5 The DHA assessment of traffic impacts, based on a standard TA approach, confirms reliance on several mitigation measures already committed and planned by other sites extending north along the A229 corridor. Some of these proposals, such as at the Wheatsheaf junction are being promoted by KCC, with others requiring further funding to supplement S106 receipts (e.g. Linton crossroads).
- 5.3.6 Highway works funding (assuming LGF and S106 monies) are set out in later DHA submissions. Commitment is made to funding towards these schemes should it be necessary, which in due course would need to be agreed and fixed through the planning process. Site access proposals are shown to be within land under the control of the promotor. Given the attention given to these details and prior discussions with KCC, Stantec are content with the approach taken.
- 5.3.7 A reasonable number of vehicle trips are predicted in the DHA TA (residential and commercial uses) to be added to the Maidstone Road corridor south into Marden, from where the majority route towards the west (onwards to Goudhurst and Horsmonden it is assumed). In the AM peak TA figure 139 predicts an additional 639 trips two way in the hour, whilst in the PM peak figure 140 shows 370 predicted vehicle trips. Added to committed and baseline vehicle flows the AM peak (figure 143) shows 1060 vehicle trips and PM (figure 144) 829.
- 5.3.1 These flows are not insignificant and in the case of the AM peak hour represent a threefold increase the existing link flow on the route when considering committed and proposal traffic. This has not been assessed in terms of the effect on existing pedestrian and cyclist amenity, safety, fear and intimidation etc. as would be expected in an EIA to follow with a planning application, however there are significant implications on the planning for sustainable access between the site and Marden village, and the environmental impact on Marden village itself. This issue is not so much about the percentage impact of the increase in traffic, but the amount of traffic that is anticipated to be in conflict with pedestrians and cyclists who have to make do with sub-standard provision.



- 
- 5.3.2 Stantec highlighted to the promotor potential deficiencies in the pedestrian and cycle access elements of the scheme, with specific reference to the severance effect created by the rail line and sustainable access to and between Marden and the site. DHA latterly responded with further technical drawings showing how they propose to address the rail station pedestrian and cycle issue and provisions along Maidstone Road.
- 5.3.3 Technical submissions from Countryside show details of land ownerships at Marden rail station and proposals to improve the PRow bridge over the railway, east of the rail platform link bridge. These details show that a ramped access bridge upgrade is feasible, subject to details being submitted and agreed with Network Rail. It is however the case that this facility is only really useful for gaining access to and from the western part of Marden village, with the centre and east portion being on a direct desire line along Maidstone Road.
- 5.3.4 The majority of the development extends to the north east rather than the north west, therefore it is logical that walking and cycle journeys would be attracted through the centre of the land parcel rather off to one side where the distances involved would be much further. Furthermore, the proposed village core is located immediately north of Maidstone Road, thus drawing a desire line northwards from the existing Marden village core. These observations, along with the significant increase in traffic flow along Maidstone Road make it critically important that the sustainable access provisions are safe, efficient and attractive, the former point being of utmost importance in terms of paragraph 108 of the NPPF. Put simply, if foot and cycle provisions are not safe and attractive, these routes will not be used and that would lead to a propensity to use the private car for journeys that could otherwise be made sustainably.
- 5.3.5 Further DHA submissions have sought to address these concerns to look at alternative traffic and pedestrian routeing strategies and to clarify the TA assumptions which in our professional opinion are based on a worst-case scenario. Firstly, with the provision of good quality walking and cycling routes it is reasonable to expect, as has been outlined by DHA, that the car driver mode share and consequently traffic flows through the village would reduce below the 'worst case' figures presented in the TA, with the expectation being that flows through Marden village would reduce, particularly for school traffic (which is a reasonable proportion of the predicted new traffic), some of which appears to be double counted or existing travelling to other schools, and those trips which are actively encouraged onto public transport through provision of well-planned services and infrastructure.
- 5.3.6 Secondly, no allowance has been made as to the role that Underlyn Lane and Pattenden Lane can play in providing for traffic routeing south westwards, using a route that is already promoted for larger vehicles albeit recognising that the low rail bridge constrains this opportunity for high vehicles (above 3.7m high) and the need for further route management within the village itself. This alternative route can be facilitated through route management techniques, such as by gating (as suggested for buses) and setting out of development access routes to discourage through traffic routeing. Both propositions are not considered unreasonable on the basis that the promotor will be expected to plan for improving sustainable access, and the consequences of that strategy, using route management and design are tools that are commonplace and have been used effectively in Kent in the past to deal with such issues. This should not hold back the promotor from looking at other alternative measures to expand further sustainable route options to supplement the main linkages at Maidstone Road and the rail station bridge.

## **5.4 Infrastructure**

- 5.4.1 Following the issue of our method statement, various discussions took place which resulted in additional information being submitted, particularly relating to their education and community facilities assessment.
- 5.4.2 While it is recognised that a range of units of proposed, from 1,750 – 2,000, the assessment of infrastructure requirements has been carried out based on the maximum number of residential units proposed (2,000). It therefore presents the maximum expected level of demand for community facilities.

- 5.4.3 The proposed garden settlement is estimated to generate 4,045 residents based on 2,000 homes. The promoter has not yet determined the precise dwelling mix of the proposals, meaning it does not yet have a final estimate of population yield. The promoter has instead adopted the dwelling mix contained in the Council's 2014 SHMA as an interim dwelling mix. It is therefore a caveat that the process of calculating infrastructure requirements, and engagement with providers, will need to be iterative as the scheme evolves and a greater level of detail is determined. As most of the infrastructure types, including open space, are driven by population growth, it therefore stands that the exact level of provision is yet to be confirmed. In the cases of education and primary healthcare, the promoter is awaiting some strategic decision making from the relevant providers, as these too will affect the form provision will take, for reasons presented in the submission.

## Education

Summary of Proposals		
	Provision	Reasoning
<b>Early years / Nursery</b>	A nursery would be provided alongside the primary school or through-school, whichever option is chosen	This is based on demand for 172 early years education places.
<b>Primary</b>	2 FE primary school provision	This is based on demand for 531 primary education places. This equate to a requirement for approx. 2.5 FE.
<b>Secondary</b>	6 FE secondary school provision	The level of provision required by the development itself is approx. 2.5 FE. The provision of 6 FE will accommodate growth from outside the settlement.
<b>Sixth Form</b>	No sixth form provision	It is expected that sixth form pupils generated by the scheme will likely be accommodated within existing provision.

- 5.4.4 The promoter has engaged with the education provider (Kent County Council) on the number of school places required at different levels and have formed some consensus based on current figures of what provision would look like.
- 5.4.5 School place estimates for primary school aged pupils is 531. This figure is based on child yield multipliers based on the provision of houses and flats. The submission details in Section 4.2 of Appendix E1 the housing mix assumptions used based on the Council's most recent SHMA, and in 4.3, the resulting population yields.
- 5.4.6 Provision of a new 2 FE primary school to accommodate an estimated 531 primary school pupils will be required. Two FE would normally accommodate 420 pupils, so an under provision is proposed by the promoter, assuming that the remainder could be accommodated elsewhere. The level of demand requires the provision of 2FE at least. Providing 3 FE (for 610 pupils) would be an overprovision of places. It is necessary to agree with the County Council and education provider the most appropriate approach to delivering this provision.
- 5.4.7 Appendix E1 states 173 early years places would be required, and the promoter proposes accommodating early years places alongside primary provision. An FE at early years level is normally 26. The submission does not detail exactly how many places would be accommodated in the early years facility associated with the primary school but if the number of FE was assumed to be consistent with the number of primary FE (being two), we can assume that 52 early years places would be provided. Additional demand, if any, would need to be accommodated in the private sector.

- 5.4.8 The estimated secondary school population is 379, or approximately 2.5 FE. This is insufficient to justify a standalone secondary school of this size, however, the option of developing a through-school including a secondary school component of 6 FE has been discussed with the education provider. Our understanding from the County Council is that this development does not on its own justify the provision of a new secondary school at this location, and this location would only be justifiable should significant additional growth be located across the Headcorn-Staplehurst-Marden catchment. Consequently, contribution to off-site provision will be required. The reserved secondary school site becomes available for alternative uses and the 4ha suggested for employment use is a welcome addition to the scheme. However, as discussed in the employment section above further details are required about where this is best provided and what is to be delivered on site.

## Primary Healthcare

Summary of Proposals		
	Provision	Reasoning
GP Surgeries	Between 2.2 and 2.6 FTE GPs required	2.2 is based on Turley Economics' analysis, 2.6 is based on CCG proxy figure for demand based on household numbers.

- 5.4.9 West Kent NHS Clinical Commissioning Group (WK CCG) is responsible for planning for primary healthcare provision, particularly GP surgeries. The promoter of the garden settlement at North of Marden has consulted with WK CCG on potential requirements of the future community.
- 5.4.10 Appendix E1 notes there is an acknowledged discrepancy between the population figures determined by the promoter, and that determined by the CCG. Current estimates by promoter are for 4,045 new residents, based on the assumed housing mix contained in the 2014 SHMA.
- 5.4.11 In the absence of a confirmed housing mix, West Kent CCG has used a generic population multiplier of 2.34 persons per dwelling. The same development would therefore produce a population of 4,680. The general threshold for the provision of a new GP Surgery, is 8,000 new residents, requiring 4.4 FTE GPs, which was apparently confirmed in discussion with CCG.
- 5.4.12 A commonly used ratio of GPs required to support a new community is 1 FTE GP per 1,800 new residents. The submission notes that locally the ratio is slightly higher at 1:1,912, and that a flexible range can be adopted, but that consultation with the CCG had confirmed that the 1:1,800 ratio was appropriate. Based on the population estimates above, it is therefore expected that the proposal will generate demand for either 2.2 or 2.6 FTE GPs.
- 5.4.13 It is likely that the CCG figure is a more conservative figure, given it does not factor in the more nuanced calculations associated with housing mix. It is also mentioned that the population estimates provided by the developer will also be subject to further refinement when precise dwelling numbers and housing mix are determined.
- 5.4.14 The submission provides an analysis of capacity at existing local GP surgeries from Section 5.9 of Appendix E1, within 5 miles of the site. It identified capacity at a number of local practices, including the nearest at Marden Medical Centres, being 655, but also an oversubscription at a number of others, including Staplehurst Health Centre, The Orchard Medical Centre / Greensand Health Centre, Sutton Valence Group Practice, Old Parsonage Surgery, and Wallis Avenue Surgery. Overall there is a shortfall of 5881 places.
- 5.4.15 The submission concludes that the demand from the proposed garden settlement will further constrain supply. As the proposed development, according to the promoter's calculations, would only produce a population of approximately half of that which normally require a new GP surgery, it would not require a standalone surgery.

- 5.4.16 However, in the context of capacity constraints, combined with the new population from the proposed settlement, a new surgery may be required to service this and other developments coming forward. The submission states the CCG has indicated it is taking the opportunity to undertake a review of the sites taken forward by the Council in through the most recent Call for Sites, so it can understand requirements at a more strategic level.
- 5.4.17 In the meantime, the CCG recommended the safeguarding of some land in the proposed settlement for a GP surgery, should it be confirmed by the CCG that it is required. A minimum sized GP surgery, serving only the future residents of the proposal would be sufficient for 2-3 GPs and around 850sqm. We understand that this is what has been incorporated into the Masterplan currently, although the location is not shown on the Illustrative Masterplan.
- 5.4.18 Greater efficiencies can be gained from providing a larger facility. The size of the facility, and therefore who it is serving, would logically influence where it is proposed to be located. If it were a smaller facility serving the garden settlement only, a central and easily accessible location on the site would be logical. A larger facility that serves a greater catchment would logically be located more towards the centre of Marden overall. The submission notes that a facility serving 8000, or 4.4 GPs, would normally be approximately 1,700sqm.
- 5.4.19 No formal decisions have been made by the CCG while further analysis is undertaken, but should it recommend the provision of a facility, it would be for a larger facility for enrolments of up to 8000, towards the boundary with Marden. Another option – to relocate, and presumably enlarge the Marden Medical Centre – is an option that has been considered by the CCG, but would need to be consulted with the GPs at that practice in order to gain traction.
- 5.4.20 The submission also discusses the provision of dental facilities. It acknowledges there is no policy-based benchmark for the provision of dentists, but adopts a benchmark based on the promoter's consultants' (Turley Economics) previous experience. This experience suggests 1 FTE dentist for 2,500 new residents, which translates into 1.6 FTE dentists (based on a population of 4,045). However, while the submission provides an analysis of existing provision within a five-mile radius, the analysis is mostly inconclusive as the data used contains inconsistencies. Consequently, there does not appear to be a deficit in provision and there appears to be little other usable information from the Council or NHS England. The promoter's engagement with the Council's IDP and NHS England suggest it is not an area of priority. The current version of the masterplan however provides D1 accommodation in the local and neighbourhood centres which the promoter notes could be used as a dental practice. This will need to be clarified in the next stage of the process.

## Community Facilities

Summary of Proposals		
	Provision	Reasoning
<b>Community Facilities</b>	1 x community hall, either standalone or as part of on-site school	Based on a benchmark of 1 community hall for 4,000 new residents
<b>Libraries</b>	No onsite library provision planned	Existing provision in Marden, small size of new community

- 5.4.21 The promoter has undertaken consultation with the Council's Leisure, Regeneration & Economic Development team and Housing & Community Services team. A representative of this team relayed the benchmark referenced in the Council's Community Hall Audit of a community hall for a new population of 4,000. This is roughly equivalent to the population estimates calculated by the promoted, which therefore strongly suggests the need for a community hall.
- 5.4.22 The example of the settlement of Beechwood is described. This community hall was delivered in 2006 for a new community of a similar scale. The hall accommodates a main hall (19 x 11 metres), a meeting room, kitchen and an external (enclosed) grassed area (21 x 14 meters). It

is not stated explicitly but it is suggested that a facility of similar proportions would be appropriate at North of Marden.

- 5.4.23 No preference has apparently been determined for the location of the community hall. The submission states that the Council consider the possibility of the provision of community halls alongside schools, which maximises their use in and out of school hours. This could therefore be provided for at the on-site primary education facility or through-school, depending which solution is recommended by the Council. We agree with the submission that recognises that further engagement with the Council is likely to be necessary as the scheme progresses to determine whether a separate hall will be required on site.
- 5.4.24 The relevant library provider is KCC, with whom the promoter has not engaged. The promoter has provided information in the submission showing two public libraries near to the North of Marden site. These are: Marden Library, located 0.5 miles away, and Staplehurst Library, located 2.4 miles away. The benchmark for the provision of a new onsite library is generally far higher than the population estimates for North of Marden. It is difficult to understand the policies or priorities of the library provider at KCC without direct feedback, or up to date policy guidance.
- 5.4.25 Considering the relatively small scale of the new community, and the proximity of other facilities, it is highly unlikely that any new onsite provision would be required. However, early engagement with KCC Libraries should be encouraged to understand if the new development could be the source of a contributions to improve or expand the existing local service.
- 5.4.26 The submission also discusses indoor sports provision and provides estimates for demand generated by the proposed new population (promoter's population figures and the Council's population figures) across several categories. The submission notes that Council's Sports Facilities Strategy is currently undergoing revision to determine suitable strategic locations for new facilities. This is particularly relevant here as the promoter's own audit of facilities shows a general lack of indoor sporting facilities towards the south of the borough. This is due to the south historically being more rural in character, with most of the development, and infrastructure provision towards the north. The balance, however, is changing, and it is likely that more indoor sports provision will be required in the area around Marden in the future. Particularly, according to the Council these would be provision of swimming pools and small sports/leisure centres in the medium to long term. The submission notes these would not likely be required onsite, however it is acknowledged that developer contributions towards such facilities could be required in future. The Council should be re-engaged on this topic during the next stage of the promoter's development of the scheme.

## Open Space, Play Space, Sports Pitches

	Requirement	Provision and Reasoning
<b>Amenity Green Space</b>	3.33 ha - Able to be met offsite within access standards	10.56 ha is to be provided
<b>Provision for children and young people</b>	1.19 ha (maximum)	1.05 ha to be provided
<b>Publicly accessible outdoor sports</b>	7.62 ha (maximum) – not committed to meeting onsite	1.52 ha to be provided
<b>Allotments and community Gardens</b>	0.95 ha (maximum)	1.95 ha to be provided
<b>Natural/Semi-natural areas of open space</b>	61.17 ha (maximum), but only 26ha based on Turley figures	54.19 ha provided based on requirements and meeting large existing shortfall

- 5.4.27 The proposal incorporates 69 ha of green space which equates to just over 50% of the site, although most of this is to be provided as natural and semi natural open space. The



---

submission commits to overproviding against the DM19 standards on all types of open space except for Informal Outdoor Sports Pitches, where there is an under-provision of just over 5ha. This is justified through the potential to co-locate some of the provision through shared use of school sports pitches.

- 5.4.28 The submission notes the provision of Outdoor sports facilities (or Publicly accessible outdoor sports) needs to be addressed in further detail with COUNCIL during the next stage of the process the purpose of which is to provide the level of detail necessary to inform the scheme's masterplan for submission.. While we understand that generally the proposer wants to meet the standards on site, where possible, they suggest that developer contributions in lieu of onsite provision is also an appropriate means of mitigation. But we doubt this will be an appropriate way forward for a garden community, where we expect standards to be exceeded and exemplar development delivered. Therefore, we consider that any under-provision represents a risk that sports provision is not adequately provided on site. This will need further clarification, specifically about which figures are used.
- 5.4.29 There is discrepancy in the figures and the approach taken is complicated by the disparity between the promoter's calculations of population estimates (4,045), and the population estimates based on Council's proxy of population yield (4,760), determined using a multiplier of 2.38 persons per household. The submission also records requirements determined by the Council based on direct consultation with the promoter, generally interpreted to be the maximum requirements.
- 5.4.30 The submission provides the findings of an analysis of existing off-site open space provision around Marden, that fall within access standards, based on ordinance survey data. The submission notes the potential for other smaller open spaces to be relevant that have not yet been captured in this analysis. GIS data has been requested from the Council, but this has not yet been received by the promoter. This could have implications for the balance of onsite provision in the tables provided in the submission.
- 5.4.31 The promoters analysis seeks to understand where there are existing shortfalls in open space provision next to the existing population within the relevant access standards. It therefore helps to understand where the proposed development would exacerbate the shortfall. It shows shortfalls in 'Equipped play space', 'Allotments', and 'Natural and semi-natural areas of open space'.
- 5.4.32 The exact level of requirements will continue to evolve as a more specific population estimate is determined, at the next stage when more detail about existing provision comes forward. Discussions with the Council needs to be ongoing, to ensure the adequate onsite provision of all types of open space, as determined by the policy standards to meet the needs of the population generated by the development.

## Retail and Services

- 5.4.33 The submission provides some indicative uses consolidated around the centres shown in the masterplan document, including retail and other services. At the 'Local Centre and Community Hub' the submission indicates provision of 400sqm for a foodstore (A1), and other services equating to 400sqm for small scale retail, food and drink, medical / other services (A1, A3, D1). The exact balance within this 400sqm area is not yet determined. The same source shows the intention to co-locate these services with multi-use community building of 600sqm, as well as a possible primary healthcare centre (a relatively small facility of up to 850sqm as described in the section above, if serving only North of Marden residents), and a 60-120 bed care / nursing home.
- 5.4.34 Two neighbourhood hubs, of 300sqm each, would provide some balance of services in the following uses: a nursery or dentist (D1), retail (A1), restaurant/café (A3), office (B1a), and community building.

- 
- 5.4.35 Reference is also made to the potential for some services to be co-located with a 'Transport and work hub' in proximity to Marden Station, such as a gym, or coffee shop. It is understood this would be in the service of the working hub and for the convenience of travelers using the station.

## Utilities

- 5.4.36 The submitted Delivery Review notes (page 17) that the promoter undertook an Infrastructure and Utilities assessment in November 2019 relating to electricity, gas, potable water and ultra-fast fibre optic broadband / telecommunications at the site. This included engagement with UK Power Networks, Southern Gas Networks, South East Water and Openreach. The report concluded that points of connection to existing mains supplies of services and utilities are available adjacent or close to the site, and formal connection offers have been received from providers. Furthermore, all of the connection points and proposed off-site routes are located within highways land and therefore no third-party issues or delays are envisaged.
- 5.4.37 The submission does not provide conclusions on any specific constraints on the masterplan placed by existing infrastructure. More information is contained on page 86 of Appendix B3 Vision Document, which shows proposed routes for utilities infrastructure overlaid on the current masterplan. It also does not suggest that the delivery of infrastructure would constrain delivery of the current masterplan.
- 5.4.38 The proposal includes a considerable amount of information and detail about the assumptions. However, there is currently a difference between the promoter's figures and the figures provided by the Council. The approach to population needs to be agreed. This uncertainty has implications for the provision of social and community infrastructure and means that the current position is a snapshot in time. This is further complicated by the lack of clarity about the secondary school, which makes a big difference to the scheme. It is recognised that the housing mix will change and that therefore the social infrastructure and open space levels of provision will consequently evolve.
- 5.4.39 While the provision is not definitive that the proposal demonstrates that the scheme can generally meet its requirements. This scheme includes the most per unit S106/CIL allowance, which is expected to cover all these social and community requirements. The costs allowances examined in the AV Viability Report are based on comparable garden schemes in the region and are considered reasonable. Going forward it will be important to ensure that all policy standards are met on site, including the adequate provision of all types of open space.

## 5.5 Placemaking and governance

- 5.5.1 In response to our detailed questions the promoters have provided a comprehensive response to all the questions, referring to and cross-referencing technical advice previously submitted as well as providing additional material to address the topic area of placemaking and governance.
- 5.5.2 The scheme provides just over 50% open space, and there is recognition that the provision is illustrative and will evolve. Corylus Ecology are undertaking an assessment of Biodiversity Net Gain and they are confident that they can provide for an increase to meet 20%, however we are yet to receive this.
- 5.5.3 Our landscape consultant comments that the scheme is generally acceptable in landscape terms and largely responds well to the local features and settlement boundary. It provides a sensible interface with the surrounding landscape which will minimise the wider potential harm. The arrangement of green space within the site boundary may be better allocated so that green infrastructure elements provide routes for pedestrians and cyclists to cross the site and create a permeable network with the surrounding landscape.
- 5.5.4 The green area to the south of the site, located near to the railway, needs to be carefully considered to ensure that it is suitable for a safe passenger link to the town centre. Any

---

design should guarantee that it does not create a space that is unlikely to be able to be lit and to make certain that it offers the opportunity for passive surveillance overlooking.

- 5.5.5 The exclusion of parcel 1 results in an odd shaped development and means all the open space is in the furthest north east corner of the site away from most of the development and certainly the town. As a facility, accessible to all, the open space would be better placed further south on missing parcel 1 linking with the ancient woodland. This would address the reasons why it has not been included in terms of the Transco main and as open space it is not required to have a natural definition to the built form. In our view it would be a better, more compact and integrated landscape led scheme if this parcel was included. We therefore encourage to promoters and Council to work together to see whether this could be included.
- 5.5.6 In terms of design the promoters refer to high quality design at premium costs and although they refer to various standards and that they are happy to use design codes and Build for Life 12 they do not commit to deliver this. The build costs used are not set out by type, but a blended build cost referencing BCIS is used. This does not appear to include any uplift for high quality design and this will need to be addressed at the next stage. The proposal promotes three character areas incorporating landscape features particularly the hedges and ditches. The average density across the site is the lowest of all the schemes at 35dph, but with the neighbourhoods varying between 33dph and 37dph, and with the option for high densities around the district centre. Given that the other schemes are promoted at 40dph, we have tested what this would mean for this site and how much more value from the site is generated.
- 5.5.7 The design creates a 'garden' at the southern end of the scheme creating a green gap between the old and new village. This separates the scheme from the village and relies on high quality pedestrian and cycle links into the village centre. This raises the issue of connectivity and the need to create dedicated walkable and cyclable routes which are attractive and safe for those walking alone and in the dark, as well as ensuring safety along Maidstone Road which is narrow. We have concerns that there is a structural weakness in the scheme which needs to address these connection issues. One option is to utilise missing parcel number 3 to provide closer access to the railway bridge on Maidstone Road. This would avoid the very narrowest part of Maidstone Road and is discussed further above in the Transport section. An alternative could be to the east of Maidstone Road, behind the houses between them and the hockey/cricket club, although this is not marked as a missing parcel.
- 5.5.8 In terms of climate change and sustainability the promoters recognise the issues and list a significant number of measures available to achieve low carbon sustainable development, and using modern methods of construction, with flexible builds, heights and block forms. Countryside indicate that they are included in FTSE4Good Index which they believe demonstrates their strong Environmental, Social and Governance practices. These issues will need to be embedded in the design and masterplan as it evolves, and it is important at this stage that the costs are included to deliver these elements within the design. In common with all the other proposals there is no costs included for this element, however, it is notable that the costs do appear to be benchmarked against other garden communities in the area, which may give some degree of comfort. If these issues are to be properly addressed and incorporated in the scheme going forward it will need to be considered and costed further at the next stage.
- 5.5.9 The Governance arrangements are confirmed as the Master Developer Model with Countryside Properties delivering site wide infrastructure and serviced parcels, as well as acting as developer. They propose to work with The Land Trust, in a partnership arrangement to manage and maintain the open space. They provide examples of where they have successfully done this, such as in Beaulieu. The Land Trust confirm that they are working with Countryside to prepare a funding model based primarily on a residential service charge to enable them to manage the land for the long terms and deliver an ongoing programme of community engagement and activity. Little information is currently provided about how other community assets will be managed. As with the other schemes little detail is envisaged about the funding arrangements, revenue stream, costs or maintenance and management of assets, although it is presumed that this would be part of the management company responsibilities.



---

The AV Viability Report confirms that the costs are included and that the service charge will ultimately pay for the governance and stewardship, with the developer frontloading the initial costs<sup>3</sup>. Going forward further detail will be required to ensure costs are explicit and that the management company endowment within the infrastructure costs are adequate. There is some comfort in the fact that this scheme includes the highest level of per unit infrastructure costs.

- 5.5.10 As the most advanced scheme some engagement has already taken place, particularly with stakeholders. There is also commitment to further public engagement in conjunction with the Local Plan process. The additional information provided explains how the development could assist in meeting the objectives of the Neighbourhood Plan in terms of securing funding, providing increased patronage, complementing the shopping offer, enhancing health services and delivering community facilities that could provide space for a youth group and play group. There is no reference to these explicitly within the viability appraisal, however these items appear to be included within the S106/CIL allowance. Going forward it is essential that these are adequately included and costed to ensure that they are delivered.
- 5.5.11 The main deliverability issue for this topic is ensuring that there is enough headroom in the viability of the schemes to embed high quality sustainable design into the scheme at an early stage so that this can be achieved on the ground at the time it is built out. This is a key issue with all the proposals where we expect low carbon design solutions and high-quality materials to be used throughout to create a garden community that meets the principles of the prospectus. This will need to be embedded into the Local Plan policy and masterplan, as well as using design codes or equivalent that are used to guide the design and layout.

---

<sup>3</sup> Table 6.1 of AV Viability Report

---

## 6 Viability Assessment

### 6.1 Introduction

- 6.1.1 Above we have discussed at some length what each of the promoters are promising as part of their scheme; effectively what factors should weigh in their favour. But the obvious challenge is whether the schemes can afford to pay for everything that is offered?
- 6.1.2 As part of this work Aspinall Verdi (AV) have tested the viability of each of the three proposals to determine the likelihood that they can meet their obligations based on the proportionate evidence we have been provided with.
- 6.1.3 This initial high-level testing exercise aims to provide consistent analysis and comparison based on the information provided. It is strategic and does not provide the level of detail necessary for a planning application. It will not replace more detailed assessment later down the line. This work should not be taken as a final view on the viability of each scheme. Instead the assessments here highlight risks and importantly whether there is sufficient viability in the schemes to manage and mitigate these risks.
- 6.1.4 The assessments are broadly in two parts. Firstly, the three proposals have been tested on the basis they have been promoted to the Council – i.e. using the promoter's costs and values. These assessments have been revised over this project because we have, for example, requested that some previously optional costs ought to be considered as 'core'. Most obviously the station at Heathlands, because without the station we don't consider the location suitable for strategic growth. However, these assessments remain (largely) the developers view and as such obviously shows each scheme as being viable.
- 6.1.5 Secondly, AV have re-assessed each scheme to allow for a better comparison between the three proposals and allow for some standardisation of the assessment. This generally results in a less viable scheme because we have imposed standardised costs but, as summarised below (and in detail in the Viability Report attached at Appendix B) this is generally offset because we have assumed that cost increases can be absorbed in the price paid for the land.
- 6.1.6 In this re-assessment AV have amended some of the assumptions; for example, increasing the costs for the new Motorway bridge at Lidsing. But because there is no known cost for some missing items (for example 'long term stewardship' or future changes to building standards) we manage and comment on this risk by way of reference to the 'surplus' value the scheme generates in this assessment.
- 6.1.7 The intention is to understand the scale of headroom within the schemes and to ensure that adequate land value capture is accounted for early to ensure the necessary benefits are delivered. A scheme which is only marginally viable will struggle to absorb any cost increases without a meaningful impact on the scoped proposal. There is considerable danger in pursuing marginal schemes because these cannot adequately accommodate any unforeseen issues. This risk is a key consideration in large garden community developments that take a long time to progress through the plan making system and delivery.
- 6.1.8 It is important to note that in the discussion that follows any suggestion that a scheme is unviable needs to be seen in the context of what 'package' is being offered. I.e. a scheme may be viable if other aspects of the scheme change. Most obviously land value (discussed below) but also wider planning obligations with affordable housing being the most flexible. Currently 40% affordable housing is promoted in all three schemes (with some difference re tenure discussed below). Also, no allowance is made for external funding to address any gap.
- 6.1.9 For our assessment we consider it unsafe to rely on external funding at this stage. This is partly because there is no guarantee that funding is available. We are aware of examples where sites have been promoted in plans only to fail to secure enabling public funding (e.g. Tandridge). Conversely there are schemes that have provisionally been offered funds only to

---

see the scheme fail at examination (e.g. North Essex). So we don't assume public funds are available but there is obvious scope for funding to help de-risk schemes should this be needed in the future.

## 6.2 Land value

- 6.2.1 Land value is perhaps the critical issue. Garden communities are promoted on the basis that they can afford to pay for their package of infrastructure (and other benefits) via a land value capture model.
- 6.2.2 We don't outline this in detail here but in summary; in return for planning permission to develop the Garden Community, the landowner takes a lower per acre value uplift but in return develops more land than would otherwise be the case.
- 6.2.3 At one extreme, where land has no reasonable alternative use in a business as usual scenario, there is no uplift. But on occasion a 'big bang' investment can open up new land for development and in these circumstances it is in the interest of the landowner(s) to help pay and open the site.
- 6.2.4 Ultimately, the landowner will take less value per acre of land (because they need to pay for infrastructure) but the residual value remains enough to motivate them to develop the Garden Community proposal. Essentially there is 'win win' – the landowner makes a fair return and the Garden Community is delivered.
- 6.2.5 This is obviously a simplification and there is considerable debate around what is a 'fair' price for the land. Too low and there is no motivation to sell – too high and the full garden community benefits are not secured. As a worst-case scenario, as outlined in the recent North Essex Inspectors letter, the quality of the development is compromised:

*“basing land values on comparable evidence without adjustment to reflect policy requirements [of the specific garden community] can lead to developers overpaying for land. This may in turn compromise the achievement of the policy requirements, if the developer then seeks to recover the overpayment by seeking a reduction in their planning obligations”* (para 203 of 05/20 letter)

- 6.2.6 In the assessments undertaken by Aspinall Verdi each proposal has been sensitivity tested using the land values provided by the promoters themselves but also a 'guide' value of £100,000 per acre. As promoted, Lidsing has the highest value - £216,000 per acre with Heathlands and Marden at £150,000 per acre. This provides an uplift over agricultural values which are around £10-£15,000 with multipliers between 10 and 18 times.
- 6.2.7 There is no hard or fast rule to determine whether this is too much. But in North Essex their inspector concluded £100,000 was a reasonable uplifted value and so there would appear to be some wriggle room in the land values assumed at the moment.

## 6.3 Costs

- 6.3.1 The second critical issue relates to costs – including policy costs and infrastructure costs. Over this project we have looked to standardise cost assumptions as best as we can, given the data available. Not all developers are able or willing to itemise their cost items and instead choose to provide 'ball-park' figures based on their experience and benchmark schemes. This is particularly the case with Marden.
- 6.3.2 Marden has provided a cost per unit around £65,000 to cover infrastructure, S106 and CIL; Heathlands slightly more but Lidsing much less.
- 6.3.3 AVs view, as set out in detail in their report, is that the Marden costs would appear reasonable along with those presented for Heathlands. However, we would add that the risk profile at Heathlands is higher because of the new station and more extensive infrastructure package

---

needed to deliver a stand-alone new settlement. As such, we may ultimately look for additional 'comfort' in the Heathlands scheme compared to Marden (a point we return to).

- 6.3.4 AV are cautious that the costs for Lidsing are too low – at 50% of the others. We agree this is concerning and while we accept the location of the site could result in lower costs, it is probably safe to allow for a further £20,000 per unit to arrive at a comparable cost with other candidate sites. This is not fatal to the scheme given the high land value assumed – double the £100,000 benchmark AV advise using.

## 6.4 Affordable housing and housing mix

- 6.4.1 We consider this briefly here because it is highly relevant to the viability assessments. Each promoter has been provided with the Council's 2019 SHMA document and as regards the mix of units both Heathlands and Lidsing have used the SHMA 2019 mix of unit sizes.
- 6.4.2 Marden use the adopted local plan policy as opposed to the new SHMA. In practical terms this helps Marden because the adopted plan allows larger (more expensive) dwellings. So, for any given number of units Marden is slightly more profitable because their end product is larger and of a higher value. We have not reworked this assessment because if we were to recast the mix of dwellings we may also need to recast the capacity of the site. With smaller units the site capacity may increase. However, if the site progresses through the plan it needs to ensure that it addresses the new estimate of need (mix of units) and not the former.
- 6.4.3 Aside from this mix issue the main difference is that Lidsing & Marden propose 'affordable rent' as part of the 40% policy request for affordable housing whereas Heathlands propose 'social rent'. In simple terms social rent is more expensive to deliver because the discount is higher.
- 6.4.4 On a like for like basis this could mean that the headline costs from Heathlands are around **£5,000** higher per unit – i.e. if they too offered 'affordable rent' costs would be lower by at least £5,000 per unit and the scheme slightly more viable. Here we don't comment on the merits of social vs affordable rent because this is a policy choice for the Council. But it is appropriate to note that the choice to promote one tenure over another impacts on the viability assessments provided.

## 6.5 Headline findings

- 6.5.1 We only provide a headline review of the detailed AV work here. More detail is available in their Viability Report at Appendix B.

### Marden

- 6.5.2 Starting with Marden the testing shows that this is a viable proposal. It is capable of delivering a new community using the promoter's assumptions or AVs moderated version. Using the promoter's version results in a residual around £4,500 - £8,000 per unit – with the 2,000 unit scheme more viable. The moderated AV version provides a higher surplus – partly because they consider the promoters land value to be higher than could be justified for a new garden community.
- 6.5.3 While the scheme is always viable there is merit in exploring this higher viability in more detail because some of this uplift could be used to address the identified shortcomings and particular the lack of new employment on site – or nearby – that may only partly be addressed with the 4ha of land no longer needed for the school.
- 6.5.4 Also, possible higher infrastructure costs to overcome the limitations of access via the narrow rail bridge. There is also merit in exploring the affordable housing offer and whether more (any) social rent could be provided and what it may mean if the 2019 SHMA mix is applied. To do this AV have adjusted the overall size of development at Marden, to bring it into line with Lidsing (who use the 201 SHAM mix assumptions) by reducing it by 8.9%. This high level

---

adjustment decreases the viability and reduces the overall surplus to £15 million and on a per unit basis the residual value is around £7,500.

## Heathlands

- 6.5.5 At Heathlands the promoter's assessment is only just viable at 3,000 units and still very marginal at 4,000 units. Progressing on an assessment showing so little contingency is risky and will require close monitoring and constant market reappraisal. This is particularly important given that even a small increase in the rail station (or other major infrastructure) costs could very easily undermine the scheme. At the moment Network Rail have not been approached to cost the new station and while the estimate used in the assessment appears credible it is not uncommon for such costs to increase exponentially at the detailed design stage.
- 6.5.6 However, AV considers that should land values fall to the North Essex £100,000K per acre benchmark there is some contingency. Their moderated version provides a slightly higher surplus (£5,000 per unit) but still very finely balanced. Only small changes to the construction costs and sales values quickly makes the scheme unviable.
- 6.5.7 This illustrates the need for landowners to be flexible with their land costs and while we understand Homes England may be supportive of the scheme it is not their role to use public funds where there is a risk the underlying land values are contributing to the lack of viability.
- 6.5.8 The assessment also illustrates the benefit of possibly expanding the development to better make the case for the station, major infrastructure and in turn share the high fixed costs (and risk) around more new homes. AV have tested the potential increase of 1,000 units without the need for significant additional infrastructure or Section 106 contributions to see if this would increase viability. The results demonstrates that the overall surplus more than doubles and the per unit residual value rises to £9,700. However, the lack of employment on site, would also need to be addressed that would also have a cost implication that is not currently included, and the current scheme could not absorb.

## Lidsing

- 6.5.9 The promoter's assessment is different to the other two we have considered. Here they have assessed the land value using a residual method – so the land value is left once all other costs paid for.
- 6.5.10 This provides a higher residual land value (over £200,000) – but we are concerned that the costs, in comparison with the other schemes, may be 'underbaked'. It would appear prudent to consider a further £20,000 per unit to deliver a fully specified and quality garden community.
- 6.5.11 The AV moderated version shows the scheme as viable, even allowing for this additional £20,000 of cost per unit and £100,000 land value but the scheme becomes more marginal.
- 6.5.12 More work is needed to confirm the development costs here. For this assessment a cost below Marden and Heathlands would appear sensible given the sites location and proximity to existing services and infrastructure, and given it only needs a bridge. Despite this it is likely to be too low and we would expect to see higher externals, infrastructure and S106/CIL contributions.

## 6.6 Summary

- 6.6.1 All three schemes can be made viable with Marden showing the greatest surplus. This could be used to help improve the scheme while still being viable to deliver.
- 6.6.2 Lidsing is also viable, although needs the flexibility in the land price to ensure this remains the case because we are concerned that the development costs may be more than the promoter has assumed.

- 
- 6.6.3 Heathlands remains challenging. The scheme is only marginally viable and will need to be closely monitored and risks identified and managed. The public sector (Homes England) may help manage this risk but the fact that the land value is 50% above what we may consider reasonable is a major issue and making the scheme unviable. At £150,000 per acre the rationale for any gaps to be made up by the public sector is reduced. At £100,000 per acre the scheme is just viable but lacks contingency and remains high risk. A small increase in costs would quickly render the scheme unviable. This endorses our recommendation that the Council consider a larger scheme to manage this risk across more new homes, while at the same time providing a 360 degree scheme around the proposed station.

DRAFT



---

## 7 Conclusions & Recommendations for the Draft Plan

### 7.1 Introduction

- 7.1.1 In this second stage of the assessment process we have looked at four possible new community sites.
- 7.1.2 Underpinning our assessment is the need for the Maidstone Local Plan Review preferred option consultation to be informed by realistic and deliverable proposals. In summary – what the potential developers are promoting to the Council via their prospectus responses should be credible and the social, community and environmental benefits achievable. We have also worked to identify critical issues that are relevant to the more detailed consideration of the proposals.
- 7.1.3 In this section of the report we set out our conclusions and recommendations regarding the strategic deliverability of three candidate garden settlements. We can only base our assessment of the material provided by the promoters and feedback from other stakeholders, such as the AONB unit. Ideally each potential scheme would be supported by a comprehensive suite of technical evidence. But we must recognise that this is expensive to assemble and requires engagement with external stakeholders who also have limited resources.
- 7.1.4 It is also the case that at this stage of plan making proposals are expected to positively respond to comments received from the Council (including this report) but also the wider audience via the plan consultation. As such, no scheme is currently final or fixed. Considerable further work will be needed to inform any potential new allocation in the emerging plan and any successful scheme will need to be reshaped and flex to reflect additional evidence as it emerges.
- 7.1.5 That said, for this report, we have worked with the promoters to assemble proportionate evidence in order to assess the proposals. On occasion there are gaps in evidence that cannot be filled – for example, the Heathfields proposal has been amended to reflect emerging technical evidence regarding heritage assets and this has, in turn, resulted in a new proposal to develop land previously (in the former Masterplan) promoted for a Country Park. This has raised new technical issues that will need investigation as the site progresses. So, in this regard, and in other matters related to this site and others we have sought to make a judgment.
- 7.1.6 In the rest of this final chapter we outline why we consider each of the proposals could be considered in the Draft Plan for formal consultation along with any caveats or concerns we have with the proposals as currently scoped. Some of these are critical and core to the sustainability of the proposals – others are areas for improvement.

### 7.2 Heathlands

- 7.2.1 The Heathlands proposal is perhaps the most complex of the remaining three proposals we are considering.
- 7.2.2 The site is promoted by Maidstone Borough Council but for this assessment we consider the Borough (as a promoter) as though they were any other promoter. As is hopefully clear from our assessments above, and the summary that follows, we have been objectively critical of the original masterplan and remain constructively critical of the current (as of June 2020) amended masterplan. There are structural weaknesses with the current masterplan that will need to be reviewed going forward to ensure that it is deliverable.

- 
- 7.2.3 However, we have enough evidence to demonstrate that a new community is, most likely, deliverable here. The further work needed to evidence the promoted (June 2020) masterplan may require changes the scale or shape of the proposal. But there remains at the core a potentially deliverable new community of a big enough scale, subject to a number of issues set out below.
- 7.2.4 In the next paragraphs we highlight these areas of ‘concern’ and possible solutions to mitigate or manage these. As an objectively critical assessment we don’t go into detail regarding the positives of the proposal and don’t, in a recommendation section of the report, require ‘actions’ from the promoter or Council.
- 7.2.5 It is relevant that the scheme has secured interest from Homes England and therefore the opportunity to access significant public funds. This could be used to address areas of weakness and deliver the scheme to a high standard. At the moment, because some of the potential barriers to development have not been costed, we cannot say that Homes England will assist with these but their involvement certainly helps reduce the delivery risk.

### Connectivity

- 7.2.6 Connectivity is perhaps the critical issue for this site. A strong connectivity package is essential given that the proposal is dependent on either Ashford or Maidstone for its (major) employment and higher order services. As discussed above the proposal is for 4,000 homes but only 850 jobs and the promoter suggests this can be justified because the site is in the middle of Ashford and Maidstone as major employment locations. Given this stated relationship accessibility to Ashford and Maidstone is vital, most new residents will need to commute offsite for employment or to visit some higher order services.
- 7.2.7 As outlined in the original masterplan the prospect of a new junction to the M20, and possible HS1 station, was a determining factor in land coming forward here. These would have facilitated high quality access out of the site. Arguably a primarily road justified scheme may not be considered a sustainable solution under the current planning framework. Were the junction the still primary motivation for the development, and the centre of the transport strategy, it would need to be explored in more detail as part of an additional assessment. While this development could contribute to the case for a motorway junction in the future, it could not facilitate one on its own, and this is no longer part of the proposal.
- 7.2.8 We do however recognise that 4,000 units here can only strengthen the case for a junction somewhere in the area and helps start developing the strategic case Highways England needs to see. Any future junction, and its detailed location needs to be considered through strategic working with Ashford Borough Council, Highways England and Kent County Council.
- 7.2.9 The scheme now indicatively proposes a new station on the ‘classic’ lines plus associated highway/cycleway improvements and bus service improvements. These can be summarised as a ‘shuttle service’ to existing stations and a diversion of the half hourly Maidstone – Ashford buses through the site.
- 7.2.10 With our critical ‘hat’ we are not convinced that the ‘indicative’ station solution is acceptable as a sustainable solution given the scale of development proposed and its reliance on Ashford or Maidstone.
- 7.2.11 Should a station not be forthcoming the scheme would be heavily dependent on the car. We don’t think it is attractive for residents to ‘shuttle’ to a station for the short (20 minute) train journey to Maidstone/Ashford followed by walk to work or possibly another bus to their place of work. The journey by car would be significantly quicker and more efficient. Further, a bus-based solution would be capacity restricted and could only transport a small minority of the working residents from 4,000 homes.
- 7.2.12 We recognise that home working is becoming more common and people may commute less in the future, but this does not, in our mind, make an otherwise unsuitable location sustainable.

---

Given this reservation, we consider that the station cannot be 'indicative' but must be considered a core component of the sustainable new community here.

- 7.2.13 We understand from the promoter that their preliminary work shows that a new station is feasible. We have also been provided with a cost estimate for testing. But no detailed work has yet to have been undertaken and we have no evidence on which to base our assessment. Nor has Network Rail been approached. For this assessment we cannot conclude that a station is plausible; but nor can we conclude one is not. This evidence gap needs addressing with extreme urgency.
- 7.2.14 For the purposes of the draft plan we would suggest that the Council caveats the deliverability of the current masterplan proposal on the successful delivery of the station.
- 7.2.15 On a positive note – we would hope the involvement of Homes England would help strengthen the case for a station and, subject to it being feasible, help with the complex delivery and funding needed to secure one.
- 7.2.16 We would hope that this infrastructure could be 'front loaded' to help ensure that new residents are able to use the station from the outset (or as early as possible). This would help the development attract new residents who are best able to use the train to access their place of work and that sustainable travel patterns are embedded in the new residents from the outset.

### The Western Parcels

- 7.2.17 The second area of concern relates to the area of land we generically call the 'western parcels'. In the earlier masterplan these were proposed as Country Park but are now proposed for development. This shift has been necessitated to maintain a 4,000 unit scheme while technical work has found that other land, formally proposed for development, is constrained.
- 7.2.18 However, this change introduced new risks that are not yet addressed in any technical evidence.
- 7.2.19 Firstly, development is now proposed around the existing Waste Water Treatment Works but no discussion has yet been had with the Water Company nor any work to establish the necessary 'cordon sanitaire'. It is possible the Waste Water Treatment Works would need to be expanded to accommodate growth and we understand that there are ongoing concerns regarding nitrite leaching that may require a more innovative solution to address including extensive reedbed planning. At the moment these are unknown technical issues.
- 7.2.20 Even once this work has been undertaken it is questionable to what extent the homes in the broader area would be attractive to the market and what detrimental impact the Waste Water Treatment Works may have on values and so viability.
- 7.2.21 Secondly, it has become apparent that part of the land is allocated in the new Kent Minerals Plan. The site has been promoted through that plan for mineral extraction (restored to agricultural use) and only recently been found sound by the Plan Inspector.
- 7.2.22 As part of that Examination (late 2019) the Inspector was not informed by the promoter that the landowner was also considering an alternative end use. Nor that housing could be developed adjacent. It is clear from the plan evidence that this site was selected partly because it was not near new housing.
- 7.2.23 This may not be an insurmountable constraint and the promoter claims that the minerals can be extracted, and the site restored so that homes can be delivered. They have provided an example of where this has been achieved. But further work is needed to demonstrate that this is realistic in a reasonable time frame and again viable in this location. In this regard KCCs provisional opinion (minerals) is that developing the site post extraction is likely to be possible but this is largely in the hands of the mineral firm. It would not be safe to assume the site is

---

available until the end of the plan period. Site capacity would need to be confirmed because, post extraction, not all the land may be developable. They also note that the operational quarry may limit development on the wider site until operations cease – various sensitive uses (esp. schools) should not be developed where they could cause conflict with quarry operations – e.g. where the school and quarry share the same access routes.

- 7.2.24 Thirdly, the development of the western parcels increases the impact of the development on the AONB by ‘elongating’ the scheme and making it more visible. The AONB unit objected to the minerals site and are likely to object again.
- 7.2.25 As noted above this was a shift in approach between different versions of the Masterplan the promoter has yet to assess for feasibility and viability.
- 7.2.26 We would suggest that the pragmatic approach for the draft plan would be to exclude the western parcels from the ‘core’ scheme pending further work. As a worst case the land could revert to a green use cutting the capacity of the site to deliver around 3,000 homes but with scope to revert back to the full 4,000. A 3,000 home scheme would still fall well within the size threshold the Council has set for a new community.
- 7.2.27 The promoter has agreed to provide viability evidence to support this.

### Relationship with Lenham Heath

- 7.2.28 As noted above the scheme has been comprehensively re-worked between the original 2019 masterplan and June 2020. Part of the reason was that a detailed assessment of the heritage landscape concluded that parts of the site were not suitable for built development. This has a consequential impact of requiring the ‘western parcels’ to be proposed for development.
- 7.2.29 However, the site remains complex because of the number of listed buildings and existing dwellings remaining within the ‘red line’ and the effective ‘enveloping’ of the small existing community at Lenham Heath. There are also a considerable number of different land ownerships within this area which add to the complexity of this part of the site.
- 7.2.30 Regarding the listed buildings, working around listed buildings is complex and we would not expect the detailed design work to have been undertaken at this stage. More work would be needed to fully assess the setting of each asset and develop appropriate design solutions. So, the presence of the listed buildings are not ‘show stopping’ at this point. But the number of assets in the area will obviously complicate further development of the proposal and introduces added risk and cost.
- 7.2.31 Regarding Lenham Heath more generally the promoters suggest that any detrimental impact can be mitigated by a 10m green ‘buffer’ around each existing dwelling. However, this has not been agreed or discussed with the potential properties concerned. We understand that part of the reason is that promoter has not yet commenced local consultation.
- 7.2.32 In this assessment we cannot conclude whether or not this ‘buffer’ remedy is acceptable to the community concerned. Or an alternative may be forthcoming. Nor are we able to judge whether the prospect of a new community nearby; with local services and a rail station; would be viewed as a positive feature that strengthens the existing community of not. There is clearly a discussion to be had with the community concerned.
- 7.2.33 We would suggest that it is now urgent that the promoter commences community engagement and the emerging findings of this exercise are made available to inform the Council’s future decision of whether or not to allocate the site in later plan rounds.
- 7.2.34 However, we note that there is no requirement for a developer to provide any ‘buffer’ around development sites nor is there any general requirement for developers to compensate properties impacted by new development. Development is almost universally controversial, and part of the planning system’s role is to also represent the views of those potential new

---

residents – who currently live elsewhere. But it is in everyone's interests to seek a mutually acceptable solution.

### Possible further expansion

- 7.2.35 We understand that there is a suggestion that the scheme could grow in size; over and above the 4,000 homes currently proposed. This is only highly indicative at the moment with additional land being illustrated north the railway and the proposed station.
- 7.2.36 No technical work is available to support this at the moment and we are limited in how we can take this expansion into account as part of this work. We note that additional development could only help build the case for the station and ultimately a possible new junction in this broad area in the future. Expansion towards the A20, and a large scheme in general, may be more attractive to the employment space / developers and so could help address some of the connectivity issues raised earlier. But northern expansion moves development closer to the AONB and would be of concern to the AONB Unit.
- 7.2.37 We recognise that further technical work is needed to support this in due course. But we are also minded of the need for transparency. If 4,000 homes are the first phase of a larger proposal, then this is made clear as part of the plan consultation process and the Council is able to scope emerging policies to facilitate this in the future.

### 7.3 Land North of Marden

- 7.3.1 The North of Marden scheme is comprehensively scoped and supported by a proportionate evidence base that demonstrates the scheme is broadly deliverable.
- 7.3.2 The main issues we have identified, and discussed with the promoter, largely relates to how the proposal can positively respond to the needs and aspirations of the existing settlement at Marden, recognising that the proposal doubles the size of the village.
- 7.3.3 Also, as with Heathlands we query the sustainability of the development given the weak employment offer proposed. Although it is recognised that this is improved if the 4ha previously reserved for a secondary school is available for employment uses. Marden benefits from an existing rail station but the scheme proposes very limited new employment opportunities on site. So, by definition all the new residents will need to commute off site for work, albeit many may use the existing station.
- 7.3.4 Given there appears to be a well occupied employment site in close proximity we have queried with the promoter why efforts are not being made to expand this site to increase the number of local employment opportunities within walking/cycling distance to the housing proposal. Related is the potential impact of increased highway flows along Maidstone Road and through the existing village. There also several boundary issues that ideally could be addressed either by the promoter or with the assistance of the Council to improve the scheme.

### Connectivity

- 7.3.5 Marden benefits from an existing rail station that is proposed to be upgraded by Network Rail to provide new lift access to the platforms. The nearby public footpath bridge is also due to be replaced with a new accessible bridge. The promoter may be asked to contribute to these improvements and other improvements to the station more generally.
- 7.3.6 Improvements to the local bus network are also proposed – although these are more limited and distance by bus to Maidstone may not encourage significant bus use. We also understand that there may be engineering complications in improving the bus route into Maidstone. But with a station bus links are less critical to the overall package.
- 7.3.7 However, counter to Garden Community Principles the scheme includes almost no new employment offer. The promoters stress that there is a well-established employment estate to



---

the west of the proposal. But we note that this is currently fully occupied with no scope to grow employment without further land allocations being made. Whereas the garden community proposal roughly doubles the size of the village. In 'net' terms almost every new working age resident must, commute, to an alternative settlement for employment.

- 7.3.8 When challenged the promoter has suggested that should the secondary school not be needed (4ha of land) this could be used to strengthen the employment offer on site. They have also suggested that the nearby industrial estate could be extended – but this is not part of their proposal and so not something we could consider in this report. There is a risk that stand-alone commercial development is unviable and without support from the garden community does not come forward.
- 7.3.9 The most significant concern we have relates to the transport assessment that suggests the scheme will significantly increase traffic flows along Maidstone Road and through the village by threefold in the morning peak hour. This has not yet been assessed as part of an EIA and is important because it means there will be conflict with pedestrian and cyclist, because the solutions require reducing the width of the rail bridge (see below).
- 7.3.10 From an engineering perspective this may be technically acceptable – the ultimate decision maker in this regard will remain the Highways Authority (KCC). But it is obviously detrimental to the existing community, especially because the route runs through the middle of the village centre.
- 7.3.11 The impact of the new homes the local network, and the village centre, is greater than the other proposals we are considering partly because of the need to 'funnel' southbound traffic across single the rail bridge and along a secondary road network. This is compounded by the fact that traffic may be required to queue along Maidstone Road waiting to pass the bridge with associated noise / emissions. The much larger Heathlands proposal uses the former A20 trunk road and Lidsing has multiple options to route traffic on/off the site. As a rural site these options don't exist here. We have queried whether greater use can be made of Pattenden Lane to reduce the flows along Maidstone Road and village centre / high street and this is something the promoter will consider if the site progresses.
- 7.3.12 As noted above we cannot conclude on the technical acceptability of the current highways solution, nor should our concerns re noise / emissions be taken as a conclusion that the proposal is unacceptable to the planning or highways authorities. We don't have the technical evidence to draw this conclusion and the reality is that many similar sized villages already accommodate similar sized traffic flows and have done so for many years. But the fact the promoter's own evidence suggests such a significant increase in traffic only strengthens the case for the wider connectivity package to be strengthened and further consideration given to what extent trips can be better internalised on site and other – no rail options – promoted more aggressively. As presented, there is a risk that this could be perceived as a dormitory residential location that may be preferable to more remote (without a station) locations but still requires considerable offsite commuting with the subsequent sustainability disbenefits compared to an edge of settlement location.

### Boundary Issues

- 7.3.13 The promoter has identified four land parcels around the site that have not been able secure. See map below





- 7.3.14 Parcels 2 and 4 are in the north and north east of the scheme and, according to the promoter, form a reasonable buffer between proposed development and listed buildings. This appears to be reasonable and pragmatic and the omission of the parcels would not appear to be detrimental to the proposal.
- 7.3.15 Parcel 1 is in the East of the scheme and, according to the promoter, excluded to help provide a strong boundary along existing field hedgerows. We are less convinced that this a reasonable justification and we note that excluding this parcel from the scheme has the ultimate effect of pushing the balance of open space northwards and further away from the new community (or pushing built development northwards and further from the station and existing village).
- 7.3.16 This is not a show stopping concern and we must take a pragmatic response to how promoters are able to assemble their sites – especially where part of the model is 'land value capture'. So, land has to be offered at a reasonable cost. However, we think there is merit in examining this omission as the scheme progresses; possibly with the help of the Council. The obvious risk is that the parcel is promoted at a later date – justified part of the grounds that the parcel will be surrounded on three sides by development.
- 7.3.17 Parcel 3 is in the south of the scheme and is, in our mind, a much more critical parcel to address. As currently proposed the new community is linked to the existing village via the railway station bridges (which are proposed to be upgraded) or along Maidstone Road and across the existing road bridge. Because the footpath over the bridge is too narrow the scheme proposes reducing the carriageway width and so increasing the footway/cycleway width. The narrower carriageway would be signal controlled. We understand that this style of solution has been accepted elsewhere in Kent and is a pragmatic solution compared to rebuilding the bridge.
- 7.3.18 However, while this solution resolves the issue with the bridge it does not address the sub-standard route northwards into the scheme. This could result in a 150m stretch of poor quality, narrow, footway with no scope for quality cycle access between the bridge and scheme.

- 
- 7.3.19 The promoter suggests that this will be less of an issue because the masterplan will seek to direct users towards the station if they want to access the existing village – avoiding Maidstone Road. We are not convinced with this given that number of core village services (including post office and pharmacy) are directly south of Maidstone Road and this will remain the most logical route for those new residents in then north and east of the proposal.
- 7.3.20 There is no suggestion that the current proposal is unsafe or unacceptable in principle. But it is clearly a less optimal solution and one that could be partly addressed were access provided through parcel 3 and directly onto the bridge – reducing reliance on pedestrian use of Maidstone Road north of the bridge as far as possible. Alternatively access has been explored east of Maidstone road between the road and hockey club - but we understand this may be complicated by Network Rail's reluctance to permit a footpath north the rail line – this was expected to be provided as part of the recent improvements to the sports ground but has yet to be delivered.
- 7.3.21 The main fundamental issue with the site remains its location and reliance on commuting for most trips to work or higher order services. The station is certainly an asset but even with the station the promoters transport evidence demonstrates the risk that the proposal will, as currently drafted as a 'worst case scenario', result in an increase in traffic through the existing village.
- 7.3.22 Should this site be taken forward we would hope that, working with KCC and Maidstone, the promoter would be able to improve the current scheme to address the key connectivity issues to provide a high quality safe pedestrian and cycle route to the local facilities in Marden.

### **Infrastructure and population estimates**

- 7.3.23 The submission provides a comprehensive appraisal of infrastructure requirements outside transport improvements. We are assured that the promoter has gone to appropriate and proportionate efforts to calculate requirements in line with commonly used standards, and has consulted with service providers in most cases, who have been responsive.
- 7.3.24 In the absence of a determined housing mix, and in using a generic one based on the 2014 SHMA, there is a theme running throughout of conflicting population estimates between the promoter and the providers. Ultimately this has implications where requirements are driven by population growth and so while we are satisfied that the general approach to provision is reasonable, exact requirements will be forthcoming in the next stage of the promoter's work.
- 7.3.25 Part of the uncertainty can also be reasonably attributed to forthcoming strategic decisions, particularly on education and primary healthcare. The need for continued dialogue with the relevant providers is noted in the submission.

## **7.4 Land North of Lidsing**

- 7.4.1 The final proposal to consider is a Lidsing. This is an urban extension to Medway but delivered within Maidstone along garden community lines.
- 7.4.2 Unlike either of the two sites above the proposal includes enough new employment land to broadly balance the needs of the new homes for new employment. The site is also very close to several established local employment estates and district centres and the proposal includes improvements to link the site to nearby centres. Although no rail station is available this is not a significant limitation given the strong employment package on site and nearby, and access to existing and potential bus routes.
- 7.4.3 The onsite employment offer is well located to maximise the benefit of an improved Motorway access and arguably, given the limited availability of Motorway accessible sites attractive to business, this is a sensible use of the land regardless of additional housing.

- 
- 7.4.4 The scheme is not without its issues – mainly relationship to Medway and the potential impact on the AONB.

### **Impact on the AONB**

- 7.4.5 Unlike Heathlands, which is in the setting of the AONB but does not encroach into the AONB this proposal requires a small amount of land south the Motorway – within the AONB. This is needed to facilitate the additional ‘arm’ of junction 4.
- 7.4.6 About the site in general the North Downs AONB unit note that the M2 as a ‘strong boundary’ and there is limited intervisibility between this site and the AONB itself. Their main concerns remain the ‘incursion’ into the AONB itself and the need to protect or enhance the ‘gateway’ into the AONB. The ‘incursion’ would appear to be their ‘critical issue’.
- 7.4.7 The promoter has assembled the land around this ‘incursion’ and proposes significant landscaping that in summary hides the infrastructure from the AONB. Our landscape review concludes that this is a pragmatic response to facilitate the infrastructure, but it remains an incursion into the AONB nonetheless.
- 7.4.8 As the motorway junction represents major development and the AONB unit is likely to object in principle. It will be for the Council to weigh the merits of the proposal in line with the guidance set out in the NPPF. Our view is that, with the new employment site, the number of new homes and potential to improve accessibility to Medway as a whole, there is a strong positive case to be made here. There are ongoing discussions with the AONB unit.

### **Impact on Medway (Landscape)**

- 7.4.9 Another major issue with this site concerns its relationship with Medway. While the land is within the administrative area of Maidstone for almost all practical purposes this is a Medway site and will ‘knit’ into the Medway urban fabric.
- 7.4.10 This area of Medway / Maidstone has not been a favoured growth location in the past. Medway have previously maintained that the valley forms an important gap between Lordswood and Hempstead and the land within Medway, to the north of this site, is designated as an Area of Local Landscape Importance (ALLI) in their development plan. This designation is not mirrored in the Maidstone plan, but it is still useful to understand the principle of the Medway ALLI policy because the principles may remain sound regardless of the absence of a Maidstone designation.
- 7.4.11 Some of the relevant issues were well rehearsed in a recent planning appeal. The appeal, determined in 2017<sup>4</sup>, was ‘recovered’ by the Secretary of State who agreed with the Inspectorate to grant planning permission for 450 homes at nearby ‘Gibraltar Farm’ (Medway). The status of the ALLI was discussed at length but ultimately the benefits of the new homes outweighed any local harm.
- 7.4.12 The promoter suggests that this appeal sets a precedent for developing this site. However, reading across between decisions must be done with care – the circumstances are often different.
- 7.4.13 Most obviously the above appeal was determined with the ‘tilted balance’ engaged. At the time the Inquiry was heard Medway could not demonstrate a 5-year land supply. This, in simple terms, increases the positive weight afforded to the new homes vs plan policies (including the ALLI).
- 7.4.14 However, it remains the case that the Secretary of State still give only limited weight to the ALLI. This was partly because the ALLI is only a local designation and, as suggested by the appellant, we note that this designation common around Medway and would constrain most

---

<sup>4</sup> APP/A2280/W/16/3143600

---

development options. But it is also important to note that the Secretary of State still considered that, with the 450 homes, the ALLI remained broadly 'intact' and that development would not *"lead to coalescence between Lordswood and Hempstead or critical harm to the ALLI's function"*<sup>5</sup>.

- 7.4.15 Because of the scale of this development it is arguable that this 'comfort' may not apply as strongly as suggested by the promoter. However, our review of the landscape evidence suggests that with the appeal site now allowed the strategic nature of the gap and role the location of the Garden Community plays as a functional ALLI is now reduced. Also, as suggested by the AONB Unit, the M2 provides the strong defensible boundary between Medway and the AONB – developing this site for housing is not a 'critical issue' (unlike the 'incursion'.)
- 7.4.16 When considering potential development scenarios for this area, a new community is probably a preferable solution here – the Garden Community provides much more landscaping and high-quality open space compared to a traditional urban extension. The new community infrastructure should mitigate impact on existing communities nearby and arguably result in betterment as these new facilities are available and potentially provide better interconnectivity to all. Planned and proactively managed open space may be more useful as amenity and recreation space than the current agricultural landscape. The strategic scale of development is needed to deliver the improvements to M2 junction 4 – which would be less likely to be delivered with smaller scale growth.

### Impact on Medway (connectivity)

- 7.4.17 A related Medway issue relates to a potential connectivity issue with the proposed layout and access arrangements. As noted, this site is well related to Medway and needs to 'knit' into the existing transport infrastructure, and social and community facilities and existing infrastructure.
- 7.4.18 The promoter has secured interest from the local bus operator who are willing to run frequent local buses through the site including new 'circular' routes that would connect Medway communities through the site and into the town centre. At the moment there is no route between Lordswood and Hempstead Valley meaning that anyone wishing to route between these communities need to change buses.
- 7.4.19 But more problematically there is a suggestion that Medway hold a 'ransom' strip preventing new access onto North Dane Way. This strip of land is readily referred to as a 'ransom strip' by Medway in various official correspondence<sup>6</sup> and has been used by the Council to delay or complicate development in the area.
- 7.4.20 This is obviously a locally complicated issue with some now seeking to use Medway Borough Council's land ownership to hinder development approved by the Secretary of State via the Gibraltar Farm planning appeal. When granting permission, the Secretary of State agreed that the development was sustainable and ought to be permitted. However, as landowner the Medway Borough Council has the right not to sell land and we don't in this report look to expand on Medway Borough Council's rationale for not selling the land at the moment.
- 7.4.21 Obviously, this Garden Community proposal would be better with access onto North Dane way – as set out in the transport section this would help complete a 'missing link'. But recognising the Medway issues the promoter has suggested 'fall back' options where development can be facilitated avoiding the Medway land. So, regardless of the Medway ownership this is unlikely to be showstopping – although obviously an unhelpful complication. We note that should the new Garden Community be successfully promoted by Maidstone this 'ransom strip' could raise new cross boundary issues that could raise interest from Central Government to address – previously we understand MHCLG have not used their powers to secure the land – presumably because this was previously a local Medway issue as opposed to cross boundary. Also, the existence of a 'fallback' raises the prospect that the value

---

<sup>5</sup> Para 24 of the Secretary of State decision

<sup>6</sup> <https://democracy.medway.gov.uk/mgconvert2pdf.aspx?id=43019>



---

Medway land falls considerably and Medway fails to secure the 'several million pounds' valuation previously reported to their cabinet.

- 7.4.22 So here, in summary, we have a complex position where new development is promoted to both meet housing need and deliver new infrastructure to the wider benefit of the 'community' blind of administrative boundaries. But a neighbouring Council may be willing to forgo some benefits and require a sub optimal design through the use of a ransom strip. For our assessment the prospect of a 'fallback' solution is material and means we cannot conclude the scheme, without Medway land, is not deliverable.

## 7.5 Recommendations

- 7.5.1 Having considered the available information we consider that all the schemes are potentially deliverable as garden community proposals.
- 7.5.2 However, there are requirements that each depend on to be deliverable and there are also risks that may make them undeliverable. These are set out below:

### Lidsing

- 7.5.3 For Lidsing garden community to be deliverable it needs to:
- Address the duty to cooperate issues and work with Medway Borough Council to secure the most appropriate access via North Danes Way
  - Secure adequate connectivity through the site and with neighbouring areas
  - Address the impact on the AONB through securing appropriate mitigation and in conjunction with the AONB Units
  - Address the local landscape issues
  - Ensure adequate costs are included to secure a high-quality sustainable garden community with adequate open space, schools, retail and the full range of community facilities
- 7.5.4 The key risk is that the costs identified are too low, and there is not adequate provision for delivery of all requisite Lidsing, could but needs more costs included and got to address duty to cooperate.

### North of Marden

- 7.5.5 The land North of Marden is deliverable, but it currently appears more like a garden extension. To be allocated as a garden community it needs to:
- Give more from the value of the site in terms of its relationship with the existing village and adequately meeting all its requirements including policy DM19 standards for all types of open space as well as delivering high quality sustainable exemplar design
  - Provide for a mix of housing units and tenures in line with the emerging SHMA
  - Address the employment shortfall and deliver more employment space on site to ensure it does not become a out commuting suburb
  - Improve connectivity to provide a high quality safe pedestrian and cycle route to the local facilities in Marden

- 
- 7.5.6 The key risk is that this site does not appropriate knit into the community of Marden and that benefits are not realised. The safe pedestrian and cycle access along Maidstone Road needs to be addressed and more employment land should be included.

## Heathlands

- 7.5.7 Heathlands, is by far the largest and most ambitious garden community proposal. As such it is different in scale and opportunity to the others and consequently has different and to be expected, not inconsiderable challenges. If it is to be deliverable it needs to:
- Deliver a station early as a core component of the scheme
  - Become more viable, potentially by including the land to the north, at no additional cost
  - Work with the local community of Lenham Heath, its heritage assets and overcome boundary and buffer issues
  - Include more employment in the scheme to ensure it is not creating significant and unsustainable out commuting
  - Clarify and address the minerals workings and waste water treatment work issues on the western part of the site, to ensure these are costed, mitigated and managed properly in the development scheme
- 7.5.8 The greatest risk for this scheme is the marginal viability due to unknown costs and significant abnormals, this will need to be properly monitored and actively managed if it was taken forward. While this could potentially be more viable, and indeed logically more sustainable if land to north was included, this would need considerably more detailed work to be undertaken because it would add an additional risk of increasing the impact on the AONB.



---

## Appendix A    Method Statements and Questions

DRAFT

---

## **Appendix B      Viability Report (Aspinall Verdi)**

DRAFT