

EXAMINATION OF THE MAIDSTONE BOROUGH LOCAL PLAN REVIEW

FURTHER CONSULTATION SUBMISSIONS ON BEHALF OF BREDHURST PARISH COUNCIL

12 FEBRUARY 2024

LIDSING PROPOSED ALLOCATION

Introduction

1. These written submissions address the concerns of Bredhurst Parish Council (“the Parish Council”) in relation to the further documents published by Maidstone Borough Council following the close of the Stage 2 hearings, comprising:
 - a) An update to the Infrastructure Delivery Plan (ED126),
 - b) An Addendum to the Integrated Transport Strategy (ED127),
 - c) An Addendum to the Viability Assessment for the Local Plan (ED128),
 - d) An M2 Junction 3 Transport Assessment (ED 135).
2. The Parish Council did not understand that it was able to comment on the first three documents in its previous response the proposed main modifications, and welcomes the opportunity to do so. The fourth document was promulgated on 10 January 2024, i.e. after the closure of the examination hearings and main modifications consultation.
3. In order to comment on these new documents, the Parish Council has commissioned two further expert reports, a Second Supplemental Update Report of Plan Wide Viability produced by Bespoke Property Consultants (“the Bespoke Report”) and a Highways Technical Note produced by Motion (“the Motion Technical Note”). Both of these documents cast further significant doubt on the justifiability and deliverability, and therefore the soundness, of the proposed Lidsing allocation.

Initial observations

4. As a preliminary point, the Parish Council remains deeply concerned by the substantial changes to the plan proposals introduced at this late stage of the examination. The Parish Council considers that these late amendments highlight the inherent flaws in the Lidsing allocation proposal and provide yet further evidence that the Lidsing allocation should be deleted.

5. The PINS Procedure Guide for Local Plan Examinations (“the Procedure Guide”) notes at 1.1 that:

“The plan should identify all the matters which need to be planned for, and provide policies to address them, paying careful attention to deliverability and viability. This approach may raise uncomfortable questions but the purpose of preparing a plan is to address all the necessary matters as far as possible, and not defer them to future updates or rely on the Inspector to deal with them at examination.”

6. It is therefore clear that:

- a) Deliverability and viability should be given particular attention at the plan-making stage.
- b) LPAs are not permitted to simply defer key matters to future updates.

7. It is however clear that, contrary to the Procedure Guide, Maidstone Borough Council have:

- a) failed to address the viability of Lidsing in the detail that is required, with significant gaps in the evidence, a number of unjustified assumptions, and inputs which have not been updated since the original assessment,
- b) continuously deferred transport matters to a later stage, evidenced most recently by a last-minute transport assessment update which the Procedure Guide warns against.

Consultation response on ED126 and ED128 (viability)

8. Paragraph 35 of the NPPF provides that plans are ‘sound’ where they are effective i.e. deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred.¹
9. A judgement on soundness therefore requires a judgement on deliverability.
10. The PPG is clear that “*The role for viability assessment is primarily at the plan making stage*” and viability assessments “*should be used to ensure that policies are realistic.*”² While individual testing of every site is not a strict requirement, “*In some circumstances more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies.*”³ Lidsing falls into this category. Moreover, the PPG states that “*It is important to consider the specific circumstances of strategic sites. Plan makers can undertake site specific viability assessment for sites that are critical to delivering the strategic priorities of the plan.*”⁴
11. Does the viability evidence before the Inspector demonstrate that Lidsing, a key strategic site, is deliverable? For the reasons set out below, the answer is no.
12. Because the Lidsing allocation is not deliverable, it follows that the allocation is not sound.⁵
13. ED126 and ED128 provide yet further evidence for this. The Bespoke Report explains in detail.
14. In summary, Bespoke identify the following issues with the viability evidence:
 - a) The new viability appraisal at ED128 confirms that a 15% increase in build costs or a 15% decrease in values would render the Lidsing scheme unviable. This is a notably narrow margin.

¹ That includes, necessary, cooperation with Medway in relation to the proposed east-west road.

² Paragraph: 002 Reference ID: 10-002-20190509 Revision date: 09 05 2019.

³ Paragraph: 003 Reference ID: 10-003-20180724 Revision date: 24 07 2018.

⁴ Paragraph: 005 Reference ID: 10-005-20180724 Revision date: 24 07 2018.

⁵ In that regard, MM58 is telling when it provides an alternative: “*In the event that the Lidsing garden community is not delivered*”.

- b) The values in table 5.9 of ED128 are overstated (Bespoke Report, 3.1.9), suggesting the values should decrease by 7.4% (Bespoke Report, 3.1.13). Half of the 15% margin can therefore be cut down straight away.
 - c) Infrastructure costs on table 6.2 of ED128 have been reduced 37% due to “double counting”, with no evidence being provided as to what this double counting relates to.
 - d) Infrastructure costs are also highly uncertain due to a lack of finalised design or land costings relating to M2 Junctions 3 and 4, and no information or indicative costings about the road improvements necessary in relation to impacts on Medway, Bredhurst and Boxley. A number of infrastructure items are marked “to be confirmed” (Bespoke Report paragraph 3.3).⁶
15. It is also noted that the Aspinall Verdi original report was written in September 2021. The Procedure Guide notes at 1.12 that (emphasis added) *“Evidence base documents, especially those relating to development needs and land availability, that date from two or more years before the submission date may be at risk of having been overtaken by events, particularly as they may rely on data that is even older.”*
16. Despite this, many of the inputs into the viability assessment relating to infrastructure costs remain unchanged. The Bespoke Report calculates there should be a 12.79% uplift in infrastructure costs to account for subsequent changes (Bespoke Report 3.3.6).
17. Bespoke conclude that in the absence of a sensitivity analysis, and assuming a lower level of infrastructure will be required as set out in ED128, the proposal would be able to provide the required level of Affordable Housing set out in the draft plan (Bespoke Report 4.9). However, once a sensitivity analysis is applied (by adopting median BCIS rates for the build cost), there is a deficit of £38,740,180 (Bespoke Report 4.11.2). On this basis the site would be unable to provide the full policy requirement for Affordable Housing and/or other planning obligations towards essential infrastructure. Bespoke therefore

⁶ In ED128 the following are not included under s.106 contributions: the extension and enhancement of existing bus route and new bus services to Lidsing; the provision of cycling and walking links throughout the site and strategically North and South; provision of off-site highway capacity improvements as demonstrated necessary through capacity assessments; M2 Junction 3 improvements; new community facilities to be proportionate with the development; the reinforcement of sewage network surrounding Lidsing Garden Village; recreational impact on the North Downs Woodland SAC.

conclude that “*the risk of an unviable scheme being presented at application stage is high*” (4.11.5).

18. It is also noted that the Bespoke Report highlights a number of deficiencies in the evidence on viability more generally, which is of course most important at the plan-making stage. The Procedure Guide is clear at 1.10 that “*The plan should avoid assertions of fact that are not supported by evidence.*” But that is exactly what has happened here.
19. Overall, it is apparent that:
 - a) Insufficient evidence has been provided to demonstrate the allocation is viable,
 - b) Even on the evidence available, there is a high risk that any proposal coming forward for Lidsing will not be viable.
20. The proposed allocation is therefore contrary to the PPG, NPPF and Procedure Guide, and accordingly should be deemed unsound.

Consultation response on ED127 and ED135 (highways)

21. The Parish Council notes that Stantec have now acknowledged in the new highways evidence what has always been clear from the outset, namely that mitigation is required for the Lidsing allocation because of its potential impacts on the wider network, including the villages of Bredhurst and Boxley in particular.
22. However, the mitigation now proposed remains inadequate to prevent severe impacts.
23. NPPF paragraph 115 provides that “*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*” As the Parish Council have previously submitted, Decision-makers are entitled to refuse planning permission in circumstances where inadequate transport evidence is produced: *Satnam Millenium Ltd v Secretary of State for Housing, Communities and Local Government* [2019] EWHC 2631 (Admin), [56]-[58].⁷

⁷ [58]: “*Both the Framework and the development plan start from the same premise, that the developer must have produced a sound and reliable transport assessment.*”

24. The Motion Technical Note provides an independent highway review in relation to the M2 Junction 3 Transport assessment.
25. Motion previously raised concerns about the outdated KCC model outputs, an error which has not been corrected in this new assessment. As a result, *“the modelling is therefore considered unreliable for modelling purposes”* (Motion Technical Note paragraph 2.4). The outputs are additionally unclear because they do not enable a clear representation of existing traffic flow compared to proposed, or ultimately understand how traffic has been redistributed on the highway network (Motion Technical Note, paragraph 2.5).
26. Motion emphasises that the new work undertaken by Stantec demonstrate that the M3 junction operates over capacity in both the AM and PM peak hours in the 2037 Reference Case scenario. When the local plan developments are added, total delay increases from 2,270 PCU/hr to 2,341 PCU/hr in the AM peak (Motion Technical Note, paragraph 2.6).
27. The proposed mitigation is insufficient because it does not result in a reduction queuing across all arms of the junction. In fact, in relation to some arms it makes a bad situation worse, e.g. A229 North Ahead/Left (Lord Lees Roundabout) (Increase in average delay of 273 (seconds/PCU) and max queue of 68 PCU), and A229 Ahead (Taddington Roundabout) (Increase in average delay of 244 (seconds/PCU) and max queue of 127 PCU). These arms will *“suffer from extensive additional congestion”* (Motion Technical Note paragraph 2.10) (emphasis added).
28. Motion concludes that *“the penalties applied to several arms of the A229 could be considered to represent a severe impact”* (Motion Technical Note, paragraph 2.12).
29. As to the effectiveness of the mitigation propose more generally, Motion identifies that Junction 3 already suffers from significant congestion (Motion Technical Note, paragraph 2.15). Even with mitigation in place, there will be significant, severe queuing. There is therefore no evidence to suggest that residents of Lidsing will prefer junction 3 to routing south via Boxley. Again, it is emphasised that the Procedure Guide states at 1.10 that *“The plan should avoid assertions of fact that are not supported by evidence.”*
30. Finally, Motion identifies that a Stage 1 Road Safety Audit still has not been completed (Motion Technical Note, paragraph 2.20).

31. Overall, the late additional mitigation evidence emphasises a point that the Parish Council have repeatedly made, namely that there is insufficient traffic mitigation for Bredhurst and Boxley in the plan in relation to the proposed new residents of Lidsing. It is now crystal clear that the Lidsing proposal will add a large number of road users to an already highly congested part of the road network. While Stantec have sought to reduce the impacts in general terms, some parts of the road network will still be worse off, in a manner that should be characterised as severe for the purposes of the NPPF.
32. But in any event, Stantec accept that this part of the road network will remain highly congested even with their proposed mitigation in place. It is therefore inevitable that Lidsing residents will use the villages Bredhurst and Boxley as rat runs. This is acknowledged in the examination evidence as a possibility, but no meaningful mitigation proposals have been put forward to address these impacts which are in fact inevitable.
33. The Parish Council also emphasise that:
 - a) There is no discussion in the new evidence as to how residents of Lidsing are supposed to get to Junction 3. It would either need to be along the Westfield Sole Road which is mainly single-track, or the as-yet unbuilt east-west road, which is reliant on Medway Council selling a strip of land along North Dane Way.⁸ But whichever route is used, it would add significant pressures to already congested residential roads in the area. In particular, Walderslade Woods Road is particularly congested at rush hour.
 - b) No additional costings for these late proposals have been provided, which casts further doubt on the viability of the allocation as a whole. The cost and difficulty of undertaking significant widening on a busy motorway slip road that is currently in use will be inevitably high. This could easily have a knock-on effect on a viability position which is tenuous at best. It is surprising that the cost of these works has not yet been considered, an omission which is no doubt reflective of the haste with which this late proposal has been prepared.

⁸ In relation to the other proposed mitigation, it is noted that there is no certainty as to whether a design acceptable to National Highways can be accommodated within the promoter's land holding.

34. Again, these deficiencies mean that, in addition to the accepted impacts on an already congested part of the network which should be deemed ‘severe’, insufficient evidence has been provided to address the transport impacts of Lidsing, contrary to the NPPF and Procedure Guide. For this reason too, the proposed allocation is also unsound.

Conclusion

35. In conclusion, the Inspector can have no confidence that the Lidsing allocation is viable or that the highways impacts of Lidsing have been satisfactorily addressed in the detail that is required at this stage. A further main modification deleting the Lidsing allocation should be proposed.

APPENDICES TO SUBMISSIONS

Appendix 1: Second Supplemental Update Report of Plan Wide Viability produced by Bespoke Property Consultants, Peter Griffiths CMCIH, Bespoke Property Consultants, with appendices

Appendix 2: Highways Technical Note, David McMurtary BA Hons (MCIHT), Motion



Second Supplemental Update Report of Plan Wide Viability Appraisal Submitted in respect of the proposed allocation of Lidsing Garden Village.

On behalf of Bredhurst Parish Council

February 2024

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1.0 Instructions and Compliance with RICS Professional Statement

- 1.1 We confirm that we are instructed by Bredhurst Parish Council to carry out a review of the submitted plan wide viability review that accompanied the Regulation 19 proposed allocation of LPRSP4(B) – Lidsing Garden Village, in respect of the financial viability of the allocation and the Local Planning Authority's evidence base supporting it.
- 1.2 Bespoke Property Consultants have not carried out an inspection of the site.
- 1.3 Bespoke Properties Ltd accepts responsibility to the Client named at the start of this report alone, that this report has been prepared with the skill, care and diligence reasonably to be expected of a competent consultant dealing with the assessment of financial viability of developments. We accept no responsibility whatsoever to any person other than the client themselves. As such this advice is exempted from the RICS "Red Book" valuation practices (with the exception of PS 2 in relation to Ethics, competency, objectivity and disclosures) on the basis that the parties are seeking to negotiate the allocation in the Local Plan and any planning obligations relevant thereto.
- 1.4 We confirm compliance with the RICS Professional Statement "Financial Viability in Planning: Conduct and Reporting" May 2019. As required by the Professional Statement we confirm the following matters:
- We have acted with objectivity, impartiality, without interference and with reference to all appropriate available sources of information.
 - We have identified no conflicts of interest or risk of conflicts in preparing this report.
 - We are not working under a performance related fee agreement or on a contingent fee basis.
 - We advocate reasonable, transparent and appropriate engagement between the parties in the planning process, and we will do all that we can to assist in that process.

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- All the sub-consultants who have contributed to this report have been made aware of the Professional Statement and its requirements, they in turn have confirmed compliance with it.
 - We have been allowed sufficient time since instruction to carry out this review, bearing in mind the scale of the development and the status of the information as at the date of this report.

1.5 This report is a second supplemental report to the ones issued 22nd August 2022 and 1st October 2022 and reflects our view on the further information presented to the Inspector as made public in the “Examination Documents”¹.

¹ <https://localplan.maidstone.gov.uk/home/local-plan-review-examination>

2.0 Updated Review

2.1 Purpose of Review

- 2.1.1 The purpose of this review is to provide further commentary on the additional viability evidence submitted as document ED128 – Maidstone Strategic Site Viability Assessment dated June 2023.
- 2.1.2 Our previous reviews, carried out in August 2022 and October 2022, concluded that we considered the scheme to be unviable, with a Residual Land Value below the Benchmark Land Value and on that basis the scheme would be unable to provide the required level of Affordable Housing as set out in the draft plan.
- 2.1.3 The new viability appraisal ED128, prepared on behalf of the LPA, confirms in paragraph 7.7 *“Lidsing is viable with a sufficient viability surplus of c. £52.5 million (£372,000 per acre / £920,000 per ha). This is more viable and a 15% increase in build costs (or a 15% decrease in values) would render this scheme unviable. Again, our baseline assumption includes BCIS Median costs which are c 10%+ greater than BCIS lower quartile which we would normally adopt for volume housebuilding.”*
- 2.1.4 We have carried out a strategic review of the inputs (to ensure that they are consistent with the approach used previously) and provide an amended appraisal that reflects any changes that we consider need to be made following our review.

3.0 Review of Submitted Plan Wide Viability Appraisal

3.1 Review of Inputs

3.1.1 We have carried out a review of the inputs used in the viability appraisal and our review has identified that the majority of inputs are consistent with the approach used in the previous assessment. This includes items such as unit size, mix, construction fees, profit levels, finance rate, build cost of garage, Cat 2/Cat 3 additions, water efficiency, future homes standard, EV costs for both houses and flats and sales and legal fees.

3.1.2 It is also confirmed that the amount identified for S106 obligations within the updated viability appraisal is £37,428,160 and the Benchmark Land Value is consistent with the approach taken previously.

Main areas of difference

3.1.3 The items that we consider need further interrogation are:

- Residential Sales Values, Affordable Housing Values and First Homes Values,
- Infrastructure Costs which have reduced by £23,634,000 since the last report,
- Residential development programme build rate and sales rate,
- Any identified changes to the wider allocation that have not been factored into the viability appraisal, such as Junction 3 M2 works,
- Base build cost.

3.1.4 Having identified these areas of concern we provide comment on these items and an updated appraisal that considers the position, if an application would be submitted now, using current costs and current values.

3.1.5 Paragraph: 003 of the National Planning Practise Guidance on viability² confirms that *“Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage. Assessment of samples of sites may be helpful to support evidence. In some circumstances more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies.”*

² <https://www.gov.uk/guidance/viability>

3.1.6 Paragraph 004 of the viability guidance confirms that *“A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period. In following this process plan makers can first group sites by shared characteristics such as location, whether brownfield or greenfield, size of site and current and proposed use or type of development. The characteristics used to group sites should reflect the nature of typical sites that may be developed within the plan area and the type of development proposed for allocation in the plan.”*

3.1.7 Therefore, whilst we understand that our approach does not specifically follow a broad characteristic approach to typologies, it does nevertheless, provide a sense check of the position stated within paragraph 7.7 of ED128 that *“Lidsing is viable with a sufficient viability surplus of c. £52.5 million (£372,000 per acre / £920,000 per ha). This is more viable and a 15% increase in build costs (or a 15% decrease in values) would render this scheme unviable”. As such we consider our approach, of assessing this individual site appropriate as it provides a detailed assessment of a key site on which the delivery of the plan relies.*

Residential Sales Values

3.1.8 Paragraph 4 of the NPPG further confirms that *“Plan makers will then engage with landowners, site promoters and developers and compare data from existing case study sites to help ensure assumptions of costs and values are realistic and broadly accurate. Market evidence can be used as a cross-check but it is important to disregard outliers.”*

3.1.9 We note from the viability appraisal that in table 5.9 on page 20 of ED128 the following values are adopted for this appraisal:

- 1 bed flats £4,667 per m²
- 2 and 3 bed houses £4,750 per m²
- 4 bed houses £4,615 per m²

3.1.10 We consider that these values, in the context of the comparable evidence provided in paragraphs 5.17 where an average price of £3,374 per m² is listed and paragraph 5.24 where the Forge asking prices are listed as £3,621 per m², are overstated.

3.1.11 We have carried out our own assessment of sales prices, which is set out at Appendix D to this report, which shows an average price in Chatham (ME5 0) postcode up to £3,728 per m²

and Gillingham (ME8 0) postcode up to £4,292 per m². We also have reference to new build sales units (although small in number) which are listed as follows:

Address	Price listed	Beds	Size (m ²)	Price per m ²
Vixen Place, Lordswood	£450,000	3	111	£4,054
Vixen Place, Lordswood	£550,000	4	137	£4,014
Alamein Avenue	£500,000	4	180.1	£2,776
Vixen Place, Lordswood	£420,000	3	95	£4,421

3.1.12 We therefore consider that it is more appropriate for the purposes of our testing to adopt the following strategic values for the area:

- 1 bed flats £4,320 per m²
- 2 and 3 bed houses £4,400 per m²
- 4 bed houses £4,275 per m²

3.1.13 Overall this reflects a downward adjustment of 7.4% in residential GDV. We therefore consider that the open market residential units are overvalued by £41,958,998 in total.

3.2 Affordable Housing Values and First Homes Values

3.2.1 On the basis of the above adjustments we have reflected the lower values through to our assessment of Affordable Housing Values on the same basis:

- Affordable Rented Products 50% market value
- Shared Ownership Values 70% market value
- First Homes Values 70% market value subject to £250,000 cap

3.3 Infrastructure Costs

3.3.1 Table 6.2 on page 23 of ED128 confirms that the new appraisal has reduced the infrastructure costs by 37% due to the removal of “*double count of Fees. Detailed breakdown can be seen in Appendix 2.*”

3.3.2 Appendix 2 confirms the reduction which in total amounts to £23,634,000, but there is no explanation of what the double counting relates to. Without this evidence being provided, it is not possible to check the detail and therefore we have to qualify our report in this regard.

3.3.3 In addition there is no reference in ED128 on whether the reduced figure has been updated to include indexation to the date of the updated appraisal.

3.3.4 We remain concerned that there are many uncertainties relating to infrastructure costs such as:

- no finalised design for M2 junction 4 and therefore no certainty over construction costs.
- no certainty about whether a design acceptable to National Highways at Junction 4 can be accommodated within the promoter's land holding.
- no allowance for any land costs associated M2 Junction 4, the connection to North Dane Way or the new secondary school.
- no cost allowance for M2 junction 3 improvements or for the proposed "*Green Bridge*" over the M2.
- no certainty about the scope or cost of work relating to necessary road improvements with Medway or those required to mitigate impacts on Bredhurst, Boxley and air quality in the AONB (North Downs Woodland)

3.3.5 In addition we remain concerned about the number of Infrastructure items (which may be identified as s106 obligations or Infrastructure) related to Lidsing marked as "To be confirmed/TBC" within document ED126 which for reference are as follows:

- the extension and enhancement of existing bus route and new bus services to Lidsing.
- the provision of cycling and walking links throughout the site and strategically North and South.
- provision of off-site highway capacity improvements as demonstrated necessary through capacity assessments.
- M2 Junction 3 improvements.
- new community facilities to be proportionate with the development.
- the reinforcement of sewage network surrounding Lidsing Garden Village.
- recreational impact on the North Downs Woodland SAC.

3.3.6 The Aspinall Verdi original report was written in September 2021, and we have applied BCIS All-in TPI index³ (as set out in Appendix C) to the reduced Infrastructure figure of £40,202,000 to current date (which is an increase of 12.79%) and results in a revised Infrastructure cost of £45,344,116. We have adopted this as the most appropriate figure noting our comments above on this figure not being evidenced.

3.4 Residential build rate and sales rate

3.4.1 We have compared the overall cashflow of this development to the one submitted previously. The current cashflow indicates a total development period in this assessment of 21 years compared to 20 years previously.

3.4.2 We note that the previous plan wide viability appraisal was produced at a time when the Bank of England base rate was 0.1% whereas it is now 5.25%. We hold the view that the base rate is not going to return to previous levels and as such this may hold back transactional activity, rather than long term sales values. We have adjusted our overall sales completions of 100 units annually (including affordable housing) with commensurately a longer build period.

Additional changes to allocation

3.5.1 We note that as part of ED126 and ED135 there is reference to works needed to M2 Junction 3. We note that this has not been factored into the viability appraisal at this stage due to ED126 confirming “*These proposals are at an outline phase, through work with KCC and NH, further detail under development.*”

3.5.2 Given our comments at paragraph 3.3.2 this reinforces our position that no clear and appropriately accounted for Infrastructure budget has been provided in the Council's submission that we are able to verify.

3.6 Base build Cost

3.6.1 The approach that we have taken at paragraph 3.1.11 is to base our appraisal at current date with current values and cost as required by the NPPG and RICS guidance. Document ED128 confirms in paragraph 6.4 that “*Note that latest best practice for strategic / large sites in Local*

³ BCIS all-in TPI (Tender Price Index) is a **measure of price movements in the construction industry**. It is based on a well-developed method of calculation and relies exclusively on tendered rates on construction projects as the source of data and is published by the Royal Institute of Chartered Surveyors.

Plan viability studies, is to use Lower Quartile BCIS costs which reflects the economies of scale available to volume housebuilders.” However, we previously used Median BCIS costs (in consultation with stakeholders) to allow for quality of urban design. We have therefore also applied Median costs in this update but consider this to provide an additional layer of buffer / contingency.”

3.6.2 In order to provide an assessment of the viability of this scheme, we have therefore adopted an assessment on the basis of Lower Quartile BCIS figures to identify whether on this basis the scheme is viable.

3.6.3 Therefore for the purposes of our appraisal we have adopted the following build cost rates:

- £130.16 per sqft for houses,
- £176.40 per sqft for apartments (including an adjustment of 15% to account for communal areas) using the Gross Internal Area.

3.6.4 Our evidence is attached to this report at Appendix B.

3.7 Other changes by BPC

3.7.1 We made a minor adjustment to the appraisal to reflect the fact that the number of garages included in this assessment has reduced to 130 from 380, but we consider that the cost for a garage needs to be increased to £11,000 per garage based on other schemes we have been involved in.

4.0 Conclusion

- 4.1 Having reviewed the additional evidence in ED128 and ED126 and our previous reports in 2022 we consider that further doubt is cast over the viability of the Lidsing allocation.
- 4.2 Our previous viability reports cast doubt on the veracity of the information provided by the promoter in July 2020 in relation to the viability of proposals. Our opinion is that the updated June 2023 plan wide viability appraisal attempts to provide an assessment to show that the scheme can be viable without further evidence of costs and timings being provided to underpin the assessment. On this basis we regard the updated report as flawed.
- 4.3 We remain of the opinion that the methodology is sound, but we consider that the inputs to the development appraisal are not sufficiently supported with appropriate evidence. This is particularly relevant for the figures used for infrastructure, the timing of s106 obligations, contributions, and land payments in the manner that they are currently reported. For strategic sites of this nature, we would expect to see a level of information commensurate with the submitted plans, especially when the LPA are promoting this site on the basis that it can achieve full policy requirements for Affordable Housing and other planning obligations whilst maintaining viability. We consider that this has not yet been demonstrated.
- 4.4 There is no evidence of “soft funding” being applied from Homes England or any other Government body for the infrastructure and S.106 items required in the early years of the development. In our opinion the finance costs are woefully understated and we cannot see how the infrastructure in years 1-6 will be delivered.
- 4.5 We have carried out a number of Strategic Level Viability appraisals for Local Councils, both to support applications for the Housing Infrastructure Fund programme and most recently an application for Judicial Review into the variation of planning obligations in respect of the major urban extension at Chilmington Green within Ashford, Kent. The latter being caused by the developer seeking to overturn a refusal to vary the terms of the S.106 agreement to improve the scheme’s viability but which the Court dismissed. We therefore have experience of having to manage the practical outcomes of decisions made at allocation stage and the challenges that developments of this scale can throw up. In the case of the subject scheme, we would highlight the following:

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- a) The actual delivery of residential units per annum which in practice may not be at the rates assumed within the LPA's trajectory,
- b) Affordable Housing – we consider that in order to be deliverable the Council has to have a reasonable expectation that Affordable Housing provision at 40% will be delivered on this site across the plan period. We have reservations, due to the number of data omissions, undercalculation of planning obligations or timing of obligations as set out in this report, that once a planning application is made, a scheme specific viability assessment will be submitted, showing the policy level of affordable housing cannot be delivered.
- c) We would note that the tenure mix used in the AV viability appraisal does not match that stated in the draft Local Plan under proposed policy LPRSP10(B).
- 4.6 We consider that the appraisal of the viability of this development has been over “optimised” leading to a significantly overstated surplus. Overall, we have concerns, that timings of land, planning obligations and infrastructure as well as the non-inclusion of the local centre/community provision within the viability appraisal leads to a significant undercalculation of build and interest costs.
- 4.7 We have carried out our own appraisal of the scheme using the figures set out in this report but for the purposes of our assessment we have maintained the previous infrastructure amount as no details have been provided with regard to the stated “double counting”.
- 4.8 For confirmation we:
- have amended the land payments from years 6,8,10,12,14 to years 1,2,3,4,5 to reflect the need to release the land earlier in order to meet the delivery targets as set out in the main modification document (1,300 units by 2037).
 - have amended the timings on infrastructure (primarily the timing of the J4M2 improvements and payments for Education provision) from year 10 to years 4,6,8 to reflect the need to deliver these improvements by 2037 and in line with the completion/occupation of the development. We have also adjusted the timing of the other planning obligations to year 8 to reflect the need to ensure that mitigation is in place prior to occupation.
- 4.9 On the basis of making the other adjustments in this report, which include:

-
- Adopting current sales values
 - Adopting lower quartile build costs
 - Adopting an indexed infrastructure cost (subject to not having seen the evidence of double counting)
 - A reduced sales rate of 100 units per annum

Adopting the above assumptions we arrive at a residual land value of £43,045,466 which is £8,303,504 above the benchmark land value and on this basis the scheme would be able to provide the required level of Affordable Housing as set out in the draft plan. We confirm that this appraisal relies on a lower level of infrastructure than our previous appraisal and we have no evidence that this reduction is appropriate given the number of TBC items within ED126 and a lack of evidence that double counting has actually taken place.

4.10 As confirmed in this report we have significant reservations about the following items:

- Double counting of infrastructure costs not being evidenced
- Lack of inclusion of Junction 3 M2 works in the costs.

4.11 **Sensitivity Analysis**

In addition we consider that in order to make our appraisal consistent with ED128 we should adopt median BCIS rates for the build cost.

4.11.1 We have therefore re-run our appraisal adopting the following amended inputs:

- An indexed (BCIS All in TPI) infrastructure cost of £72,000,624,
- Median BCIS of £146.97 per sqft for houses and £200.01 for flats (including communal areas).

4.11.2 On this basis the amended residual land value is calculated to be **-£3,998,218** (as set out in Appendix A(ii)) which results in a deficit of £38,740,180.

4.11.3 On this basis this would mean that this site would not be able to provide the full policy requirement for Affordable Housing and/or other planning obligations towards essential infrastructure.

4.11.4 Taking account of the above issues and our sensitivity analysis it is our opinion that ED128 does not provide sufficiently robust evidence to demonstrate that 40% affordable housing

can be delivered. There are significant gaps in the evidence base such that the information before the Inspector does not demonstrate that there is sufficient headroom for this scheme to be delivered in a Policy Compliant manner over the Plan Period as required by the NPPF and NPPG.

- 4.11.4 It is clear to us those changes to infrastructure timings, land payments, sales values, build costs and delivery rates contemplated above would have a significantly detrimental effect on the viability of this scheme and the Council will be faced with application specific viability assessments which seek to reduce the planning obligations being sought to make the scheme viable.
- 4.11.5 We therefore agree with ED128 that “a 15% increase in build costs (or a 15% decrease in values) would render this scheme unviable.” We consider, having carried out a significant number of reviews of applications for allocated sites, that the risk of an unviable scheme being presented at application stage is high given that it has to be carried out with current costs, current values and full details of the costs associated with infrastructure having been designed and costed accordingly.

Appendix A

Appendix A(i) - Amended assumptions appraisal Jan 2024

BPC
Lidsing Garden Village

Phase 1 - Viability Review

Tab 1

Unit Type	Tenure	Beds	Number of Units	Average ft2	Average m2	Total ft2	Total m2	£s per ft2	Average Unit Value	Total Value	Market	Affordable	Non-Resi	
Market Units														
1 bed	Market	1	60	646	60.0	38,760	3,601	£401.34	£259,266	£15,555,938	£15,555,938			
2 Bed	Market	2	300	861	80.0	258,300	23,997	£408.77	£351,951	£105,585,291	£105,585,291			
3 bed	Market	3	540	1,076	100.0	581,040	53,980	£408.77	£439,837	£237,511,721	£237,511,721			
4 Bed	Market	4	300	1,399	130.0	419,700	38,991	£397.16	£555,627	£166,688,052	£166,688,052			
OPEN MARKET CAPITAL VALUE		60%	1,200	1,082	100	1,297,800	120,570		£437,784	£525,341,002	£525,341,002			
Affordable Rent														
1 bed	Affordable Rent	1	0	0	0.0	0	0.0	£0.00	£0	£0		£0		
2 Bed	Affordable Rent	2	204	775	72.0	158,102	14,688.1	£204.39	£158,404	£32,314,393		£32,314,393		
3 bed	Affordable Rent	3	140	904	84.0	126,585	11,760.1	£204.39	£184,805	£25,872,635		£25,872,635		
4 Bed	Affordable Rent	4	56	1,044	97.0	58,470	5,432.1	£198.58	£207,339	£11,610,982		£11,610,982		
1 bed flat	Affordable Rent	1	160	538	50.0	86,112	8,000.1	£200.67	£108,001	£17,280,095		£17,280,095		
2 bed flat	Affordable Rent	2		657	61.0	0	0.0			£0				
TOTAL AFFORDABLE RENT		70%	560	767	24.0	429,268	13,432.1	£202.85	£155,497	£87,078,104				
Shared Ownership														
1 bed	Shared Ownership	1	0	0	0.0	0	0.0	£0.00	£0	£0		£0		
2 Bed	Shared Ownership	2	15	775	72.0	11,625	1,080.0	£286.14	£221,761	£3,326,412		£3,326,412		
3 bed	Shared Ownership	3	10	904	84.0	9,042	840.0	£286.14	£258,721	£2,587,209		£2,587,209		
4 Bed	Shared Ownership	4	4	1,044	97.0	4,176	388.0	£278.01	£290,272	£1,161,090		£1,161,090		
1 bed flat	Shared Ownership	1	11	538	50.0	5,920	550.0	£280.94	£151,202	£1,663,221		£1,663,221		
TOTAL SHARED OWNERSHIP		5%	40	769	23.5	30,764	938.0	£284.04	£218,448	£8,737,932				
First Homes														
1 bed	First Homes	1	0	0	0.0	0	0.0							
2 Bed	First Homes	2	73	775	72.0	56,576	5,256.0	£286.14	£221,761	£16,188,538		£16,188,538		
3 bed	First Homes	3	50	904	84.0	45,209	4,200.0	£276.49	£250,000	£12,500,000		£12,500,000		
4 Bed	First Homes	4	20	1,044	97.0	20,882	1,940.0	£274.22	£250,000	£5,000,000		£5,000,000		
1 bed flat	First Homes	1	57	538	50.0	30,677	2,850.0	£280.94	£161,000	£8,618,509		£8,618,509		
TOTAL FIRST HOMES		25%	200	767	24.0	153,344	4,790.0	£279.45	£211,535	£42,307,046				
TOTAL AFFORDABLE HOUSING		40%	800	767	24.0	613,376	19,160.1	£225.19	£172,654	£138,123,083				
TOTAL HOUSING		100%	2,000	956	69.9	1,911,176	139,730	£347.15	£331,732	£663,464,085				
Industrial	Non-Residential							£ / ft2	Yield	£0			£0	
Office	Non-Residential									£0			£0	
Storage	Non-Residential									£0			£0	
COMMERCIAL														
													£0	
Gross Ha/ Acres		100%	2,000			1,911,176	139,730			£663,464,085				
Average market units sales values psf														
								£0.00						
Legal and Marketing Fees (Open Market Housing) @														
										3.00%	(£17,029,441)	(£17,029,441)		
Affordable Housing Transaction Costs														
										0.50%	(£479,080)		(£479,080)	
Non-residential marketing														
										1.50%	£0			£0
Base Build Costs Housing														
								sq ft	£/ ft2	(£227,741,733)	(£227,741,733)			
								1,749,706	£130.16	(£28,483,308)	(£28,483,308)			
Base Build Costs Flats														
								161,470	£176.40					
Base Build Costs Commercial														
								0						
Garages														
								130	£11,000	(£1,430,000)				
Externals														
										(£38,433,756)				
Cat 2														
								Units	£/ Unit	(£2,800,000)				
								2,000	£1,400.00					
Cat 3														
								40	£11,386.00	(£455,440)				
Water Efficiency														
								800	£11.00	(£8,800)				
Future Homes Standard														
								2,000	£10,000.00	(£20,000,000)				
EV Houses														
								1,712	£500.00	(£856,000)				
EV Flats														
								72	£2,500.00	(£180,000)				
Contingency														
								5%		-£18,099,846				
Construction Fees														
								10.0%	(£36,199,693)	(£36,199,693)	(£25,622,504)	£0	£0	
Open Market Dwelling Profit														
								20.0%	(£105,068,200)		(£105,068,200)			
First Homes Dwelling Profit														
								12.0%	(£5,076,846)			(£5,076,846)		
Affordable Housing Profit														
								6.0%	(£5,748,962)			(£5,748,962)		
Commercial Land Profit														
								15.0%	£0				£0	
								17.47%	(£115,894,008)	(£115,894,008)				
Sub-Total Gross Land Value										£155,372,979	£646,736,817	£126,818,195	£0	
Infrastructure Costs														
								£/ Unit						
								£22,672	(£45,344,116)		(£45,344,116)			
Section 106 Costs														
								£/ Unit						
								£18,714	(£37,428,160)		(£37,428,160)			
Biodiversity														
										(£2,256,000)		(£2,256,000)		
Construction Finance Costs														
										(£27,299,236)		(£27,299,236)		
										(£112,327,512)			(£112,327,512)	
Residual Land Value										£43,045,466				
BENCHMARK LAND VALUE														
								per hectare	Hectares	£32,682,937				
								£571,980	57.14	£1,568,781				
SDLT @														
								4.8%		£490,244				
Legals														
								1.50%				£34,741,962		
Surplus / Deficit										£8,303,504				
VIABLE/ NON-VIABLE?										VIABLE				
Actual Developer Return										£124,197,512				
Actual % Return on GDV										18.7%				
Actual % Return on Costs										20.0%				

Appendix A(ii) - Sensitivity appraisal Jan 2024

BPC
Lidsing Garden Village

Phase 1 - Viability Review

Tab 1

Unit Type	Tenure	Beds	Number of Units	Average ft2	Average m2	Total ft2	Total m2	£s per ft2	Average Unit Value	Total Value	Market	Affordable	Non-Resi	
Market Units														
1 bed	Market	1	60	646	60.0	38,760	3,601	£401.34	£259,266	£15,555,938	£15,555,938			
2 Bed	Market	2	300	861	80.0	258,300	23,997	£408.77	£351,951	£105,585,291	£105,585,291			
3 bed	Market	3	540	1,076	100.0	581,040	53,980	£408.77	£439,837	£237,511,721	£237,511,721			
4 Bed	Market	4	300	1,399	130.0	419,700	38,991	£397.16	£555,627	£166,688,052	£166,688,052			
OPEN MARKET CAPITAL VALUE		60%	1,200	1,082	100	1,297,800	120,570		£437,784	£525,341,002	£525,341,002			
Affordable Rent														
1 bed	Affordable Rent	1	0	0	0.0	0	0.0	£0.00	£0	£0		£0		
2 Bed	Affordable Rent	2	204	775	72.0	158,102	14,688.1	£204.39	£158,404	£32,314,393		£32,314,393		
3 bed	Affordable Rent	3	140	904	84.0	126,585	11,760.1	£204.39	£184,805	£25,872,635		£25,872,635		
4 Bed	Affordable Rent	4	56	1,044	97.0	58,470	5,432.1	£198.58	£207,339	£11,610,982		£11,610,982		
1 bed flat	Affordable Rent	1	160	538	50.0	86,112	8,000.1	£200.67	£108,001	£17,280,095		£17,280,095		
2 bed flat	Affordable Rent	2		657	61.0	0	0.0			£0				
TOTAL AFFORDABLE RENT		70%	560	767	24.0	429,268	13,432.1	£202.85	£155,497	£87,078,104				
Shared Ownership														
1 bed	Shared Ownership	1	0	0	0.0	0	0.0	£0.00	£0	£0		£0		
2 Bed	Shared Ownership	2	15	775	72.0	11,625	1,080.0	£286.14	£221,761	£3,326,412		£3,326,412		
3 bed	Shared Ownership	3	10	904	84.0	9,042	840.0	£286.14	£258,721	£2,587,209		£2,587,209		
4 Bed	Shared Ownership	4	4	1,044	97.0	4,176	388.0	£278.01	£290,272	£1,161,090		£1,161,090		
1 bed flat	Shared Ownership	1	11	538	50.0	5,920	550.0	£280.94	£151,202	£1,663,221		£1,663,221		
TOTAL SHARED OWNERSHIP		5%	40	769	23.5	30,764	938.0	£284.04	£218,448	£8,737,932				
First Homes														
1 bed	First Homes	1	0	0	0.0	0	0.0							
2 Bed	First Homes	2	73	775	72.0	56,576	5,256.0	£286.14	£221,761	£16,188,538		£16,188,538		
3 bed	First Homes	3	50	904	84.0	45,209	4,200.0	£276.49	£250,000	£12,500,000		£12,500,000		
4 Bed	First Homes	4	20	1,044	97.0	20,882	1,940.0	£274.22	£250,000	£5,000,000		£5,000,000		
1 bed flat	First Homes	1	57	538	50.0	30,677	2,850.0	£280.94	£161,000	£8,618,509		£8,618,509		
TOTAL FIRST HOMES		25%	200	767	24.0	153,344	4,790.0	£279.45	£211,535	£42,307,046				
TOTAL AFFORDABLE HOUSING		40%	800	767	24.0	613,376	19,160.1	£225.19	£172,654	£138,123,083				
TOTAL HOUSING		100%	2,000	956	69.9	1,911,176	139,730	£347.15	£331,732	£663,464,085				
Industrial	Non-Residential							£ / ft2	Yield	£0			£0	
Office	Non-Residential									£0			£0	
Storage	Non-Residential									£0			£0	
COMMERCIAL														
TOTAL COMMERCIAL													£0	
Gross Ha/ Acres		100%	2,000			1,911,176	139,730			£663,464,085				
Average market units sales values psf														
								£0.00						
Legal and Marketing Fees (Open Market Housing) @														
										3.00%	(£17,029,441)	(£17,029,441)		
Affordable Housing Transaction Costs														
										0.50%	(£479,080)		(£479,080)	
Non-residential marketing														
										1.50%	£0			£0
Base Build Costs Housing														
								sq ft	£/ft2	(£257,154,291)	(£257,154,291)			
								1,749,706	£146.97	(£32,295,615)	(£32,295,615)			
Base Build Costs Flats														
								161,470	£200.01					
Base Build Costs Commercial														
								0						
Garages														
								130	£11,000	(£1,430,000)				
Externals														
										(£43,417,486)				
Cat 2														
								Units	£/Unit	(£2,800,000)				
								2,000	£1,400.00					
Cat 3														
								Units	£/Unit	(£455,440)				
								40	£11,386.00					
Water Efficiency														
								Units	£/Unit	(£8,800)				
								800	£11.00					
Future Homes Standard														
								Units	£/Unit	(£20,000,000)				
								2,000	£10,000.00					
EV Houses														
								Units	£/Unit	(£856,000)				
								1,712	£500.00					
EV Flats														
								Units	£/Unit	(£180,000)				
								72	£2,500.00					
Contingency														
								5%		-£18,099,846				
Construction Fees														
								10.0%	(£36,199,693)	(£36,199,693)	(£28,944,991)	£0	£0	
Open Market Dwelling Profit														
								20.0%	(£105,068,200)		(£105,068,200)			
First Homes Dwelling Profit														
								12.0%	(£5,076,846)			(£5,076,846)		
Affordable Housing Profit														
								6.0%	(£5,748,962)			(£5,748,962)		
Commercial Land Profit														
								15.0%	£0				£0	
								17.47%	(£115,894,008)	(£115,894,008)				
Sub-Total Gross Land Value										£117,164,385	£610,189,466	£126,818,195	£0	
Infrastructure Costs														
								£/Unit		(£72,000,624)	(£72,000,624)			
								£36,000						
Section 106 Costs														
								£/Unit		(£37,428,160)	(£37,428,160)			
								£18,714						
Biodiversity														
										(£2,256,000)	(£2,256,000)			
Construction Finance Costs														
										(£9,477,819)	(£9,477,819)			
										(£121,162,603)	(£121,162,603)			
Residual Land Value										-£3,998,218				
BENCHMARK LAND VALUE														
								per hectare	Hectares	£32,682,937				
								£571,980	57.14	£1,568,781				
SDLT @														
								4.8%		£490,244				
Legals														
								1.50%						
Surplus / Deficit										-£38,740,180				
VIABLE/ NON-VIABLE?										NON-VIABLE				
Actual Developer Return										£77,153,828				
Actual % Return on GDV										11.6%				
Actual % Return on Costs										11.6%				

Appendix B

£/M2 STUDY

Description: Rate per m2 gross internal floor area for the building Cost including prelims.

Last updated: 13-Jan-2024 07:26

Rebased to 1Q 2024 (389; forecast) and Maidstone (109; sample 28)

MAXIMUM AGE OF RESULTS: DEFAULT PERIOD

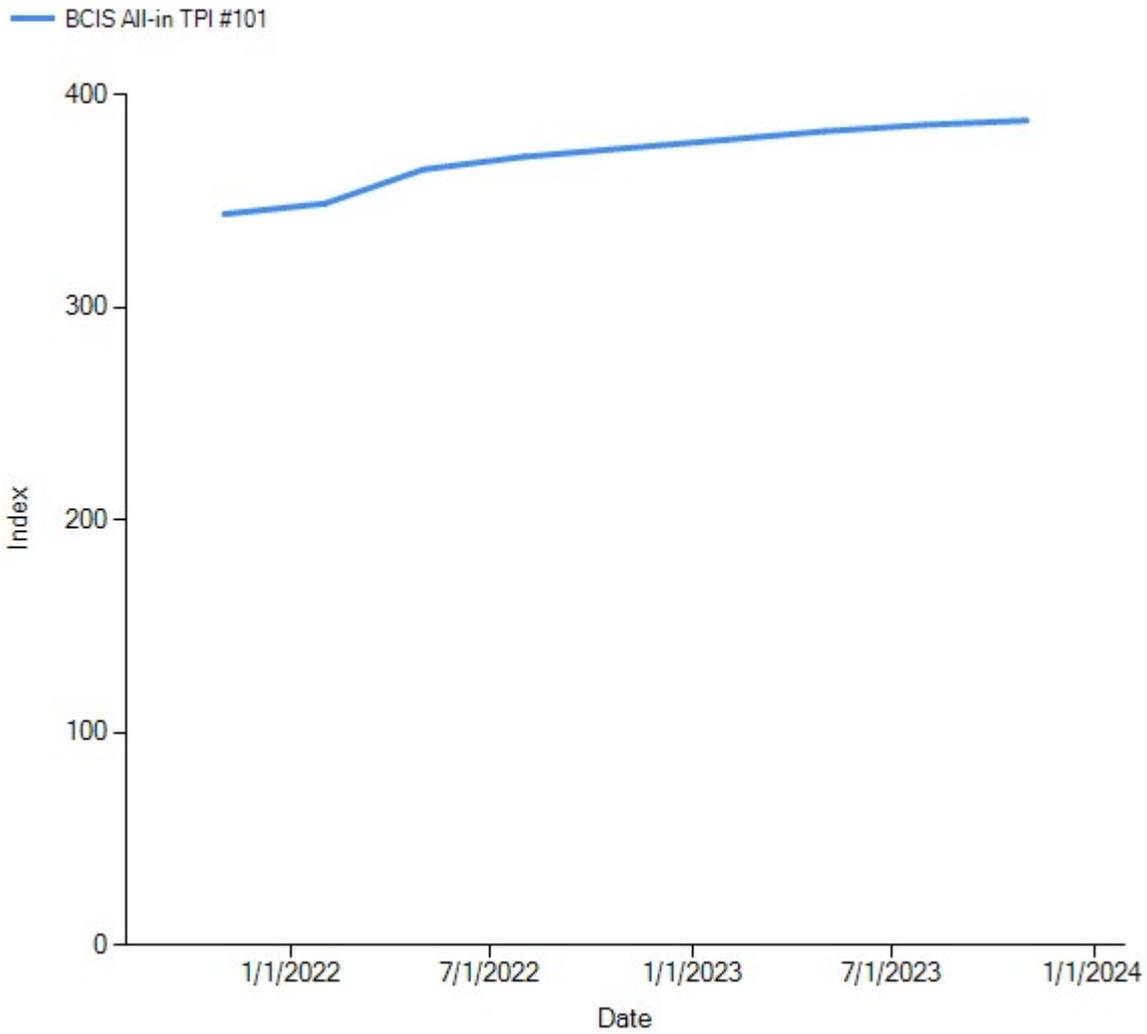
Building function (Maximum age of projects)	£/m ² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
New build							
810. Housing, mixed developments (15)	1,661	897	1,440	1,607	1,815	4,092	1275
810.1 Estate housing							
Generally (15)	1,646	798	1,401	1,582	1,797	5,666	1409
Single storey (15)	1,873	1,117	1,584	1,792	2,067	5,666	233
2-storey (15)	1,583	798	1,373	1,537	1,737	3,419	1093
3-storey (15)	1,737	1,016	1,442	1,654	1,973	3,377	78
4-storey or above (15)	3,441	1,666	2,756	3,077	4,581	5,125	5
810.11 Estate housing detached (15)	2,143	1,219	1,597	1,837	2,285	5,666	21
810.12 Estate housing semi detached							
Generally (15)	1,660	969	1,414	1,629	1,805	3,663	353
Single storey (15)	1,853	1,197	1,584	1,801	2,020	3,663	80
2-storey (15)	1,602	969	1,402	1,557	1,764	2,812	261
3-storey (15)	1,627	1,212	1,314	1,559	1,932	2,348	12
810.13 Estate housing terraced							

Building function (Maximum age of projects)	£/m ² gross internal floor area						Sample
	Mean	Lowest	Lower quartiles	Median	Upper quartiles	Highest	
Generally (15)	1,677	975	1,375	1,582	1,830	5,125	231
Single storey (15)	1,922	1,253	1,596	1,893	2,295	2,738	18
2-storey (15)	1,598	975	1,358	1,532	1,758	3,419	178
3-storey (15)	1,777	1,016	1,442	1,630	1,995	3,377	33
4-storey or above (10)	4,853	4,581	-	-	-	5,125	2
816. Flats (apartments)							
Generally (15)	1,945	962	1,614	1,830	2,198	6,590	828
1-2 storey (15)	1,834	1,120	1,542	1,736	2,049	3,803	173
3-5 storey (15)	1,919	962	1,605	1,822	2,162	4,022	554
6 storey or above (15)	2,288	1,396	1,854	2,152	2,482	6,590	98

Appendix C

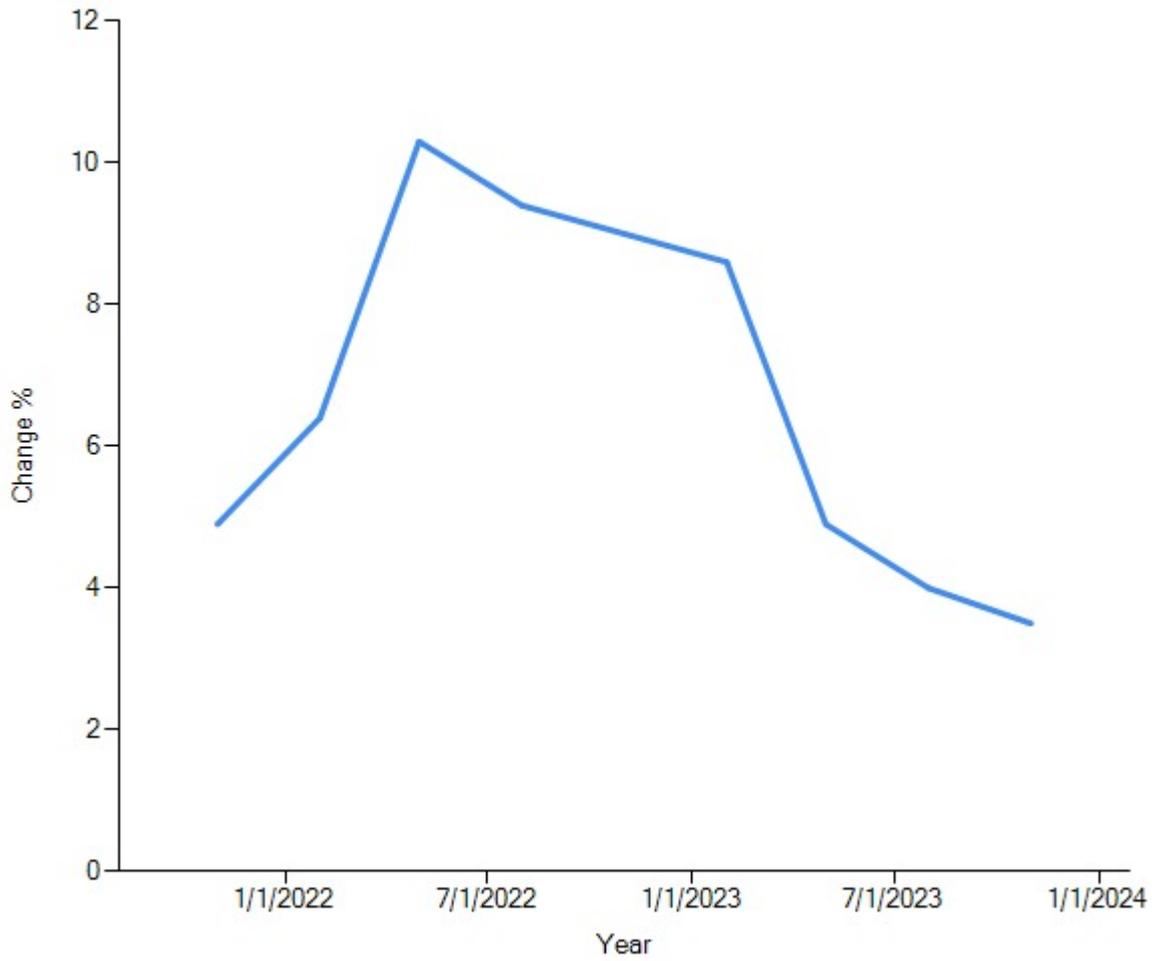
			Percentage change		
Date	Index	Equivalent sample	On year	On quarter	On month
4Q 2021	344	Provisional	4.9%	1.5%	
1Q 2022	349	Provisional	6.4%	1.5%	
2Q 2022	365	Provisional	10.3%	4.6%	
3Q 2022	371	Provisional	9.4%	1.6%	
4Q 2022	375	Provisional	9.0%	1.1%	
1Q 2023	379	Provisional	8.6%	1.1%	
2Q 2023	383	Provisional	4.9%	1.1%	
3Q 2023	386	Provisional	4.0%	0.8%	
4Q 2023	388	Provisional	3.5%	0.5%	

Index value over time



Percentage change over time
Percentage change: Year on year

— BCIS All-in TPI #101



Appendix D

Appendix D – Residential Sales comparable information

Chatham Sales Values

HouseMetric Search... Login Register

About
HouseMetric is a hobby, created out of a desire to see data and analysis not present on any free to use website. It is still a work in progress and I'll add more stuff in the near future.

Street level data

Street	Avg size	Avg £/m ²	Recent sales
Sussex Drive, Chatham, ME5 0N	86m ²	£3,515	23
Crestway, Chatham, ME5 0E	73m ²	£3,498	19
King George Road, Chatham, ME5 0P	79m ²	£3,448	19
Churchill Avenue, Chatham, ME5 0Q	87m ²	£3,085	17
Downview, Chatham, ME5 0A	90m ²	£3,450	15
Harroree Drive, Chatham, ME5 0T	87m ²	£3,703	14
Hurstwood, Chatham, ME5 0X	86m ²	£3,684	13
Settlington Avenue, Chatham, ME5 0A	66m ²	£3,728	11

Search for your street here.

Raw data
Our analysis of Chatham is derived from what is essentially a big table of sold prices from Land Registry with added property size information. Below are three rows from this table to give you an idea.

Address	Paid	m ²	£/m ²
11, Gentian Close, Chatham	£225,000 Oct-2023	66	3,409
7, Fallowfield, Chatham	£210,000 Sep-2023	78	2,692

Gillingham Sales Values

HouseMetric Search... Login Register

About
HouseMetric is a hobby, created out of a desire to see data and analysis not present on any free to use website. It is still a work in progress and I'll add more stuff in the near future.

Street level data

Street	Avg size	Avg £/m ²	Recent sales
Maidstone Road, Gillingham, ME8 0H	130m ²	£4,021	24
Maidstone Road, Gillingham, ME8 0Q	91m ²	£3,804	23
Wigmore Road, Gillingham, ME8 0T	137m ²	£4,116	22
Edwin Road, Gillingham, ME8 0A	135m ²	£4,074	20
Woodside, Gillingham, ME8 0P	135m ²	£3,828	19
Maidstone Road, Gillingham, ME8 0L	116m ²	£4,292	18
Chart Place, Gillingham, ME8 0L	93m ²	£3,899	16
Marshall Road, Gillingham, ME8 0A	144m ²	£4,025	14

Search for your street here.

Raw data
Our analysis of Gillingham is derived from what is essentially a big table of sold prices from Land Registry with added property size information. Below are three rows from this table to give you an idea.

Address	Paid	m ²	£/m ²
40, Edwards Close, Gillingham, Rainham	£440,000 Oct-2023	66	6,666
8, Kenyon Walk, Gillingham, Rainham	£299,995 Oct-2023	83	3,614

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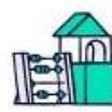


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Highways Technical Note

Site: Lidsing, Maidstone
Prepared by: DM
Approved by: DM
Date: 9 February 2024

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1.0 Introduction

- 1.1 This Technical Note provides an independent highway review relating to additional analysis prepared in respect of the Maidstone Borough Council (MBC) Local Plan Review. Specifically, this note reviews the 'M2 Junction 3 Transport Assessment' submitted by Stantec.
- 1.2 Motion has given due regard to the resultant implications of the M2 proposals in association with a proposed 'garden village' located in Lidsing which is proposed as part of the Maidstone Local Plan site allocations. The site is included as policy LPRSP4(B) and is one of two potential garden communities included in the draft Local Plan. The proposals include 2,000 dwellings, alongside employment floorspace catering for 2,000 jobs. The proposals also include a local centre, GP surgery, primary school and public open space.
- 1.3 The key headline points addressed within this note can be summarised as follows:
- ▶ The suitability of the traffic data taken from the KCC model;
 - ▶ The benefits of the mitigation measures proposed at the M2 junction 3; and
 - ▶ The robustness of the mitigation proposed, and whether it can be delivered when considering the lack of supporting evidence.

2.0 Review of ED135 'M2 Junction 3 Transport Assessment'

Use of KCC Model Outputs

2.1 It is acknowledged by Stantec in their report in paragraph 1.1.2 that:

"During the Local Plan Review process, a need to provide mitigation at M2 Junction 3 to mitigate the effects of the Plan has become apparent, meaning a mitigation scheme would need to be included in Infrastructure Delivery Plan (IDP)."

2.2 It is clear from the above statement that in order to bring forward Local Plan sites, predominantly the Lidsing proposal, mitigation is required at the junction.

2.3 Paragraph 2.1.5 states that *"The traffic flows used within the Stantec model were also taken from the KCC model outputs. It is understood that these flows were taken from the strategic modelling used to inform the wider Local Plan Review."*

2.4 Concern has previously been raised by Motion as to the validity of the KCC model outputs, which are outdated. As noted in the 19th October report prepared by Motion, the traffic data dates back several years (pre-Covid) and does not accurately reflect current traffic conditions post-Covid. The data underpinning the modelling is therefore considered unreliable for modelling purposes unless appropriate updates/validation is undertaken.

2.5 In addition, the outputs to the strategic model are unclear and do not enable a clear representation of existing traffic flow compared to proposed, or ultimately understand how traffic has been redistributed on the highway network. This is still the case with the latest model review utilised by Stantec to form their assessment.

Results of Stantec Modelling

2.6 The Stantec model shows that in the 2037 Reference Case scenario the M3 junction operates over capacity in both the AM and PM peak hours. When including the Local Plan developments, total delay increases from 2,270 PCU/hr to 2,341 PCU/hr in the AM peak but decreases from 3,195 to 3027 in the PM peak hour.

2.7 The decrease would presumably be attributed to wider mitigation on the road network such as the proposals to upgrade junction 4 of the M2. This will have the effect of re-routing traffic flow on the wider road network. Regardless, delay is still significant, extending beyond 3,000 PCU per hour in the evening peak hour.

2.8 Whilst the mitigation measures proposed would provide an overall reduction in queuing across the junctions during both peak periods, there are particular arms which experience material increases in queuing, suggesting particular movements are penalised in preference to reducing queuing elsewhere.

2.9 For example, the following is highlighted in the outputs:

- ▶ A229 North Ahead/Left (Lord Lees Roundabout) = Increase in average delay of 273 (seconds/PCU) and max queue of 68 PCU; and
- ▶ A229 Ahead (Taddington Roundabout) = Increase in average delay of 244 (seconds/PCU) and max queue of 127 PCU.

2.10 As such whilst the modelling does show clear overall improvement across the network, there are arms of both roundabouts which are negatively affected. It is therefore questioned whether the mitigation does as Stantec suggest in mitigating the impacts of the Local Plan sites. Whilst overall improves are seen at the junction, some arms will be penalised and suffer from extensive additional congestion.

2.11 Paragraph 115 of the National Planning Policy Framework (NPPF) states that:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

- 2.12 Whilst the above benefits are noted, the penalties applied to several arms of the A229 could be considered to represent a severe impact. This is complicated by the reliance on wider mitigation being brought forward by Local Plan sites, in particular Lidsing. The Lidsing proposal intends to rely on a 'Monitor and Manage' approach to wider mitigation as opposed to implementing measures from day one. Arguably therefore the modelling results do not reflect a more realistic picture of traffic impact likely to materialise.

Mitigation Measures Proposed

- 2.13 The proposed mitigation measures include the following:
- ▶ An additional left-turn flare lane on the M2 South arm of the Taddington Roundabout which is 10 PCUs in length;
 - ▶ An extension of the off-side flare from 5 PCUs to 10 PCUs on the M2 North arm of the Taddington Roundabout;
 - ▶ Lane allocation changes between the A229 west arm and the Taddington Roundabout circulatory, and between the western side of the Taddington Roundabout circulatory and the north side of the Taddington Roundabout circulatory to allow vehicles to more naturally 'spiral' around the gyratory; and
 - ▶ Lane allocation changes between the southern side of the Taddington Roundabout circulatory and the A229 west arm, and between the southern side of the Taddington Roundabout circulatory and the western side of the Taddington Roundabout circulatory. This allows all three lanes of the circulatory to route towards the A229.
- 2.14 The suggestion is that *"In terms of the Local Plan Review development, Lidsing in particular would benefit from this improvement, being located to the south and therefore utilising the north bound off slip to a greater degree. This should act to reduce the potential for Lidsing traffic to route via Boxley village."*
- 2.15 Whilst Stantec suggest that the mitigation measures proposed will improve vehicle flow through junction 3, the reality is that the junction already suffers from significant congestion, something Stantec readily accept (paragraph 1.2.3 of the Stantec report). Even with mitigation in place there will be significant queuing experienced, which is considered a severe impact in respect of paragraph 115 of the NPPF. As such there is no evidence to suggest that residents of the Lidsing proposal would seek to travel through junction 3 of the M2 over routing south via Boxley.
- 2.16 As noted by Stantec in paragraph 3.2.9 *"the existing layout does not provide adequate deflection, with the entry path radius currently being 183m."* Paragraph 3.2.10 continues by stating that *"Due to the nature of the junction being wide on entry and exit, it would be extremely difficult to provide an entry path radius less than 100m, as is typical of junctions built under a prior standard. Therefore, the aim of the scheme design was to ensure that deflection was no worse than the existing situation."*
- 2.17 Paragraph 3.2.12 acknowledges that *"the entry radii do not apply with the DMRB and that therefore a 'departure from standard' will be required to confirm the departure is still acceptable."*
- 2.18 This is a fundamental part of any design process, and should be fully explored with the highway authority in advanced of any conclusions being drawn as to the suitability of the proposed layout scheme.
- 2.19 Paragraph 3.4.4 acknowledges that *"a Stage 1 Road Safety Audit (RSA1), and a Walking, Cycling and Horse-Riding Assessment and Review (WCHAR) will be completed separately during the consultation period."*
- 2.20 A Stage 1 Road Safety Audit is a fundamental tool to establishing the suitability of the mitigation package, and must be carried out to have any confidence the works can be brought forward. When considering there are accepted Departures from Standards, a Road Safety Audit is necessary as part of an allocation proposal to give confidence it can be delivered.

- 2.21 In addition to the above, no swept path analysis has been undertaken of relevant vehicles navigating through either roundabout. There is an acknowledgement that the improvements to the Taddington roundabout fail to meet the requirements of DMRB in respect of adequate deflection, yet no swept path of HGVs (i.e. a 16.5 metre articulated HGV) has been undertaken to demonstrate that sub-standard deflection will not affect the ability for a driver to navigate through the junction. Again, when considering there are accepted Departures from Standards, swept path analysis is necessary at this stage to give confidence the scheme can be delivered.
- 2.22 No consideration appears to have been given to the cost of the works, which would inform on the viability of the Lidsing proposal. This is critical to understanding whether the M2 works can be delivered, alongside the overall viability of the Lidsing proposal.

3.0 Summary

- 3.1 In summary, this technical note raises a number of fundamental criticisms of the highway related submission in regard to mitigation at the M2 junction 3. Further work is required to establish whether the proposals are viable and deliverable, as the evidence provided in the Junction 3 report does not provide sufficient confidence that the scheme proposed can be delivered in design terms. It also fails to offer sufficient improvement to network performance to not only address existing congestion but also the additional traffic flow generated by the Local Plan sites (in particular Lidsing).