

## **MAIDSTONE BOROUGH LOCAL PLAN REVIEW**

### **DRAFT PLAN FOR SUBMISSION (REGULATION 19)**

#### **OBJECTION TO SOUNDNESS ON BEHALF OF LENHAM PARISH COUNCIL**

##### **POLICY LPRSP5 (B)**

##### **INVICTA PARK BARRACKS, CAPACITY 3075 DWELLINGS**

##### **REASONABLE ALTERNATIVE DEVELOPMENT LOCATION**

##### **LPC THREE**

1. Policy LPRSP5(B) and paragraphs 6.93 and 6.94 of the Maidstone Borough Local Plan Review (MBLPR) consider Invicta Park Barracks site (the Barracks) as a strategic development location.
2. The Barracks cover some 41 hectares. The site comprises a range of military buildings. This is a brownfield development site. The site contains many level hard-surfaced platforms which comprise the footprint of the existing buildings. These level platforms could form the basis for a high-density, high-quality redevelopment project.
3. The site is located just to the north of Maidstone town centre with ready access to education, employment and service facilities within the urban area. The site is within walking distance of Maidstone East rail station and is served by frequent and rapid bus services to both Maidstone and the Medway Towns.
4. The MoD has recently confirmed that the site will be released by 2029.
5. The site contains landscape and ecological features to form the basis for an attractive parkland development structure.
6. The site is currently allocated for a total 1,300 dwellings. The gross residential density currently envisaged is therefore some 32 dwellings per hectare (dph).
7. The site is bounded by the A229 Chatham Road for much of its western frontage. It is also bounded by Sandling Lane and Cuckoo Wood for much of its northern frontage. There are therefore only a limited number of existing residential properties which are close to and over-looking the site boundaries.
8. Maidstone Borough Council published Planning Guidelines for Maidstone Riverside (MRPG) in January 2020. The Riverside site measures some 7.09 hectares gross (MRPG, para 1.2.1). The site is said to champion good design and to provide high-quality public realm and urban living. On this basis the site is given a capacity of approximately 650 units. This is a density of approximately 108 dph.

9. Paragraph 3.2.4 at page 20 of the MRPG refers to a landmark building up to approximately eight storeys in height.
10. The Barracks offers a significant opportunity to provide a high-quality high-density mixed-use development at an exceptionally accessible and attractive urban location.
11. Policy LPRHOU5 (page 224) in the MBLPR provides for a density of 75 dph within the inner urban area. Lenham Parish Council believes such a density is appropriate for the Barracks redevelopment site. At a density of 75 dph, the 41 hectares at the Barracks would yield some 3,075 dwellings. The current provision is 1,300 dwellings. Development at the appropriate density would provide an additional 1,775 dwellings to the total supply.
12. The National Planning Policy Framework (NPPF) contains several policy statements supportive of the development of the Barracks at a more realistic density.
13. Paragraph 11 (a) of the NPPF now states that ***‘all plans should promote a pattern of development that seeks to ..... mitigate climate change (including by making effective use of land in urban areas....’***
14. Paragraph 32 of the NPPF states that significant adverse impacts should be avoided and wherever possible, alternative options which reduce or eliminate such impacts should be pursued.
15. The Sustainability Appraisal (SA) has identified that the Heathlands garden settlement performs poorly against sustainability criteria. These adverse impacts could be avoided by increasing the amount of housing provided at the Barracks. This could be achieved by increasing the planned for density and capacity at the Barracks. Increasing the density provided for at an already identified housing site is a reasonable alternative which should properly be tested within the SA. The Barracks forms part of the Maidstone urban area which is identified as performing well against sustainability criteria in the SA.
16. Paragraph 105 of the NPPF states that significant development should be focused on locations which are, or can be, made sustainable through limiting the need to travel and offering a genuine choice of transport modes. The Barracks is very well served by existing transport infrastructure, particularly bus, rail and road. This will minimise the length of journeys that would be necessary for employment, shopping, leisure, education and other activities in accordance with NPPF paragraph 106 (a).
17. Paragraph 119 of the NPPF states that planning policies should promote the effective use of land. Strategic policies should make as much use as possible of previously developed or brownfield land. Paragraph 120 (c) of the NPPF states that planning policies should give substantial weight to the value of using suitable brownfield land within settlements.
18. The Barracks site is already allocated for development. For such a well-located brownfield site, 32 dph is a very low density. The site is an accepted suitable brownfield location. The more effective use of such a site is clearly supported by the NPPF.

19. Paragraph 124 of the NPPF supports planning policies which make efficient use of land.
20. Paragraph 125 of the NPPF supports planning policies which avoid dwellings being built at low densities. Development should make optimal use of the potential of each site.
21. Paragraph 125 (a) of the NPPF supports policies to optimise the use of land including the use of minimum density standards for city and town centres. These standards should seek a significant uplift in the average density of residential development within these areas.
22. The direction of travel of Government planning policy clearly gives support to making full and effective use of previously developed brownfield urban land.
23. Lenham Parish Council would support a policy which made effective use of the existing Barracks site at optimal residential densities in preference to using unsustainable and unsuitable greenfield land at Heathlands.
24. The Sustainability Appraisal (SA) is supportive of scenarios that include a substantial proportion of the total amount of development at Maidstone urban area. These options:

***“generally provide good access to the town’s higher order services, facilities, jobs and transport links. They also reduce the need to develop the more rural areas of the Borough, these being generally of higher landscape and biodiversity value.” (SA, para 4.29, page 43).***

25. The SA also found that one garden settlement approach performed most strongly. The reasons for this performance are given paragraph 4.28. Two garden settlement approaches (i.e. Lidsing and Heathlands) performed least well (SA para 4.28).
26. Lenham Parish Council would support a strategy of delivering a greater amount of housing at the Barracks in replacement for Heathlands garden settlement, which should be removed from the MBLPR in its entirety.
27. Due to its urban location, Lenham Parish Council believes it would be possible to include buildings of up to eight storeys in height at the Barracks as part of a high-density high-quality urban quarter. If the gross residential density endorsed by the borough council at policy LPRHOU5 (2) is applied to the Barracks, the potential capacity is 3,075 dwellings. This is some 1,775 dwellings more than currently provided for in policy LPRSP5(B).

28. The SA (para 7.174) declines to test the Barracks policy on the basis that it is a continuation from the current adopted Local Plan. Lenham Parish Council questions the soundness and legal compliance of this approach for three reasons:
- (i) the sustainability of the Barracks should have been comparatively assessed in the context of the new NPPF policy on sustainable development introduced at paragraph 11(a) in July 2021. This new policy now requires plans to mitigate climate change including by making effective use of land in urban areas.
  - (ii) the sustainability of the Barracks should have been comparatively assessed in the context of the new policy for urban density which is apparent from the Maidstone Riverside Planning Guidelines.
  - (iii) the sustainability of the Barracks should be comparatively assessed in the context of the new Climate Change policy statutory duty discussed at paragraphs 7.171-1.274 of the MBLPR.
29. It is possible for the Barracks to be both part of the baseline 2017 plan for the purposes of assessment and, at the same time, an option for residential development at a higher density in the MBLPR.
30. Lenham Parish Council believes that the Barracks may well have capacity to deliver 3,075 units. The current capacity is 1,300 dwellings. That yield could be increased by 1,400 dwellings to 2,700 dwellings within the plan period. Completion of 2,700 dwellings within the MBLPR period should be more than easily achievable for such a high-quality urban site with genuine easy accessibility to both Maidstone town, the existing stations and the existing Junction 5 on the M20.
31. When the Barracks are released by the MoD, the site would normally go through a process of compulsory competitive tendering. Bidders for the site would wish to maximise its value. In making submissions, bidders would be aware of the density precedent set by Maidstone Borough Council in approving the Maidstone Riverside Planning Guidelines document in 2020. Bidders would also be aware of the compelling arguments supporting effective use of urban land contained within the NPPF and reported above.

32. Several changes to the MBLPR are sought by Lenham Parish Council as a consequence of this objection:

1. Heathlands should be removed from the plan in its entirety.
2. The plan should adopt the one garden community strategy supported by the sustainability appraisal with Lidsing being retained because it performs better than Heathlands against sustainability criteria.
3. The 1,400 dwellings lost during the plan period could be included by a revision to policy LPRSP5 (B) which should read:

***“Invicta Park Barracks is identified as an allocation for up to 3,075 dwellings in total with 2,700 dwellings being delivered during the Local Plan period 2029 to 2037.”***