

# Maidstone Borough Council

## Maidstone Borough Local Plan

### Employment and Retail Topic Paper 2016





Affordable housing,  
Armstrong Road, Maidstone



Scania Depot, Brooklyn Yard



Lenham Village Square



Langley Park, Maidstone



Kent Institute of Medicine  
and Surgery, Maidstone



Sandling Lane, Penenden  
Heath, Maidstone



Captain Nolan Sculpture,  
Old Ophthalmic Hospital



Mote Park, Maidstone



Marden



Fremlin Walk

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## INTRODUCTION

1. This topic paper covers the Local Plan's approach to employment land (Class B uses), retail and Maidstone town centre. It is relevant to the following policies in the submission Local Plan:
  - Policy SS1 – Maidstone Borough spatial strategy
  - Policy SP4 – Maidstone town centre
  - Policy RMX1 – Retail and mixed use site allocations
  - Policy EMP1 – Employment site allocations
  - Policy DM17 – Town centre uses
  - Policy DM18 – District centres, local centres and local shops and facilities
  - Policy DM20 – Economic development
  - Policy DM21 – Retention of employment sites
  - Policy DM31 – Primary shopping frontages
  - Policy DM32 – Secondary shopping frontages
  - Policy DM33 – Leisure and community uses in the town centre
  - Policy DM41 – Expansion of existing businesses in rural areas
  
2. The principal evidential documents supporting these policies are as follows;
  - Economic Sensitivity Testing and Employment Land Forecast (January 2014), GVA, (ECON 001)
  - Maidstone Strategic Housing Market Assessment (2014), G L Hearn, (HOU 002)
  - Qualitative Employment Site Assessment (September 2014), GVA, (ECON 002)
  - Strategic Housing and Economic Development Land Availability Assessment: Combined Report (January 2016) (HOU 007)
  - Maidstone Retail Capacity Study (June 2013), DTZ, (CEN 003)
  - Maidstone Town Centre Assessment (June 2013), DTZ, (CEN 004)
  - Maidstone Town Centre Study (2010), Urban Practitioners, (CEN 002)
  - District and Local Centres Assessment (2013) (CEN 005)

## ECONOMIC DEVELOPMENT

### Context

3. Maidstone Economic Development Strategy (2011-31) (EDS; ORD 005) was adopted by Full Council in July 2015<sup>1</sup>. The EDS sets out the Council's ambitions to achieve economic growth up to 2031. There is a consistency between the Local Plan's approach to employment land provision and economic matters more widely and the Council's EDS. The Local Plan takes the role of delivering the spatial aspects of that strategy. Importantly the Local Plan and the EDS draw on the same employment land and economic forecasting evidence. The economic forecast on which the Local Plan is based anticipates the creation of 14,400 jobs in the borough by 2031 and one of the aims of the EDS is to help enable this level of job creation.
4. Section 4 of the EDS provides an analysis of the key sectors in the Maidstone economy and the significance to their contribution to the economic makeup of the local economy going forward.
5. By 2031, the EDS aims to: a) enable the creation of 14,400 jobs in a range of sectors and occupations; b) raise economic output (GVA) per head to the level of the South East; and c) raise the skills profile of Maidstone to the South East average. The EDS goes on to identify 5 priority actions. In addition to stimulating entrepreneurship, enhancing the town centre, and improving skills and infrastructure, the EDS prioritises retaining and attracting inward investment. To do this; "we will support existing businesses to grow and also work to attract new employers to the borough, creating job opportunities for all residents across a range of sectors."
6. The South East Local Enterprise Partnership (LEP) covers Kent and Medway, Essex and East Sussex. The local LEP Board is the Kent & Medway Economic Partnership (KMEP) on which Maidstone Borough Council's Leader has a seat.

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<sup>1</sup> 13<sup>th</sup> July 2015

7. The overall role of the KMEP is to deliver the Growth Deal and Strategic Economic Plan which sets out the actions that businesses and local authorities in Kent and Medway, together with the South East LEP and central Government will take to drive forward delivery. The KMEP identifies and prioritises projects for the South East LEP's Strategic Board and Accountability Board to consider and to submit to government for funding, including the Local Growth Fund and other sources. The South East LEP devolves funding to KMEP who are then responsible for local delivery and for managing their local programme within defined thresholds. The Partnership also acts as an advocate for Kent and Medway's businesses and government at the regional and national levels.
  
8. Sub-regional picture: this is provided in section 2 of the Economic Sensitivity Testing and Employment Land Forecast (January 2014, GVA, ECON 001) ("the Forecast Report"). The Forecast Report comes to the conclusion that "it is reasonable to define the functional economic area of Maidstone borough as focussed on the immediately surrounding districts" (paragraph 2.74). The more detailed analysis of commuting flows in the Maidstone Strategic Housing Market Assessment (2014, G L Hearn, HOU 002) identifies the highest flows between Maidstone and Medway and Maidstone and Tonbridge & Malling, providing some evidence of where the stronger functional economic relationships are.

### **Current Employment**

9. The ONS' official NOMIS labour market statistics provide time series data for the change in 'employee jobs' in the borough between 2011 and 2014<sup>2</sup>. 2014 data is the latest data set which is available. 'Employee jobs' is a measure of the number of jobs held by employees; it excludes self-employed, government-supported trainees and HM Forces. The information comes from the Business Register and Employment Survey (BRES) which is an employer survey conducted in September of each year. The BRES records a job at the location of an employee's workplace (rather than at the location of the business's main office).

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<sup>2</sup> <http://www.nomisweb.co.uk/reports/lmp/la/1946157316/report.aspx?#ld>

10. The time series data reveals that in 2014 the number of jobs in the borough has returned to 2011 levels after a period of contraction in the intervening years.

**Table 1 – ‘Employee jobs’ in Maidstone Borough**

	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>
<b>Total employee jobs</b>	68,400	68,300	67,100	68,400

(source: ONS NOMIS)

11. The NOMIS data reveals that there has been a significant decline in employment in public administration, education and health over this period which can be linked to the overall national contraction of the public sector. The borough’s jobs in this category declined from 24,500 in 2011 to 22,000 in 2014, a loss of some 2,500 jobs. This scale of this loss was balanced out to a substantial extent by an increase in jobs in finance and other business services which increased by 2,300 jobs from a level of 12,700 in 2011 to 15,000 in 2014.
12. The NOMIS data also reveals the relative importance of service type jobs to the Maidstone economy. This category of jobs, which excludes primary industries (agriculture and mining), manufacture and construction, equates to 88% of the total employee jobs in 2014.

### **Employment forecast**

13. The need for the employment site allocations in the Local Plan is evidenced by the assessment of economic needs in the Forecast Report. The Forecast Report quantifies the scale and nature of future economic growth in the borough and translates this into a land requirement in hectares for Class B uses i.e. for offices, industry and warehousing/storage. The Forecast Report takes a longer term view of how the economy will grow, aligned with the 20 year timeframe of the Local Plan.
14. The Local Plan is based on the jobs growth forecast of 14,394 jobs (2011-31), rounded to 14,400 jobs, from the Forecast Report. This scale of jobs growth should



be regarded as ambitious as it is above past performance rates (paragraph 5.65 of the Forecast Report). It represents a reasonable maximum figure based on borough-specific analysis of growth potential. The Forecast Report identifies that achieving this 'maximum' level of growth is contingent on the full realisation of the Kent Institute of Medicine & Surgery (KIMS) and the Maidstone Medical Campus (MMC) proposals at Junction 7 of M20 (Policy RMX1(1)) and sufficient, suitable employment land coming forward through the planning process (paragraphs 5.53-5.55). By using the maximum scenario as its evidence base, the Plan identifies sufficient land such that land supply should not be a barrier to economic growth.

15. The full employment land requirement for the 20 year plan period taken from Table 24 of the Forecast Report is set out below. The total requirement of 17.7ha excludes the land associated with the site specific KIMS/MMC proposals.

**Table 2: Total Employment Land Requirement 2011-2031**

	<b>Additional Jobs 2011-31 (Class B)</b>	<b>Additional Land 2011-31 (Ha)</b>	<b>Additional floorspace 2011-31 (sqm)</b>
Office (B1a/b)	3,053	2.7	39,830
Industrial (B1c/B2)	226	5.1	20,290
Warehouse (B8)	453	10.0	49,911
Total general requirement	3,733	17.7	110,030
KIMS/MMC	4,200 <sup>3</sup>	19	-

16. This shows that of the 14,400 new jobs which will be created (2011-31), some 3,730 will be in Class B sectors, excluding KIMS/MMC. The balance of 10,670 jobs will be generated from non-Class B employment, such as in health and social care sectors, education, retail and leisure and through the realisation of the KIMS/MMC proposals

<sup>3</sup> Directly created jobs only

which will generate a mixture of both Class B jobs (such as administration type jobs) and non Class B jobs (for example healthcare; catering).

17. The net requirement for additional Class B floorspace for the 17 year period 2014 to 2031 is identified in the Qualitative Employment Site Assessment ( GVA, September 2014, ECON 002) (“the Qualitative Assessment”). This net requirement takes account of existing sources of employment land supply specified in the Qualitative Assessment, namely vacant land and premises, sites with planning permission at 1<sup>st</sup> April 2014 and locations where there is scope for intensification through redevelopment. (Section 5 of the Qualitative Assessment pages 54-61).
18. The net requirement is shown in Table 29 of the report (page 62) and is also set out in the table below. This represents the amount of land for the Local Plan to allocate.

**Table 3: Net Employment Land Requirement 2014-2031**

	<b>Net additional land 2014-31 (Ha)</b>	<b>Additional floorspace 2014-31 (sqm)</b>
Office	1.6	24,000
Industrial	-3.9	-15,600
Warehouse	1.3	6,500
<b>Total</b>	<b>-1.0</b>	<b>14,900</b>

19. These figures appear to indicate that there is no overall requirement to identify additional employment land in the Local Plan. Based on the figures alone, there would be a theoretical oversupply of 1ha of employment land assuming the new offices and warehousing needed were provided on the land which would come out of industrial use. The Qualitative Assessment identifies examples of sites which are currently in Class B use but which are likely to reach the end of their functional life within the plan period (paragraphs 7.32 to 7.36). There are sites located within Maidstone in areas which have become primarily residential in character and also premises in more rural parts of the borough. Based on the evidence, such sites would be not reused for alternative Class B uses. The greatest development

pressure is likely to be for residential redevelopment and Policy DM4 – Development on brownfield land sets out the key considerations that will apply to such proposals.

20. Further, the analysis in the Qualitative Assessment (Sections 3 and 6) reveals that there is likely to be a distinct, qualitative requirement for new land to match the likely land requirements of future growth sectors. Specifically there is a gap in the Borough’s portfolio of employment land and premises for a new, mixed use employment site well connected to the strategic road network to enable efficient access to markets which could accommodate a mix of small scale office floorspace, industrial and manufacturing provision and smaller scale warehousing/distribution.
21. An outcome of the quantitative and qualitative analysis therefore is that additional capacity is required across all Class B sectors.

**Overall Local Plan delivery of Class B floorspace**

22. Two monitoring years (2014/15 and 2015/16) have elapsed since the Qualitative Assessment was completed. Table 4 below shows the amount of Class B floorspace which has been completed in this intervening 2 year period up to 1<sup>st</sup> April 2016.

**Table 4: Class B completions in 2014/15 and 2015/16 (sqm)**

	<b>B1a</b>	<b>B1b</b>	<b>B1c</b>	<b>B2</b>	<b>B8</b>	<b>Total</b>
<b>Gain</b>	6,863	1,351	7,025	12,215	9,604	37,058
<b>Loss</b>	9,922	0	326	1,723	1,221	13,192
<b>Net</b>	-3,059	1,351	6,699	10,492	8,383	23,866

23. The total amount of Class B employment land with planning permission at 1 April 2016 is set out in Table 5 below. These figures specifically exclude the outline consent for the Maidstone Medical Campus (Policy RMX1(1)); the position on this site is set out in the ‘allocations’ section of this topic paper.

**Table 5: Total floorspace (sqm) with consent for Class B uses at 1 April 2016**

	<b>B1a</b>	<b>B1b</b>	<b>B1c</b>	<b>B2</b>	<b>B8</b>	<b>Total</b>
<b>Gain</b>	23,731	544	5,561	9,269	13,764	52,869
<b>Loss</b>	44,544	0	8,428	18,696	13,304	84,972
<b>Net</b>	-20,813	544	-2,867	-9,427	460	-32,103

24. Commentary on the main schemes which contribute to the overall supply in the Tables 4 and 5 above is included in Appendix A.
25. A substantial proportion (83%) of the projected loss of office floorspace in Table 5 is as a consequence of Prior Notification conversions to residential use. This matter is discussed in more detail below.
26. As set out at paragraph 17 above, the Qualitative Assessment (section 5) took account of existing sources of employment land supply in determining the future requirement for additional land shown in Table 3. An update is included in Appendix B to factually update the position set out in the Qualitative Assessment with respect to these existing sources in the light of the latest monitoring information.

**Prior Notifications (office to residential)**

27. Approximately 2,540sqm of town centre office floorspace was converted to residential flats in the last two monitoring years, 2014/15 and 2015/16. At 1 April 2016 the loss of a further 30,400sqm (estimated) has consent for conversion to residential by means of prior notification. In total therefore nearly 33,000sqm of town centre office floorspace either has been converted to residential since 1<sup>st</sup> April 2014, or has consent to be converted.
28. Further analysis of these completions and permitted developments reveals that the residential conversions are overwhelmingly concentrated in the poorer quality office

premises identified in the Qualitative Assessment (Figure 9, page 50). In total, 83% of the lost floorspace would be of this identified poorer quality.

29. The Qualitative Assessment proposes that some rebalancing is required to remove out of date office stock from the town centre which does not meet modern occupier demands and is serving to suppress the overall values achievable for office space (Qualitative Assessment, Sections 2 and 4). The Local Plan recognises that this rebalancing process is needed to contribute to the aim for the town centre as an attractive hub for business as set out in Policy SP4 and its supporting text. Based on an analysis of stock which had been vacant and on the market for more than 5 years at 2014, the Qualitative Assessment proposed that in the order of 18,000sqm of office stock could be lost to other uses without detriment to the local economy (paragraphs 5.8 to 5.10). This analysis provided some guideline quantification of the oversupply of poorer quality stock. This stock would not be part of the functional supply of office floorspace going forward.
30. The more recent pattern of Prior Notifications since 2014 shows that a more significant rebalancing of the office market appears to be transpiring. The full implementation of the consents outlined above would result in the 18,000sqm guideline being exceeded. Further, the housing land supply position set out in the Housing Topic Paper (SUB 004) envisages some continuation of the trend as it anticipates an additional 290 dwellings coming forward post 2021 through office conversions in the Town Centre Broad Location. This could equate to the estimated loss of a further 13,750sqm of office floorspace.
31. It can be expected that, in future, a tipping point will be reached in this rebalancing trend when sufficient demand for new town centre offices arises and land values improve such that the development new offices will become viable. Prediction of exactly when this point may be reached is, however, uncertain.
32. Therefore, whilst the pattern of Prior Notifications could imply a risk that the growth in town centre based office jobs could be limited by a future lack of available sites in

the town centre, it is the Council's case that the allocation of additional town centre office site or sites is not merited at this stage. The reasons for this are;

- a) The Local Plan includes a specific allocation at Mote Road in the town centre (EMP1(1)) which will provide for new office space, potentially in conjunction with some residential development, in response to market demand. Also the Local Plan identifies that a subsidiary element of office space could be part of the retail-led proposals for the Maidstone East/Sorting office site (Policy RMX1(2)); and
- b) Importantly, offices are a defined town centre use and as such they are 'in principle' a suitable use within the town centre boundary which is defined in the Local Plan (Policy SP4) through the application of the sequential test (Policy DM17). The Local Plan, and national guidance, provides the presumptive support for new office development to come forward on sites in the town centre as demand emerges. The allocated retail site at King Street (Policy RMX1(3)) as an example could provide offices as a 'windfall' on the upper floors.

33. The Council will monitor the implications of the loss of town centre office stock to other uses over the duration of the Local Plan to determine if specific action is required. The following factors will be monitored;

- a) Amount and proportion of poorer quality stock converted to residential (source: MBC's Commercial Information Audit); and
- b) Monitor changes in the amount of vacant office floorspace in the town centre being marketed (source: CoStar)

34. Wider initiatives which will help secure the continued and enhanced attractiveness of Maidstone town centre as a business location are explained in the following 'town centre' section of this topic paper.

### Employment and Mixed Use Site Allocations

35. Candidate employment sites which were submitted during the 2012/13 Call for Sites were assessed in the Strategic Housing and Economic Development Land Availability Assessment (SHEDLAA; HOU 007). The following sites were found to be available and suitable for such development through the SHEDLAA process and are allocated in the Local Plan for Class B development.

**Table 6: allocated sites which will provide Class B floorspace**

	Office	Industrial	Ware housing	Total
<b>Land/Floorspace Requirement 2014-31 (ha)</b> <i>Equivalent Floorspace in italics (sqm)</i>	1.6 24,000	-3.9 -15,600	1.3 6,500	2.9 <sup>4</sup> 30,500
EMP1(1) Mote Road, Maidstone	8,000			8,000
EMP1(2) Barradale Farm, Headcorn		5,500		5,500
EMP1(3) Land south of Claygate, Marden		6,800		6,800
EMP1(4) Land at Wheelbarrow Estate, Marden		14,500		14,500
EMP1(5) – Woodcut Farm, Bearsted		49,000		49,000
RMX1(4) Syngenta, Yalding		[8,640] <sup>5</sup>		
<b>Total (sqm)</b>	<b>8,000 + 16,000 at EMP1(5)</b>	<b>26,800 + 33,000 at EMP1(5)</b>		<b>83,800</b>
RMX1(1) – Newnham Park	100,000sqm of medical and associated uses			

<sup>4</sup> total additional requirement for office and warehousing land/floorspace

<sup>5</sup> Already counted in the Qualitative Assessment as an existing vacant site so excluded from table to avoid double counting

36. **Policy EMP1(5) – Land at Woodcut Farm:** This site is located immediately to the west of the Junction 8 of M20 and will deliver up to 49,000sqm of mixed Class B floorspace in the form of a business park. This site will specifically address the gap which has been identified in the borough’s portfolio of land and sites for a mixed use site with good connections to the strategic road network.
37. To achieve the stated ambition in the Council’s Economic Development Strategy (EDS) of enabling 14,400 new jobs depends on four named factors, one of which is ‘filling the gap in our portfolio of employment sites to meet modern business needs.’ The EDS explicitly links its ambitions for job creation with developing a site at Junction 8 as follows:
- “The strategic case for a new employment site at Junction 8 has been established and its development is critical to ensuring that the principal aim of the Strategy is achieved i.e. the creation of 14,400 jobs by 2031 in a range of sectors and occupations”<sup>6</sup> (emphasis added)
38. The decision to include Land at Woodcut Farm as an allocation in the Local Plan was taken by the Strategic Planning, Sustainability and Transport Committee on 19<sup>th</sup> August 2015. Prior to this decision, the overall strategic approach to development at Junction 8 of M20 and the merits of making a specific site allocation had been considered by the Council on a number of occasions. For clarity, a chronology of these decisions is attached in Appendix C.
39. This site is subject to a current outline application for ‘a mixed commercial development comprising B1(a), B1(b), B1(c) and B8 units, maximum floor space 47,750 square metres (access being sought)’ (MA/15/503288/OUT). The application has been submitted by an established developer of commercial floorspace, Roxhill Developments Ltd. These facts confirm that the site is available for development and that there is active commercial interest in it, giving certainty that the development will be delivered during the timeframe of the Local Plan.

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<sup>6</sup> Paragraph 6.22, Economic Development Strategy



40. The economic justification for a site allocation which is well connected to the strategic road network is provided by the analysis in the Qualitative Assessment. The SHEDLAA demonstrates that the only candidate sites which could realistically address this specific requirement are both at Junction 8 of M20 and both fall within the setting of the Kent Downs AONB. These sites are 'land at Woodcut Farm' (SHEDLAA reference ED-12) and 'Waterside Park' (reference ED-6). For anticipated economic needs to be met, as directed by paragraph 21 of the Framework, an allocation at Junction 8 is required.
41. A detailed comparison of the planning merits of the two sites is set out the 'Core Strategic Site Allocations' report to the Council's Cabinet on 25<sup>th</sup> July 2012<sup>7</sup> <sup>8</sup>. Development of the Waterside Park site at the scale envisaged would require substantial site excavation, fundamentally altering the existing profile of this sloping site. The size and topography of the Woodcut Farm site does not necessitate excavation of this scale and also enables the provision of extensive structural and internal landscaping in a parkland setting to better mitigate the landscape impacts of development, in particular on the setting of the Kent Downs AONB.
42. Two planning applications have been submitted on the non-allocated Waterside Park site, both of which were refused by the Council. Application MA/13/1549 was for 56,000sqm of Class B floorspace. The application was refused on 6<sup>th</sup> September 2013 on the grounds that the overall scale and the mass and design of the development, together with the changes to the topography and landform of the site, would be detrimental to the character and appearance of the countryside, the setting of nearby heritage assets and to the setting of the Kent Downs Area of Outstanding Natural Beauty in particular. A reduced proposal for 45,528sqm of Class

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<https://services.maidstone.gov.uk/meetings/documents/s24394/Cabinet%20Council%20or%20Committee%20Report%20for%20Core%20Strategy%20Strategic%20Development%20Site%20Allocations.pdf>

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At this time, the Waterside Park site was referred to as 'Land south of A20'

B floorspace was refused on 22<sup>nd</sup> October 2014 on the same grounds (MA/14/501895).

43. The subsequent appeals into the two schemes were dismissed on 23 July 2015 (APP/U2235/A/142224036 and /142229271). In defending these appeals, the Council did not dispute that there is an economic case in favour of making land available in the M20 J8 location for Class B development but argued that this did not override the environmental harm of the development of this specific site. Principal amongst the Inspector's concerns were the visual and landscape impact, including on the setting of the AONB, and impact on heritage assets. She concluded that this environmental harm was not outweighed by the acknowledged economic and social benefits of the proposal.
44. The Inspector accepted that there is need for additional Class B floorspace. She also did not dissent from the position that there a qualitative need for a site well located to the strategic road network and also stated that there does appear to be a need for more employment allocations. Indeed she found it unsatisfactory that there is a vacuum of allocated land for employment uses when there is evidence of local firms wishing to expand. The Inspector considered that it had not yet been demonstrated, however, that the need would have to be met through a greenfield countryside site allocation. Importantly, this Inspector did not have the benefit of considering the full extent of the Local Plan evidence which the Council considers provides the sound justification for the allocation of Woodcut Farm.
45. Crucially, and in contrast to the Waterside Park site, the size and topography of the Woodcut Farm site enables key mitigation measures to be incorporated within the design of a scheme for the site. To address the landscape sensitivity of the site, Policy EMP1(5) includes detailed development parameters at criteria (1) to (7) with respect to building site coverage, minimising the need for site excavation, extensive landscape buffers within the site, along the boundaries and adjacent to the developed area, limits on buildings footprints and heights and requiring that the detailed scheme design takes account of a landscape and visual impact assessment.

By the application of these detailed and specific policy criteria through the development management process, the impact of the development on views to and from the AONB and on overall landscape character will be controlled. The policy also requires a significant package of sustainable transport measures to ensure that the development delivers substantial improvements to the accessibility of the site by sustainable modes (criterion 14).

46. The allocations at **Pattenden Lane, Marden (Policies EMP1(3) and (4))** and at **Barradale Farm, Headcorn (Policy EMP1(2))** provide land for the expansion of two established employment areas. The **Syngenta site (Policy RMX1(4))**, which was previously used for the manufacture of agricultural chemicals, has been cleared of buildings (with the exception of an office building) and the site contamination has been mitigated. The site is suitable for comprehensive redevelopment to provide a mix of employment-generating uses and new housing.
47. The allocation of these sites in the rural parts of the borough helps to provide some flexibility and choice in terms of location, site type and likely cost and thereby will help to meet a range of market needs. They may be particularly more suited to businesses whose market is more locally focused. This approach ensures that there is a diversity of available, suitable sites to meet needs over the timeframe of the Local Plan. The evidence base points to the merit of providing capacity a degree above the level of the quantitative need should any of the identified supply not come forward as anticipated (paragraph 8.13 of the Qualitative Report).
48. With the exception of the site at Mote Road, Maidstone which is a town centre site specifically allocated for office floorspace, the site allocations EMP1(2) – (5) and RMX1(4) are allocated for a range of Class B uses. This policy approach also gives an appropriate degree of flexibility, enabling a range of types of development to come forward response to market demand. It also enables ‘hybrid’ uses to be accommodated by which a business may incorporate elements of different types of uses within the same building (for example offices and light industrial manufacture).

49. The market analysis in the Qualitative Report finds that the town centre and out of centre office markets are distinct and attract different types of occupier. A choice of office stock is needed (paragraphs 3.17 – 3.28). Out of centre demand can be met on site EMP1(5) and through the site capacity at Eclipse Park, Maidstone (Policy DM21 (2iii)) whilst new town centre offices can be provided, potentially with an element of residential, at the site at **Mote Road, Maidstone (EMP1(1))**.
50. It is recognised that demand for new town centre office development is unlikely to materialise in the shorter term. There is an acknowledged over-supply of poorer quality office stock in the town centre which has a negative effect on land values such that new/redeveloped office stock is unlikely to be attractive in the shorter term and will need to follow some loss of space in the shorter term (Qualitative Assessment paragraph 6.54). Analysis of Prior Notifications in the preceding section shows that this ‘rebalancing’ of the Maidstone town centre office market is underway.
51. The medical campus allocated in **Policy RMX1(1) at Newnham Court, Maidstone** will provide up to 100,000sqm of specialist medical related development, capitalising on the establishment of the Kent Institute of Medicine & Surgery (KIMS) to create the Maidstone Medical Campus (MMC). This is a specific opportunity for a specialist form of development to co-locate with KIMS. By the positive identification of this site, the Local Plan enables a cluster of health-related, knowledge-driven businesses to establish in the borough, as directed by paragraph 21 of the Framework.
52. Outline consent was granted in April 2014 for the medical campus comprising an additional 98,000sqm floorspace for hospital facilities, clinics, consultation rooms, rehabilitation centre (Classes C2/D1); education and training facilities with residential accommodation (Class C2/D1); key worker accommodation for nurses and doctors (Class C3); pathology laboratories (Class B1); business uses (Class B1); ancillary retail services (Class A1, A2, A3); and up to 116 Class C2 neuro-rehabilitation accommodation units (MA/13/1163). There is a current reserved matters application for the erection of a 65-bed hospital/care home on a plot at the south eastern corner

of the site (MA/16/500360/REM). Evidence in the Forecast Report assesses that the full realisation of the MMC proposals has the potential to generate some 4,700 additional direct and indirect jobs in the borough (Forecast Report paragraph 5.38).

53. In November 2015 KIMS/MMC was designated as an Enterprise Zone as part of the North Kent innovation Zone which links Kent Medical Campus at Maidstone with proposals for new commercial development in Ebbsfleet Garden City and Rochester Airport Technology Park. The bid had been sent to Government on behalf of Maidstone Borough Council, Ebbsfleet Development Corporation, Medway Council and other partners, by the South East Local Enterprise Partnership (LEP) and Thames Gateway Kent Partnership. The success of the bid was confirmed in November 2015. This means that MMC can now attract companies by offering business rate discounts for new occupiers. The Government will support the discounts of up to £55,000 per year for five years, for businesses that move to an Enterprise Zone by 31 March 2022.
54. The table below summarises the current planning status of all the Submission Local Plan allocations which will deliver Class B floorspace.

**Table 7 – current planning position for the Local Plan allocations**

<b>Site allocation</b>	<b>Floorspace</b>	<b>Current planning position</b>
EMP1(1) Mote Road, Maidstone	Up to 8,000sqm B1a	No current planning application
EMP1(2) Barradale Farm, Headcorn	5,500sqm B1,B2,B8	No current planning application
EMP1(3) – Land south of Claygate, Marden	6,800sqm B1, B2,B8	No current planning application
EMP1(4) – Land at Wheelbarrow Estate, Marden	14,500sqm B1,B2,B8	Development of 4,307sqm B2 floorspace is under construction in the northern portion of the allocated site (MA/14/4058). The remaining site area of 1.9ha could deliver in the order of 7,600-9,500sqm of Class B floorspace.

EMP1(5) – Woodcut Farm, Bearsted, Maidstone	Up to 49,000sqm B1, B2,B8	Current outline planning application for 47,750sqm mixed Class B floorspace (MA/15/503288)
RMX1(4) – Syngenta, Yalding	Up to 8,600sqm B1,B2	No current planning application
RMX1(1) – Newnham Park, Maidstone	100,000sqm of medical related uses	Outline planning consent granted for 98,000sqm of medical related uses. (MA/13/1163)

55. **Designated Economic Development Areas (Policy DM21):** Policy DM21 designates existing industrial estates and business parks as Economic Development Areas which are suitable for, and should be retained for, Class B uses. The areas were assessed and identified in the Qualitative Assessment as ones which “will play the primary role in supporting economic development and growth by offering attractive and available opportunities for the retention and expansion of existing occupiers, as well as helping to secure new inward investment” (paragraph 7.5). Further, “it is critical that the Class B nature of these sites is maintained over the plan period to provide the borough with sufficient capacity across a range of space types to retain existing businesses, enable them to grow and also to accommodate new activity” (paragraph 7.6).
56. As outlined above, the Town and Country Planning (General Permitted Development) Order 2015 (GDPO) allows for the conversion of B1a office floor space to residential use without the need for a planning application. From 1 October 2017 planned changes to the GDPO will mean that the conversion of up to 500sqm of light industrial floorspace (B1c) to residential use will be ‘permitted development’ for a 3-year period until 30 September 2020.
57. The existing employment sites included in Policy DM21 have all be assessed against a consistent and comprehensive range of factors including building quality and vacancy rates (see paragraphs 4.11-4.17 and Appendix I of the Qualitative Assessment). This has ensured that the areas of highest quality stock with low or nil

vacancy have been identified. In addition to the allocations, these areas can therefore best be expected to be the focus of the market demand for Class B floorspace. Further, outside the town centre, the designated areas are generally established industrial and commercial estates which in terms of amenity and character are less likely to be suitable for residential uses.

58. These areas, in conjunction with the allocation of new land, will help to ensure that a range of sites are available to meet existing and future business needs (Class B uses) over the timeframe of the Plan as directed by paragraph 21 of the NPPF.
59. Importantly, the Local Plan's approach enables the Council to meet its identified employment land needs within its own boundaries. It is implicit in the Council's approved Economic Development Strategy ambition that the 14,400 new jobs will be created within the borough and not outside it. The approach also demonstrates that the Local Plan is planning positively for the development needs of the borough as directed by paragraph 157 of the Framework.

#### **Non Class B uses**

60. As highlighted at paragraph 16 above, a significant proportion of jobs growth will be in non-Class B sectors, not all of which necessitate site allocations in the Local Plan. The Local Plan will positively influence the achievement of growth in other economic sectors in the following ways:
  - a. Retail: Policy RMX1 allocates specific sites for new shopping floorspace in anticipation of the growth expected in this sector. Redevelopment of The Mall will deliver improved, expanded shopping in the longer term. The Plan's policies also support the continued retail and retail related functions (use Classes A2-A5) of the town centre and the borough's district and local centres.
  - b. Health and social care: in addition to the specific Maidstone Medical Campus proposals, the growth of the borough's population will generate a

generalised, additional demand for healthcare services and facilities. The Infrastructure Delivery Plan (IDP) identifies specific proposals to expand and improve primary healthcare facilities to be delivered, in part, through developer contributions. The Plan also anticipates an increase in the demand for nursing and care homes equating to some 980 additional care home places (2011-31) and supports the provision of new/expanded facilities through Policy DM15.

- c. Education: The IDP also identifies specific proposals for new or expanded schools to be delivered, in whole or in part, through developer contributions
- d. Construction: the Plan provides for a significant scale of new development which in turn will help to support and generate employment in the local construction industry.
- e. Tourism: the Local Plan gives support to leisure and cultural development in the town centre helping to ensure the town centre has attractions for all ages. Policy SP17 – Countryside and Policy DM20 also provide support for and guidance for tourism related development in the rural parts of the borough
- f. Agriculture: again through Policy SP17 the Local Plan offers support for schemes which will facilitate the efficient use of agricultural land and Policy DM35 guides the diversification of rural buildings.

### **The relationship between homes and jobs**

- 61. The Framework highlights that planning policies should seek to address barriers to investment in the local economy, including where the availability of housing could be a barrier to economic growth (paragraph 21).
- 62. The inter-relationship between jobs and housing requirements has been tested in the Maidstone Strategic Housing Market Assessment (2014), (HOU 002). The creation of 14,400 additional jobs will necessitate a related increase in the number of working age people (PROJ4, Table 27, page 102). Applying reasonable assumptions,



including about future commuting rates (paragraphs 6.31-6.32), the SHMA reveals that between 15,780 and 18,560 new homes would be needed by 2031 to house the workforce needed for the 'maximum' level of jobs growth of 14,400 new jobs, (Table 29, page 104). The Local Plan housing target of 18,560 is therefore sufficient to ensure that housing supply in the borough would not be a barrier to achieving the level economic growth which is being planned for in the Local Plan (paragraphs 6.52-6.53).

63. To conclude, the Council is confident that the Local Plan policies and allocations will deliver the quantity and types of land demanded to fully meet anticipated needs for additional Class B employment land over the Plan period. It does this whilst monitoring and anticipating the effects of the Government changes to permitted development rights. In summary, the Local Plan does this by;
- a. The allocation of a range of available and suitable sites (Policies EMP1 and RMX1), which are now coming forward through planning consents, in conjunction with support for employment development within Maidstone urban area and the Rural Service Centres (Policy DM21);
  - b. The designation of existing employment areas, including areas with additional capacity (Policy DM21); and
  - c. Permitting smaller scale economic development proposals in the countryside (Policies SP17/DM41).

## **RETAIL & TOWN CENTRE**

### **Retail Forecast**

64. The assessment of future capacity for both comparison and convenience retail floorspace is provided by the Maidstone Retail Capacity Study (June 2013, DTZ, CEN 003). The table at figure 2, page 19 of the Study, reproduced below, quantifies the

retail capacity in terms of additional net sales area floorspace (cumulative) in 5 year cohorts to the end of the Plan period. The base year for the assessment is 2012.

**Table 8 – Maidstone Borough retail requirement 2011-2031**

	2016	2021	2026	2031
Comparison retail floorspace (sqm)	5,550	12,400	18,800	23,700
Convenience retail floorspace (sqm)	3,700	4,400	5,250	6,100

65. The retail capacity forecast has been sensitivity tested against the overall housing trajectory included in the submission Local Plan by Cushman & Wakefield (formerly DTZ). The outcome of this testing, undertaken in February 2016, is that the population/household forecasts used in the Retail Capacity Study are sufficiently consistent with the scale and distribution of housing in the submission Local Plan. Revisions to the capacity assessment are not required. An explanatory note of this sensitivity check is included in Appendix D.
66. It is acknowledged in both the Retail Capacity Study itself and the Local Plan (paragraph 5.29) that there are limits to predicting retail trends over such an extended timeframe and that the findings for the period beyond 2026 are best regarded as indicative at this point. On this basis, a review of retail capacity will be merited in or around 2022 to confirm, or otherwise, the continuing robustness of the forecasts.

**Retail consents/completions update**

67. Three monitoring years have elapsed since the Retail Capacity Study was undertaken, 2013/14, 2014/15 and 2015/16. The table below sets out the total amount of convenience and comparison floorspace (use Class A1) completed during this period. These figures exclude cases where exiting floorspace has been granted a Lawful Development Certificate.

**Table 9 – Retail floorspace completions (gain) 2013/14 to 2015/16**

	Convenience		Comparison	
	Gross floorspace	Net sales area <sup>9</sup>	Gross floorspace	Net sales area
<b>Gain (sqm)</b>	781	557	7,202	4,556

68. As at 1 April 2016, there was planning consent for a further 16,013sqm (gross) of retail floorspace in the borough as shown in the following table. Cases where the proposed type of floorspace is not specified in the application documents are captured in the final columns of the table.

**Table 10: Total retail floorspace with consent (gain) at 1 April 2016**

	Convenience		Comparison		Unspecified	
	Gross floorspace	Net sales area <sup>10</sup>	Gross floorspace	Net sales area	Gross floorspace	Net sales area
<b>Gain (sqm)</b>	14,267	7,977	527	448	1,219	1,036

69. Commentary on the main schemes which contribute to the overall supply set out in the above tables is included in Appendix A.

### **Retail Site allocations and The Mall**

70. The submission Local Plan allocates three sites which will deliver additional retail floorspace over the timeframe of the Local Plan.

<sup>9</sup> Where information has not been provided with the application, net sales area is calculated using the conversion ratios in the Retail Capacity Study 2013

<sup>10</sup> Where information has not been provided with the application, net sales area is calculated using the conversion ratios in the Retail Capacity Study 2013

**Table 11: allocated sites which will provide additional retail floorspace**

	<b>Retail floorspace (additional) sqm</b>	<b>Retail floorspace (estimated net sales)<sup>11</sup> sqm</b>
RMX1(1) – Newnham Park, Maidstone	700	700
RMX1(2) – Maidstone East/Sorting Office, Maidstone	10,000	8,500
RMX1(3) – King Street Car Park	1,400	1,190

71. Together these sites will deliver in the order of 10,390sqm of additional net sales floorspace.
72. **Maidstone East/Royal Mail Sorting Office (RMX1(2)):** this edge of centre site has been subject to a recent planning application (MA/14/500483OUT Redevelopment of land at Maidstone East to provide a new railway station and station building (330 sqm GIA), new large foodstore (8,296 sqm GIA), customer cafe, non-food retail units (4,364 sqm GIA), flexible units within Class A1 (retail), A2 (financial and professional services), a3 (restaurant and cafe) Use Class A4 (drinking establishment) or A5 (hot food takeaways), petrol filling station, associated commuter parking (560 spaces), retail parking (580 spaces), and off site highways works) submitted on behalf of Network Rail, which owns the station site, and the Royal Mail which owns the Sorting Office. More recently the Sorting Office site has come onto the market for sale and the application is currently in abeyance. The new owners will be encouraged to work collaboratively with Network Rail to secure development of the whole site. The arrival of Thameslink at Maidstone East station in 2018 will significantly enhance the town’s links to London and will increase station footfall. Station redesign will be a key element of the overall redevelopment scheme.

<sup>11</sup>

Gross floorspace to net sales area ratio taken from the Retail Capacity Study 2013

73. The eastern part of the King Street/AMF Bowling site (RMX1(3)) has planning consent for a sheltered housing scheme which is under construction (at May 2016). The western part of the site is currently a surface level car park in the ownership of the Council. As the car park is well used, it is not being actively marketed for development at this point in time. This will be kept under review and the Council, as landowner, would respond positively to approaches at any time from retail developers.
74. For the longer term, redevelopment of **The Mall** (Policy SP4 1ii) would deliver reconfigured and, subject to demand, net additional retail floorspace. As this is a substantial redevelopment proposal, it is more likely to come forward in the later years of the plan period post 2026, although development could come forward earlier if market conditions prove favourable. Indeed The Mall's owners held a public exhibition in Spring 2014 which set out ideas for a comprehensive redevelopment of the shopping centre<sup>12</sup>. The Council is committed to working together with The Mall's owners to bring forward a redevelopment scheme as confirmed in the Council's Town Centre Plan, further explained below. More immediately, a £5 million refurbishment of The Mall is underway to include improved street entrances, replacement flooring and lighting and improved customer facilities. This signals the landowners' commitment to the continued vitality of the centre.
75. Through the plan's policies and sites allocations, and the implementation of consents, the Council is confident that evidenced retail needs will be met over the timeframe of the Local Plan.

### **Maidstone Town Centre**

76. The Town Centre Assessment (DTZ, June 2013, CEN 004) recommends ways in which planning policy could support and enhance the health of Maidstone town centre

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<sup>12</sup> <http://www.themall.co.uk/media/79385/FINAL-Exhibition-boards.pdf>

(paragraphs 6.4-6.18). The way the Local Plan policies respond to these recommendations is set out in the table below.

**Table 12 – Responses to the Town Centre Assessment recommendations**

Recommendation	Relevant Local Plan Content
The council should pro-actively promote town centre sites for retail development (paragraph 6.9)	The Local Plan allocates 2 specific town centre sites (RMX1(2) and RMX1(3)) and identifies The Mall which is also within the town centre for longer term retail redevelopment.
The Council should consider more flexible change of use policies within A1-A5 use Classes in the secondary areas (paragraph 6.10)	Policy DM32 allows for A1-A5 uses in the defined secondary shopping frontages as well as leisure (D2) and community uses (D1).
There is limited demand to increase total office stock in the town centre. The imbalance in the quality of the town centre office stock should be addressed with policies in some parts of the town centre for conversion to alternative uses. (paragraph 6.11/6.12)	The recent changes to the GPDO have catalysed the conversion of some town centre office stock to residential uses. Analysis shows that this has been concentrated in the poorer quality office locations. In circumstances where development requires a planning application, Policy DM21 has the objective of retaining the better quality town centre stock in office use to help ensure current and future employment needs can be accommodated in the town centre. The Mote Road site (EMP1(1)) is a positive opportunity to provide new, quality office floorspace as demand returns, potentially in the longer term.

Recommendation	Relevant Local Plan Content
<p>The council should avoid the over provision of high density residential development in the town centre because viability is likely to be challenging in the foreseeable future. The Council may wish to promote medium density residential development at sites at the edge of the town centre such as Springfield (paragraph 6.13/6.14)</p>	<p>As above, the recent changes to the GPDO appear to have supported the viability of converting some town centre offices to flats. The town centre broad location anticipates some 990 new dwellings coming forward within the town centre boundary by 2031. Whilst these dwellings will be on ‘unidentified’ sites, the figure is substantiated by an analysis of opportunities as described in the Housing Topic Paper (SUB 004).</p>
<p>Leisure uses can help to increase dwell time and thereby support other town centre uses. The Earl Street leisure offer should be encouraged and the policies should restrict the loss of A3/A4 uses in this location (paragraph 6.15/6.16).</p>	<p>To ensure the Local Plan enables an appropriate degree of policy flexibility and thereby be responsive to market demand, the restriction proposed has not been carried forward into the Local Plan in this instance. Policy DM32 applies to Earl Street which will enable the full range of A Class uses in this location.</p>
<p>The Council should pursue a comprehensive strategy for the regeneration of the town centre with a) planning policies for each town centre use; b) identified opportunity sites and c) a delivery strategy (paragraph 6.17/6.18).</p>	<p>The Council has an approved Town Centre Plan. This is described in greater detail in the section below.</p>

77. **Town centre boundary:** the town centre boundary has been defined based on the analysis of different areas’ character, function and future development potential in the Town Centre Study (2010), Urban Practitioners, (CEN 002; paragraphs 7.7 to 7.12). At the time this Study was prepared, there was some potential that the Springfield area could be the location for a large scale office/education campus as the University of the Creative Arts was at that time looking to consolidate its operations and Maidstone was a candidate location. In recognition of this potential the Springfield area was included in the proposed town centre boundary in the Town Centre Study. As this opportunity did not materialise, the Borough Council

undertook a reassessment of the future development potential of this area through the SHEDLAA to deliver a significant amount of new housing (SHEDLAA site reference MX-13; Local Plan Policy H1(11)). As the area is now planned to be predominantly residential in character, it is not included in the town centre boundary in the Local Plan.

78. The area in the vicinity of Albion Place, which is to the north and west of King Street, was excluded from the proposed town centre boundary in the Town Centre Study. This area has been incorporated in the town centre in the Local Plan as the concentration of office uses on either side of this street is considered to justify its inclusion within the boundary.
79. **Primary shopping area:** the evidential analysis which supports the definition of the primary shopping area in the Local Plan is set out in the Town Centre Assessment paragraphs 3.83 to 3.131.
80. **District/local centres:** The District and Local Centres Assessment (2013) (CEN 005) provides evidence for the selection of centres identified in Policy DM18.

#### **Wider town centre initiatives**

81. Enhancing Maidstone town centre is one of the 5 key priorities in the Council's approved Economic Development Strategy (EDS, ORD 005). The EDS confirms that the Council will "promote the regeneration of Maidstone town centre as a high quality retail and leisure destination, and as a place to live and work."
82. A Town Centre Strategic Development Plan 2015-20 (ORD 009) has been approved by the Council's Policy & Resources Committee<sup>13</sup>. The Town Centre Plan brings together a range of investment and priority projects across a range of fields and presents these under a single 'umbrella' Plan. The Council will pursue these projects with its partners over the next 5 years. A Town Centre Strategic Advisory Board has

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<sup>13</sup> , Maidstone Town Centre Strategic Development Plan 2015-2020' Policy & Resources Committee 20<sup>th</sup> December 2015



been established which brings together key public and private sector interests to oversee this programme. The intention is that the package of projects will reinforce one another and thereby act as a significant, co-ordinated boost to the town centre. The proposals in the Local Plan are a crucial element of this wider co-ordinated framework.

83. Projects cited in the Town Centre Plan which particularly link to, and support, the provisions in the Local Plan are:
- a) Bridge Gyrotory System improvement scheme
  - b) Riverside tow path improvements to create a cycle link along the river through the town centre
  - c) Phase 1 station improvements at Maidstone East
  - d) Potential for public realm improvements to the upper (northern) end of Week Street.
  - e) Bus station refurbishment
  - f) MBC working with the owners of The Mall to bring forward a comprehensive redevelopment

84. To conclude, through the plan's policies and sites allocations, and the implementation of consents, the Council is confident that evidenced retail needs will be met over the timeframe of the Local Plan. The Local Plan provides an appropriate planning framework to help secure the future viability and vitality of Maidstone town centre. Wider, complementary initiatives heralded in the Town Centre Plan will further help to deliver a significant boost to the attractiveness of Maidstone Town Centre for residents, workers and visitors.

### **MONITORING & REVIEW**

85. The following measures will be used to monitor the progress and delivery of the Local Plan's provisions for Class B employment and retail uses;
- a) Consents/completions on the sites allocated in Policies EMP1 and RMX1
  - b) Delivery of Class B floorspace in the Economic Development Areas
  - c) Changes to A1 floorspace in the primary shopping frontages
  - d) Changes to B1a floorspace in the town centre
  - e) Amount of poorer quality town centre office floorspace converted to residential (completions and consents)
86. As signposted in the Local Plan, a review of the Retail Capacity Study will be needed for the post-2026 period.

## Appendix A: Commentary on Class B and Retail (Class A1) Completions and Consents

### Class B completions and consents update

**Table 4: Class B completions in 2014/15 and 2015/16 (sqm)**

	<b>B1a</b>	<b>B1b</b>	<b>B1c</b>	<b>B2</b>	<b>B8</b>	<b>Total</b>
<b>Gain</b>	6,863	1,351	7,025	12,215	9,604	37,058
<b>Loss</b>	9,922	0	326	1,723	1,221	13,192
<b>Net</b>	-3,059	1,351	6,699	10,492	8,383	23,866

- A1. There was an overall gain in B class floorspace of some 23,866sqm in this period. There was a net gain across all use classes, other than for offices (B1a). The loss of office floorspace was primarily as a result of schemes for the residential conversion of offices but there were also significant gains, the largest of which were at Maidstone Studios, New Cut, Maidstone (1,000sqm gain) and at the town centre St Faiths Street library site (1,443sqm gain).
- A2. Significant completed developments within the identified Economic Development Areas include 5,247sqm of mixed B class floorspace at Aylesford Industrial Estate, Forstal Road, Maidstone (DM21(1ii)), some 11,072sqm of mixed B class floorspace across 3 sites on the Parkwood Industrial Estate, Maidstone (DM21(1iv)) and 1,766sqm of B2 floorspace at Brooklyn Park, Sandling near Maidstone (DM21(1xxv)). Also a 3,044sqm new light industrial unit (B1c) was completed at Station Approach, Staplehurst (DM21 1(vi)). This modern standard floorspace compensates for the loss of some 6,400sqm of older, underused stock in B2 and B8 use which will be redeveloped when the planning consent for a new Sainsburys supermarket on an adjacent site is implemented. As an aside, criterion 4 of Policy DM21 specifically sets out the considerations that will apply to any future proposals of this type whereby a mixed use scheme incorporating an element of non B class use is put forward within an identified Economic Development Area.
- A3. The total amount of B class employment land with planning permission at 1 April 2016 is set out in Table 5 below (excluding the outline consent for the Maidstone Medical Campus (Policy RMX1(1))).

**Table 5: Total floorspace (sqm) with consent for Class B uses at 1 April 2016**

	<b>B1a</b>	<b>B1b</b>	<b>B1c</b>	<b>B2</b>	<b>B8</b>	<b>Total</b>
<b>Gain</b>	23,731	544	5,561	9,269	13,764	52,869
<b>Loss</b>	44,544	0	8,428	18,696	13,304	84,972
<b>Net</b>	-20,813	544	-2,867	-9,427	460	-32,103

- A4. This shows that a significant amount of new floorspace will come forward with the implementation of consents, totalling some 52,869sqm across all use classes. Significant contributions will be made at Pattenden Lane, Marden (4,307sqm B2; DM21(1vii)), at Hen & Duckhurst Farm, Staplehurst (8,700sqm of mixed B class; DM21(1vi)) and 1,632sqm of B1a floorspace at Turkey Mill (DM21(2ii)) as well as 1,550sqm of mixed B class floorspace at Congelow Farm, Laddingford. Whilst there is an extant consent for 16,700sqm of B1a office floorspace at Springfield, Maidstone included within the above figures, this scheme is unlikely to be brought forward in its current form and indeed the site is allocated for residential use in the Local Plan (Policy H1(11)).
- A5. The projected loss of light industrial space (B1c) is largely accounted for by just three schemes in Headcorn, Leeds and Maidstone to redevelop commercial premises to residential use. These schemes are all on sites outside the designated EDAs and would see the loss of some 7,269sqm of older light industrial floorspace. Similarly, a permitted scheme in Sutton Valence, also outside the EDAs, will result in some 9,720sqm underused B2 floorspace being redeveloped for housing. The B2 loss figure in the table above also includes the numerical loss of 3335sqm at Station Approach, Staplehurst explained above.
- A6. With respect to B8 losses, the replacement of an existing warehouse within the Lenham Storage site (DM21(1ix)) with a new, larger building shows both as a 'loss' of 6,932sqm and a gain of 12,931sqm in the table above. Importantly, the net position on this site is a gain of some 6,000sqm. Again, the Station Approach scheme appears as a numerical loss of 3,069sqm of B8 floorspace. The conversion of an agricultural style building (1,225sqm B8) to a day nursery within the grounds of Newnham Park (RMX1(1)) is also included in the figures above.

## Retail consents/completions update

**Table 9 – Retail floorspace completions (gain) 2013/14 to 2015/16**

	Convenience		Comparison	
	Gross floorspace	Net sales area <sup>1</sup>	Gross floorspace	Net sales area
<b>Gain (sqm)</b>	781	557	7,202	4,556

- A7. The largest single development completed during this period was for a new Next store at Eclipse Park, Sittingbourne Road, Maidstone (MA/12/2314) which delivered an additional 3,320sqm of comparison floorspace (net sales). A new Sainsburys Local has opened on Loose Road Maidstone (278sqm net sales convenience) (MA/13/1292). The balance is made up of individual small scale retail uses (40-250sqm gross floorspace), primarily elsewhere in Maidstone.
- A8. 10,491sqm (gross) of A1 floorspace in the borough has been redeveloped or converted to other uses over this period. Approximately 60% of this total loss has taken place in locations beyond the primary shopping area of Maidstone Town Centre. Analysis of the changes within the primary shopping area show that approximately 1,800sqm of A1 floorspace at ground floor level in the secondary shopping frontages has been converted to supporting uses such as cafes (A3), banks (A2) and takeaways (A5). This illustrates that these areas continue to add to the overall diversity of the retail offer in the town centre in line with the objective of Policy DM32. The loss of 963sqm A1 floorspace in the primary shopping frontages (Policy DM31) is accounted for by three relatively minor schemes; one to convert a unit in Fremlin Walk to a bank and two schemes to convert units in The Mall to A3 use. Taken as a whole, these recent changes are not considered to diminish the overall principal retail function of the town centre and indeed help to actively support it.
- A9. At 1 April 2016, there was planning consent for a further 16,013sqm (gross) of retail floorspace in the borough as shown in Table 10. Cases where the proposed type of floorspace is not specified in the application documents are captured in the final columns of the table.

<sup>1</sup>

Where information has not been provided with the application, net sales area is calculated using the conversion ratios in the Retail Capacity Study 2013

**Table 10: Total retail floorspace with consent (gain) at 1 April 2016**

	Convenience		Comparison		Unspecified	
	Gross floorspace	Net sales area <sup>2</sup>	Gross floorspace	Net sales area	Gross floorspace	Net sales area
Gain (sqm)	14,267	7,977	527	448	1,219	1,036

A10. The most significant extant consents are for a new Sainsburys store at Staplehurst (net sales 1,784sqm), for a foodstore plus smaller units at Langley Park, Sutton Road, Maidstone (1,254 sqm net sales) and for a foodstore and associated uses at Baltic Wharf, St Peters Street, Maidstone (3,716 sqm net sales).

A11. The Retail Capacity Study presents the retail floorspace forecast for the borough in 5 year tranches. This helps to illustrate the rate at which the demand for additional retail floorspace is expected to transpire and provides a useful guideline to monitor progress. For comparison floorspace, the Capacity Study findings indicate a demand for some 5,550sqm of comparison floorspace arising in the period to 1<sup>st</sup> April 2016. The completion of the new Next store (MA/12/2314) has delivered a substantial proportion of this anticipated floorspace requirement (3,320sqm net sales).

A12. The forecast requirement for convenience floorspace for the same interim period is 3,700sqm. There are sufficient planning consents in the pipeline to deliver, and indeed exceed, this figure as demand arises. Sainsburys at Staplehurst (1,784sqm net sales; MA/11/1944), the foodstore plus additional retail units at Langley Park, Sutton Road (1,254sqm; MA/15/508496REM) and, potentially, the large scale scheme at Baltic Wharf, St Peters Street, Maidstone (3,716 sqm; MA/13/0297).

A13. There are some 24 sites with planning permission at 1<sup>st</sup> April which would result in a loss of A1 floorspace. Whilst the sum of these potential losses is 2,671qm (gross), each individual site loss is relatively small scale; the largest is a loss of 460sqm (gross). Furthermore, none of these losses would be within the defined primary shopping frontages in the town centre (Policy DM31).

<sup>2</sup>

Where information has not been provided with the application, net sales area is calculated using the conversion ratios in the Retail Capacity Study 2013

## Appendix B – Monitoring update to section 5 of the Qualitative Site Assessment

Section 5 of the Qualitative Site Assessment identifies capacity for new B class employment floorspace within existing employment areas and sites in the borough. The sources of existing supply assessed in the study are a) vacant stock; b) permitted development (i.e. sites with planning permission); c) sites for intensification and redevelopment; and d) vacant land. The text below provides a factual update to this section of the report resulting from the monitoring of commercial land consents and completions for 2014/15 and 2015/16.

a) Vacant stock: there is no further change to this analysis as a result of the commercial land consents and completions monitoring

b) Permitted development: Table 24 of the Qualitative Assessment set out the extant planning consents for sites falling within the identified employment areas. The right hand column below provides an update for each of these extant consents.

Site name & address	2013/14 not started [from Table 24 of the Qualitative Assessment]	Update [at 1 <sup>st</sup> April 2016]
Tovil Green Business Park, Burial Ground Lane, Tovil, Maidstone	Unit 11 – 89sqm B1c	Consent has expired
Eclipse Business Park, Sittingbourne Road, Maidstone	7,071sqm B1a	Consent has expired. Site designated as an Economic Development Area (Policy DM21 2iii)
Former Poundstop, Crismill Lane, Maidstone	704sqm B1a 720sqm B2	Consent has expired [NB this site is not one of the identified EDAs in Policy DM21]
Honeycrest Industrial Park, Staplehurst	Unit B - 156sqm B1a Hen & Duckhurst Farm – 5,425sqm B1c/B2 5,425sqm B8	Unit B – extant consent Hen & Duckhurst Farm - extant consent for 8,700sqm of Class B floorspace

c) Intensification & Redevelopment: the Qualitative Assessment identifies 3 locations at Parkwood Industrial Estate (Policy DM21 1 iv) with potential for redevelopment/intensification:

Site	Update [at 1 <sup>st</sup> April 2016]
Integra, Parkwood Industrial Estate, Maidstone	Site fully developed.
Land on Bircholt Road, Parkwood Industrial Estate, Maidstone	No current application/consent
Land at the corner of Bircholt Road and Cuxton Road, Parkwood Industrial Estate, Maidstone	No current application/consent

Of the 2.2ha identified from this source in the Qualitative Study (paragraph 5.27) 0.5ha remains to be developed.

d) Vacant Land: the Qualitative Assessment identifies 3 vacant land parcels within existing employment areas with the potential to provide additional employment floorspace.

<b>Land</b>	<b>Update</b> [at 1 <sup>st</sup> April 2016]
Honeycrest Industrial Park, Staplehurst	Extension to existing warehouse to provide 465 sqm of B8 has been completed. (MA/14/0732).
Woodfalls Industrial Estate, Laddingford	No current consent or application.
Syngenta site, Yalding	No current consent or application. Site is allocated under Policy RMX1.

Of the 4.1ha identified from this source in the Qualitative Assessment (paragraph 5.36), approximately 3.9ha remains to be developed.



## Appendix C:

### Chronology of MBC reports and decisions on the Core Strategy/Local Plan concerning the allocation of employment land at Junction 8 M20

Date	Plan/Report/Decision
<b>January 2007</b>	The <b>Maidstone Core Strategy Preferred Options</b> (January 2007): in the context of a 10,080 dwelling target, land west and south of Junction 8 was included within a wider area of search at south east Maidstone.
<b>September 2011</b>	The <b>draft Core Strategy (2011)</b> published for public consultation in September 2011 identified Junction 8 of the M20 motorway as a strategic location for employment. At that time, based on the scale of employment land requirements (Employment Land Review Partial Update 2011) it was considered that land at Junction 8 would be required in addition to a dispersed pattern of smaller sites to accommodate industrial and warehousing floorspace.
<b>25<sup>th</sup> July 2012</b>	<p><b>Cabinet considered the main issues raised in the public consultation on the Core Strategy and proposed Strategic Site allocations.</b></p> <p>In respect of employment sites, the Cabinet report assessed that Junction 8 would be the best location for a critical mass of employment uses, including premier office development, industry and warehouse uses, of a quantity that would enable the delivery of the necessary supporting infrastructure whilst also providing for a qualitative scheme in a parkland setting to help mitigate the impact of development on the landscape. The location also has transport capacity.</p> <p>The Strategic Sites' Cabinet report considered alternative sites at J8 and recommended that the site at Woodcut Farm be included as an allocation in the Strategic Sites allocation document which was to be published for public consultation.</p>

Date	Plan/Report/Decision
	<p>Rather than to agree a specific site allocation, Cabinet resolved to retain Junction 8 of the M20 motorway as a strategic location for economic development to address qualitative and quantitative employment needs and the aspirations of the Council (as set out in the Economic Development Strategy 2008), pending further consultation as part of the Strategic Site Allocations consultation in August/September 2012, to enable a more informed decision to be made on the allocation of strategic site(s) at this location.</p>
<p><b>17<sup>th</sup> August – 1<sup>st</sup> October 2012</b></p>	<p><b>Public Consultation on the Strategic Sites Allocations document.</b> Views were invited on 3 potential sites in the J8 strategic location – Land at Woodcut Farm, Land south of M20 J8 (now called Waterside Park) and a much smaller site east of M20 J8.</p>
<p><b>13<sup>th</sup> March 2013</b></p>	<p><b>The outcomes of the public consultation for the Strategic Sites Allocations document (2012) were reported to Cabinet.</b> The issues raised in connection with Junction 8 were wide ranging and, to a large extent, focused on public opposition to the principle of development in this location. The main issues raised included the questioning of the need for the development, the availability of alternative sites within and outside the borough, impact on the AONB, impact on the highway network, the loss of countryside, the sustainability (or otherwise) of the location, precedent and concerns over the quality of jobs which would be generated. In the same report Cabinet was presented with an update of the borough’s employment land demand (based on delivering interim housing provisions of 14,800 dwellings up to 2031). The updated evidence pointed to a more modest requirement for employment land overall than previously, with a particular emphasis on office uses. Based on this updated evidence, the justification to release employment land at Junction 8 became less clear cut than it had been previously.</p> <p>Cabinet took the decision to retain Junction 8 as a strategic development location for employment until such time as the work identifying employment land demand (employment land forecasting) and supply (the Strategic Economic Development Land Availability Assessment) was completed.</p>

Date	Plan/Report/Decision
<p><b>24<sup>th</sup> February 2014</b></p>	<p><b>Cabinet considered a draft of the Maidstone Borough Local Plan for public consultation (Regulation 18).</b></p> <p>The Cabinet report considered the Local Plan’s approach to employment land. New evidence on employment land forecasting had been completed to confirm the employment land requirement 2011-31 [Economic Sensitivity Testing &amp; Employment Land Forecast (February 2014), GVA].</p> <p>Based on the SHEDLAA assessment, the new industrial and warehousing floorspace required could be delivered in a dispersed pattern of new employment allocations at locations near or adjoining the main rural settlement. As an alternative approach, the report identified that Junction 8 as a location for new employment floorspace has some significant, qualitative advantages. Key is its location immediately adjacent to the strategic road network. This helps to drive its market attractiveness and will serve to control HGV movements on local roads. It is the case that a site at Junction 8 is much more likely to be attractive to an inward investor and would be a more prestigious site for the promotion of the borough. This is a significant consideration; one of the council’s three key objectives is for Maidstone to have a growing economy.</p> <p>However, the report concluded that the harm caused by development in the location of Junction 8 would be substantial, in particular in terms of impacts on the AONB and the wider landscape. Local Planning Authorities have a duty to have regard to the conservation and enhancement of the natural beauty of AONB landscapes. This duty equally applies to development proposals outside the boundary of an AONB but which may impact on the designated qualities of the AONB. Coupled with the relative unsustainability of Junction 8 as a new employment location, the harm caused by development here is not considered to be over-ridden by the acknowledged qualitative benefits.</p> <p>Cabinet resolved to agree the dispersed pattern of employment sites (i.e. not to allocate a site at J8) for inclusion in the Regulation 18 draft of the Local Plan (March 2014). Cabinet also resolved that the designation of land at Junction</p>

Date	Plan/Report/Decision
	8 of the M20 motorway as a strategic location for employment use be rejected;
<b>21<sup>st</sup> March – 7<sup>th</sup> May 2014</b>	Public consultation on the <b>draft Maidstone Borough Local Plan (Regulation 18) March 2014.</b>
<b>21<sup>st</sup> October 2014</b>	<p><b>Joint meeting of Planning Transport &amp; Development Overview &amp; Scrutiny Committee and Economic and Commercial Development Overview &amp; Scrutiny Committee</b> to consider the Local Plan’s approach to employment land in the light of the most recent evidence and to consider the draft Economic Development Strategy.</p> <p>The committee report presented the findings of the Qualitative Employment Sites Assessment (September 2014) undertaken by GVA. The Assessment finds that there is both quantitative and qualitative need for additional employment land. New site/s should focus on a ‘new’, diversified offer in preference to replicating the characteristics of the existing portfolio. This points towards: a. Range of flexible, small scale, good quality office space b. Capacity for ‘design and build’ bespoke industrial space c. Small-medium warehouse/distribution units d. Location/s with good strategic road access to markets e. Location/s with minimal development constraints f. Location/s with ICT connectivity g. Creation of a distinct new employment location. The Assessment concludes that “there is likely to be demand for a new high quality, well serviced mixed use employment development area that accommodates small business orientated space, standalone industrial and manufacturing provision (albeit likely to be a design and build demand) and smaller scale distribution and ancillary workspace and office space”.</p> <p>In terms of the implications for the Local Plan, the Committee report concluded the following: “It is considered that the combined findings of the two evidential documents on employment needs point towards identifying land in the location of J8 in the Local Plan for a mix of offices, industrial and warehousing uses. Balanced against this economic case is the acknowledged sensitivity of the landscape in the J8 location. In the February Cabinet report it was recognised that development of either of the candidate sites at J8 would cause substantial landscape harm. The limitations of the location in terms of public transport connections and relative separation from the centres of</p>

Date	Plan/Report/Decision
	<p>population were also acknowledged.</p> <p>With the NPPF direction to meet the needs of the economy in full it is officers' view that, with the completion of this qualitative assessment, the balance of planning and economic development considerations now weigh in favour of identifying land in the location of J8 in the emerging Local Plan."</p> <p>The PTDO&amp;S Committee resolved that</p> <ol style="list-style-type: none"> <li>1) The Cabinet Member for Planning, Transport and Development be recommended to develop a planning policy to mitigate damage and to ensure appropriate constraints for any employment land allocation at Junction 8 of the M20. This policy should be considered by the Planning, Transport and Development Overview and Scrutiny Committee in January 2015.</li> <li>2) If the thresholds contained in the policy in recommendation 1 are met, the Planning, Transport and Development Overview and Scrutiny Committee would, in principle, support development for employment land at Junction 8.</li> </ol>
<p><b>16<sup>th</sup> December 2014</b></p>	<p>At the 16<sup>th</sup> December 2014 meeting of the Planning Transport &amp; Development Overview &amp; Scrutiny Committee and in response to the Committee's recommendation of 21<sup>st</sup> October 2014, the <b>Cabinet Member for Planning, Transport and Development</b> requested officers undertake outline work to explore options and mitigation strategies for junction 8 including: 1) Do nothing; 2) An area of land north of the A20; 3) An area of land south of the A20; 4) An area of land both north and south of the A20; and 5) Further consideration of options eastward of junction 8 (A20 corridor).</p>
<p><b>19<sup>th</sup> August 2015</b></p>	<p>The <b>Strategic Planning Sustainability &amp; Transport Committee</b> considered a report entitled 'Maidstone Borough Local Plan – employment land allocations'. The report presented the matters raised in the representations to the Local Plan Regulation 18 consultation (March 2014) on the subject of employment, the options requested by the December</p>

Date	Plan/Report/Decision
	<p>2014 decision of the Cabinet Member and the evidential findings which had previously been reported to the Overview &amp; Scrutiny Committees in October 2014.</p> <p>The Committee resolved to include a policy allocating Land at Woodcut Farm in the Maidstone Borough Local Plan Regulation 18 consultation (October 2015).</p>
<p><b>2<sup>nd</sup> – 30<sup>th</sup> October 2015</b></p>	<p>Public consultation on the Maidstone Borough Local Plan Regulation 18 consultation (October 2015)</p>
<p><b>18<sup>th</sup> December 2015</b></p>	<p>The <b>Strategic Planning, Sustainability &amp; Transport Committee</b> considered the main issues raised in the representations during the consultation on the Local Plan. The Committee agreed to include a policy allocating Land at Woodcut Farm in the publication (Regulation 19) version of the Local Plan.</p>
<p><b>5<sup>th</sup> March – 18<sup>th</sup> April 2016</b></p>	<p>Public consultation on the Maidstone Borough Local Plan Publication (Regulation 19) February 2016.</p>

## Addendum Note on Catchment Population

### Maidstone Retail Capacity Study (June 2013)

### Maidstone Borough Council

#### *Background*

This note has been prepared in the light of Maidstone Borough Council's housing target set out in the Regulation 19 version of the Local Plan (March 2016); and to confirm whether the population forecasts used for the Maidstone Retail Capacity Study (June 2013) are consistent with this housing target.

The Maidstone Retail Capacity Study, prepared by DTZ (now Cushman & Wakefield) for the Council, adopted population forecasts from Pitney Bowes; derived from 2001 Census data and subsequent estimates. These population forecasts are set out at Appendix C of the Maidstone Retail Capacity Study (RECAP Model Table 1), on a catchment area zone-by-zone basis.

#### *Methodology*

Work undertaken by the Council for the Regulation 19 version of the Local Plan established an overall housing target and the spatial distribution of 18,481 dwellings over the plan period to 2031. Based on this work, and to enable Cushman & Wakefield to test the effect of housing growth on forecast retail capacity, the Council provided a zonal breakdown of housing growth within Maidstone (namely and consistent with Zones 1, 2 and 3 as defined within the Maidstone Retail Capacity Study) at each year over the plan period to 2031.

An appropriate 'persons per dwelling' ratio, derived from GL Hearn's Maidstone Strategic Housing Market Assessment (January 2014), was applied in order to convert the dwelling numbers into population forecasts. Using these population forecasts, sensitivity testing was undertaken to identify the effect of the *Regulation 19* housing trajectory on forecast retail capacity.

#### *Conclusion*

The population forecasts used for the Maidstone Retail Capacity Study are sufficiently consistent with the Council's *Regulation 19* housing trajectory.

Therefore, the housing target set out in the Regulation 19 version of the Local Plan does not result in any substantive risk to the retail capacity forecasts set out and explained within the Maidstone Retail Capacity Study (June 2013).

**Cushman & Wakefield**

18 February 2016