

**MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION  
COMMENT BY CPRE KENT &  
MAIDSTONE DISTRICT COMMITTEE OF CPRE KENT  
ON  
INSPECTOR'S INTERIM FINDINGS - ADDITIONAL EMPLOYMENT MATTERS (ED118)**

## **1 General**

1.1 The Inspector's Interim Findings dated 22 December 2016 at paragraph 129 with regard to the need for an early review of the Plan states:

*"In this case there are some issues which do need to be resolved before the plan is first adopted. However there are others, especially in relation to housing delivery at the end of the Local Plan period. These are less urgent because they do not impact on strategy in the first 5 years of the Local Plan. To delay the adoption of the Local Plan to resolve all of these matters would have other disbenefits including prolonged uncertainty about the 5 year housing supply position later in the plan period."*

1.2 The Interim Findings go on after paragraph 130 to state that:

*"The Local Plan should include a policy commitment to a review with a target adoption date by April 2021. ..."*

1.3 It is noted that the GVA Table on page 7 of their analysis attached as Appendix A to the Borough Council's additional employment matters assumes that the OAHN will be 18,560 and has not taken account of the Inspector's requirement that the figure is reduced by 900 dwellings.

1.4 The Interim Findings in the conclusion after paragraph 27 reduces the OAHN by 900 homes. This will result in a reduced employment need. Using the workforce (17300) to dwellings ratio (18560) of 0.932 this implies that 900 dwellings would generate 839 workers. Using the ratio of projected job growth (14,400) to projected workforce growth (17,300) of 0.952 reduces the figure to 698. That is of the 839 workers 698 would work in Maidstone Borough. This will result in a reduced need for employment floorspace. The reduced requirement means that the Borough Council's estimate of office floorspace reduces to around 12,800sqm (-852sqm), and Industrial / Warehousing to 65,000sqm (-3311sqm), assuming that these sectors reduce proportionally.

1.5 At the Examination CPRE Kent raised concern that the Referendum decision to leave the European Union was likely to result in reduced net International migration, which would reduce the scale of housing needing to be built. At that time it was not clear if Government would choose a 'hard' or 'soft' exit. Government has now set out that it will be negotiating a 'hard' Brexit and on 8 February MPs backed the Brexit bill. There is now greater probability that Brexit will result in reduced International migration. Reduced demand for housing will affect the amount of employment land required.

1.6 For the period 2001-2015 42% of population change in Maidstone<sup>1</sup> was due to internal migration, of which some will be people moving from London. People moving from London with a London job are unlikely to seek a job in Maidstone Borough.

1.7 The Borough Council's additional employment matters paper at paragraph 2.25 states: *"As part of the Local Plan Review, the Council will re-assess both the need (demand) for employment floorspace and the supply, including whether additional allocations or alterations to existing allocations are required."*

1.8 The Borough Council's proposed modification to RMX1(1) Newnham Park states that

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<sup>1</sup> Population Estimates for UK, England and Wales, Scotland and Northern Ireland Mid-2015: MYE3B Summary Components of Change Series UK (2015)

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*"... the first Local Plan Review will be a timely point at which to review progress with the delivery of the campus and to consider whether any adjustments to the policy framework for this site are justified. ..."*

If the campus is not forthcoming there could be opportunity for other employment floorspace to be provided for on the site.

1.9 Planning application MA/16/507292/OUT for land at Newnham Park includes up to 24,750sqm of B1(a) and B1(b) floorspace for Offices/Research & Development (including pathological laboratories). The application was considered by the Council's Planning Committee on 2 February 2017 with the recommendation that *'The Head of Planning & Development be given Delegated Powers to grant planning permission subject to conditions and a Section 106 Agreement subject to the expiry of the newspaper advert and no new material issues being raised.'* The applicant (Kent Medical Campus Ltd) sought a 10 year consent to submit reserved matters on the basis that the site is considered to be complex and will be delivered over several years, and that having to reapply for planning permission every three years is considered to be an unnecessary expense. This approach places some doubt on the likelihood of the scheme being developed out in full.

1.10 Update Table 4.4 which takes account of completions to 1<sup>st</sup> April 2016 identifies that for the period 2016-2031 there is no net requirement for industrial floorspace (B2), and if fact there is a negative requirement, and that there is a net requirement for a small amount of warehousing floorspace (B8) - 7,965 sqm.

1.11 The latest Kent County Council Commercial Information Audit for Ashford, Swale and Tonbridge and Malling (see Appendix B) show that at 31<sup>st</sup> March 2014 allocations for B8 and Mixed B1-B8 floorspace provided:

	Warehousing (B8) sqm	Mixed (B1-B8) sqm
Ashford	10,000	102,208
Tonbridge and Malling:	16,074	7,994
Swale	48,796	204,379

Thus the M20 corridor allocations provided 26,074sqm warehousing floorspace (B8), and 110,202sqm mixed floorspace (B1-B8), whilst the three boroughs allocations provided 74,870sqm warehousing floorspace (B8), and 314,581sqm mixed floorspace (B1-B8).

1.12 The Government has still to make a decision on the location of the Lower Thames Crossing. Should the route east of Gravesend be chosen this could result in greater use of the A2 by lorries that currently use the M20. This could result in reduced demand for warehousing floorspace on the M20 corridor.

1.13 In view of the above considerations it would be prudent not to allocate the level of employment land set out in the submission local plan until there is clear evidence that it is required. CPRE Kent considers that there is no requirement for land at Woodcut Farm to be allocated in the Local Plan.

## **2 Office floorspace**

2.1 The Inspector's Interim Findings dated 22 December 2016 after paragraph 112 suggest that *"Consideration should be given to safeguarding Woodcut Farm or other sites for office development from other uses for a period pending a recovery of office development values later in the plan period."*

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2.2 The Borough Council's additional employment matters paper assesses office floorspace.

2.3 We agree with the Council that it would be appropriate to include an allowance for windfall floorspace.

2.4 We note that the consent figures are permissions over 400 sqm. No indication is given of the amount of consented floorspace for permissions of less than 400sqm.

2.5 The Council's paper only refers to one planning permission for office development post 1<sup>st</sup> April 2016, namely MA/502359 Turkey Court, Maidstone.

2.6 We have used the information in paper ED118, for the planning applications and the effect reducing the OAHN by 900 dwellings to assess identified need against supply for the periods 2014-16, 2016-2021, 2021-2026 and 2026-2031. We have made a number of assumptions. These are:

- 750sqm annual windfall floorspace from 2019/2020.
- That planning permission granted at 1<sup>st</sup> April 2016 and that for Turkey Mill will be developed by 2021.
- That allocations RM1(1) Mote Road and RMX1(2) Maidstone East and Royal Mail Sorting Office will be developed in the period 2021-2026.
- That the office floorspace for MA/502359 Turkey Court, Maidstone, is 2448sqm as set out in the planning application and not 816sqm as given in Table 2 of the additional employment matters.
- That Woodcut Farm would not be required (if at all) until 2027-2031.

2.7 This assessment is shown at Appendix A, and suggests that:

- For the period 2016-2021 there would be a shortfall of about 1,700sqm, although this may not happen depending on the extent of office permissions for developments of under 400 sqm permitted at 1<sup>st</sup> April 2016 and that come forward during the first period, along with any windfall schemes not assumed.
- For the period 2022-2026 there would be a surplus of around 1,500sqm.
- For the period 2026-2031 there would be a surplus of 3,300sqm.
- Overall, when a reduced housing need is taken into consideration for the period 2016-2031 there would be a surplus of around 3,900sqm (+16.3%).

It should be noted that for the periods 2022-2026 and 2027-2031 the assessment does not provide any allowance for small scale office permissions.

2.8 The paper (ED118) at paragraph 2.19 concludes that *"there is therefore sufficient supply of land for B1a/b uses through allocations and consents in conjunction with a justified allowance for future windfalls to meet the evidenced need for the full Plan period to 2031."* We agree with this statement.

2.9 With regard to policy RMX1(1) Newnham Park paragraph 2.27 states:  
*"The Council considers that the Local Plan Review would be a timely point at which to review progress with the delivery of the medical campus..."*

2.10 The proposed change to policy RMX1(1) at paragraph 2.30 provides for the first Local Plan review to *"assess the site's suitability for an element of non-medical B1a/b uses, which could be additional to, or a partial alternative to the floorspace allocated on Policy RMX1(1)."*

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2.11 Given that there is sufficient permissions, allocations and windfalls to meet demand up to 2026, along with reduced demand due to a 900 dwelling reduction in the OAHN and as the Council at the first review will consider whether Newnham Park could be allocated for non-medical B1a/b uses CPRE Kent considers that there is neither the need to allocate Woodcut Farm for office floorspace nor to safeguard the site for office development for a period pending a recovery of office development values later in the plan period.

### **3 Conclusion**

3.1 On the above evidence CPRE Kent considers that there is no requirement for the Local Plan to allocate land at Woodcut Farm for employment purposes.

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**Appendix A: Assessment of supply against requirement for the periods 2026-2021,  
2022-2026 1n3 2027-2031**

Site	16-21	22-26	27-31	Total
Completions				
Planning permissions (over 400 sqm):				
<i>MA/15/505504 Mandarin Chef, 35-37 Lower Stone Street</i>	660			660
<i>MA/12/0867 Congelow Farm, Benover Road, Yalding</i>	530			530
<i>MA/13/2059 Knight Ashphalt, Lenham</i>	730			730
<i>MA/502359 Turkey Court, Maidstone (1)</i>	2448			2448
Sub Total	4368			4368
<i>Allocations</i>				
<i>RM1(1) Mote Road</i>		2000		2000
<i>EMP1(5) Woodcut Farm</i>			7500	7500
<i>RMX1(2) Maidstone East &amp; Royal Mail Sorting Office</i>		4000		4000
Sub Total		6000	7500	13500
Windfalls (750 per annum from 2019)	2250	3750	3750	9750
Total for each period	6618	9750	11250	27618
Cumulative Total	6618	16368	27618	
Allowance for reduction in dwellings (-900)				-852
Requirement	8329	8273	7998	23748
<i>Cumulative requirement</i>	8329	16602	24600	23748
Shortfall / Surplus (Total for each period - Requirement)	-1711	1477	3252	3870

Note

(1) the planning permission is for 2448sq.m. not 816sq.m. as set out in ED118 paragraph 2.18