

Session 8 – Employment Policies and Allocations

Case for a Strategic Review

1. This paper is written on behalf of the Coordinating Team.
2. While it does not refer directly to any of the Inspector's questions for this session, it outlines an over-arching strategic context for Session 8 which is an essential consideration for an improved future for Maidstone.

Reasons for this paper

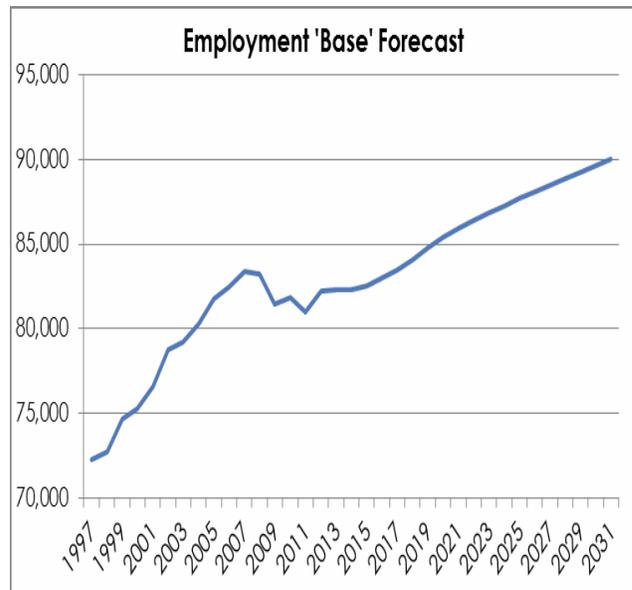
3. The first six days of the Inspector's examination have thrown up a number of issues that bear on employment matters, the number of jobs that can realistically be generated and where employment sites should be located, with a new large site entering the equation.
4. In the opening days of the examination the Co-ordinating Team, various parish councils and other organisations argued:
 - a) The housing target Maidstone Borough Council (MBC) has set to 2031 is too high.
 - b) The 14,000 target for new jobs is unrealistic, as evidenced in our submission "Coord Team – 1B -1" to Session 1B and partially repeated below.
 - c) The movement of over 13,000 people a day across the administrative border between MBC and Tonbridge and Malling Borough Council (TMBC), many of whom work in the companies located in the corridor between Aylesford and Larkfield, establish this as a common economic, employment and travel-to-work area.
 - d) Despite this, the scope for strategic planning across this area that spans the space between Junction 8 in the east and Castle Way in the west (including Kings Hill to the south west) has not been properly explored by TMBC and MBC under the Duty to Co-operate, as evidenced in our submission "Coord Team – 1A - 1" to Session 1A.
 - e) The experience of trying to locate new jobs of the kind MBC has sought to attract at or near motorway junctions has not been successful – notably at Junction 7 – as evidenced in our submission "Coord Team – 8 – 2" to this Session 8.
 - f) The main new employment sites proposed in the Plan at Junction 8 and Woodcut Farm are, for various reasons, unsuitable.
5. Furthermore, the Binbury Park development presented on 6 October opens up another possible site of strategic importance of which no account could be taken in the Plan and which, if granted planning permission (or permission for a variation), could obviate the need for sites included in the Plan.
6. In addition, the future of Aylesford Paper Mill site – another strategic site within the MBC/TMBC economic area – needs to be further explored before any sensible strategic decisions can be made about the distribution of further employment sites within this area.
7. In the light of the above, this paper recommends that, as a matter of urgency, the employment target and the sites needed to provide the jobs that can realistically be expected to be required over the planning period should be the subject of an immediate review and that the Plan should not be approved until this review has been completed and any changes required fed into it as Major Modifications. The remainder of this paper explains why.

Session 8 – Employment Policies and Allocations

8. Of the points listed at paragraph 5 above, the first four have already been aired in the opening days of the examination. This paper will therefore concentrate on the remainder.

Employment Growth - GVA Grimley

9. Jobs growth over the plan period is forecast at between 7,800 and 14,400. However, the Economic Development Strategy adopts the top of the range, 14,400, as a target, even though there was actually a **loss** of 3900 jobs in the period 2009- 2015 and this weakness is likely to continue given the high proportion of public sector jobs in Maidstone.
10. GL Hearn (January 2014) itself states at paragraph 10.23: “The GVA forecast anticipates job growth of 14,400 jobs in Maidstone Borough over the 20 year period to 2031. This represents a potentially optimistic assessment of employment growth, and is above baseline forecasts”.
11. The 14,400 should be discounted; it has no substance.
12. This chart from paragraph 3.2 of GVA’s Economic Sensitivity Testing & Employment Land Forecast Maidstone Borough Council Final Report February 2014 identifies potential employment growth of 7,818 workforce jobs between 2012 and 2031.
13. Assuming 1.3 employees per home, 14,400 jobs would support just over 11,000 new homes, while 7818 jobs would support only 6,000. The current OAHN would imply a need for almost 25,000 jobs.
14. The large gap between new employment and new homes implies either unsustainably high unemployment or a large growth in out-commuting to employment opportunities elsewhere.



Aims & Objectives

15. MBC has long sought to improve the quality of jobs available within the Borough. More high paid, highly skilled jobs has been the Holy Grail of successive councils. Regrettably this laudable objective has proved as elusive as that undertaken by King Arthur’s knights.
16. Junction 7 was originally conceived as the great white hope of realising this policy. While the development of the Kent Institute for Medicine and Surgery (KIMS) has undoubtedly met those aspirations, the remainder of the Eclipse Park site has fallen well short of the hopes and ambitions the Borough Council had for it as noted in our submission “Coord Team – 8 – 2” to this Session 8.
17. Instead of prestigious headquarters offices there have been hotels, bland offices and, most recently, retail development in the shape of a NEXT superstore. It is now suggested that the recently closed Park and Ride site – the only one to the northeast of Maidstone - is to become the site of a Waitrose supermarket.
18. While we have no doubt that people do enjoy shopping at NEXT and would do so if a Waitrose store were built, the plain fact is that the space they have taken up, and may take up, represent a failure of the Council’s original plans for the site. Indeed, this is reinforced by the recommendation of consultants employed by the Council that a new business plan

Session 8 – Employment Policies and Allocations

is needed for Eclipse Park because the old one has failed to deliver (Maidstone Economic Development Strategy 2015-31, page 30).

19. MBC describe the 49,000m² [527,240 sq ft] of proposed development at Woodcut Farm as:

“A unique opportunity..... to provide a prestigious business park at Junction 8 of the M20 that is well connected to the motorway network and that can provide for a range of job needs up to 2031. This will help to diversify the range of sites available to new and expanding businesses in the borough to help accommodate future demand. Land at Woodcut Farm is allocated to provide for a mix of business uses comprising industrial, offices and distribution/logistics. High quality office development is sought, such as that required by company headquarters for example, providing complementary provision to the town centre.”

20. This paean of praise is reminiscent of the way Junction 7 was at first described.

Woodcut Farm

21. Helen Whately MP stated at Session 3A that the proposed land allocation at Woodcut Farm should be scrapped, as it is not appropriate in terms of location and its negative impact on Leeds Castle. She also pointed out that development around Junction 8 had been rejected before.
22. Yet MBC has brought forward no persuasive reasons to justify the belief that, if development were allowed at Woodcut Farm, it would be any more successful than that at Junction 7. To argue as they have done in the past that, because companies are free agents and cannot be compelled to take up sites already designated for development, the Council must provide a “palette” of options from which the private sector can pick and choose will simply result in large tracts of countryside being earmarked for development with no assurance that the private sector will take them up.
23. Furthermore, simply designating land for development does not create jobs. Nor is development at motorway junctions, of itself, a sure fire way of generating high quality, well paid employment. If it were, then Maidstone, sitting as it does at the edge of four such junctions within the space of less than ten miles, would be one of the richest communities in the South East. The fact that it is not points to companies rationally weighing up the pros and cons of alternative locations and choosing other sites. In our view more time needs to be spent on understanding the reasons for that choice because until that is clear Maidstone will always find it difficult to attract the kind of employers it so desires to settle in the area.
24. Paragraph 160 of the NPPF states that:

“Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should:

- Work closely together with county and neighbouring authorities and with Local Enterprise partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market; and***
- Work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability.”***

Session 8 – Employment Policies and Allocations

25. We believe that the way the Council has set about allocating land for employment fails this test and is therefore unsound.
26. Not having engaged effectively with neighbouring authorities over development needs operating across their areas, the Council has no sound basis to suggest that a real need exists for development at Woodcut Farm. Nor has the Borough Council provided evidence to justify why development near one motorway junction should prove any more successful than that which has patently failed at another. The proposed development is neither justified nor sustainable and runs wholly contrary to the Council's policies for protecting the countryside.

Impact on the countryside

27. On page 209 of the Local Plan the Council states:

***“The visual character of Maidstone’s landscape is highly valued by those living, working and visiting here. A significant proportion of the borough benefits from high quality landscapes. A large part of the borough lies within the Kent Downs AONB, a nationally important landscape designation and a strong level of protection will be given to this designation and its setting, set out in policy SP17. However, all of the landscapes play an important role in contributing to the borough’s environmental, economic and social values. Therefore all landscapes, rather than those that are designated, will be viewed as a natural asset. This is in line with the European Landscape Convention.*”**

[Our underlining]

28. These issues were touched on at the session on Tuesday 11 October around various amendments the Council tabled to SP17.
29. The impact on the North Downs AONB and its setting were amongst the reasons why members of the Council rejected the advice of officers and refused planning permission for both the Waterside Park development at Junction 8 and, subsequently, Woodcut Farm to the west.

Waterside Park

30. The development at Waterside Park was opposed by all the local parish councils, by Kent County Council, by CPRE, by the Kent Downs AONB Executive and by Natural England. MBC’s refusal of planning permission was upheld by a Planning Inspector on appeal.
31. A legal challenge by the applicants against this decision was comprehensively rejected on all counts by Mr Justice Collins at the High Court in January 2016.
32. It is worth considering the environmental grounds that played such an important part in the Inspector’s decision and which were endorsed by Mr Justice Collins.
33. In paragraph 33 of her decision letter the Inspector said:

***“In terms of the visual impact of the developments, the rural character of the site would be lost and the sensitivity of those receptors most affected, the walkers using the public rights of way, particularly those within the AONB, would be high. With a moderate sensitivity to change, as found in the Maidstone landscape character assessment, the resultant effect would, I consider, be much greater than the moderate adverse, falling to minor adverse over time, as assessed by the applicant’s witness. The harm is in my opinion a significant factor weighing against both the appeal proposals.”*”**

Session 8 – Employment Policies and Allocations

34. In addition, the Inspector decided the proposed development would be particularly harmful to the setting of Leeds Castle (the only Grade I asset of national importance within the MBC area), and its Grade 2* listed park and garden. In paragraph 40 of her decision letter she wrote:

“The intrusion of substantial industrial development into an otherwise well preserved setting seems to me to be particularly harmful. Whilst this harm to the setting might be experienced only from a narrow field of view, it would nevertheless detract from the largely unspoilt and tranquil scenario in which the castle is experienced and which has historically surrounded it. The castle has up to now been fortunate in retaining this setting and the intrusion of modern development into this particular view would, I consider, diminish the significance of the heritage assets.”

35. The Inspector concluded that neither of the proposals for Waterside Park amounted to sustainable development as defined in the NPPF due to the extent that they would conflict with the environmental policies contained within it.
36. Woodcut Farm is open to similar objections to those of Waterside Park. It is a wholly speculative development and its impact on the setting and on the AONB itself is, if anything, greater because it is even closer.
37. As to the question of identified need for additional employment land, the Inspector said in paragraph 53:

“Of course this does not mean that this land will necessarily be considered suitable for allocation in the emerging local plan, or that even if it is, the appeal site would be the preferred location. Neither is it definite that the identified need, whatever quantum is eventually adopted, would have to be satisfied through the allocation of a greenfield site. There are other competing sites, such as the existing business park of Detling Aerodrome, that might possibly come forward as the preferred location.

[Our underlining]

Binbury Park

38. The Detling site (Binbury Park Garden Village) is now on the table as a strategic site that should be taken into account before decisions are made about land allocations in the Local Plan.
39. The Detling Aerodrome Industrial estate is located on part of the former RAF Detling World War II airfield. The original footprint extended westwards to include what is now a major portion of the Kent County Agricultural Society showground. Hence, the current proposal would in part be building upon an existing brownfield footprint.
40. The present industrial site has grown up piecemeal, largely upon appeal and, if it is carried forward for development, might benefit from enhancement, including community facilities benefitting from its current, and possibly enhanced, transport links.
41. Binbury Park proposals encompass, amongst other things, the building of 1,100 dwellings, 500,000sq ft of commercial space and 150,000sq ft of office and incubator space – far more than proposed at Woodcut Farm.
42. While the site is open to environmental objections because of its location within the AONB, paragraph 116 of the NPPF, to which Mr Mellor has already drawn attention in other parts

Session 8 – Employment Policies and Allocations

of the examination, makes clear that development can be permitted where it is in the public interest and there is need for the development.

43. As noted above, the site includes an extremely unsightly commercial development which could be eradicated under the new proposals. Furthermore, it offers opportunity for significant highway improvements at Junction 7 / M20 and along A249 adjacent to the site.
44. The site is not subject to the same infrastructure constraints that limit development in south-east Maidstone and lies close to an excellent – albeit heavily trafficked - road and is roughly equidistant between M20 and M2 junctions. It would also provide improved accessibility and linkage between the Lower Thames Crossing and the M2/M20 corridor.
45. This area was also identified by KCC as a preferred location for development at the Regulation 18 stage of consultation in March 2014.

The need for a review

46. MBC is now faced with at least three proposals for new employment land within the Borough: Waterside Park, Woodcut Farm and Binbury Park. All three are open to objection on environmental grounds but there are trade-offs to be considered and carefully assessed. In our view it would be wrong to reach a decision without considering all three.
47. While MBC contends that it has fully discharged its Duty to Cooperate, it is evident that this must be challenged with respect to employment possibilities within TMBC, given the huge travel-to-work flows between these two neighbouring Authorities.
48. A review would involve some delay, but, given political will and necessary resources, it need not take an age. More time arriving at the right decision would be time well spent. It would also provide the opportunity to:
 - a. Revisit the estimates for job creation, with the assertion of “14,400” being identified by GL Hearn as “potentially ambitious” and which others believe to be grossly inflated.
 - b. Re-open discussions with TMBC over long-term use of the former Aylesford Paper Mill site. This would provide an opportunity to rectify a failure to co-operate with that authority on strategic planning issues in what is clearly a joint economic, employment and travel-to-work area.
 - c. Re-open parallel discussions with Ashford BC, given its previous growth aspirations and large infrastructure investment.
 - d. Undertake an in-depth assessment of why sites such as Junction 7 have failed to achieve their objectives, to identify lessons to be learnt and to adjust plans accordingly.
 - e. Review the above intra-Borough sites i.e. Waterside Park, Woodcut Farm and Binbury Park – together with any others which may surface during such review.
49. Only by bringing all these strands together can Maidstone residents be assured that all possible sites for employment have been considered, that a proper strategic approach has been adopted towards their provision and that assessment of future employment growth are sound.