# Retail and Leisure Strategy Topic Paper

Planning is a technical process, driven by legislation and government policy and advice. This topic paper uses a number of acronyms and technical terms, so the glossary below has been prepared to assist the reader.

| Acronym | Term | Description |
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| | Comparison (A1 use) | Retail items not bought on a frequent basis, for example televisions and white goods (fridges, dishwashers etc.) |
| | Convenience (A1 use) | The provision of everyday essential items, such as food |
| | Development Plan | Is defined in section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the local planning authority decides that the neighbourhood plan should not be made. |
| DPD | Development Plan Document | A DPD is a spatial planning document that is subject to independent examination. Under new regulations, DPDs are now known as local plans. |
| | Experian | Detailed monthly forecasts with supporting qualitative reports to help understand more about the UK economy - specifically how it will perform over the next cycle. |
| FEMA | Functional Economic Market Area | key economic markets broadly corresponding to sub-regions or city regions |
| | Garden Settlement | • a purpose built new settlement, or large extension to an existing town<br>• a community with a clear identity and attractive environment |

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| | | • it provides a mix of homes, including affordable and self-build<br>• planned by local authorities or private sector in consultation with the local community |
| GEA | Gross external area | Broadly speaking the whole area of a building taking each floor into account.<br>GEA will include:<br>• perimeter wall thickness and external projections<br>• areas occupied by internal walls (whether structural or not) and partitions<br>• columns, piers, chimney breasts, stairwells, lift wells etc<br>• lift rooms, plant rooms, tank rooms, fuel stores, whether or not above roof level<br>• open-sided covered areas (should be stated separately) |
| LIS | Local Industrial Strategy | Local Industrial Strategies will be long-term, based on clear evidence and aligned to the national Industrial Strategy. They should set out clearly defined priorities for how cities, towns and rural areas will maximise their contribution to UK productivity. Local Industrial Strategies will allow places to make the most of their distinctive strengths. They will better coordinate economic policy at the local level and ensure greater collaboration across boundaries. |
| LP17 | Maidstone Borough Local Plan | The Maidstone Borough Local Plan is the key document that sets the framework to guide the future development of the borough. It plans for homes, jobs, shopping, leisure and the environment, as well as the associated infrastructure to support new development. It explains the 'why, what, where, when and how' development will be delivered through a strategy that plans for growth and regeneration whilst at the same time protects and enhances the borough's natural and built assets. The plan covers the period from 2011 and 2031. |
| | Main town centre uses | Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres |

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| | | and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). |
| NPPF | National Planning Policy Framework | The NPPF was published in February 2019 and it sets out the government's planning policies for England and how these must be applied. Local plan policies must be in conformity with the NPPF. |
| | Neighbourhood Plan | A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004. |
| | Previously Developed Land | Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape. |
| PF | Primary Frontage | Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. |
| PSA | Primary Shopping Area | Area within the town centre where retail development is concentrated. |
| PPG | Planning Practice Guidance | The PPG provides additional guidance on how the national policies in the National Planning Policy Framework should be interpreted and applied. |
| SA | Sustainability Appraisal | The SA is a tool for appraising policies to ensure they reflect sustainable development objectives, including social, economic and environmental objectives. |
| SELEP | South East Local Enterprise Partnership | A body, designated by the Secretary of State for Housing, Communities and Local Government, established for the purpose of |

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| | | creating or improving the conditions for economic growth in an area. |
| SF | Secondary Frontage | Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses. |
| SME | Small and Medium Sized Enterprise | A category of micro, small and medium-sized enterprises which employ fewer than 250 persons and which have an annual turnover not exceeding 50 million euro, and/or an annual balance sheet total not exceeding 43 million euro |
| SPD | Supplementary planning documents | An SPD provides further detail to a policy or a group of policies set out in a local plan. A SPD can provide additional detail about how a policy should be applied in practice. SPDs are a material consideration in planning decisions but are not part of the development plan. |
| | Use classes | The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories |
| | Windfall site | Sites not specifically identified in the development plan. |

## Background/Context

This topic paper considers matters relating to retail and leisure provision in the borough**, from both a strategic and non-strategic perspective**. This includes understanding the objectively assessed needs for main town centre uses [1] (retail and town centre leisure uses) – both quantitative and qualitative – and considers how to accommodate such requirements spatially. It also highlights what is required in terms of identifying centre hierarchies and retail designations. Non-strategic development management matters are also included within this topic paper.

## Legislative Requirements

***Planning and Compulsory Purchase Act 2004 (as amended)*** - Basis for making local plans and relevant requirements for producing plans; duty to cooperate requirements; and requirements for sustainability appraisals.

***Environmental Assessment of Plans and Programmes Regulations 2004*** **-** Sustainability appraisals incorporate the requirements of these regulations.

***Localism Act 2011*** **-** Introduced the duty to cooperate.

***Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) -*** Prescribes the general form and content of local plans, policies maps, monitoring reports; the process for preparing local plans; the requirement to review local plans; consultation/notification; public participation; and examination.

**Town and Country Planning (Use Classes) Order 1987 (as amended)** – this categorises different types of property or land into classes. Changes between uses within the same classes does not constitute development and therefore does not require planning permission. On 1 September 2020 the Use Class Order was significantly amended. Key Use Classes relative to this topic paper include Class E – Commercial, Business and Service uses. Some uses do not fall within a Use Class and are known as sui generis. To change from one sui generis use to another sui generis use, planning permission is required.

**Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)** – this identifies some permitted development rights allowing the change of use from one class to another, subject to conditions, limitations and/or a prior approval process. Class MA permits change of use from Use Class E to residential use, with a few limitations and conditions.

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[1] The national Planning Policy Framework defines 'main town centre uses' for use in planning terms. It is important to note that, from a spatial perspective, such uses may be located outside of designated town centres.

# National Policy and Guidance Requirements

## National Planning Policy Framework (NPPF)

The NPPF (paragraph 11) indicates that councils should positively seek opportunities to meet the development needs of the area, and local plans should meet objectively assessed needs. In doing so, policies should support the role that town centres play by taking a positive approach to their growth, management and adaptation. Designated town centres should be the first choice for retail, leisure and main town centre uses.

### Retail

Local Planning Authorities are required to: define a network and hierarchy of town centres; define the extent of town centres and primary shopping areas and make clear the range of uses permitted in such locations;  allocate a range of suitable sites in town centres (or sequentially edge of centre or other accessible locations) to meet the scale and type of development likely to be needed, looking at least ten years ahead; and to recognise the important role that residential development often plays in ensuring town centre vitality.

### Frontages & Permitted Development Rights

The NPPF requires councils to define the town centre boundary and the extent of the Primary Shopping Area (PSA). Councils may also, where appropriate, wish to define primary and secondary retail frontages where their use can be justified in supporting the vitality and viability of particular centres (NPPG). This approach differs from the current LP17, where it was a requirement and not an option to define the primary and secondary frontages (LP17 policies DM27 and DM28). This increase in flexibility is in response to the changing nature of retailing and the evolving role of the town centre, not just as a functional place for shopping but as a wider experiential destination including for food and drink, entertainment and leisure offerings.

### Leisure

The NPPF includes "leisure, entertainment and more intensive sport and recreation uses" within the definition of main town centre uses. For the purposes of this topic paper, this includes: cinemas; restaurants; drive-through restaurants; bars and pubs; nightclubs; casinos; health and fitness centres; indoor bowling centres and bingo halls. It would not include facilities such as swimming pools, leisure centres or parks and playing pitches. These are considered separately under the Infrastructure Topic Paper. For the purposes of this topic paper, the collective 'retail and leisure' terminology used by the NPPF will simply be referred to as 'town centre uses'.

LP17 does not allocate land for leisure purposes as there was no strategic need identified for such uses during the plan preparation. LP17 identifies that a flexible approach to allowing leisure uses in the secondary areas of the town centre will help improve unit occupation and encourage people to extend their length of visit to the town centre.

Impact assessment

The NPPF states that in determining applications for retail and leisure development outside of the town centre which are not in accordance with an up to date local plan, an impact test is required for development over a proportionate, locally set threshold. If there is no local threshold, the default threshold is anything exceeding 2,500 sqm GEA. At present, LP17 does not set a locally appropriate threshold, although there is evidence to suggest that the default threshold may be inappropriate to apply across the whole of the borough, because a retail or leisure development smaller than 2,500sqm (GEA) could have a significant adverse impact on some of the smaller centres. As part of the Local Plan Review (LPR), a reduced locally set threshold of 400sqm GEA is proposed for retail and leisure development applications outside of the Maidstone urban area.

## National Planning Practice Guidance (PPG)

The PPG suggests that we can take a leading role in promoting a positive vision for town centres, bringing together stakeholders and supporting sustainable economic and employment growth. In doing so, we will need to consider structural changes in the economy, in particular changes in shopping and leisure patterns and formats.

A wide range of complementary uses can help to support the vitality of town centres, including residential, employment, office, commercial, leisure/ entertainment, healthcare and educational development. Evening and night-time activities also have the potential to increase economic activity and provide additional employment opportunities, as well as allowing town centres to diversify and develop their unique brand and offer services beyond retail.

The key approach to setting out a vision and strategy for town centres is through the development plan and (if needed) supplementary planning documents. Through planning policies, the Council is expected to define the extent of the primary shopping area. Where appropriate, the Council may also wish to define primary and secondary retail frontages where their use can be justified in supporting the vitality and viability of the town centre. If it is not possible to accommodate all forecast needs for main town centre uses in a town centre, the Council should plan positively to identify the most appropriate alternative strategy for meeting the identified need, having regard to the sequential and impact tests.

## Ministerial statements

There are no Ministerial Statements that significantly change the overall approaches set out in this paper.

# Maidstone Borough Local Plan 2017 (LP17) policies: Strategic vs Non-Strategic

The location, scale, quality and provision of development for town centre uses within Maidstone Borough is defined by the NPPF (paragraph 20) to be a strategic matter which needs to be addressed by the LPR's strategic policies.

## Key Strategic Policies

There are a number of existing strategic policies pertaining to the location of town centre uses across the borough within the plan period which either relate to the borough as a whole **(policy SS1)** or to specific areas **(SP1-16)** of the borough where retail will be accommodated.

**SS1** (Maidstone Borough spatial strategy) and supporting text sets out the borough's retail floorspace requirement up to 2031: 6,100sqm (net) convenience A1 use and 23,700sqm (net) comparison A1 use. There is currently no floorspace allocation requirement set out for A3-A5 uses or other town centre uses.

**SP1** (Maidstone urban area) seeks to maintain and enhance the retail hierarchy set out in LP17, i.e. Maidstone Town Centre, five Rural Service Centres and five Larger Villages.

**SP21** (Economic Development) is primarily focused on the borough's economic development, but the policy seeks to enhance the vitality and viability of Maidstone Town Centre and maintain the hierarchy of retail centres.

**SP23** (Sustainable transport) seeks to facilitate the delivery of strategic transport links to Maidstone Town Centre including bus services across radial routes and railway stations.

Specific mixed-use (including retail) allocations are included as part of strategic policy **RMX1**, with sites **RMX1(1), RMX1 (2)**, **RMX1(3)** and **RMX1(5)** allocated to deliver a total of 25,700$m^2$ retail floorspace.

## Non-strategic Policies

**DM16** (Town centre uses)

**DM17** (District centres, local centres and local shops and facilities)

**DM18** (Signage and shop front)

**DM27** (Primary shopping frontages)

**DM28** (Secondary shopping frontages)

**DM29** (Leisure and community uses in the town centre)

**DM40** (Retail units in the countryside)

**LPR1viii** (Reconsideration of the approach to the Syngenta and Baltic Wharf sites if these have not been resolved in the interim)

### Relevant Supplementary Planning Documents (SPD) and Planning Policy Advice Notes

None relevant to this topic area.

## Maidstone Strategic Plan Requirements

The Strategic Plan sets out the Council's aspirations through to 2045. The vision is '*Maidstone: a vibrant, prosperous, urban and rural community at the heart of Kent where everyone can realise their potential'*. The relevant priority based on the vision is:

**A Thriving Place**

- The outcome of which is a vibrant leisure and culture offer, enjoyed by residents and attractive to visitors. The focus between 2019–24 is reviewing and delivering leisure and cultural services that meet future needs.

**The requirements in meeting this priority are**:

- Ensuring sufficient land and floorspace is provided to support economic growth in the borough and to contribute to the needs of the wider economic market area.
- Ensuring that Maidstone has a vital and vibrant town centre which maintains its role in the sub-region and that a network of local centres continue to serve local retail and service needs.

## Kent County Council (KCC) Policy Framework

No policies/guidance are directly related to the topic area.

## Other Key Plans and Strategies (incl. Neighbourhood Plans)

**Neighbourhood Plans** - Form part of the Maidstone Development Plan. Neighbourhood Plans and the Local Plan Review will need to be complementary of one another and should avoid any conflict between policies or land allocations. The LPR will need to take into account the policies within made neighbourhood plans. There are six made plans:

- North Loose Neighbourhood Plan 2015 – 2031 (2016)
- Staplehurst Neighbourhood Plan 2016 – 2031 (2016 and amended 2020)
- Loose Neighbourhood Plan 2018 – 2031 (2019)
- Marden Neighbourhood Plan 2017 – 2031 (2020)
- Lenham Neighbourhood Plan 2017 – 2031 (2021)
- Boughton Monchelsea Neighbourhood Plan (2021)

There are is a further plan which has passed referendum and forms part of the Maidstone Development Plan:

- Otham Neighbourhood Plan 2020 – 2035 (2021)

The neighbourhood plans listed below have consideration for the retail and leisure of the neighbourhood plan area:

- North Loose Neighbourhood Plan: Policy BCE 1 – New retail and commercial development. This policy supports new retail or commercial development, including expansion of existing premises, subject to a number of criteria. Policy BCE 2 – Change of use of commercial and business premises. This policy seeks to resist the loss of commercial and business premises that provide a service to the local community.
- Staplehurst Neighbourhood Plan: Policy VH1 – Support the retention and enhancement of the existing retail and ancillary facilities in the village heart including improvements where necessary to meet the needs of users of those facilities. This policy supports new retail and commercial development as well as protecting and enhancing existing facilities.
- Marden Neighbourhood Plan: Policy E2 – Retail. Support will be given to the creation, retention and enhancement of shops and other uses that service the community.
- Lenham Neighbourhood Plan: Policy EMP1 Lenham Square, development proposals will preserve and enhance the function of Lenham Square as the retail, commercial, employment and entertainment hub.
- Otham Neighbourhood Plan: Policy CL1 development of a new village hall in the Plan area will be supported.

There are a number of neighbourhood plans which are emerging alongside the LPR. The Parish Council and MBC will need to work together to minimise any potential conflicts. In the case where there is a conflict, emerging neighbourhood plans will need to be in general conformity with the strategic policies of the adopted Maidstone Borough Local Plan and then also with the strategic policies contained in the LPR once adopted. Government legislation requires that where non-strategic policies in neighbourhood plans and local plans overlap, the last document to become part of the Development Plan takes precedence.

**Maidstone Destination Management Plan 2015 (updated Action Plan 2019)**

Strategic priorities:

- Increase the value of tourism by targeting higher-spend markets with growth potential.
- Use tourism to reinvent what a County Town means for the 21st century.
- Encourage more overnight visitors to the borough to come into the town centre – including in the early evening – and to explore Maidstone's countryside and villages.
- Connect the town with its surrounding countryside in tangible ways that encourage visitors to explore further and stay longer.
- Strengthen potential visitors' awareness and image of the borough by using the Shared Story to develop a strong brand positioning.

Action strand:

- Improving the County Town's appeal to visitors
- Improving the impact of events on the visitor economy
- Making more of the countryside.

**Maidstone Economic Development Strategy 2015-2031** - Sets out the vision: '*A model 21st century county town, a distinctive place, known for its blend of sustainable rural and urban living, dynamic service sector based economy, excellence in public services and above all quality of life'* to be achieved by 2031.

This strategy sets out five priorities:

- Retaining and attracting investment
- Stimulating entrepreneurship
- Enhancing Maidstone Town Centre
- Meeting the skills needs
- Improving Infrastructure.

**Maidstone Economic Development Strategy Review (draft, 2021)** – This is a review of the currently adopted EDS. The document is in draft form and is currently undergoing public consultation. The draft EDS vision is as follows:

"By 2030 Maidstone will excel as the 'Business Capital of Kent', defined by a strong entrepreneurial spirit, an unrivalled urban-rural economic offer, and which offers opportunities for all of our communities."

The proposed new strategic priorities are:

- Open for business
- A greener, more productive economy
- A thriving rural economy
- Inclusive growth

- Destination Maidstone town centre

This final bullet point is expanded upon as follows: "Reimagining Maidstone's town centre as a vibrant, mixed use destination with a thriving day and night time economy befitting a modern county town." Furthermore, the draft EDS makes reference to a future Town Centre Area Action Plan which provides a timely opportunity to develop a transformational programme of investment to deliver an improved retail, leisure and cultural offer, focused around Key Opportunity Areas and regeneration sites in Maidstone town centre.

## Democratic Resolutions (Full Council/Committees)

**Town Centre Article 4 Directions (SPI 10.09.2019)** - Non-Immediate Article 4 Directions were made on 14 town centre sites to remove permitted development rights on office to residential development.

**Business rates retail relief (Full Council 26.02.20) -** Government recognised changing consumer habits and the need to intervene to help the high street to evolve. For this reason, changes to retail business rates were adopted.

**Town Centre Opportunity Sites (SPI 05.11.2019)** - Planning Guidelines were adopted as material planning considerations for 5 town centre sites.

## Meeting Objectively Assessed Need

The NPPF (paragraph 11) indicates that plans should meet the development needs of their areas, and that policies should, as a minimum, provide for objectively assessed needs.

For leisure in Maidstone borough, there is theoretical capacity for a medium sized or boutique cinema over the plan period. Alternatively, there is scope for the provision of additional screens at Lockmeadow Entertainment Centre. There is also scope for 4 to 5 additional medium sized gyms in the borough over the plan period. However, there is no strategic need to allocate land for these specific purposes. Rather, the plan policies should be flexible enough to respond to emerging opportunities for new leisure facilities.

For retail (comparison retail, convenience retail food and beverage uses), the intention is to meet all of the borough's identified needs in full, with allocations to meet the floorspace requirements for a minimum of 10 years. This means, as a minimum, accommodating 10,847m$^2$ (gross) floorspace to 2032. This requirement is primarily fuelled by population growth. The full need to 2037 is 13,769m$^2$ (gross) floorspace across all retail and food/beverage uses. Appendix 1 to this topic paper sets out how the objectively assessed retail needs are to be met over the plan period.

## Supporting Evidence (Current and Future)

**Economic Development Needs Study (2019 & 2020)** - Identifies that Maidstone Borough falls within a Functional Economic Market Area (FEMA) that is largely consistent with the borough boundary, extending slightly into the neighbouring authorities of Tonbridge & Malling and Medway. It will be important for the Council to actively engage with authorities in these areas on any cross-boundary issues arising in relation to town centre uses provision through the preparation of the LPR.

**EDNS Addendum 2021 –** This provides an updated to the 2020 study (set out above) and takes account of the impacts of Brexit and Covid-19 on the future of the economy, retailing and town centres. It reassesses likely floorspace requirements over the plan period, re-basing from 2022 to 2037 and even further to 2042.

## Retail

Maidstone Town Centre is a Major Regional Centre, only falling below Bluewater in the regional hierarchy. The town centre is classified as having a "middle" market position, suggesting it does not compete with other centres such as Bluewater, Tunbridge Wells and Canterbury, which are classified as having an "upper middle" market position[2]. This alludes to the fact that Maidstone has a significant draw in terms of the "middle" market, with few competitors equal in scale locally. Maintaining this position and market offering is important to the continued success of the town centre.

The recently updated floorspace projections (EDNS Addendum 2021)are lower than those quoted in LP17, even when taking account of a revised end date of 2037 and net rather than gross floorspace figures used in 2013. By 2037, the Council will require 5,726m$^2$ (gross) A1 convenience (38%); 1,116m$^2$ (gross) A1 comparison (6%); and new for this LPR, 6,927m$^2$ (gross) A3/A4/A5 food/beverage (56%) floorspace. This is a total of 13,769m$^2$ (gross) of all uses to 2037. Choices will need to be made as to where this floorspace is located, with allocations required to accommodate at least the first 10 years of floorspace requirements (10,847m$^2$ (gross)). RMX1 policies may require diversification to allow for the new food and beverage floorspace requirement as opposed to purely convenience/comparison retailing.

## Town centre assessments/healthchecks

A qualitative assessment or 'healthcheck' of the existing town centre, RSCs and LVs in the borough was undertaken in 2019. This looked at factors such as the range of shops and services in each location and the vacancy rates. Overall, it concluded that residents have good access to local shops and services, which is supplemented by Maidstone town centre and other smaller local centres/parades. There was no suggestion that any of the centres required radical changes.

## Leisure

[2] EDNS Stage 1 report 2019

The EDNS identifies theoretical capacity for a medium sized or boutique cinema over the plan period. Alternatively, there is scope for the provision of additional screens at Lockmeadow Entertainment Centre. There is also scope for 4 to 5 additional medium sized gyms in the borough over the plan period. However, there is no strategic need identified to justify allocation of land for these specific purposes. Rather, the plan policies should be flexible enough to respond to emerging opportunities for new leisure opportunities as they occur.

## Primary and Secondary Frontages

As explained elsewhere in this topic paper, national guidance sets out that the defining of primary and/or secondary frontages within the town centre is entirely optional. Since the adoption of LP17, the nature of town centres and the traditional role of the high street has undergone significant change. Online e-tailing and greater expectation of leisure and experiential opportunities within the centre as opposed to traditional shopping has created the need for a more responsive and flexible approach to uses in the town centre. Evidence[3] produced for the LPR in 2019/20 assessed the suitability of LP17 policies DM27 and DM28. For secondary retail frontages, the approach remained robust, as it employed a suitably flexible approach, allowing for a more diverse range of town centre uses than in the primary frontage.

For primary retail frontages, there was no evidence to suggest the need for a more restrictive policy than the LP17 policy currently in place. The Council's most recent monitoring report[4] shows the percentage of A1 uses remains at or above the 85% target in the primary frontage. However, with changes in the Use Classes Order and permitted development rights, the Council's ability to control non-retail uses within the primary frontage will significantly diminish. Furthermore, commercial market conditions have moved on to such an extent that a wider range of land uses are now likely to make an equal or greater contribution to Maidstone's town centres moving forwards. As such, it is considered pragmatic to remove both the primary and secondary frontage designations (and associated LP17 policies), recognising the need for flexibility and the ability for uses to change without the need to obtain planning permission. This does not alter the Primary Shopping Area nor overall town centre boundary, both of which will remain in place as required by the NPPF.

**Economic Development Strategy 2015-2031 -** The current EDS sets out the vision: '*A model 21st century county town, a distinctive place, known for its blend of sustainable rural and urban living, dynamic service sector based economy, excellence in public services and above all quality of life*' to be achieved by 2031. This strategy sets out five priorities:

- Retaining and attracting investment
- Stimulating entrepreneurship
- Enhancing Maidstone Town Centre
- Meeting the skills needs

[3] EDNS stage 2 report – Feb 2020
[4] Maidstone AMR 2018-19

- Improving Infrastructure.

The EDS is being reviewed and updated in line with the LPR. This may result in a different focus or strategy for the borough, and it will be important to incorporate any shift in direction into the LPR. Progress of the EDS review was slightly delayed due to Covid-19, however the draft EDS was published for public consultation in the Summer 2021 (see below). For now, the LPR will need to align with the current EDS but on the assumption that revisions may be required at a later stage.

**Maidstone Economic Development Strategy Review (draft, 2021)** – This is a review of the currently adopted EDS. The document is in draft form and underwent public consultation (until July 7th 2021). The draft EDS vision is as follows:

"By 2030 Maidstone will excel as the 'Business Capital of Kent', defined by a strong entrepreneurial spirit, an unrivalled urban-rural economic offer, and which offers opportunities for all of our communities."

The proposed new strategic priorities are:

- Open for business
- A greener, more productive economy
- A thriving rural economy
- Inclusive growth
- Destination Maidstone town centre

**Strategic Land Availability Assessment (SLAA) Draft** - The purpose of the SLAA is to identify and assess the land which is available to meet all objectively assessed needs for the LPR. This includes meeting needs for housing, employment, retail, and infrastructure purposes. It draws together the outputs from:

- Call for Sites 2019
- Call for Sites - Site Assessments
- Annual Monitoring Report into existing Local Plan progress
- Windfall Assessment update
- Retail, Employment, Housing, and G&T Needs Assessments
- Alternative sources of sites
- Garden Settlement Assessments.

The SLAA lists all site assessments of Call for Sites proposals, looking into the suitability and achievability of sites to be allocated in the LPR. A sub-section of the SLAA will include an assessment of Garden Settlement proposals. In terms of sites put forward for retail/town centre uses, it has been assumed that all town centre sites will contribute to the provision of commercial (Class E Uses) floorspace as part of mixed-use schemes. The SLAA is a working document and will be published when finalised.

**LP17 Retail Hierarchy** - An assessment of the hierarchy through recent evidence work shows the existing hierarchy of centres remains appropriate should the LP17 approach be rolled forward. With the inclusion of Heathlands and Lidsing Garden Communities in the preferred spatial strategy, new district and/or local centres serving the new communities will be incorporated into the retail hierarchy – complimenting the existing network, not competing with it.

## Duty to Cooperate

The NPPF identifies retail development as a strategic cross-boundary issue, for which the duty to cooperate applies. Whilst there is currently no statement of common ground (SOCG) in place, there has been agreement on appropriate geographic areas (FEMA). The Council also shared its proposed EDNS evidence base methodology in advance of undertaking evidence gathering to ensure all neighbouring Local Planning Authorities (LPA) were happy with the Council's approach, and no issues were raised.

The non-spatial elements of retail and leisure are not strategic and whilst we will engage with key stakeholders under the duty to cooperate it is not expected that the issues dealt with under this section are cross-boundary in nature.

As the LPR is progressed through to the Regulation 19 consultation and on to submission, it will be important to continue to engage actively and on an on-going basis with neighbouring LPAs to ensure that any issues are identified and resolved as early as possible.

## Development Management (DM) Input

- **SP4** – Unlike the RSCs, there is no infill policy for the town centre – clarification that infill is supported in the town centre is requested.
- **DM7** – policy repeats other policies in the plan.
- **DM16** – Overlap between DM16, DM20 and DM29 – look to avoid repetition.
- **DM17** – District centres, local centres and local shops and facilities: this is part-spatial, in that it designates the district and local centres. It should be amended as such in the LPR. There was question the as to the relevance of the policy given latest PD rights and whether there should remain such a strong focus on retail as opposed to seeking vibrancy and community focus in the centres.
- **DM26** – Actual mooring is controlled by the Environment Agency. it is only the ancillary riverbank development that may require planning permission.
- **DM29** – 'active frontage' – should be defined or explained. Overlap between **DM16, DM20 and DM29** – look to avoid repetition. Policy should address leisure and community uses across borough, not just town centre and should ensure sites are accessible by sustainable modes to the relevant communities or catchment area.
- **DM40** – Suggest the title should refer to farm shops. Minor wording amendments proposed. Further clarification/definition of some of the policy criteria would be useful.

## Regulation 18a (Scoping Themes and Issues) References

**Maidstone town centre -** Sustaining the town centre is a priority; to protect it from systemic change, it will most likely have to become more diverse.

**Transport -** Several measures are necessary for the improvement of transport as this is one of the highest priorities in the borough. This will require the identification for different measures with some prioritised over the others. Some of the measures to be considered are:

- Smart City
- Public Transport
- Parking Control
- Design healthy places.

## Public Consultation Regulation 18a

*OQ1: What can the Local Plan Review do to make the growth we need 'good growth'?*

- Support for a holistic approach to housing, infrastructure and community facilities, with mixed residential, commercial and leisure buildings supported as a priority in the town centre. Residents (14); Developers (3); Councillor (2); Residents Association (1); Parish Council (6)

*OQ2: What could the Local Plan Review do to help make our town and village centres fit for the future?*

- Contain policies to deliver a mix of uses within defined centres. Developers (2).
- Support allocation of sustainable sites, not only within settlement boundaries, but adjacent or close to town centres. Residents (5); Expert Agency (2)
- Support for adequate parking provision. Residents (4)
- Incorporate green and blue infrastructure into centres. Residents (1); County Council (1)
- Broadband: KCC welcomes the proposal to promote full fibre (fibre-to-the-premise connections) in both new and existing development, in line with current Government policy. It is recommended that full fibre connections are also delivered within town and village centres. Ashford Borough Council has developed a full fibre policy, (EMP6) which is widely promoted nationally as best practice, whilst being in line with the current National Planning Policy Framework.

*OQ4: What overall benefits would you want to see as a result of growth?*

- More local facilities to reduce the need to travel to larger towns. Residents (124); Expert Agency (1); Councillor (1); Resident Association (1); Parish Councils (11)

*OQ5: What infrastructure and services, including community services and facilities, do you think are the most important for a successful new development?*

- Support for community and retail facilities for all ages and within walking distance. Residents (223); Developers (6); Expert Agency (4); Councillor (2); Parish Council (7); County Council (1)

*OQ6: How can the Local Plan Review help support a thriving local economy, including the rural economy?*

- Ensure sufficient commercial land is retained in the town centre. Residents (2)
- Recognise that leisure and tourism are increasingly key to supporting socio-economic well-being of rural areas. County Council (1)
- Broadband: Full fibre broadband infrastructure should be developed to encourage a thriving local economy, including the rural economy. The County Council is pleased to see that its role in the delivery of full fibre broadband is included within the Local Plan Review and would welcome further discussions with the Borough Council to seek to deliver full connectivity as far as possible across the Borough.

*TQ9: What approaches could we use to identify sites in and at the edge of the town centre for future shopping and leisure needs?*

- Invest more in the town centre to combat their decline. Residents (28); Developers (1); Expert Agency (1); Councillor (1); Resident Association (1); Parish Council (7)
- Make TC sites more accessible by main roads, public transport and cycle routes. Residents (13); County Council (2); Expert Agency (2); Councillor (1); Resident Association (1); Parish Council (4)
- Reduce parking charges in the Town Centre. Residents (4); Parish Council (2)
- Support for better quality built and landscape design, and ethical considerations such as sustainability to be acknowledged. Expert Agency (2)

*TQ10: Do you think there should be changes to the current settlement hierarchy? If yes what evidence do you have for your answer?*

- Suggested change to settlement hierarchy to take into account the number and change in services in the area. Residents (274); Developers

(5); Expert Agency (1); Parish Council (4); Petition (1); Resident Association (1)
- Support for existing settlement hierarchy as per LP17.Residents (6); Developers (14); Expert Agency (3); Parish Council (3); Resident Association (1); Councillor (1)
- Support for hierarchy changes. Residents (16); Developers (14); Expert Agency (1); Councillor (1); Parish Council (8)

*TQ18: How can the Local Plan Review help ensure that local economic growth benefits everyone?*

- Suggestion that retail developments should not be located to out of town sites, due to increase in private vehicle use to access them. Therefore, supports town centre first approach. Residents (1); Developers (2)
- Protect and enhance Maidstone Town Centre, which should be the focus for new development. Residents (267); Parish Council (2)
- Support for flexible tourism policies to meet the changing demands of tourism industry. Residents (3); Expert Agency (1)

*TQ19: How can the Local Plan Review help sustain our town and local centres?*

- Reduce traffic and improve public transport. Residents (8); Developers (1); County Council (1); Councillor (1); Resident Association (1); Parish Council (7)
- Protect and enhance Maidstone town centre, as the focus for new development [Residents (225), County Council (1), Expert Agency (2), Councillor (2), Developer (2), Resident Association (1) and Parish Council (7)
- Encourage mixed use developments in the town centres and edge of centres. Residents (5), Developers (1), Expert Agency (1), County Council (1) and Parish Council (2)
- KCC would welcome a renewed focus on creating mixed use town centres that are sustainable, resilient and fit for the future, with policies that have sufficiently flexibility to enable town centres to respond to changes in market conditions. Town and local centres should be accessible, with user friendly public transport links, electric vehicle charging and car club provision.

## Public Consultation Regulation 18b

Key comments regarding the policies on retail and leisure are summarised as follows:

- Policy CD2 and the requirement for primary frontages in Fremlin Walk are not justified and seek to provide a restrictive approach to preventing the loss of retail uses within use class E(a).
- Positive intervention measures should be taken to ensure the viability and vitality of the town centre.

- Concern that the policies relating to town centres, retail and shopping frontages do not accurately reflect latest Use Class Order and permitted development rights.
- Policies should account for Covid and Brexit impacts on floorspace demands.
- Support principal policies which seek to support the delivery of a mix of retail, leisure, entertainment, office and cultural facilities, all of which are considered appropriate in shopping areas.
- The demand for additional comparison goods retail in the town centre is highly questionable due to the effects of online shopping on the town centre.
- There should not be a resistance to concentrations of leisure, cultural, tourism, food, drink and evening economy uses within the town centre.
- Need to ensure the retail forecast post-Covid is accurate to ensure only needed retail floorspace is provided.

## Public Consultation Regulation 19

To be completed following Regulation 19 consultation.

## Deliverability

The retail industry is very precarious and uncertain, with many businesses going into administration. Uncertainties surrounding Brexit, followed by Covid-19, has meant that already struggling comparison retailers are now failing to survive. These factors, among others, have also impacted upon the food and beverage industry, with Patisserie Valerie, Jamie's Italian and Carluccio's being just a few examples to suffer. Convenience retail (i.e. supermarket type shops) will remain a necessity and this is largely fuelled by the population growth of an area, although it is still not without its own challenges such as the rise of the discount supermarkets and the competition between the 'big' supermarkets to retain customers.

In the short term, new development is likely to be slower to come forward as the market attempts to recover. However, there will remain a longer-term need for retail development.

Floorspace projections are based on the latest Experian projections, which account well at a macro-economic scale, but are less reliable at a micro-economic scale. They will include Brexit-related assumptions about the market, but not necessarily the implications arising from exceptional circumstances such as those currently being experienced as a result of Covid-19. Also, the further forward these floorspace requirements are projected, the less reliable/certain they become. That said, they are the most accurate projections of floorspace requirements available based on long-term market assumptions, which the Council can reasonably expect to be delivered over the plan period to meet assessed needs. The projections are significantly reduced compared to those used to base the LP17 on. Regular review will remain an important and essential part of plan making.

## Potential Objective(s)

The following objectives set out in the current Local Plan are pertinent:

| |
|---|
| 3: To transform the offer, vitality and viability of Maidstone town centre including its office, retail, residential, leisure, cultural and tourism functions together with significant enhancement of its public realm and natural environment including the riverside. |

This objective remains relevant, however it may be beneficial to change 'transform' to 'improve'.

| |
|---|
| 4: To reinforce the roles of the rural service centres through the retention of existing services, the addition of new infrastructure where possible, and the regeneration of employment sites including the expansion of existing employment sites where appropriate. |

This objective remains appropriate.

## Tests of Soundness

1. **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

   The Council's preferred approach meets the requirements as identified through the Economic Development Needs Study (addendum 2021). The issue of meeting need across wider market areas is also considered in the 'Meeting Objectively Assessed Need' section of this topic paper.

2. **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

   The Council's preferred approach is based on meeting the needs identified in the recent EDNS and maintains and/or enhances Maidstone's place in the regional retail hierarchy. The approach was subject to transport modelling and sustainability appraisal testing to ensure its suitability as a preferred strategy.

3. **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

   Comments/feedback on both the proposed FEMA and methodology for undertaking the retail assessment were sought from neighbouring authorities, and no issues were raised. Engagement with neighbouring planning authorities continues as the plan progresses. Effective and on-going engagement with neighbouring LPAs should ensure that any cross-boundary issues of a strategic nature are identified as early as possible, and resolutions sought.

The strategy chosen in the plan is considered to be deliverable over the plan period as the Council anticipates being able to meet its objectively assessed needs in their entirety within the borough boundary. Consequently, the Council is not relying on neighbouring LPAs to help deliver its needs over the plan period.

4. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework (the NPPF).

   The Council's chosen strategy is based on up-to-date evidence that has been produced based on current NPPF and NPPG guidance and is therefore compliant with national policy.

## Sustainability Appraisal (SA)

The Sustainability Appraisal concludes the following:

The Sustainability Appraisal scores 4 strategic policies SP11 to SP11(c) and 11 non-strategic policies CD1 to CD9 and TRL1 to TRL2 against all 16 sustainability appraisal objectives.

All proposed policies with the exception of CD8 – Farm Shops in the countryside score a combination of significant positive likely effects, mixed significant positive and minor negative effects, and minor positive effects across a range of the SA objectives. Whilst policy CD8 scores minor positive effects against SA2 - services and facilities and SA5 – economy; it also scores minor negative effects against SA7 – sustainable transport, SA11 air quality, and SA13 climate change. This is as a result of people likely needing to use private vehicles to access farm shops in remote countryside locations.

Policy SP11(b) District and Local Centres scores highest against objectives SA2 – Services and facilities, and SA5 – Economy; as well as scoring positively against objectives SA4 – Health, SA7 – sustainable Travel, SA11 – air quality, and SA13 – climate change.

Policies CD1, CD2 and CD3 all score highest against objectives SA2 – Services and facilities. They also score highly against SA3 – Community, SA5 – Economy, and SA6 – Town Centre. The Sustainability Appraisal does not identify any negative affects arising from these policies.

SA objective SA5 – Economy scores strongest across the policies, with 6 policies having a significant positive likely effect and a further 7 policies having minor positive effects likely.

None of the 15 economic policies tested in the sustainability appraisal scored ‘mixed significant negative and minor positive’ or ‘significant negative’ effects likely against the 16 sustainability objectives.

# APPENDIX 1

## Retail capacity and land supply

### Introduction

In supporting the important role that Maidstone town centre plays at the heart of the local community, it is essential that a range of suitable sites are available in the town centre to meet the scale and type of development likely to be needed, looking at least ten years ahead – in this case, to 2032. It is important that limited site availability does not compromise the ability to meet this need.

Based on evidence prepared as part of the LPR, it is appropriate and realistic to plan to maintain the borough's market share of retailing over the plan period. Whilst major commitments in surrounding authorities (e.g. development at Bluewater, Medway and Ashford) are likely to reduce Maidstone's market share of expenditure; conversely development within Maidstone could help to counter-balance this reduction in market share.

Future floorspace requirements are determined using the most up-to-date Experian data and trend forecasts. Experian's short-term growth forecast rates, particularly for comparison goods and leisure, are relatively cautious, reflecting the current economic circumstances including the current Covid-19 crisis. In the longer term, it is more difficult to forecast year on year expenditure with a real degree of certainty, therefore the plan only seeks to accommodate need over the first ten years of the plan, with a review after five years to ensure continued appropriate levels of floorspace is provided/allocated to meet future needs.

### Floorspace requirements

The EDNS Addendum (March 2021) identifies the following floorspace capacity for retail (comparison and convenience), plus food and beverage uses to both 2032 and 2037, by broad geographic location:

| | **2032** | | | **TOTAL** | **2037** | | | **TOTAL** |
|---|---|---|---|---|---|---|---|---|
| | **Need (sqm, gross GEA)** | | | | **Need (sqm, goss GEA)** | | | |
| | Convenience | Comparison | Food/ drink | | Convenience | Comparison | Food/ drink | |
| Maidstone Town Centre | 1,716 | 0 | 4,394 | **6,110** | 2,362 | 0 | 5,023 | **7,385** |
| Garden Settlements | 2,507 | 623 | 445 | **3,575** | 3,067 | 1,005 | 804 | **4,876** |
| Elsewhere in borough | 200 | 3 | 959 | **1,162** | 297 | 111 | 1,100 | **1,508** |
| **TOTAL** | **4,423** | **626** | **5,798** | **10,847** | **5,726** | **1,116** | **6,927** | **13,769** |

**Table 1:** Retail and food/beverage floorspace capacity (sqm, gross GEA – cumulative), by broad geographic location to 2032 and 2037.

Illustrated graphically, it is clear to see that the greatest requirement in terms of floorspace to 2032 is for food and drink uses (53% of the total requirement), followed by convenience retail floorspace (41%) and just 6% of floorspace for comparison goods.

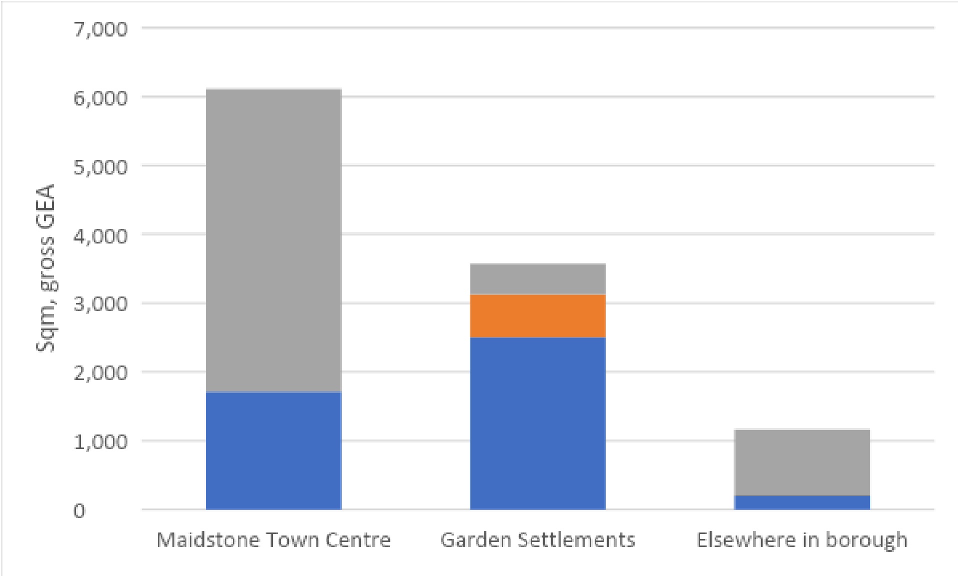


**Figure 1:** Retail and food/beverage floorspace capacity (sqm, gross GEA), by geographic location to 2032.

In terms of leisure floorspace requirements, these are difficult to forecast – certainly over the medium to long term, as new trends can emerge fairly quickly. Take, for example, the rise in popularity of trampoline parks and escape rooms. Rather than trying to predict and plan for these emerging leisure activities, it is more important to remain flexible to be able to accommodate such uses as and when opportunities arise.

The EDNS Addendum (2021) found there to be no clear need for additional theatre, tenpin bowling, bingo, casino, nightclub/live music venues or trampoline facilities in the Borough. However, it identified scope for 5 additional cinema screens (over 700 seats) over the plan period. This is a theoretical capacity for a medium-sized or boutique cinema, such as an Everyman. The evidence also identifies scope for 4 medium sized additional gyms (up to 50 stations) by 2042.

## Meeting identified needs

The NPPF indicates that local plans should allocate a range of suitable sites to meet the scale and type of retail, leisure and other development needed in the town centre, for at least 10 years. Given the current economic circumstances and the uncertainty around market recover post-Covid, the LPR will not seek to allocate anything beyond the first ten years, with a review of the requirements after the first five years.

The EDNS Addendum (2021) suggests that there is very limited scope for new comparison goods retail floorspace anywhere in the borough to 2032 – the only places a small amount will be required are within the newly created Garden Settlements. A minimum of 623sqm of comparison goods floorspace will therefore be accommodated within the newly created District and/or Local Centres within the Garden Settlements. The 3sqm identified for elsewhere in the borough will not be allocated as this can reasonably be expected to come through the planning applications process over the first ten years of the plan.

In terms of convenience retail floorspace, only 1,716sqm is required in Maidstone town centre and 2,507sqm within the Garden Settlements. A further 200sqm in identified as a requirement across the rest of the borough.

Approximately 2,500sqm of convenience floorspace will be therefore accommodated within the newly created District and/or Local Centres within the Garden Settlements. The 200sqm identified for elsewhere in the borough will not be allocated as this can reasonably be expected to come through the planning applications process over the first ten years of the plan. The additional 1,716sqm of convenience floorspace required in the town centre will come forwards predominantly on Len House and Maidstone East allocations, in combination with the use of existing vacant town centre floorspace. This strategy offers diverse floorspace options to suit a range of retail needs – from start-ups seeking smaller units within established frontages, to bigger multi-national retailers looking for bespoke, larger floorplates.

In terms of food and beverage floorspace, 4,394sqm is required within Maidstone town centre, 445sqm in the Garden Settlements and 959sqm elsewhere in the borough. A minimum of 445sqm of comparison goods floorspace will therefore be accommodated within the newly created District and/or Local Centres within the Garden Settlements. The 959sqm identified for elsewhere in the borough will not be allocated as this can reasonably be expected to come through the planning applications process over the first ten years of the plan. The additional 4,394sqm of food/beverage floorspace required in the town centre will come forwards predominantly through the use of existing vacant town centre floorspace, plus some provision at Len House, King Street, High Street/Medway Street and Maidstone East allocations.

## Floorspace supply – re-use of vacant units

In 2020, there were 56 vacant shop units within the town centre, equating to approximately 17,500sqm (GEA) of floorspace[5]. This equated to a vacancy rate of 10.6%, which was slightly lower than the Goad national average at the time of 11.8%. Since then, the effects of the Covid-19 pandemic, multiple lockdowns and government-imposed restrictions have further increased the level of vacant floorspace at a national level[6].

The strategy for accommodating future needs – particularly in the short term – is to prioritise the reuse of the existing vacant town centre stock. From a policy perspective, they are sequentially preferably located, and from an economic and place-making perspective, the re-use of existing town centre floorspace enhances the vitality and vibrancy of the town centre; increases footfall; and places town centres at the heart of the local communities they serve.

Reducing the vacancy rate to the point where even a quarter of those 56 vacant units in Maidstone town centre are reoccupied (14 units); that would accommodate approximately 4,375sqm of retail/food/beverage needs. This could particularly suit food and beverage providers who typically require smaller floorplates than modern convenience or comparison goods retailers.

[5] EDNS Stage 2 report (April 2020)
[6] British Retail Consortium [Empty shop fronts continue to soar (brc.org.uk)](https://brc.org.uk) (June 2021)

## Floorspace supply – allocations

| Site Ref | Site Name | Growth Location | Identified capacity<br>E Class Uses sqm |
|---|---|---|---|
| LPRSA145 | Len House | Maidstone Town Centre | 3,612[1] |
| LPRSA147 | Gala Bingo & Granada House | Maidstone Town Centre | TBD[2] |
| LPRSA148 | Maidstone Riverside | Maidstone Town Centre | |
| LPRSA149 | Maidstone West | Maidstone Town Centre | |
| LPRSA144 | High St/ Medway St | Maidstone Town Centre | 150 |
| LPRSA146 | Maidstone East | Maidstone Town Centre | 2,000[3] |
| RMX1(3) | King Street Car Park | Maidstone Town Centre | 700 |
| **SUB-TOTAL** | | | **6,462** |
| RMX1(1) | Newnham Park (Kent Medical Campus) | Maidstone Urban Area | 0[4] |
| **SUB-TOTAL:** | | | **0** |
| LPRSA078 | Haven Farm | Sutton Valence | 400[5] |
| **SUB-TOTAL:** | | | **400** |
| Garden Community | Lidsing | | 1,055[6] |
| Garden Community | Heathlands | | 4,764[7] |
| **SUB-TOTAL:** | | | **5,819** |
| **TOTALS:** | | | **12,681** |

**Table 2:** Retail and food/beverage floorspace supply, sqm.

[1] LPRSA145 – Len House: This allocation has planning permission to provide 3,612 sqm (GIA) flexible commercial floorspace within the following uses - retail, financial and professional, café or restaurant, drinking establishment, offices, clinic or health centre, crèche or day nursery, gymnasium or indoor recreational purposes uses (within classes A1/A2/A3/A4/A5/B1a/D1/D2 of the Town & Country Planning uses Classes Order) at ground floor (20/501029/FULL).

[2] Whilst it is expected that these allocated sites will provide commercial floorspace as part of their redevelopment, the exact floorspace to be delivered on these sites will be determined through the planning application process and are therefore not ascribed any quantum of floorspace in the above table.

[3] LPRSA146 – Maidstone East: This allocation is the key site within the town centre with the potential to deliver a significant amount of commercial floorspace. 2,000sqm is indicative of what may be achieved on the site, however the exact mix and amount of floorspace to be provided will be determined through the planning application process.

[4] RMX1(1) – Newnham Park: This site is continued from Local Plan 2017 and is allocated for 14,300sqm replacement retail. However, this does not result in any net increase in commercial floorspace and is restricted to replacement of the garden centre/comparison goods floorspace only. It is therefore shown in Table 2 as 0sqm to reflect no net increase in floorspace.

[5] LPRSA078 – Haven Farm: This site is allocated for approximately 400sqm of retail 'village hub' and approximately 1,500sqm for a GP surgery.

[6] Lidsing Garden Community – this figure is taken from Maidstone Garden Settlements Economic Report, May 2021.

[7] Heathlands Garden Community – this figure is taken from Maidstone Garden Settlements Economic Report, May 2021.

## Floorspace supply - summary

Looking specifically at the supply of floorspace within Maidstone Town Centre between 2022-2032, the three components to floorspace provision are shown below. This demonstrates that re-use of vacant units in the town centre can provide the necessary floorspace in the immediate future, with Len House already having planning permission and expected to deliver in the short term, then Maidstone East likely to be the final large allocation to come forwards in the short to medium term, by 2032. As shown in Figure 2, below, the total retail/food/beverage floorspace requirement in Maidstone town centre to 2032 is 6,312sqm (red dashed line). The total supply is 10,837sqm (4,375sqm vacant unit re-use + 6,462sqm allocations).

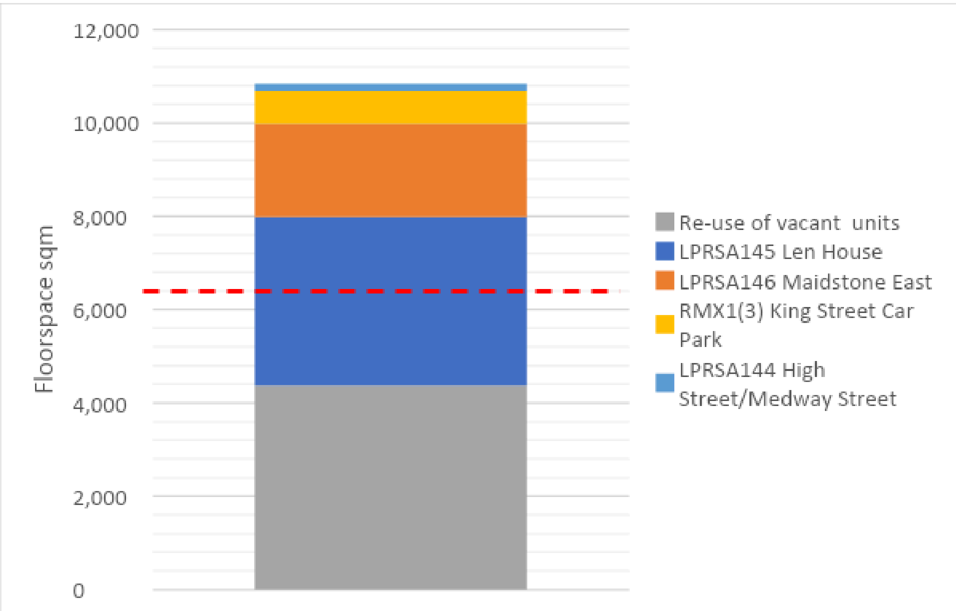


**Figure 2:** Retail and food/beverage floorspace supply to 2032, sqm GEA.