



Gladman Developments Ltd

Maidstone Local Plan EiP

Matter 5A: Housing Supply – Additional Comments

Following on from the initial herrings into Matter 5A on the 12th October, some additional information has been submitted by Maidstone Borough Council to address concerns raised. This brief statement outlines the Gladman comments on the information put forward by the Council.

Firstly, it is our view having examined the information to the best of our ability in the short time allowed, that the new documents do not change the views put forward by Gladman in our initial Matter 5A statement. We still do not believe that the local plan will come close to providing a 5 year land supply upon adoption, and therefore the plan remains unsound. Of the new information submitted by the Council the most pertinent is the yearly trajectory and the updated contact logs with site developers and promoters. We consider the additional information submitted in the logs first.

Some of the logs, and comments received by the Council do not seem to have translated through to the way in which the Council have assessed their supply position. By way of example we include the following extracts:

Brenchley House, Week Street, Maidstone

Owner confirmed that it was a valuation exercise, a different scheme was being considered and that their intentions may have changed. However, the Council still have the scheme delivering all 183 units within the 5 year land supply despite clear evidence from the site promoter to the contrary. This also highlights the concerns we have with regard to the deliverability of office conversions.

Frederick House and 28 Brewer Street, Maidstone

Owners confirmed they will not be progressing, will remain as office. The Council still claim 11 units because of an application for a HMO. Again, this underlines the problem with the approach taken to offices by the Council. The addition of C4 units into the supply is contentious at best.

Child and Adolescent Services, Gatland House, Gatland Lane, Maidstone

It is reported that KCC are now intending to develop the site for a free school. However, the Council still claim it will deliver 14 units in 2025/26.

These are just three areas which appear questionable, given the limited time Gladman have not been able to research all the entries on the list, however there would seem to be considerable doubts as how the Council has used the information collected to arrive at its land supply position.

The overall trajectory contained on page 22 of ED-043-A seems to suggest that for the 5 year land supply date of 2016/17-2020/21 the total deliverable supply is 6,896 units. This is entirely different to the table included in ED-013, which used a figure of some 7,699 units, this higher figure was using mid year and interim totals and was the subject of objection from Gladman, nevertheless it was considered that this was the figure being put forward by the Council. Gladman would request that the Council clarify its position on the base date for the calculation and which figure they are trying to defend at the EIP. We need to be clear if the Council is now only proceeding on the basis that it can claim, at best a 5.12 year supply (as in their hearing statement). If this is the case the Councils best case position is incredibly fragile and there is an urgent need to find additional supply. For clarity it remains our view that the 5 year land supply position is at best between 3.57 and 4.08 years.

In terms of the overall plan development targets being met, Gladman continue to express concern about the delivery of both the office to residential conversions, the Lenham proposals and the likelihood of the delivery of the redeveloped Invicta Barracks.

Offices

Our position on the delivery of office to residential units remains as in our hearing statement – there is no evidence to demonstrate deliverability.

Lenham

There remains no evidence as to the delivery prospects of the broad allocation in Lenham, the Council purely seek to bring it forward to try and ensure that it can meet its overall plan needs. There is no evidence offered as to how the figure of 120 units per annum has been arrived at or what underpins such delivery rates. Gladman do not consider there is evidence before the examination to conclude that there is reasonable likelihood that such a site can be delivered in the timelines identified and the rates anticipated.

Invicta Barracks

Whilst the MoD has now confirmed that the Invicta Barracks is planned to close in 2027 this is one year later than the plan previously considered. Given the base date of the plan is from 2011 - 2031 the possibility, that even should the site be vacated in 2027, that any development would take place within the plan period is unrealistic. The site will need to be marketed, sold, designed, planning consents granted and then possibly sold to an end developer before any housing can be delivered. Given that this will be a complex brownfield regeneration scheme, and one which could be the subject to a requirement for ground remediation and the need to sensitively treat historic assets its redevelopment could be a lengthy process. Furthermore, given the connection of the town of Maidstone to the barracks, it is likely that the MoD decision to vacate will be the subject of significant challenge. There is simply no evidence that this site can deliver housing within the plan period.

Conclusions

In conclusion therefore we do not believe that the additional evidence changes any of the conclusions previously arrived at in our earlier hearing statement, which are;

- A)** The plan can at best demonstrate a 4.08 year land supply;
- B)** The plan does not provide enough housing to meet overall plan needs with an appropriate buffer to ensure delivery
- C)** The plan is unsound.

We would also remind the Inspector as to the fragility of the Councils position, even should all of the arguments put forward by Gladman and others be rejected.