# Economic 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 | Descriptions |
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| AMR | Authority Monitoring Report | The Monitoring Report provides a framework with which to monitor and review the effectiveness of local plans and policies. |
| | Article 4 Direction | Restricts permitted development rights in relation to a particular area or site such as in a conservation area, or a particular type of development. |
| | Brownfield Land | See previously developed land |
| | 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 holistically planned new settlement which enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities |

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| KMC | Kent Medical Campus | Permission granted for 98,000m$^2$ A1, B1, C2 and D1 flexible accommodation for health, education and life science companies. |
| LIS | Local Industrial Strategy | Local Industrial Strategies are long-term, based on clear evidence and aligned to the National Industrial Strategy. They set out clearly defined priorities for the area that will help to maximise its contribution to UK productivity and allow places to make the most of their distinctive strengths. |
| 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 and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). |
| | Main Villages | Most sustainable settlements in Maidstone's settlement hierarchy after the town centre, urban area and rural service centres:<br>East Farleigh<br>Eyhorne Street (Hollingbourne)<br>Sutton Valence<br>Yalding<br>Loose<br>Leeds |
| 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. |

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| | 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. |
| 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. |
| RSC | Rural Service Centre | Most sustainable settlements in Maidstone's settlement hierarchy after the town centre and urban area:<br>Coxheath<br>Harrietsham<br>Headcorn<br>Lenham<br>Marden<br>Staplehurst |
| 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 creating or improving the conditions for economic growth in an area. |
| SFRA | Strategic Flood Risk Assessment | A study carried out by one or more local planning authorities to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and to assess the impact that land use changes and development in the area will have on flood risk. |
| 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 euros. |

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| 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. |
| | Town Centre | Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres. |
| | Use classes | The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories |
| | Windfall sites | Sites not specifically identified in the development plan |

# Background/Context

This topic paper considers the strategic employment matters that include the location, quantity and types of employment development from a strategic, spatial perspective. It also includes non-strategic matters, development management matters related to economic development too.

# 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 B2 – general industrial, B8 – storage/distribution, and Class E – Commercial, Business and Service uses including offices. 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 the permitted development rights allowing the change of use from one class to another, subject to conditions, limitations and/or a prior approval process. On 30 September 2020, the permitted development right to change from light industrial to residential fell away. Class MA permits change of use from Use Class E to residential use, with a few limitations and conditions.

# National Policy and Guidance Requirements

## National Planning Policy Framework (NPPF)

Overall 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. In doing so, councils are required to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth (paragraph 82.a). This includes identifying the pattern, scale and quality of employment and other commercial development over a minimum 15-year period from adoption of the Local Plan Review (LPR).

The Council's policies should set criteria or identify strategic sites to meet anticipated needs, seek to address potential barriers to investment and be flexible enough to accommodate needs not anticipated in the plan. There is an emphasis for the Council to create conditions in which business can invest, expand, and adapt (paragraph 81).

The Council is also expected to take a positive approach to planning applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help meet identified development needs (paragraph 121). This means supporting proposals to use non-allocated employment land/premises for homes in areas of high housing demand, subject to other policies in the framework. Such proposals must not undermine key economic sectors or sites or the vitality and viability of the town centres.

## Employment types

Clustering of certain industries can play an important role in supporting collaboration, innovation, productivity, and sustainability, as well as in driving the economic prospects of an area. There is a requirement for the Council to recognise and address the specific locational requirements of different sectors, including making provision for clusters or networks of industries including storage and distribution operations at a variety of scales and in suitably accessible locations (paragraph 83).

## Rural economy

The NPPF supports the sustainable growth and expansion of *all* types of businesses in rural areas.

Importantly, the NPPF recognises that sites to meet local business and community needs in rural areas may be adjacent to or beyond existing settlements, and in locations that are not well served by public transport. Whilst this is not explicitly set out in the Maidstone Borough Local Plan 2017, is does not preclude sites coming forward in such locations provided the development would not result in unacceptable traffic levels on nearby roads.

The NPPF expects that policies should support sustainable rural tourism and recognises the importance of tourism and leisure development in supporting a prosperous rural economy. Tourism development is also listed as an acceptable main town centre use and will therefore be referenced in the Retail Topic Paper too.

## National Planning Practice Guidance (PPG)

In terms of evidence needed to support plans and policies, the NPPG expects councils to liaise closely with the business community, taking account of any Local Industrial Strategy (LIS). The SELEP are working to produce a LIS – the most recent publication was the 2018 Economic Strategy.

The NPPG also requires councils to assess the best fit Functional Economic Market Area (FEMA); existing stock of employment land, recent pattern of land supply and loss; market demand; wider market signals; and evidence of market failure.

The NPPG requires councils to develop an idea of future needs based on labour demand, labour supply, past trends, and consultation with relevant organisations, and studies of business trends. Councils also need to consider longer term economic trends and consider and plan for the implications of alternative economic scenarios.

A final consideration is that of the logistics industry. By its very nature, it has distinct locational requirements that need to be considered. Councils should also consider other forms of logistics requirements, including the needs of small and medium sized enterprises (SMEs) and of 'last mile' facilities serving local markets.

## Ministerial statements

### Revitalising high streets and town centres – 1st July 2021

Through this statement, the MHCLG has announced a new "higher threshold" for the use of Article 4 Directions, including confirmation that they should apply only to the "smallest area possible". The new class MA commercial-residential PD right allows all uses in the Class E town centre use class, including offices, shops, and gyms, to convert to housing without needing a planning application and is due to come into effect in September 2021.

The use of Article 4 Directions to remove those permitted development rights will therefore be limited to situations where it is necessary to avoid wholly unacceptable adverse impacts or to protect local amenity (in the case of local facilities).

For Maidstone borough, this may have implications with regards to the longevity of the existing Article 4 Directions currently in place on higher quality office stock within the town centre, as well as the Council's ability to issue further Article 4 Directions in the future.

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

The location, scale, quality and provision of development for employment and other commercial uses within Maidstone Borough is considered 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 employment growth across the borough within the plan period which either relate to the borough as a whole (policy **SS1**) or specific areas of the borough (policies **SP1-SP10**) where employment will be accommodated.

**SS1** (Maidstone Brough spatial strategy) and supporting text sets out the borough's employment floorspace requirement up to 2031: 39,830m² for office use; 29,290m² for industrial use; 49,111m² for warehouse use; and 100,000m² for medical use.

**SP21** (Economic Development) sets out how the Council aims to support and improve the economy of the borough and provide for the needs of businesses.

**SP22** (Retention of Employment Sites) lists the borough's designated employment areas and sets out what type of development would be supported in these locations.

**SP23** (Sustainable Transport) outlines improvements to public transport to and from Maidstone including increased frequency along radial routes to the town centre and railway stations, particularly during the morning and evening peak travel times.

**RMX1** (Retail and mixed-use site allocations) sets out individual land allocations for retail and mixed-use sites, which may include elements of employment uses.

Specific employment site allocations are included as strategic policies **EMP1(1)-EMP1(4)** and as part of mixed-use allocation strategic policies **RMX1(1), RMX1 (2), RMX1(4), RMX1(5)** and **RMX1(6).**

Allocation **RMX1(1)** for a medical campus at Newnham Park (Kent Medical Campus), forms part of the North Kent Enterprise Zone focusing on a campus style cluster that brings together healthcare providers, scientific research and education. The LPR should continue to recognise and support this industry cluster, as well as addressing other sectoral requirements where there is an evidential need highlighted.

Through this LPR, there is a need to set a clear economic vision and strategy, as well ensuring provision of sufficient employment land to meet the identified needs over a minimum of 15 years from adoption of the LPR – to at least 2037. To have a clearer and more accurate understanding of the pipeline supply of employment land available, employment allocations should ideally specify an expected floorspace capacity, or at the very least a floorspace range, that could be achieved. Currently, there are LP17 allocations without any quantum ascribed to them. Whilst this allows flexibility, it also creates ambiguity.

## Non-strategic Policies

**DM16** (Town centre uses) - insofar as relating to office provision.

**DM35** (Live-work units)

**DM37** (Expansion of existing businesses in rural areas)

**LPR1iv** (A review of employment land provision and how to accommodate any additional employment land needed as a result)

**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

**Kent Design Guide 2005 (2009) -** Sets out a guide for developers and others to achieve high standards of design and construction. This provides local authorities with a common approach to the main principles when assessing planning applications.

# 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'.* Relevant priorities based on the vision are:

### Embracing Growth and Enabling Infrastructure

- The key outcome of which is that key employment sites are delivered. The focus between 2019 – 2024 is intervening where necessary in the market, to deliver key employment sites.

### A Thriving Place

- The key outcome for 2045 being: "our town and village centres are fit for the future". The focus between 2019-2024 is: Building the innovation centre at Kent Medical Campus, promoting inward investment in the borough.

### The requirement in meeting these priorities include:

- Ensuring sufficient land and floorspace is provided to support economic growth and the wider economic market area.

## Kent County Council (KCC) Policy Framework

None of relevance for this topic paper.

## 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 economic development needs 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 H6 seeks to protect the existing employment facilities at Lodge Road and enhance and expand the area as a mixed-use residential and employment area, subject to a number of criteria. Objective 12 also supports a strong local economy with good access to jobs and employment opportunities.
- Marden Neighbourhood Plan: Policy E1 – Business and employment supports employment generating businesses that maximise employment opportunities within the parish, subject to a number of criteria. The NP also makes suggested amendments to the adopted MBLP allocation EMP1(3), expanding the boundary to encompass existing employment premises.

- Boughton Monchelsea Neighbourhood Plan: Policy LRE1 – Rural economy supports development of traditional rural industries and leisure and tourism within the countryside, subject to a number of criteria.
- Lenham Neighbourhood Plan: Policy EMP1 – supports development which preserves or enhances the character and function of Lenham square as the retail, commercial, employment and entertainment hub. Policy EMP2 – appropriate commercial development will be supported on land to the north of Lenham Railway Station; proposals for new commercial and social development on land to the south of Lenham Railway Station will be considered in relation to the proposed development of Strategic Housing Delivery Site 3. Policy EMP3 – providing for a mix of employment opportunities

The Parish Council and MBC will need to work together to minimise any potential conflicts with neighbourhood plans which are emerging alongside the LPR. 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.

**Industrial Strategy White Paper 2017** - Sets out a long-term plan to boost the productivity and earning power of people throughout the UK.

**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

## 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

As required by the NPPG, the Council's economic development needs evidence has developed three different scenarios for future employment needs, based on: labour demand, labour supply, and past trends. The labour demand scenario is considered a suitably robust baseline position for the provision of employment land to support economic growth in the borough over the plan period. This identified employment need is further broken down by Use Class (E(g)/B2/B8) in order to confidently recognise and address the specific locational requirements of different sectors.

The Council's evidence has established that Maidstone's Functional Economic Market Area (FEMA) is largely consistent with the borough boundary, extending slightly into the neighbouring authorities of Tonbridge & Malling and Medway. There is a particularly strong economic relationship with the Malling part of Tonbridge & Malling. In purely quantitative terms, as a minimum, it is possible to accommodate the baseline objectively assessed economic growth needs (labour demand scenario) within the borough.

The issue of meeting need across wider market areas is also considered by those areas identified as having a strong linkage to Maidstone's economic market area i.e. Tonbridge & Malling (including the centres of Aylesford and Kings Hill), Swale and Medway. In summary, these authorities plan to accommodate their own business growth needs in full, with limited scope for over-provision of employment land but also no obvious requirement for 'spill over' capacity from Maidstone Borough.

To ensure the objectively identified need is deliverable over the plan period, the PPG recommends setting out a clear supply trajectory, similar to that required of housing delivery. As such, an 'Employment Land Trajectory' supplementary document is appended to this Topic Paper (see Appendix 1).

## Supporting Evidence (Current and Future)

**Economic Development Needs Study (2019 & 2020) (EDNS)** – The study 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 employment provision through the preparation of the LPR.

Through Experian data, the EDNS identifies that the health and social care sectors are expected to be the key drivers of employment growth within the borough over the plan period. Other sectors forecast to increase are education, specialised construction services, admin and support services, professional services and retail. The majority of these are non-office or B-use class sectors and land requirements for these uses are not quantified.

The EDNS provides different scenarios based on labour demand, labour supply and past trends. The preferred scenario at this point is the labour demand version as it gives a realistic indication of what the market can provide, therefore making the likelihood of deliverability strongest. However, there could be potential to go beyond this if the Council creates the conditions for greater inward investment through a strong and ambitious economic strategy.

The EDNS identifies a gross floorspace requirement of 101,555$m^2$ across all office, industrial and warehouse/distribution uses over the plan period to 2037. This floorspace is further split as 33% offices (E(g) use class), 27% manufacturing (B1c/B2 use class), and 40% distribution (B8 use class). The EDNS then translates this floorspace requirement into a land requirement, taking account of the area typically needed to accommodate the different uses e.g. landscaping, car parking, lorry turning. In total, approximately 20.7 hectares of land is required, with approximately half of that (10.2 hectares) being required for distribution uses (B8 use class).

In deciding where this land is allocated in the borough, the Council has carefully considered where existing employment sites are and what type of employment they contain, understanding the benefits of clustering employment types. There are also important sectoral requirements in terms of accessibility and proximity to transport networks and workforce, as well as the composition of allocations in terms of appropriate mix of uses.

The Council has chosen to be more ambitious in terms of economic growth and has allocated more land than the labour demand scenario projections. This would be going beyond what is 'demanded' by the market and would therefore require a concerted effort to drive inward investment into the area, perhaps growing on the North Kent Enterprise Zone status of the Kent Medical Campus, encouraging more companies from the health sector into the area. This requires strong direction and consistency with the revised Maidstone Economic Development Strategy.

**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. For employment uses where floorspace allocation is required (offices, industrial and warehousing/distribution), the study concludes that whilst the methodology used results in a higher overall floorspace requirement, this is artificially inflated in the early years of the plan period due to the 'catch up effect' of economic recovery after Covid. The recommendation is to continue with the 2020 floorspace requirements as a minimum, with the regular monitoring and review of delivery.

**Maidstone Economic Development Strategy (EDS) (2015-2031)** - This Strategy sets out an economic vision for the borough in 2031 through its 'ambition statement'. The strategy goes on to identify five priorities to capitalise on the borough's economic assets and to create the right conditions for growth. These are 1) retaining and attracting investment; 2) stimulating entrepreneurship; 3) enhancing Maidstone town centre; 4) meeting skills needs and 5) improving the infrastructure. Whilst the EDS is scheduled for imminent revision, the Council must prepare this LPR consistent with the EDS currently in place; making necessary revisions to the LPR as and when the EDS is updated.

**Maidstone Economic Development Strategy Review (draft, 2021)** – This is a review of the currently adopted EDS. The document is in draft form and has recently undergone 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
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- A thriving rural economy
- Inclusive growth
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**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 will list all site assessments of Call for Sites proposals, looking into the suitability and achievability of sites to be allocated in the Local Plan. A sub-section of the SLAA will include an assessment of Garden Settlement proposals. It has been assumed that all town centre sites will contribute to the provision of commercial (Class E Uses, including offices) floorspace as part of mixed-use schemes. The SLAA is a working document and will be published when finalised.

**Kent Property Market Review -** This annual report provides insight and analysis of the performance of the area's property by sector and the key projects supporting the county's growth and economic development.

**South East LEP – Economic Strategy Statement (2018)** - This is a Local Industrial Strategy being produced by SELEP. The latest document produced was an Economic Strategy Statement in 2018: "Smart, Faster, Together". The strategy identifies five priorities: Creating ideas and enterprise; Developing tomorrow's workforce; Accelerating infrastructure; Creating places; and Working together. The LPR will need to acknowledge the aims of the Strategy Statement.

## Duty to Cooperate

The NPPF identifies employment development as a strategic cross-boundary issues, 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 has also shared its proposed EDNS evidence base methodology in advance of undertaking its evidence gathering to ensure all neighbouring local planning authorities (LPA) were happy with the Council's approach. No issues were raised.

The non-spatial elements of employment 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 progresses 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

- **DM34** – helpful to set out what evidence is required by the policy, for example a business plan. The policy needs to be more general and cover 'rural' workers rather than just agricultural workers.
- **DM35** – Policy rarely used.
- **DM36** – Minor wording amendments proposed. Expand reference to polytunnels to include other structures such as Cravo greenhouses.
- **DM37** – Minor wording amendments proposed.

- **DM38** –Expand to include holiday lets. Minor wording amendments proposed. Should investigate setting out the need for a register of lettings to be kept and submission of a business plan to demonstrate long term viability.

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

In ensuring successful economic growth, different economic sectors will be assessed for their requirements. With regard to the criteria that successful employment locations share, these criteria are listed below:

- Good quality of provision
- Strong public realm
- Flexibility of space
- Appropriate space for activity in the area
- Realistic price point compared to the nature of the stock.

The LP17 provides a foundation for meeting future employment needs with an approach that identifies extensions to existing successful rural business sites, Maidstone town centre new office development opportunities, and the allocation at Woodcut Farm for a new mixed-use business park. There is also an allocation at Newham Court for the Kent Medical Campus which is a specialist hub for medical related development.

Revisions to this Local Plan foundation will only occur if evidence necessitates it. The type of sites that may be required as part of the LPR could include mixed use sites where complimentary uses can be co-located; new business park locations; or extensions to established industrial and business parks.

It appears that all relevant matters have been addressed as part of this consultation, in relation to the economic strategy topic area.

## Public Consultation Regulation 18a

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

- Support for making use of brownfield land as a priority. Residents (283); Expert Agency (1); Resident Association (1); Parish Councils (2)
- Support for the provision of local jobs to reduce the need to commute. Residents (2); Developers (1)
- Support for the allocation of sufficient land to meet requirements. Residents (5); Developers (2); Expert Agency (1)
- Support for the re-use of sites allocated for employment use, but yet to be developed. Residents (5)

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

- Suggestion that industrial sites be relocated from rural areas to larger road network locations. Residents (1)
- Contain policies to deliver a mix of uses (including offices) within defined centres. Developers (2)
- 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 employment opportunities in the borough. Residents (4); Developers (1); Expert Agency (1); Councillor (1); Parish Council (3)

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

- Transport infrastructure needs to be able to meet higher demands. Residents (286); Developers (2); Parish Councils (5); Resident Association (2)
- Allocate employment sites away from residential areas e.g. business parks. Residents (2); Developers (2)
- Improved digital connectivity e.g. 5G and WIFI. Residents (13); County Council (1); Councillor (1); Resident Association (1); Parish Councils (9)
- Take into account plans for local business development in rural areas. Residents (22); Developers (5); County Council (1); Resident Association (1); Parish Councils (5)
- Ensure sufficient commercial land is retained in the town centre. Residents (2)
- Protect allocated land for employment uses and high performing existing employment sites/premises. Developers (1)
- Make better use of unused brownfield land in rural locations. Residents (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.

## OQ7: How can the Local Plan Review ensure we have an environmentally attractive and sustainable borough that takes a pro-active approach to climate change?

- Suggestion that employment sites be located away from residential areas and served by public transport. Residents (1); Developers (1)

## TQ8: Have we identified all the possible types of employment site?

- Suggestion that mixed use sites should only be allowed if the jobs go to local people. Residents (247); Resident Association (1); Parish Council (1)
- The Plan should consider both the quantitative and qualitative need for employment land. Residents (4); Parish Councils (5)
- Support for mixed use sites and business locations being planned alongside new housing. Residents (4); Developers (4); Expert Agency (1)
- Suggestion that Maidstone borough is good for micro-businesses, but does not offer sufficient space for businesses to grow. Residents (1); Councillor (1)
- Allocate land adjacent to existing commercial businesses in rural areas to support sustainable economic growth. Developer (1)
- Historic England: historic industrial and institutional buildings are often a good source of adaptable and flexible floorspace that particularly benefits small and medium sized enterprises, start-ups and creative industries businesses, and may be considered an additional type of site for employment provision purposes.
- KCC: recommends consideration of employment sites that are focused around existing and new transport hubs – including bus interchanges and rail stations that include good access to public transport and are well served by walking and cycling networks. The movement of goods is likely to warrant the consideration of locations where direct access to rail and/or strategic highway networks can be achieved. The County Council notes the challenges raised in respect of employment space at M20 Junction 8 as to whether the economic benefits of major commercial development at this location outweighs the harm caused to the landscape, the adverse impacts on visual amenity and the setting of the AONB. The County Council would like to ensure that new sites proposed within the Local Plan Review provide sustainable opportunities for new employment growth moving forward.

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

- Support for environmentally sustainable economic growth by developing sites near urban areas and communities. Residents (1); Expert Agency (2); Councillors (3)
- Support for the protection and enhancement of Maidstone Town Centre as a focus for new development. Residents (267); Parish Council (2)

- Support for the sustainable growth and expansion of business in rural areas, and possibly beyond the confines of the existing settlement boundaries. Residents (1); Developers (3)

## Public Consultation Regulation 18b

Key comments regarding the policies on economic development are summarised as follows:

- Ensure that duty to cooperate beyond administrative boundaries has occurred in relation to employment and retail needs/provision
- Consider amendment to policy to support heritage led regeneration or tourism to support the economy
- Policies should account for Covid and Brexit impacts on floorspace demands
- Strengthen wording as to what constitutes an appropriate location for retention, intensification, regeneration of the existing industrial and business estates within RSCs
- May need to consider release of some existing office floorspace in the town centre as part of wider approach to regeneration and sustainable development.
- Concern that the policies relating to town centres, retail and shopping frontages do not accurately reflect latest Use Class Order and permitted development rights
- Proposed amendments to the requirements to allow alternative uses of sites/premises in Economic Development Areas
- Prioritise the use of brownfield sites that are accessible by sustainable travel modes.

Key comments regarding the sites proposed for economic development are summarised as follows:

- Support for retention of Woodcut Farm allocation
- Support for sustainable development for employment opportunities within the flooding constraints at the Former Syngenta Works.
- Support for continued allocation of Claygate Distribution site at Pattenden Lane
- Objection to industrial uses at junction 8 (M20)
- Land at Ashford Road, Lenham – proposed shift to residential use (approx.. 15-20 homes).
- Land at Ashford Road, Lenham – reinforce the landscaping requirements
- Land at Maidstone Road/Whetsted Road – concern over flood risk and preference to locate employment elsewhere if possible
- Land at Maidstone Road/Whetsted Road –suggestion that site uses should be more flexible to include wider commercial, business and service class E uses.
- Land at Dickley Court – request from promoter/landowner to remove proposed allocation from the LPR. Site no longer available.

## Public Consultation Regulation 19

To be completed following Regulation 19 consultation.

## Deliverability

The LP17 uses projections based on an Experian labour demand scenario. It is reasonable, therefore, to use the same Experian labour demand scenario from the updated evidence i.e. employment floorspace need driven primarily by the market. This is a good baseline position and there is no reason, at this point, to suspect it is not deliverable over the full length of the plan period, even given current uncertainties around Brexit and more recently Covid-19. This position is supported by the updated EDNS Addendum 2021, which accounts for the likely impact of Brexit and Covid on the economy and provision of retail, both in the short term and over the plan period.

For town centre sites, flood risk is an important consideration and all sites will be subject to Levels 1 and 2 SFRA. Any mitigation measures required may result in reduced viability and careful consideration will need to be given as to the viable mix of uses on each site to ensure deliverability.

The approach to include two Garden Settlement(s) must be treated with caution in terms of overall deliverability at this stage. However, it is logical to assume that a certain amount of employment floorspace would be deliverable in any Garden Settlement to support a sustainable pattern of growth, commensurate with the rate of housing delivery.

Another important factor to consider in the deliverability of employment sites is the level of marketing and developer interest. There are current LP17 allocations that have yet to come forward and others that have currently unimplemented planning permission. It will be important to understand developer interest and preferences to seek to ensure that allocated sites are delivered within the plan period.

## Potential Objective(s)

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

2: To focus new development:
i. Principally within the Maidstone urban area and at the strategic development locations at the edge of town, and at junctions 7 and 8 of the M20 motorway;
ii. To a lesser extent at the five rural service centres of Harrietsham, Headcorn, Lenham, Marden and Staplehurst consistent with their range of services and role; and
iii. Limited development at the five larger villages of Boughton Monchelsea, Coxheath, Eyhorne Street (Hollingbourne), Sutton Valence and Yalding, where appropriate.

This objective remains appropriate but will require amending to include reference to Garden Settlements as that is the preferred approach.

| |
|---|
| 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, but could require the strengthening of the town centre office renaissance if that is the preferred reasonable approach. 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 approach seeks to exceed the baseline job growth (labour demand) requirements as identified and recommended 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 preferred approach is based on not just meeting but exceeding the needs identified in the EDNS. The spatial approach has been subject to a transport modelling and sustainability appraisal to ensure its appropriateness to pursue.

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 economic assessment were sought from neighbouring

authorities, and no issues have been raised. Engagement with neighbouring planning authorities became more focused as the potential development approaches progress, with Statements of Common Ground with neighbouring authorities having been produced and jointly agreed. Continued effective and ongoing 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 preferred approach is considered 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 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.

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

## Employment Land Supply Trajectory

The EDNS Addendum (March 2021) identifies sufficient employment floorspace in quantitative terms to meet the objectively assessed need of a minimum of 101,555sqm over the plan period 2022-2037. However, it goes on to recommend the Council "should identify a realistic delivery trajectory for its pipeline employment supply to better understand which sites offer the greatest prospects of accommodating employment development over the period to 2037… It should evidence how the Borough's portfolio of allocations and other development opportunities will support delivery of new space over the short, medium and long-term (structured broadly in five-year periods) in a similar approach to five-year housing land supply assessments as required by PPG."

The PPG states that assessments of land availability should identify a future supply of land which is suitable, available and achievable for economic development uses over the plan period.

The Council has therefore undertaken an assessment of all employment sites and mixed-use employment sites proposed to be included within the Regulation 19 pre-submission draft Local Plan Review to understand the extent to which each site is available for employment development and how deliverable this would be within a series of five-year periods following the adoption of the Local Plan, taking account of particular constraints or other factors identified for each site.

An important consideration for any work of this type is that it is inevitably a 'point-in-time' assessment that cannot entirely reflect very recent changes in circumstances not reflected in published statistics or evidence.

## Methodology

The assessment considers 8 sites in total:

- 7 are existing allocations within the adopted 2017 Local Plan; and
- 1 is a newly proposed allocation

There is also employment land proposed as part of the two Garden Settlements – Heathlands and Lidsing. Given their very different nature, they are not assessed in the same way. It is considered that both of these new settlements will deliver employment floorspace as part of creating mixed and balanced, self-contained communities. This is demonstrated through viability and sustainability assessments and the exact details on location and delivery will be refined through future masterplanning work. At this point, there are no significant windfall sites with extant planning permission, however, should this change these could also be included within the assessment.

Each site has been reviewed as follows:

**Site details**

1) Site size
2) Allocation in R19 draft Local Plan Review or extant planning permission
3) Potential for new employment floorspace (based on draft Local Plan Review or extant planning permission)

**Availability**

1) Ownership and current tenants/occupation status
2) Planning status/history
3) Known developer/landowner aspirations

**Deliverability**

1) Presence of abnormal costs or barriers to delivery
2) Market attractiveness of locality
3) Extent of active marketing/known developer interest

This information is drawn together in the form of a red/amber/green or RAG matrix to easily and clearly indicate how each site performs against each of the criteria.

For sites assessed as both 'available' and 'deliverable' during the Local Plan period, an estimate was made of the amount of floorspace that could be delivered within each 5-year period (consistent with the plan period 2022-2037). An assumption on the split in terms of office and industrial space on a site-by-site basis was made on the basis of scheme proposals (if available) or developer/landowner aspirations indicated in representations to the Council.

The amount of employment floorspace considered likely to be delivered on each site was calculated using indicative plot ratios as per the EDNS methodology or alternatively, based on estimates supplied by the site promoter and agreed by the Council, or taken from planning permissions where applicable. The amount of floorspace considered likely to be delivered within each five year period has been estimated based on the particular constraints and development factors identified for each site. These time periods were chosen to be consistent with the anticipated Local Plan timescale following adoption (i.e. 2022-2027, 2027-2032, and 2032-2037).

## Assessment

### *Availability*

On the basis of the factors assessed, a judgement was made on the overall achievability of each site coming forward for development as follows:

- **Available now** – factors such as ownership, planning permission and developer/landowner aspirations all indicate that the site can be considered available now for development.

- **Available in the future** – sites with some constraints in terms of ownership/current occupation, absence of planning permission or lack of clear developer/landowner aspirations, but there is a reasonable prospect that these factors can be overcome over the plan period.
- **Not available** – sites with significant constraints in terms of ownership, planning status or conflicting developer/landowner aspirations which imply very limited prospect of the site being available over the plan period.
- **Unknown** – there is insufficient information/evidence available to make an assessment at this time.

Table 1 shows a summary of the results of the assessment of site achievability. Of the 8 sites assessed, all are considered 'available', and none are considered to be 'available in the future' or 'not available' at this time.

| Status | Number of sites | Employment Space Supply (sqm) | | | |
|---|---|---|---|---|---|
| | | Office | Industrial/ Warehousing | Mixed | TOTAL |
| **Available now** | 8 | 27,439 | 0 | 105,000 | 132,439 |
| **Available in future** | 0 | 0 | 0 | 0 | 0 |
| **Not available** | 0 | 0 | 0 | 0 | 0 |
| **Unknown** | 0 | 0 | 0 | 0 | 0 |
| **TOTAL** | **8** | **27,439** | **0** | **105,000** | **132,439** |

**Table 1:** Summary of site achievability

In terms of floorspace supply, the above table can be summarised as follows:

- **Offices:** 100% of floorspace is considered to be available now
- **Mixed:** 100% of floorspace is considered to be available now

*Deliverability*

On the basis of the factors assessed, a judgement was made on the overall deliverability of each site coming forwards for development as follows:

- **Deliverable** – sites where there are few factors which would pose 'abnormal cots' or other barriers, or where these exist there is a strong prospect that they could be overcome.
- **Uncertain** – sites where there are identified works which are likely to present abnormal costs and where there is doubt over the viability of the site. In these cases, further feasibility work is likely to be required to assess the extent to which these factors can be overcome.
- **Not deliverable** – sites where the identified works associated with the site (e.g. site preparation or significant infrastructure requirements) would not be able to be delivered as part of the value generated by the

development proposed, to the extent that it could render the development unviable.

- **Unknown** – there is insufficient information/evidence available to make an assessment at this time.

Table 2 shows a summary of the results of the assessment of site deliverability. Of the 8 sites assessed, all are considered 'deliverable', with none considered to be 'uncertain', 'not deliverable' or 'unknown' at this time.

| Status | Number of sites | Employment Space Supply (sqm) | | | |
|---|---|---|---|---|---|
| | | Office | Industrial/ Warehousing | Mixed | TOTAL |
| **Deliverable** | 8 | 27,439 | 0 | 105,000 | 132,439 |
| **Uncertain** | 0 | 0 | 0 | 0 | 0 |
| **Not deliverable** | 0 | 0 | 0 | 0 | 0 |
| **Unknown** | 0 | 0 | 0 | 0 | 0 |
| **TOTAL** | **8** | **27,439** | **0** | **105,000** | **132,439** |

**Table 2:** Summary of site deliverability

In terms of floorspace supply, the above table can be summarised as follows:

- **Offices:** 100% of floorspace is considered to be deliverable
- **Mixed:** 100% of floorspace is considered to be deliverable

## Garden Settlements assessment

The Local Plan Review identifies Heathlands and Lidsing as suitable and deliverable opportunities to deliver growth in sustainable locations. They will both be delivered according to garden community principles, with value captured from the raising of land values coming from the changes of use on these sites to help fund infrastructure improvements, and place-shaping facilities. They will both operate as sustainable locations in their own right and will also help provide opportunities for surrounding areas in terms of improved employment opportunities and service choice.

Local Plan Review policy **SP4(a) 'Heathlands Garden Settlement'** sets out the benchmark requirement for the provision of as close to 5,000 new jobs as is feasible and viable, to match 1 new job per new home planned. Local Plan Review policy **SP4(b) 'Development north of M2/Lidsing'** sets out the benchmark requirement for the provision of as close to 2,000 new jobs as is feasible and viable, to match 1 new job per new home planned.

The Council, working alongside the site promoters and with input from independent technical specialist consultants, have determined the potential quantum, type and broad location of employment uses for each of the garden communities in order to meet the Local Plan Review policy requirements. The methodology used was broadly consistent with the brough-wide employment

needs evidence, with assumptions made on a site-specific basis, given their individual locational opportunities and constraints e.g. potential connectivity to strategic transport networks and landscape sensitivities.

To deliver truly sustainable communities, it is important to ensure, as far as is possible, that employment floorspace is delivered at a pace commensurate with the level of housing delivery. It is currently anticipated that delivery of new homes in Heathlands will commence in 2029/30, and in Lidsing in 2027/28. By the end of the plan period, it is expected that approximately 1,600 new homes will be delivered in Heathlands (equivalent to 32% of the total); with approximately 1,300 new homes in Lidsing (equivalent to 65% of the total). The employment floorspace trajectory will therefore assume the same level of delivery over the plan period, with a strong emphasis on the provision of high quality local employment opportunities in order to encourage increased self-containment and reduce the need for out-commuting. However, it is acknowledged that delivery of the housing, employment floorspace and other land uses will be phased in accordance with the timing of provision of essential supporting infrastructure and facilities, including at Heathlands: a new rail station on the Maidstone-Ashford line; 2 new A20 connections; and a potential connection to the M20 ; and at Lidsing:  a new connection to the M2 at Junction 4; and new bus connections to link Lordswood & Hempstead, and linking to the Medway town centres.

Delivering some employment floorspace at an early stage will provide an important statement of intent regarding the overall balance of uses, whilst also ensuring availability of local employment opportunities to optimise sustainability. Nevertheless, we are mindful that any employment floorspace that does come forward should do so in a way that is broadly aligned and balanced with delivery of wider uses (particularly residential). For instance, the excellent strategic connectivity offered by the Lidsing site, adjacent to an existing M2 junction, is likely to make this an attractive short-term location for business development regardless of its intended wider garden settlement economic role.

## Floorspace supply trajectory

Based on the assessment of site availability and deliverability as set out in the previous section, a potential employment floorspace supply trajectory has been compiled, showing when employment floorspace is likely to come forwards for delivery over the plan period.

Each site has been placed into a five-year period based on its assessment, however some larger sites may span across more than one five-year period, or indeed, in the case of the Garden Settlement, beyond the plan period. Sites assessed as ‘not deliverable’ or classified as ‘unknown’ would be excluded from this trajectory given their delivery uncertainty at this time.

The figure below sets out the indicative employment floorspace trajectory over the plan period, with the individual site-by-site trajectory set out in the table below.

**Figure 1:** Indicative employment floorspace trajectory by five-year period

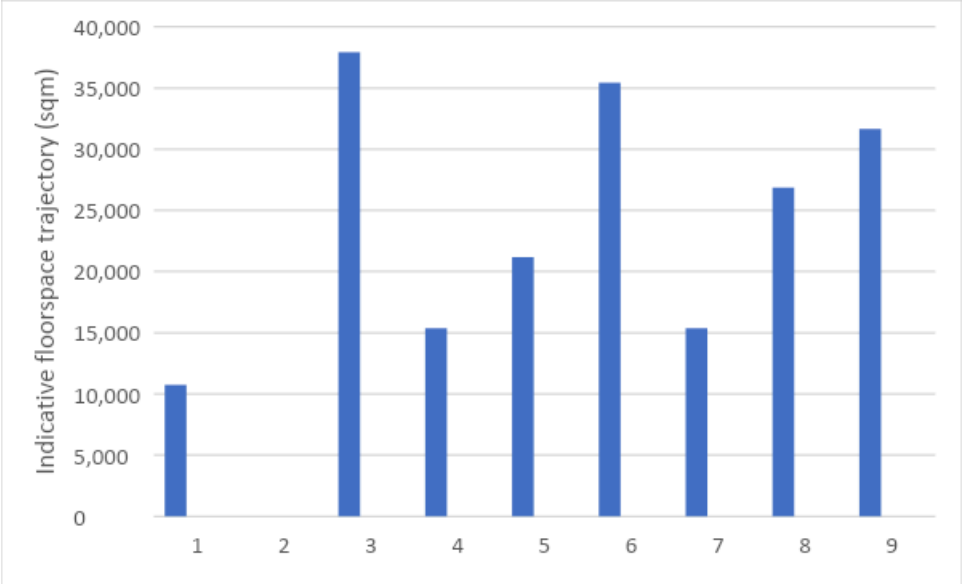


**Table 3:** Indicative employment floorspace trajectory, by site and five-year period

| Site ref | Site name | | Indicative delivery trajectory (sqm) | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Total floorspace (sqm, gross) | Short term (0-5 years) | | | Medium term (5-10 years) | | | Long term (10-15 years) | | | Beyond plan period (15+years) | | |
| | | | Office | Industrial | Mixed | Office | Industrial | Mixed | Office | Industrial | Mixed | Office | Industrial | Mixed |
| EMP1(1) | West of Barradale Farm | 3,500 | - | - | 1,750 | - | - | 1,750 | - | - | - | - | - | - |
| EMP1(2) | South of Claygate | 4,000 | - | - | 2,000 | - | - | 2,000 | - | - | - | - | - | - |
| EMP1(4) | Woodcut Farm | 49,000 | - | - | 16,333 | - | - | 16,333 | - | - | 16,333 | - | - | - |
| RMX1(1) | Newnham Park (Kent Medical Campus) | 21,270 | 7,090 | - | - | 7,090 | - | - | 7,090 | - | - | - | - | - |
| LPRSA146 | Maidstone East | 5,000 | 2,500 | - | - | 2,500 | - | - | - | - | - | - | - | - |
| LPRSAEmp1 | Former Syngenta Works | 46,000 | | | 15,333 | | | 15,333 | | | 15,333 | - | - | - |
| LPRSA151 | Mote Road | 1,169 | 1,169 | - | - | - | - | - | - | - | - | - | - | - |
| LPRSA260 | Ashford Road, Lenham | 2,500 | - | - | 2,500 | - | - | - | - | - | - | - | - | - |
| Garden Community | Lidsing | 66,150 | - | - | - | 4,095 | 17,404 | - | 4,095 | 17,404 | - | 4,410 | 18,743 | - |
| Garden Community | Heathlands | 68,250 | - | - | - | 1,680 | 3,780 | - | 4,200 | 9,450 | - | 15,120 | 34,020 | - |
| **Sub-total** | | | **10,759** | **-** | **37,917** | **15,365** | **21,184** | **35,417** | **15,385** | **26,854** | **31,667** | **19,530** | **52,763** | **-** |
| **Total** | | **266,839** (194,547 in plan period) | **48,676** | | | **71,965** | | | **73,905** | | | **72,293** | | |

The results of the above figures can be summarised as follows:

- On sites providing solely for office floorspace (use class E(g)), 26% is expected to be delivered over the period 2022/3 – 2026/7, 37% over the period 2027/8 – 2031/2, and 37% over the period 2032/3 – 2036/7.
- On sites providing solely for industrial floorspace (use classes B2 and B8), 0% is expected to be delivered over the period 2022/3 – 2026/7, 44% over the period 2027/8 – 2031/2, and 56% over the period 2032/3 – 2036/7.
- On sites providing a mix of office and industrial floorspace (use classes E(g), B2 and B8), 36% is expected to be delivered over the period 2022/3 – 2026/7, 34% over the period 2027/8 – 2031/2, and 30% over the period 2032/3 – 2036/7.

## Analysis

For comparison purposes and to sensitivity check the proposed employment floorspace delivery trajectory, the indicative supply for each five year period has been benchmarked against the annual average gross floorspace completions for both office and industrial uses over the time frame 2016/17 to 2019/20. This is based on data from the Council's published Authority Monitoring Reports. Using gross floorspace completion figures as opposed to net figures provides a clear understanding of the build out rate of employment floorspace in the borough. Due to the large volume of poor quality office floorspace lost to other uses, the net floorspace requirements do not give any indication of build out rates as they return negative figures.

**Table 4:** Annual average gross completions for office and industrial floorspace

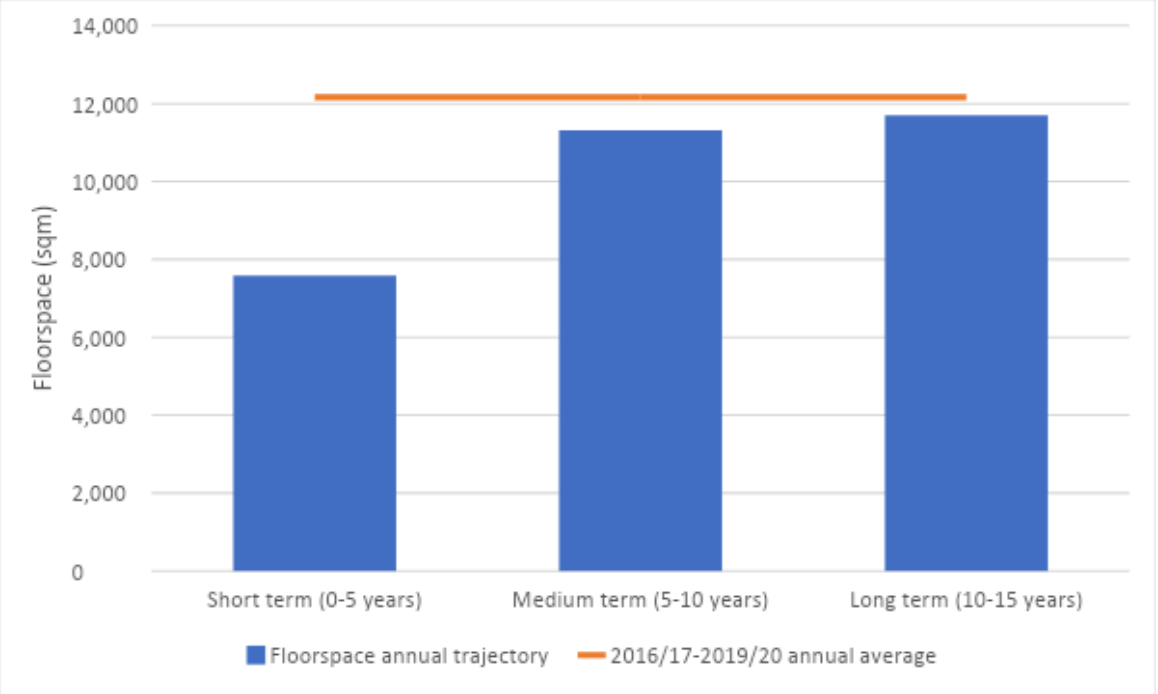
| Employment type | Annual average gross completions (sqm) |
|---|---|
| Office (E(g) and former B1 Use Classes) | 6,601 |
| Industrial (B2 and B8 Use Classes) | 12,163 |

Reviewing historic delivery rates in this way shows that the indicative delivery trajectory for office floorspace is below the annual average historic rate across the whole plan period. However, the majority of the site allocations are for a mix of employment uses (which will likely provide some office floorspace) and are therefore included in the industrial/mixed use trajectory (figure 1). Examples of this include Woodcut Farm and the Former Syngenta Works – 2 large allocations proposed for a mix of office and industrial uses that will contribute to the office floorspace supply throughout the plan period.

**Figure 2:** Office floorspace trajectory

Based on the assessment of historic gross floorspace completions, the indicative delivery of industrial/mixed floorspace looking ahead to 2037 falls short of the annual average in the first 5 years, but increases to a similar level as the annual average over the medium and long term. This is largely as a result of the Garden Settlements expected delivery towards the later stage of the plan period.

**Figure 3**: Industrial/mixed employment floorspace trajectory




## Key findings

This paper has assessed the availability and deliverability of sites identified in the Local Plan Review as contributing to meeting the future employment (office, industrial and distribution) floorspace requirements to 2037. The analysis is limited to those sites where specific floorspace capacities have been identified and/or extant planning permissions exist, recognising that other sites may also contribute to meeting future needs (e.g. mixed-use town centre sites) but are not assumed to be delivering net increases in employment floorspace.

Of the 8 sites analysed in detail, all are considered to be 'available' and 'deliverable'. The deliverability of one site, Maidstone East/ Former Royal Mail Sorting Office (LPRSA146) is currently bordering on 'uncertain' due to issues of viability relating to the potential mix of uses – particularly in the wake of the Covid-19 pandemic. However, as a key corporate priority for the Council there is demonstrable and ongoing work to bring this site forward and ensure its timely delivery in the short to medium term. The site is therefore considered, on balance, to be deliverable.

## Implications

Firstly, it is important to recognise that the sites assessed for this paper are not the only potential sources of new employment floorspace in Maidstone borough. Local Plan Review policy SP11(a) supports proposals to intensify employment uses within designated Economic Development Areas; and policy SP11(b) supports the development of new industrial and business sites/premises on non-allocated sites, subject to fulfilling certain criteria. Furthermore, policy CD7 supports the expansion of existing businesses in rural areas. In the case of SP11(a), the sites are not expected to yield any net gains in employment floorspace – rather, they should not see a net loss in floorspace. Proposals coming through via policies SP11(b) and/or CD7 are considered to be 'windfall sites'. As we cannot know where or when these may come forwards, they cannot be assessed in this paper, however such sites will count towards meeting future requirements when delivered.

For offices, the supply is expected to come from two key town centre sites: Mote Road and Maidstone East; as well as the continued build out of offices at the Kent Medical Campus (Newnham Park). Delivering Maidstone East is one of the Council's key corporate priorities within the short-term. Office floorspace is also expected to come forwards on two large allocations: Woodcut Farm and the Former Syngenta Works. Woodcut Farm has outline planning permission, with reserved matters applications recently approved. Delivery is therefore anticipated to begin in the short term, with the build out trajectory spread equally over the lifetime of the plan. The Former Syngenta works site also has an outline planning permission for mixed use employment floorspace currently pending a final decision. If approved, it is expected that delivery could realistically being on site towards the end of the first 5 years – again with the build out trajectory spread evenly across the plan period.

Over the medium to long term, Woodcut Farm and Syngenta would continue to deliver floorspace, plus the garden settlements of Lidsing and Heathlands are expected to contribute to the office floorspace supply from 2027 and 2029 onwards, respectively.

For industrial uses, the short term supply comprises a combination of the two large allocations of Woodcut Farm and the Former Syngenta Works sites, plus the smaller allocations of: West of Barradale Farm, South of Claygate, and Ashford Road, Lenham. All of these are adjacent to existing industrial estates and represent expansions to employment floorspace in locations where preconditions exist for delivery early on in the plan period, over the short to medium term.

Over the medium to long term, similar to the office floorspace provision, industrial and mixed-use employment floorspace will be delivered as the Garden Settlements emerge. The proposed floorspace quantums expected from each Garden Settlement are commensurate with the anticipated level of housing delivery. The precise mix of employment uses can be refined and reviewed between the start of the plan period and the expected commencement of

delivery to ensure the optimum mix of uses are provided based on market conditions and likely needs nearer the time.

**Table 5:** Employment site allocations assessment matrix

| Site details | | | | | | | | | Availability | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | Potential new floorspace (sqm) | | | | | | | | | | | | | | |
| Site ref | Site name | Size (ha) | Planning permission (Y/N/ Pending) | Permission details | Total | Offices (B1a/ b) | Industrial (B1c/B2/ B8) | Mixed | Ownership and occupation | RAG | Planning status R19 | Planning status LP17 | RAG | Developer / Landowner aspirations | RAG | Overall availability | Abnormal costs/ barriers to delivery | RAG | Eco att |
| EMP1(1) | West of Barradale Farm | 2.27 | Y | 17/503152/FULL - 2 industrial units of B2 and B8 use - 967.66sqm | **3,564** | 0 | 0 | 3,564 | Single ownership, part developed/occupied | | Allocation EMP1(1) | Allocation EMP1(1) | | Landowner promoted site for LP17. Remainder of site yet to be developed. | | Site promoted by landowner through LP17. Part built. Part remains available. Whilst no current PP, overall site is considered available now. | None apparent | | All occ (roo con surf vely M2 A22 acc nar |
| EMP1(2) | South of Claygate | 1.97 | N | N/A | **4,084** | 0 | 0 | 4,084 | Single ownership, part developed/occupied | | Allocation EMP1(2) | Allocation EMP1(2) | | Landowner promoted site for LP17. Remainder of site yet to be developed. Reconfirmed by landowner through R18b reps. | | Site promoted by landowner through LP17 and confirmed through R18b representations. Part built. Part remains available. Whilst no current PP, overall site is considered available now. | Access would be needed through existing neighbouring estate, however this is easy to overcome and should not be considered to be a barrier to delivery. | | Site exis whi as a qua this effe an Rel to A give acc |

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| EMP1(4) | Woodcut Farm | 15.56 | Y | 17/502331/OUT- 45,295sqm (23,022 B1 and 22,273 B8). 20/505182/REM - appearance, landscaping, layout and scale - phase 1 | **49,000** | 0 | 0 | 49,000 | | Single ownership, no occupiers | | Allocation EMP1(4) | | Allocation EMP1(4) | | Permission granted, with reserved matters permitted in Feb 2021. Developer intention to begin works on site this year, 2021. | | Site promoted through LP17. Permission granted and developer intends to begin works on site this year, 2021. Overall site is considered available now. | | Sloping topography and AONB landscaping conditions require careful design. However, site has now gained planning consent, therefore no obvious barriers to delivery. | | Larg<br>pro<br>gre<br>in p<br>loca<br>adj<br>M2<br>jun |

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| RMX1(1) | Newnham Park (Kent Medical Campus) | 23.2 | Y | 16/507292 outline permission for 92,379sqm medical campus, including up to 24,750sqm B1 office and 1,00sqm A1/A2/A3. 17/501723/REM 4,222sqm C2 care facility. 18/506658/REM permission for B1 offices Innovation Centre, 3,482sqm. | **21,270** | 21,270 | 0 | 0 | | Single ownership, multiple occupiers | | Allocation RMX1(1) | Allocation RMX1(1) | | Development on site part completed, with KIMS Hospital and two care homes complete, and the Kent Innovation Centre under construction. | | Site promoted by landowner through LP17. Part built. Part remains available. PP on site. Overall site is considered available now. | | None apparent | | Hig site junc Ecli Site mai dev und reir site attr |

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| LPRSA146 | Maidstone East | | Y | 16/507358/FULL - temp permission (5 years) for mised use B1a (873sqm gain), B8 (3945sqm gain, 2731sqm loss), and A1 (450sqm gain). Complete. | **5,000** | 5,000 | 0 | 0 | | Single ownership, multiple occupiers | | Allocation LPRSA146 | Allocation RMX1(2) | | Site promoted for LP17. Council produced opportunity guidance for delivery of site in 2019 and have identified the delivery of the site as a key short-term priority in their Strategic Plan 2019-2045. | | Site promoted by landowner through LP17 and LPR. Delivery is identified as a short-term corporate priority. No PP but overall site is considered available now. | | Site design would need to incoprate existing train station, however should not result in abnormal costs. | | Hig pro tow loca rail with serv Lon acc A22 |
| LPRSAEmp1 | Former Syngenta Works | | P | 19/504910/OUT decision pending for up to 46,447sqm B1/B2/B8. 19/504783/FULL permitted 163sqm B1 office | **46,000** | 0 | 0 | 46,000 | | Single ownership, single occupier | | Allocation LPRSAEmp1 | Allocation RMX1(4) | | Developer keen to build - permission currently pending decision. Strong intent to develop. | | Site promoted through LP17. Permission currently pending. Overall site is considered available now. | | Possible remedial works (contaminated land). Highways concerns. Flood risk. | | Per loca acc to M to s nar Flat isol maj resi area |

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| LPRSA151 | Mote Road | 0.39 | Y | 20/505707/FULL permission for 172 units and 1,169sqm office floorspace | **1,169** | 1,169 | 0 | 0 | | Single ownership, no occupiers | | Allocation LPRSA151 | Allocation RMX1(6) | | Landowner promoted site through LPR, and site has recent planning permission granted for residential-led mixed use development | | Site promoted through LP17 and LPR by landowner, and has recent planning permission. Overall site is considered available now. | | None apparent | | Tow<br>loca<br>acc<br>A22<br>via<br>gyra<br>wel<br>cen<br>and |
| LPRSA260 | Ashford Road, Lenham | | N | N/A | **2,500** | 0 | 0 | 2,500 | | Single ownership, no occupiers | | Allocation LPRSA260 | None | | Landowner promoted site through LPR Call for Sites. Owns adjacent existing employment site too. | | Site promoted through LPR. Development aspirations clearly set out by landowner. Whilst no PP, overall site is considered to be available now. | | Scheme design and employment uses will need to be compatible with neighbouring residential uses | | Per<br>loca<br>with<br>acc<br>loca<br>adja<br>exis<br>bus |