



# **Maidstone Local Plan Examination**

## **Response to Inspector's Session 8 Questions: Employment**

*Prepared on behalf of*

**Gallagher Properties**

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DHA/11108**

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# 1 Introduction

## 1.1 Overview

- 1.1.1 This additional evidence is submitted on behalf of Gallagher Properties, which controls a number of development sites within the Maidstone Borough including Eclipse Park at M20 Junction 7 and the potential development site at Waterside Park to the south of M20 Junction 8.
- 1.1.2 This Written Statement expands upon the evidence previously submitted, specifically in response to the Inspector's questions in relation to session 8, where relevant to Gallagher's previous representations, in order to assist the Examination.
- 1.1.3 It should also be read alongside Gallagher Properties' previous submission in relation to Session 3B and in particular question Qn3.17 concerning Woodcut Farm.

## 2 Response to the Inspector's Questions

### 2.1 Woodcut Farm

**Qn8.19 What reasonable alternatives for a development of similar strategic scale [to Woodcut Farm] may have a less adverse landscape or visual impact, including in their effect on the AONB and its setting?**

- 2.1.1 Our response to Qn3.17 in session 3B set out a proposal for a reasonable alternative scheme which could reduce landscape and visual impacts by spreading the same quantum of development required to meet the identified need over two sites. In impact terms, spreading development spread over two larger sites is far less than harmful, thereby addressing the reasons for refusal common to both sites.
- 2.1.2 We are not aware of any other alternative site, in a location which would be equally attractive to the market, which would have a reduced impact on landscape and the AONB in particular. The proposal for development at Detling Aerodrome, unlike both Woodcut Farm and Waterside Park is located wholly within the AONB, as shown in Figure 2.1 below. At Junction 8, Waterside Park is located further away from the AONB than Woodcut Farm, and is adjacent to a development cluster.

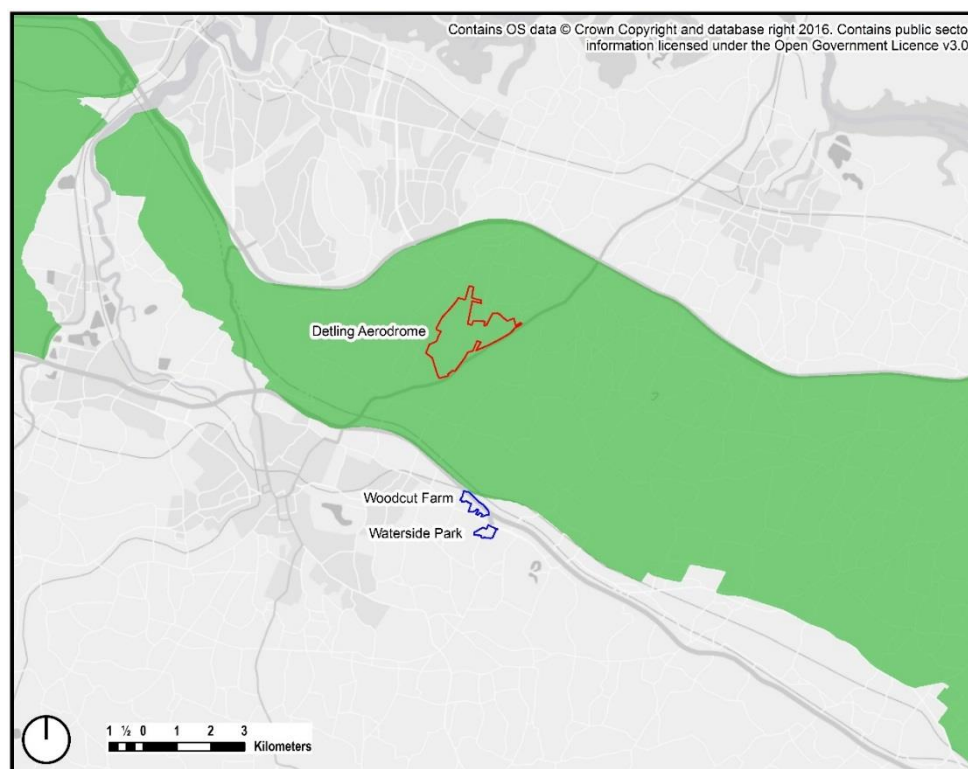


Figure 2.1: Location of Detling Aerodrome (outlined red) relative to the AONB (shaded green)

- 2.1.3 As set out in paragraphs 2.1.9 to 2.1.13 of Gallagher's response to Qn3.17, the Economic Development Strategy is clear that there is a qualitative need for development sites with good

quality access to the M20. As Figure 2.2 demonstrates, all four motorway junctions within Maidstone borough are close to the AONB. There is no land available suitable to meet the identified need for B2/B8 development outside the AONB at junctions 5, 6 or 7. Therefore, if Maidstone's Economic Development Strategy is to be realised, development needs to take place at Junction 8, in the most sympathetic manner possible.

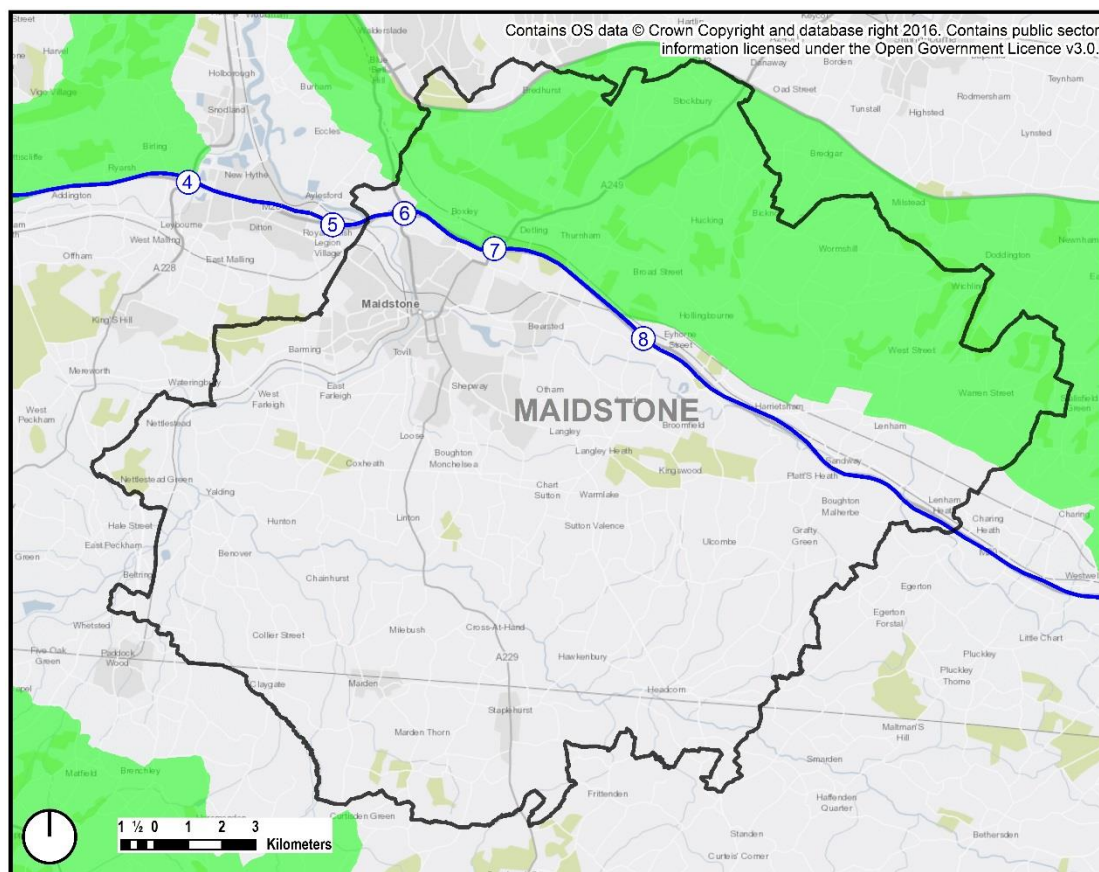


Figure 2.2: Relationship between M20 junctions and the AONB (shaded green)

**Qn8.20 In the alternative could equivalent floorspace be achieved by dividing provision between 2 or more smaller sites and would that have less impact?**

- 2.1.4 Our proposal referred to above would achieve this. This could result in a scheme with increased screening, reduced mass and reduced effects on landform whilst still delivering the same quantum of development to specifications and in a location proven to be required by the market for employment development, thus increasing competition and deliverability. This strategy deals with the main reasons for refusal of both previous schemes, including the impact on the AONB.
- 2.1.5 The Waterside Park element of the alternative scheme could deliver 50-60% of the previously proposed floorspace on just 40% of the site area. As with the previous appeal schemes, it would be necessary to raise the eastern part of the site by around 2m in order to connect to the A20. Limited cut would be necessary to create the western part of the proposed platform, but this would be very substantially reduced from the previous schemes. The revised scheme

would require a retaining wall of up to 5m at its highest point, tapering down either side of the high point, ceasing to be necessary part way along the north and south boundaries of the developed area.

- 2.1.6 To the west of the retaining wall, the existing land rises by around 5m over a distance of 75m towards the Biffa site, i.e. a very shallow 1:15 gradient. This would remain unchanged. The retaining structure itself would be in the form of an attractive and gently sloping retaining wall comprised of Kentish ragstone gabions, in the same form as the wall constructed at Brooklyn Park (a recently completed Gallagher development at M20 J6 – see photographs at **Appendix 1**).
- 2.1.7 As such, the existing field beyond the developed area would remain completely unchanged from its existing topography.
- 2.1.8 At Waterside Park, such a scheme would also result in:
  - Limited earthworks;
  - Increased separation from the non-designated heritage assets at Old Mill Farm and Mill Pond to the south;
  - No disruption to the public footpath;
  - Visibility from Leeds Castle reduced to nil/negligible; and
  - Reduced visual impact from the AONB.

## 2.2 Waterside Park

***Qn8.21 Do participants agree or disagree with the SA assessment and how might the reduced scale of the development now proposed by the Representor affect those conclusions?***

- 2.2.1 A reduced scheme would not change any of the responses to the SA for Waterside Park as these are generally concerned with the site as a whole. Whilst we consider that a reduced scheme would have a reduced impact on the AONB, it is likely that the SA would continue to have an amber response on this issue. Similarly, the scheme would still be adjacent to an already compromised Listed Building (Old England Cottage, opposite the proposed site entrance) and so that response would also be likely to remain the same.
- 2.2.2 We have some further comments on the SA questions in relation to this site which are set out in Table 2.1.

Sustainability Appraisal Question	Comment
How far is the site from the Urban Area / Rural Service Centre?	Clearly the site is not adjacent to the urban area. However, the SA does not take into account the sustainability benefits of B2/B8 development being located close to a motorway junction, meaning fewer lorries having to travel through populated urban areas.

How far is the site from the nearest GP/primary/secondary school/post office/sports facilities/children's play space/green space?	We don't disagree with the SA findings, but these matters are more relevant to housing rather than employment schemes. If these irrelevant answers are removed from the matrix, the site would score much better in terms of the proportion of green/amber answers.
How accessible is the site to local employment provision?	Similarly, this is more relevant to housing rather than employment schemes. Clearly if developed for employment, the site would be immediately accessible to local employment provision.
Will allocation result in employment-generating development in or close to deprived areas?	The fact that it is not in such an area does not mean that employment-generating development is any less sustainable.
How far is the site from the nearest bus stop/train station?	The SA does not take into account the proposals to improve bus services including a bespoke shuttle service linking to stations.
Is the site within or near an AQMA?	The SA is factually correct but does not take into account the sustainability benefits of reducing lorry movements within the urban area that would result if development was located at motorway junctions.

Table 2.1: Comments on the Sustainability Appraisal 2016

***Qn8.22 How might the suggested relief road be incorporated and where might it continue to the south?***

- 2.2.3 Our response to Qn3.17 in Session 3B included at its Appendix 2 a plan demonstrating how the Woodcut Farm and Waterside Park sites could be developed to give a total of 55,740m<sup>2</sup> of employment development.
- 2.2.4 An alternative version of this plan is included as **Appendix 2** to this submission. This shows precisely the same development layout, but indicates (in diagrammatic form) how a relief road could be incorporated within the plans. This shows a relief road starting at the existing M20/A20 roundabout, therefore providing a direct link to M20 Junction 8.
- 2.2.5 From here, the route would cross the mill pond to the south, passing to the west of Leeds village to join the A274. A Leeds-Langley bypass has been considered on and off for several decades. **Appendix 3** shows two historic KCC feasibility drawings which showed a potential route – one of many considered over time – which was given previous consideration, well before Gallaghers became involved with promoting the Waterside Park site. This gives an indication of a potential route south of the Waterside Park.

***Qn8.23 Where would the proposed development take access from the A20?***

- 2.2.6 The previous Waterside Park proposals subject to the appeal took access directly from the M20/A20 roundabout. This is the most direct access, but due to the topography also necessitates a significant element of cut to achieve this. An alternative access arrangement is shown at **Appendix 2**. This access, on the eastern edge of the site, is at a similar level to the A20 and so would not require significant topographical change. It would be a left-in, left-out

arrangement. It has been considered by our transport engineers and would be suitable to accommodate the reduced scale of development now shown.

***Qn8.24 If the relief road were not incorporated would the access to the proposal site compromise any future connection of the relief road to the M20 and junction 8 at this roundabout?***

- 2.2.7 No, any scheme could be designed to enable an access to the relief road to be provided from the A20/M20 roundabout at a future date.

***Qn8.25 What account has been taken of the appeal Inspector's conclusions concerning heritage impacts and how have these been addressed?***

- 2.2.8 The Inspector considered that "...the greatest impact on the setting of a heritage asset would be that on Leeds Castle and its park." [DL38]. She acknowledged that there was little intervisibility between the castle buildings and Waterside Park, but that glimpses would be available from the Park.

- 2.2.9 She identified two locations from where glimpses would be available:

- (a) From the 5<sup>th</sup> tee of the Golf Course; and
- (b) From the entrance to the Park from Penfold Hill.

Golf Course viewpoint

- 2.2.10 It is clear from paragraphs 39-40 of the decision letter that this was the viewpoint which caused the Inspector the greater concern. A photomontage of development from this viewpoint is attached as **Appendix 4**.
- 2.2.11 The building visible to the left of the Castle tower is the proposed Scarab building, on the western part of the development site (see appeal scheme layout at **Appendix 5**). The alternative proposal now put forward would exclude development from this area.
- 2.2.12 The building visible to the right of the Castle tower is the ADL building, on the eastern part of the development site. Reducing the eaves height of buildings in this location to around 10m (from 12m in the enclosed photomontages) would reduce buildings towards the tree line making them much less visible in views from this viewpoint.

Entrance viewpoint

- 2.2.13 Paragraph 41 of the Inspector's decision confirms her view that the development would only be visible for a very short time and from limited viewpoints in this location, and she doesn't expand any further upon any concerns regarding this viewpoint. Nevertheless, a scheme which reduced the height of buildings in this location to a 10m eaves height would further reduce the impact in this location so that any building would be significantly less visible than shown in the photomontage at the appeal (**Appendix 6**).



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Impact on Visitors to Leeds Castle

- 2.2.14 It should be noted that the Inspector was not persuaded by the argument cited by opponents to the scheme that visitors would avoid the Castle and its grounds simply because they would see an industrial park on their drive to and from the venue (DL41).

Impacts on Old Mill Farm

- 2.2.15 The revised proposals would keep development well away from the non-designated heritage assets at Old Mill Farm, significantly reducing impact there.

***Qn8.26 Has MBC's opposition to the allocation of this site been affected by the Planning Committee's decision concerning Woodcut Farm?***

- 2.2.16 Whilst this is for the Council to answer, the Planning Committee clearly refused planning permission for a scheme which appears to be wholly compliant with the draft allocation, raising very real concerns about the deliverability of the allocation. As Mr Fullwood said at the 3B hearing session, it is important that the Council does not put all of its eggs in one basket when making allocations. Yet at present, that is exactly what the Council is doing in response to the need for B2/B8 development at Junction 8, something that the Council's own Economic Development Strategy states is "critical to ensuring that the principal aim of the Strategy is achieved".<sup>1</sup>

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<sup>1</sup> EDS para 6.22