

Comments Made By	Comment Ref. Number	Comment	Draft EDS Section	Agreed/Not Agreed/Noted	MBC Response
Bearsted & Thurnham Society	BTS1	The Society strongly endorses the regeneration of the town centre, improved and expanded shopping facilities and improvements to areas such as Lower Stone Street, the adjacent office blocks and the area around the East Station	Enhancing Maidstone Town Centre	Noted	No change
	BTS2	The area around the east Station provides an exciting opportunity to provide employment opportunities adjacent to the town's main railway station, Maidstone and Medway towns' bus routes and the Fairmeadow and Royal Engineers' Road. Being so close to transport links makes for more sustainable development. It should also help to improve the northern end of Week Street which is tired and in need of better shopping facilities.	Enhancing Maidstone Town Centre	Agreed	This reflects the draft Local Plan policy and approach set out in the draft EDS. No change needed
	BTS3	Achieving the redevelopment of Maidstone East will not be easy. Various proposals for a large retail store have come and gone over the years and nothing has materialized. The Victoria pub is becoming derelict. The Strategy does not go into any detail about how areas such as this are to be regenerated and all the time proposals keep coming in for out of town shopping areas that conflict with the aim of regenerating areas such as this. If the Strategy is to be credible more information needs to be given as to how the Council's ambitious ideas are to be delivered.	Enhancing Maidstone Town Centre	Noted	Officers are working with Solum Regeneration, the development company set up by Network Rail in partnership with Keir Group, to bring about the comprehensive redevelopment of the Station site, which will include the adjacent Royal Mail sorting office. No change proposed
	BTS4	The Society has always supported the new Medical Campus because it helps to provide the kind of highly skilled and well paid jobs the Council has been seeking to attract. However, there have been suggestions that the expansion of the campus should be tied to retail development at Junction 7 and that we would oppose on the grounds that it would draw trade away from the town centre and prevent the regeneration of The Mall.	Retaining and Attracting Investment	Noted	An outline planning permission has been granted for the development of Maidstone Medical Campus with detailed consent for the necessary off site highway improvements. The Council's policy regarding retail development at Junction 7 is set out in the Regulation 18 Local Plan 2014 and requires any retail uses to be complimentary to town centre uses so as not to conflict with the vitality and viability of the town centre.
	BTS5	The Society is deeply sceptical about the proposals for retaining and attracting new investment. We are strongly opposed to development at Junction 8. Our views, which correspond to those of local parish councils, the Joint Parishes Group, Kent County Council, CPRE and Leeds Castle have been set out in detail when commenting on the planning applications for this site and on the appeals. The site is in an isolated position, remote from public transport, would have a damaging effect on the hinterland of Leeds Castle and damage the countryside. It runs directly contrary to the Council's aim of achieving: "A balanced approach to ensure that growth does not come at the expense of the environmental assets which make the borough special."	Retaining and Attracting Investment	Not agreed	For the reasons set out on page 40 paragraph 6.19 a new employment site is needed if the Borough is to maximise its economic potential and create a range of jobs for a growing population. A policy led approach to development at Junction 8 will help ensure the impact on the Borough's environmental assets are minimised and mitigated.
	BTS6	The Society has also drawn attention to the fact that development at motorway junctions is not, in itself, a solution to the needs perceived in the Strategy. Such development does not guarantee the kind of highly skilled and well paid jobs that the Council is seeking to attract. If ever evidence demonstrated this one has to look no further than Junction 7. This was once the great white hope for such development. The failure of this policy is shown only too starkly by the need for "a new master plan for Eclipse Business Park". The Society sees no reason to suppose that if development ever were allowed at Junction 8 that the same problem would arise there.	Retaining and Attracting Investment	Not agreed	The draft EDS aims to support new job opportunities in a range of sectors and occupations. An important factor in attracting and retaining businesses in to have a property portfolio that meets modern business needs. The Qualitative Employment Site Assessment (GVA September 2014 para 6.23) states that "It is clear that from our Assessment there is both a quantitative and qualitative need for additional employment land within the borough to enable the full economic potential identified within the Economic Scenario Testing to be realised." With regard to Eclipse Business Park the same GVA Site Assessment states that "Clearly the office market has shifted away from large scale spaces to smaller, high quality, flexible multi-occupier provision that more closely matches the size and requirements of the business community. This is reflected in the nature of more recent development and lettings in the area, with smaller units in rural areas (such as Hermitage Court and Abbey Court) demonstrating that when the stock profile is 'right' businesses will occupy the space." Eclipse Business Park is still considered a suitable site for office development but a mechanism needs to be established which will enable smaller more flexible office units to be delivered.

	BTS7	Maidstone's economic market extends well beyond its administrative boundary. If the Maidstone Economic Strategy were to be based on its economic market instead of its administrative boundaries, then the results would look very different. The Society recognizes that the current planning system which places the focus of responsibility on district councils, and the absence of the wider strategy vision at county level, is a serious short coming and that, as a result, matters that are of common interest to neighbouring authorities are sublimated to the perceived interests of individual districts. However the NPPF contains a whole section on "Planning strategically across local boundaries". The failure of the Economic Development Strategy to take account of these factors does, in the Society's view, means that the evidence base is not robust and leads to proposals which do not reflect the reality on the ground, resulting in a distortion of demand and of the proposed provision of development space to meet that perceived demand. As a result the Strategy's credibility is undermined and, if adopted, places the Local Plan at risk when it is submitted for examination	Retaining and Attracting Investment	Not agreed	The Economic Sensitivity Testing Report (GVA 2014) considered the economic growth plans of neighbouring areas when drafting their report and this is set out in section 2 of their report.
Kent Invicta Chamber of Commerce	KICC8	In its broadest terms, the Chamber welcomes and supports the Draft document.	Overall	Noted	No change
	KICC9	The Chamber strongly supports the Council's use of GVA and Shared Intelligence and the evidence gained by those organisations.	Overall	Noted	No change
	KICC10	Direct high speed rail connection is absent and therefore a disadvantage from an Economic Development viewpoint.	C&O	Agreed	This is a weakness compared to competitor locations such as Ashford. However this is recognised in the SWOT under "poor rail connectivity to London". An Action in the EDS is to lobby for better High Speed Services. This could include the feasibility of introducing direct HS to the Borough at the end of the Local Plan period when population growth may make this huge investment viable. No change.
	KICC11	The Chamber fully supports the three aims of the Strategy regarding job creation, economic output and skills.	Intro	Noted	No change
	KICC12	The Growth Deal for Kent and Medway (via the SE LEP) highlights one of the key locations for (future) growth in Kent as Maidstone. Therefore part of the South East Growth Strategy as promoted by the SE LEP sees Maidstone as an important centre for future economic growth. The Chamber fully supports this Strategy and is pleased to see that it is followed through within the key principles contained in the Maidstone Draft Economic Development Strategy.	Overall	Noted	No change
	KICC13	The Chamber believes the proposed transport 'improvements' will do little to improve the actual current transport problems within and across the urban area. The Chamber's view is that major improvements to and also additions to the existing road network will be essential, particularly to the highway network serving the whole Borough if the economic growth potential of the Borough is to be fully realised over the life of the Strategy. The Chamber believes that an essential part of this Strategy should include an eastern bypass linking the road network and urban areas to the south and east of Maidstone to the M20 Motorway.	Improving the Infrastructure	Noted	This draft Regulation Local Plan 2014 does not propose a Leeds Langley Bypass or what was once called the South East Maidstone Strategic Link or SEMSL. Traffic Modelling work will help to determine whether SEMSL has transport benefits compared to other investments to improve traffic flows and reduce congestion.
	KICC14	The Draft identifies (see paragraph 2.20) that strategic decision making by urban Authorities is a driver of competitiveness when effective governance arrangements are in place. The Chamber supports this principle, but questions whether the existing Government's arrangements within Maidstone Borough Council are capable of achieving successful decision making at the required level. The Chamber notes the recent change in governance arrangements in terms of Committee as opposed to Cabinet/Committee structure, but reserves its judgement as to the effectiveness or otherwise of these changes as the Local Economy seeks to move forward.	Overall	Noted	No change

KICC15	The Chamber is very aware of the current lack of floor space in appropriate areas of the Borough. The result is severe frustration to those businesses looking to expand further. The Policy of the Local Authority expressed in the Regulation 18 Consultation Document is to follow, in effect, a dispersed pattern of economic development land allocation, in many ways mirroring the historic rather fragmented manner in which economic development land had located. This saw an emphasis on land being positioned in the southern area of the Borough, but regrettably well away from the main arterial M20/M2 highway network seen as the essential transport infrastructure upon which the further growth of existing businesses needed to rely. The Chamber, whilst recognising the need to respect and accommodate environmental issues, nevertheless wholly opposed that approach, as did Shared Intelligence and GVA in their conclusions. The Chamber is therefore pleased to note and fully supports the Draft documents assertion that more land, in particular in and around J8 of the M20, needs to be allocated within the Local Plan for the accommodation of new economic development aimed at supporting the process of economic growth through the planned period.	Retaining and Attracting Investment	Agreed	No change. This point is accepted and set out in the priority and actions for Retaining and Attracting Investment.
KICC16	In the Chamber's view wage level growth will not be achieved solely by existing business growth within the Borough, but will need to be bolstered by attracting new vibrant businesses to the Borough who can bring diversification of job opportunity and with it higher paid jobs to the Borough.	Retaining and Attracting Investment	Agreed	No change. This point is accepted and set out in section 5 of the EDS Strategy for Growth.
KICC17	Conversations with both local commercial agents and agencies involved in attracting new business opportunities into Kent emphasise that post recession there is substantially increased level of interest in relocating to the M20 corridor. Inevitably Maidstone will only attract such businesses if new developable sites are available and promoted within proximity to the existing M20 Junctions, and with the gradual filling of opportunity at Junction 6 and 7, the only available option becomes land within proximity to Junction 8.	Retaining and Attracting Investment	Agreed	No change, already supported in the draft EDS.
KICC18	The Chamber fully supports the Draft's call for appropriate land allocation at Junction 8. Failure to meet this call by an appropriate allocation will, in the Chamber's view, result in serious risk through the Local Plan period of losing already established businesses from the existing Maidstone economy by their being forced to move their operations elsewhere out of the Borough; a clear and serious risk to the local economy.	Retaining and Attracting Investment	Agreed	No change
KICC19	The release of land by the M20 Junctions allowing relocation of major businesses from existing industrial estates, particularly to the south of Maidstone, will in itself release floor space opportunities for the further expansion of much smaller businesses and the establishment of new businesses.	Retaining and Attracting Investment	Agreed	No change
KICC20	Enhancing the Town Centre. In general terms the Chamber supports the Draft Strategy's encouragement for improving the existing office stock within the Town Centre, much of which is seen by the 'market' as being aged and low quality stock.	Enhancing Maidstone Town Centre	Noted	No change
KICC21	The Council's recent policy of improvements within the environment of the Town Centre (the recent High Street improvements) should, wherever possible, be continued. Overall, the Chamber supports the Economic Development Strategy's Policies for encouraging further improvement to the Town Centre retail economy.	Enhancing Maidstone Town Centre	Noted	No change
KICC22	Meeting Employers Skill Needs and the inter-relation with Higher Education. The Chamber is very aware of the growing problems faced by local employers in finding suitably skilled/qualified staff as they seek to expand their businesses. The Draft Strategy clearly refers at paragraph 5.52 to this problem and the challenges it represents. There is therefore a growing need to provide the enhanced facilities both in terms of formal education facility expansion, enlargement of the apprenticeship scheme and strengthening of local business training provider network.	Meeting the Skills Needs	Noted	No change

	KICC23	Whilst the Chamber recognises that it is important that the right balance be struck between enabling economic growth and protecting the general environment, the environment in itself should not entirely override and suppress the need for economic growth. There is a serious danger that vibrant and expanding businesses will be forced out of the Borough for lack of appropriate space to expand their businesses, resulting in major losses to employment, risk of serious detriment to the overall Maidstone economy over the life of the Local Plan. It also sends out a message to the world at large that Maidstone is 'closed to business'.	Retaining and Attracting Investment	Noted	No change
	KICC24	The Chamber strongly supports the comment at paragraph 7.3 of the Draft wherein it states that 'it is important that the Council work closely with developers' to ensure that the required commercial floor space (in the right location) is forthcoming across the life of the Local Plan.	Retaining and Attracting Investment	Noted	No change
	KICC25	The Chamber therefore strongly supports the statement at paragraph 7.4 that the Council should be 'considering favourably proposals that would bring a large number of jobs to the Borough and promoting Maidstone as a business location'.	Retaining and Attracting Investment	Noted	No change
	KICC26	For all of the above reasons the Chamber supports the general thrust of the Draft Economic Development Strategy	Overall	Noted	No change
Coxheath Parish Council	CPC27	Our major concern is the overall strategy for economic/commercial development, which, as articulated in the draft Maidstone Local Plan, seems to place an unbearable burden upon the parishes of South Maidstone. For instance, one site identified in Coxheath (Clockhouse Farm) is planned to absorb 77,000 square feet of commercial/employment. In our opinion, this is completely unsustainable. Quite apart from the negative impact that it will have on our rural village, the road infrastructure is far below the level required to support such an enterprise and Coxheath is situated several miles from the nearest motorway, the linkage to which is either via 'B' class roads or through the heavily congested town centre.	Retaining and Attracting Investment	Noted	Clockhouse Farm, Heath Road, Coxheath (Policy RMX1(4)) is allocated for 40 homes and 7,700sqm of office/light industrial floorspace (B1) in the draft Local Plan. This allocation and the representations made to it during the Local Plan consultation last year will be one of the matters considered in the forthcoming Local Plan report.
Councillor Paul Harper and Maidstone & the Weald constituency Labour Party	PH28	Key priority for the period must be to: (1) Broaden the economic base to make it more resilient.(2) Create enough jobs for the projected future population 18,600 homes will need us to aim for over 30,000 new jobs. (3) Strength in both urban and rural economies(4) Develop Maidstone's role as a hub for creative industries(5) Provide quality jobs.	Overall	1. Agreed 2. Not agreed 3. Agreed. 4 and 5 Not agreed	1. The Strategy recognises the need to move the economy away from its dependency on public sector jobs and create more private sector jobs in order to make the economy more resilient to economic shocks. 2. The Strategic Housing Market Assessment sets out the number of economically active population by 2031 which is 17,300 people. This is the number of jobs needed to meet the needs of our growing population. However the Economic Sensitivity Testing Report (GVA 2014) establishes that the capacity of the local economy to grow its limited to below this figure. It considers that the maximum number of jobs that could be created is in the region of 14,400 jobs. The GVA report recognises the inherent difficulties in forecasting economic growth but their methodology has been accepted by Planning Inspectors. 3. The needs of both rural and urban areas is recognised in the Strategy. 4 and 5. The Strategy aims to provide a range of jobs in a range of sectors to meet the needs of a growing population. However it is recognised that intervention is required to support and attract businesses in the knowledge economy, which includes the creative industries.
	PH29	Economic Hubs / Seed Units. The council should aim to expand its current proposed enterprise hub in Maidstone house to a full scheme ASAP to serve the needs of the Maidstone urban area. Also there is the need to consider smaller enterprise hubs / multi flexible seed units in rural centres such as Lenham, Hollingbourne, Headcorn, Staplehurst and Marden. These will help develop the rural economy and keep jobs local to people.	Stimulating Entrepreneurship	Noted	The Enterprise Hub in the Terrace (above the Gateway) will test to some extent the concept of a Hub. A review of the Hub will be undertaken and if it is considered to be successful the plans to find premises suitable for a larger version which includes a hub and spoke model involving rural satellite locations. No change proposed.
	PH30	A fundamental aim of the economic development strategy should be to promote jobs close to where people live. Whilst we welcome the commitment to preserve the main employment area in the borough this does not go nearly far enough. To create additional 15-30,000 jobs over 20 years means we need policy to prevent the loss of all employment land. Labour proposes that the Council adopts policies in the EDS and Local Plan to oppose the loss of any employment land unless it can be demonstrated to be an unsocial neighbour, outside the town centre.	Retaining and Attracting Investment	Not agreed	The Council's approach to the retention or redevelopment of employment land is set out in the draft Local Plan Regulation 18 2014.

	PH31	Quality jobs and training. Current evidence demonstrates that the local economy is poor at providing quality jobs. As part of diversifying jobs we need to concentrate in quality / skilled jobs. Support should be given to enhancing our manufacturing sector which used to be a prime part of our economy. We need to take advantage of our location on the M20 and close to the channel ports and tunnel to be a manufacturing centre for Europe.	Meeting the Skills Needs	Noted	Whilst it is true to say that we need to attract more higher skilled, higher paid jobs to the Borough, this will not be accomplished by focussing solely on manufacturing. The manufacturing sector represents just 6% of all jobs in the Borough. The Borough does have a mix of manufacturing businesses some of which are high tech. Through the Economic Development Team's new CRM database targeted support will be offered to these businesses in conjunction with national programmes such as the Manufacturing Advisory Service or Growth Accelerator (now called Business Support Services) and Innovate UK.
	PH32	Living Wage apprenticeships linked to the drive for quality jobs, needs to be the development of more apprenticeships, but ones which develop skills and trades for well / high paid jobs. All apprenticeships should be paid at the living wage from day one and for a period of up to 7 years.	Meeting the Skills Needs	Not agreed	Encouraging and raising awareness of the value of apprenticeships and vocational training is an important element of the Council's work and this will include promoting higher level apprenticeships. However the rate of pay for Apprenticeships is set at the national government level.
	PH33	Enterprise zones. The task to reverse the long term decline and promote quality employment will not be easy. The council now has control over business rates, we need to use these powers positively. Enterprise hubs or zones should be established where employers will be given reduced business rates to setup on a formula linked to the number of well-paid permanent jobs they create. These areas should be provided throughout the Borough in rural and urban areas. Emphasis should be given to linking them to areas of new housing development to create mixed use development on the model of neighbouring Kings Hills.	Retaining and Attracting Investment	Not agreed	Enterprise Zones are a specific government allocation. Only 24 exist in the country, the nearest to Maidstone being Discovery Park. They are often given Government support to mitigate against economic shocks or long term economic decline. Enterprise Zones are often criticised because they can often lead to displacement i.e. local businesses simply relocating into the Enterprise Zone because of the benefits but not creating new jobs. However the pooling of business rates does provide a resource that could be used to reduce the business rates payable to certain targeted businesses. State aid rules would apply. Small businesses already benefit from Small Business Rates Relief. Change to the Action Plan add A5: Consider the use of the Business Rates Pool to target certain businesses with rates relief as an incentive to invest and grow.
	PH34	Junction 8. The best sites for developing new large scale industrial businesses are adjacent to good transport links. The M20 corridor with the adjacent A20 and railways provides this. The council should support development (with surrounding environmental protection) at Junction 8. This has been demonstrated by ADL and Scarab, who want to relocate within the Borough and this is the only appropriate site. Development at Junction 8 and along this corridor should be sensitive to the environment especially if provided between junction 8 and Lenham. Through the use of screening and good design rural views across the area to the North Downs and the green sand hills can be preserved and the impact minimised.	Retaining and Attracting Investment	Agreed	Following the Local Plan report to Overview and Scrutiny Committee in October 2014 setting out the findings of the GVA Employment Land Qualitative Assessment which recognised the qualitative need for a new employment site near the strategic road network and the subsequent work identifying Junction 8 as the only suitable location for a new business park, the EDS will be reworded to reference Junction 8 and these findings.
	PH35	In conclusion, this draft strategy amended by these recommendations can provide the biases to develop a strong long economy, suited to the needs of our population. It is critical Maidstone remains the capital of Kent and a beacon economy.	Overall	Noted	No change
Keith Grimley- Maidstone resident	KG36	Absence of 'big ideas' to transform Maidstone as a place to live and work. Major opportunities to transform Maidstone's economic prospects do not feature in the Strategy. Ambitious schemes being embraced in other comparable locations around the UK, such as a proposal for a 'garden city' style new community or much needed new road connections to the motorway, receive little or no mention. Where there is sufficient scale to ensure high quality amenities, local services, transport and digital connectivity, genuinely attractive new communities can be created – in contrast to cramming unsuitable development within existing urban areas or smaller towns and villages lacking sufficient infrastructure.	Overall	Noted	The Borough Local Plan Regulation 18 Consultation 2014 proposes a dispersed pattern of housing development rather than a new settlement or urban extension or Garden City. It for the Local Plan to set out the pattern and location of development, but there is still scope for transformational projects which are outlined in the Economic Development Strategy, such as the masterplanning work on the Town Centre, Kent Medical Campus and a new business park at Junction 8.
	KG37	The Strategy is silent on the major expansion plans proposed by two established local manufacturers, ADL and Scarab (a proposal known as Waterside Park, near J8 of the M20). Manufacturing is identified in the Strategy as a growth sector, both nationally and locally. Regardless of their contentious planning status (a separate matter), it is genuinely difficult to comprehend that the draft Strategy fails to make reference to these proposed investments.	Retaining and Attracting Investment	Agreed	At the time of drafting the EDS the Planning and Economic Development teams were working with the applicant of Waterside Park to amend the designs in order to reduce their landscape impact following its refusal at Planning Committee. The new plans were supported by Planning Officers and were recommended for approval. However Planning Committee still considered their impact on the landscape too significant and refused the application. The applicant has appealed. It is appropriate to highlight in the draft EDS the lack of expansion opportunities within the Borough for certain businesses such as ADL and Scarab. The planning context of Waterside Park can now be added as an example of the balance that has to be struck between the need of business and maintaining a high quality natural environment.
	KG38	If this lack of explicit support to the manufacturing sector was consistent, it would be more understandable, albeit extremely disappointing still. However, by comparison the action plan states unambiguous 'site-specific' support for Maidstone Medical Campus, despite the current lack of confirmed demand from potential occupiers. The reasons for Waterside Park's omission are not explained and moreover, its absence is in stark contrast to the evidence base informing the Strategy, which notes the growth in manufacturing sector activity within the local economy and repeatedly makes reference to the importance to Maidstone's future prosperity of businesses like ADL and Scarab.	Retaining and Attracting Investment	Not Agreed	Maidstone Medical Campus MMC is supported in the Local Plan Regulation 18 Consultation 2014 and benefits from an outline planning application. Jones Lang LaSalle has been appointed as the commercial agent. MBC submitted a bid to the Local Enterprise Partnership to pump prime the construction of off site road and junction improvements. The planning context for MMC is therefore very different and more certain during the life of the Economic Development Strategy. It also offers opportunities to attract higher skilled, higher paid jobs and so naturally.

	KG39	Generally, the Strategy is comprehensive in terms of its statistical analysis and projections for the future but is weak in terms of clear, unequivocal commitments or bold plans.	Overall	Noted	No change
	KG40	The Strategy reads more like a research study than a clear statement of intent or 'big picture' ambitions for the future. The strategy document gives a lot of space and credence to statistical projections and fairly precise scenarios for projecting future jobs and population growth. By contrast, the history of successful places strongly suggests that civic strategies achieve most where they pursue a bold vision for the future, tempered by the ability to adapt as plans unfold.	Overall	Not Agreed	The Strategy aims to strike a balance between being ambitious in its aims, whilst recognising the limitations of its existing local economic structure, and the constraints imposed on growth due to the need to protect the Borough's high quality landscapes and generally rural hinterland. The Strategy is therefore heavily focussed on deliverability in the short, medium and longer term.
	KG41	By contrast, the strategy describes a 'planned' view of the future and lacks recognition of the spontaneity of an entrepreneurial economy. The very real risk is that an opportunity comes along which doesn't fall in line with the Strategy, stimulating inertia and even boosting the case for outright opposition.	Overall	Not Agreed	A balance needs to be struck between policies that are flexible enough to respond to changes in local economic circumstances and a planned approach to growth that gives business the certainty on which to invest. Monitoring of the Strategy and Action Plan, and review and refresh, will ensure that it is responsive to opportunities as they arise.
	KG42	For example, allocating new employment land in locations attractive to occupiers is about sending a message that Maidstone wants to grow and is seeking to attract investment based upon <i>demand</i> from businesses, rather than the anticipated (and hugely uncertain) projected future supply of workers.	Overall	Noted	The future land requirements of businesses has not been determined by the projected growth in the working age population and economic activity levels. GVA's reports "Economic Sensitivity Testing" and "Qualitative Assessment of Employment Needs" is based on the projected growth of existing sectors of the local economy and known developments such as Maidstone Medical Campus. No change required.
	KG43	Promoting Maidstone as being 'open for business' can't be about matching employment land allocations to local population growth (as suggested in the Strategy) because this is a crude measure of need which has no regard to the needs of the economy. Even if this 'planned' approach were desirable, labour markets bear little or no resemblance to the population of the Borough they happen to fall in. Put simply, not everyone who lives in Maidstone wants or is able to work here! Attempting to micro-manage the local economy by restricting land supply regardless of demand from local businesses, would be to fly in the face of the free market economy.	Overall	Agreed	Promoting Maidstone as being open for businesses is not just about "matching employment land allocations to local population growth". The evidence supporting the Economic Development Strategy and Local Plan does not consider local population growth as a limiting factor but rather the capacity of the local economy to grow, taking into account its current economic structure, its location, sector growth forecasts etc...
	KG44	Justifying new allocations in this way is misplaced in an economic development strategy and can only create a rod for the backs of those trying to build confidence and attract the very significant investment necessary to deliver the objectives sets out in the Strategy.	Overall	Not Agreed	Using the available evidence, the NPPF requires the Local Plan to meet anticipated needs. The onus is therefore for the borough council to meet its needs within its boundaries in the first instance. If this cannot be achieved, the prospects of other authority areas meeting the borough's needs through the Duty to Cooperate will need to be explored. Both the other authorities and the Local Plan Inspector will need to be convinced of the compelling reasons/constraints which prevent needs being met within MBC. Evidence such as the extent of the sub-regional market/s and commuting patterns should influence which authorities should be approached in the event of the borough not meeting its own needs.
	KG45	I think the Strategy would benefit from being paired back to focus on how the council and its partners can create the environment in which free enterprise can flourish and grow.	Overall	Not agreed	The strategy aims to strike a balance between providing strategic direction, and flexibility to react to unforeseen events. The Strategy and Action Plan will be monitored and kept under review.
Liberal Democrat	LD46	A general point: The word 'Maidstone' is most commonly used to describe the town. Although it is often implicit within the text as to whether it is the town or the borough intended, we would suggest that in a strategy such as this, Maidstone should always have the suffix either 'town' or 'borough' for complete clarity to prevent any chance of ambiguity or misinterpretation.	Ex Sum	Agreed	At the beginning of the Strategy a footnote will be added to make it clear that Maidstone refers to the Borough. Maidstone will be added to Town Centre references where it is unclear which town centre is being referenced.
	LD47	In the supporting text the retirement age of 65 is taken when analysing employment trends. Assumptions are therefore made about employment need throughout the strategy which may well prove to be erroneous. We require some assurance that this has been understood and confidence that this will be taken into account before adoption of the strategy. Figures relating to the new flexible retirement age need to be assessed and their effect upon assumptions made within the draft analysed and where necessary amended.	Overall	Not agreed	The employment need has been assessed by GVA from a starting point of the likely demand for labour and not the supply of labour. GVA have projected the likely growth in each sector of the Local Economy and applied jobs figures to each. The demographic changes in the population over the period of the Local Plan is not driving the employment numbers.
	LD48	As the Executive Summary is placed at the front of the document and is therefore the first thing that will actually be read it would be wise to annotate the text so the reader can easily find where statements written as fact were sourced, evidenced and substantiated.	Ex Sum	Agreed	Page references to data sources in the main body of the report will be added.

LD49	The first introductory paragraph of the document contains the sentence <i>"It has not been all bad news though – the population has grown and is forecast to continue to grow"</i> What is the assumption behind this? Quite the reverse assumption could be made in that if population continues to grow and employment opportunities do not, we are either going to become an increasingly dormitory borough for workers in London and elsewhere or, unemployment currently at a low level in the Borough, would significantly increase. We would suggest that this sentence should be removed from the introductory paragraph. It is better explained from both view- points under section "A growing population" point 3.26	Ex Sum	Agreed	A growing population indicates an areas attractiveness as a place to live, a growing consumer population supporting local markets, and is a boost to the construction industry. It is true that not all growth is universally accepted as good news, especially if economic growth does not keep pace with demographic growth. Rephrase the start of this sentence to read. "On the other hand..."
LD50	Meeting the skills needs. Suggest this paragraph requires significant rewriting as we are not the primary education provider nor do we currently have a Maidstone Medical Campus only the aspiration to have one. Perhaps:" By working closely with our partners we will ensure that residents are equipped with the skills for work and that skills needs of business are being met. We will support the expansion of the Higher Education sector to increase the number of graduates in the work-force , supporting initiatives such as the Kent Institute of Medicine and Surgery (KIMS) and the provision of a Maidstone Medical Campus, as well as the University of the Creative Arts (UCA) expansion at Maidstone Studios.	Ex Sum	Agreed	Change this text as suggested and on page 35 first sentence.
LD51	Throughout the draft there is an over emphasis in one direction towards degree level education. We suggest that you should consider a reference to apprenticeships and vocational training for the 'practical' skills such as plumbing and electrical engineering.	Ex Sum	Agreed	Encouraging and raising awareness of the value of apprenticeships and vocational training is an important element of the Council's work. Offering work experience opportunities to strengthen CVs and improve employability skills is also valuable. Add to the second sentence of Meeting the Skills Needs "We will encourage better careers advice in schools and promote apprenticeships and work experience placements in the Council and with businesses. This will be repeated on page 35 under the heading Meeting the Skills Needs.
LD52	Improving the Infrastructure – this sentence requires amendment for accuracy. Suggest: <i>"We will invest in infrastructure by working closely with our partners, in particular Kent County Council. A priority being the need for digital accessibility and an adequate transport network across the Borough"</i>	Ex Sum	Agreed	Amend the first sentence to read <i>"We will invest in infrastructure by working closely with our partners, in particular Kent County Council. A priority being the need for digital accessibility and an adequate transport network across the Borough"</i> This will be repeated on page 39 under Improving the Infrastructure.
LD53	1.6 there is no mention of the views of Parish Councils being sought which is important considering the extent of our rural communities and the economy required to support them. Is this contained within the <i>"face to face and telephone interviews with 14 stakeholders"</i> ? If so it would be wise to say so.	Ex Sum	Not Agreed	Ward Councillors from across the Borough were offered the opportunity to discuss the draft EDS with the Council's consultants during the development of the Strategy, not Parishes directly. During consultation on the published draft EDS a specific Parishes and Communities event was held on the 13th January with 33 Parish Councillors. This event enabled attendees to ask direct questions of officers and members and to engage in a workshop style discussion to offer views and opinions on the Strategy and their own views on what needs to be done to make Maidstone more prosperous. All these views were captured have been used to inform the final Economic Development Strategy. In addition an online open consultation form was available during the consultation period.
LD54	The Local Plan has moved away from quoting a precise number of jobs stating that as it is impossible to predict a precise number it is better to give an area given over to employment rather than job creation numbers. However at 1.9 a precise number of jobs is proposed. As the Local Plan and this Strategy are supposed to work together should we not be using the same measures for both?	Ex Sum	Not Agreed	The Local Plan has relied upon the 2013 GVA work regarding "Economic Sensitivity Testing" which is the source of the jobs figures in the draft EDS and the "Qualitative Employment Land Assessment 2014" to produce employment areas. Both the EDS and Local Plan are therefore aligned. The EDS is not a statutory document governed by the requirements set out in the NPPF and can therefore set targets that are perhaps more easily understood by businesses and residents whilst recognising the inherent uncertainties of forecasting growth precisely over such a long period.
LD55	Our 2013 Ambition Statement also confuses town and borough throughout the document. We regret we did not adequately pick this up at the time including the reference to the Maidstone Medical Campus as though it was in existence. However if we are going to retain this as our ambition statement going forwards we suggest it needs a rewrite not to change intent but definitely for clarity and accuracy.	Intro	Not Agreed	The issue regarding town and borough has already been recognised. The Ambition Statement concerns itself with how the Borough might look in 2031. It is therefore considered appropriate to reference the Maidstone Medical Campus as in existence.
LD56	The Plan for Growth and the UK Industrial Strategy. 2.5 Was the strategy for Creative Industries launched in 2014 as indicated? In any case this does require updating for the final version of our Strategy.	Strategic Context	Noted	The report was published in June 2014. The EDS will be updated to reflect the publication of the Strategy.

LD57	Unlocking the potential: going for growth. We do not specifically argue with the paragraphs in this section but are giving a health warning that when that work has been completed the Borough's officers and councillors, including the Liberal Democrat Group, may have to significantly amend their views regarding the economic development strategy. Some indication of what we have long believed is however contained later under Section: Challenges and Opportunities: 3.29- 3.31 and we agree with the main thrust of What makes a Successful Local Economy?	Overall	Noted	No change
LD58	The SWOT analysis under weaknesses should state opposite opportunities around motorway junctions the weakness that these junctions are either in, or in the immediate vicinity of the AONB	C&O	Not Agreed	The location of the motorway and its junctions serving the Borough, and the proximity of the AONB is a constraint to development rather than a weakness. No change
LD59	Maidstone's Growth Potential: It was disappointing not to see a section on farming, agriculture, horticulture and also equestrian occupations in view of the extensive rural nature of the borough and because agricultural technologies had been highlighted at 2.5 as one of the sector strategies pertinent to the Borough. Opportunities in the rural economy for growth in green technologies is also lacking – solar farms for example where there are both challenges and opportunities. We believe this should be rectified and appropriate paragraphs inserted.	Overall	Not Agreed	The Agri-tech sector has some potential for the Borough as identified by GVA in the Economic Sensitivity Testing report. However P69 of GVA 2013 Economic Sensitivity Testing forecasts no employment growth in the Agriculture, Forestry and Fishing sector in the Borough to 2031. P21Table 10 of the same report sets out the relative concentrations of activity by sector in the Borough compared with Kent and nationally. Agriculture, Forestry and Fishing is relatively weak. This sector is recognised in the EDS on page 26 and will be made clearer with an action to work with the land based sector to identify where MBC can add value. With regard to Green Technologies, the GVA 2013 Economic Sensitivity Testing report did not identify any particular strengths in this area, or in the research by Shared Intelligence. The land use implications for renewable and low carbon energy schemes are set out in Draft Reg 18 Local Plan Policy DM3. Moreover investment is already planned elsewhere in Kent and the South East. The Economic Development team does promote Low Carbon Kent, Eco Innovation and other opportunities for businesses to access finance to innovate or reduce emissions.
LD60	Under paragraph 4.24 , The Visitor Economy, please correct the sentence "Other key attractions include Maidstone Museum, Kent Showground & Bently Art Gallery to Kent Showground, Maidstone Museum and Bently Art Gallery –one of the most important regional museums in the South East"	Growth Potential	Agreed	Change para 4.24, second sentence to sentence starting "Other key attraction include Kent Showground, Maidstone Museum and Bently Art Gallery—one of the most important regional museums in the South East,..."
LD61	Throughout the document, 'heritage and culture' only appear to be seen as an adjunct to being a tourist destination or events location as indicated under The Visitor Economy Section of the draft. Indeed the word 'heritage' only appears once under 4.23 in this section of the document. This is a missed opportunity as heritage is actually the foundation from which the town and borough derives a 'sense of place.' We suggest there should be more within this document linking it to a Heritage, Culture and Leisure policy/strategy.	Growth Potential	Agreed	The role of culture to drive economic development, regeneration and the visitor economy, needs drawing together to support and inform the work of the Town Centre Visioning programme and the Destination Management Plan. A Cultural Strategy, encompassing not just heritage, but creative industries is to be produced. Add to the Action Plan "Commission and deliver a Cultural Strategy"
LD62	Strategy for Growth :Under Actions, point A3 it should not merely mention achieving the balance between realising potential growth opportunities and not sacrificing the environment. Most readers will make the assumption that this refers to the natural or wild/semi wild environment. This is excellent but we should also indicate the need to recognise the importance of agriculture and retention of agricultural land.	Action Plan	Not Agreed	The point being made in Action A3 is that the quality of the environment in its broadest sense is recognised as part of the reasons why Maidstone is an attractive place to live, work and visit. The protection and retention of agricultural land is more appropriately addressed in the Local Plan and not the Economic Development Strategy.
LD63	Enhancing the Town Centre: At 5.38 suggest that the mention of a reduction in shop vacancies from 10 units to 2 should have a date beside it as to when this survey was taken and may, indeed, require updating before final publication and adoption.	Enhancing Maidstone Town Centre	Agreed	Mott Macdonald has been commissioned to evaluate the economic impact of the High Street project, phase 1 and 2. Delete " As a result of this scheme there has been a reduction in ground floor shop vacancies from 10 units to 2. The other economic benefits of this type of investment are well known and include increases to footfall, consumer expenditure, job creation and rising property values." And replace with "Mott Macdonald has been commissioned to evaluate the economic impact of the public realm works including impact on shop vacancies, job creation, visitor perception, consumer expenditure and property prices. In November 2014 the scheme was Highly Commended in the Kent Design and Development Awards." at paragraph 5.46 of the final version of the EDS.
LD64	The Liberal Democrats have repeated ad nauseam that we should take as a major theme for the Town that it should be promoted as the Music Centre of Kent. This has been welcomed in so many quarters, that we are suggesting it should feature, or at least get a mention, in the Economic Strategy under the Future for the Town.	Enhancing Maidstone Town Centre	Noted	The role of culture to drive economic development, regeneration and the visitor economy, needs drawing together to support and inform the work of the Town Centre Visioning programme and the Destination Management Plan. A Cultural Strategy, encompassing not just heritage, but creative industries is to be produced. Add to the Action Plan: "Commission and deliver a Cultural Strategy"

LD65	Employment sites for future growth. "Future land allocations should prioritise space along the motorway corridor to support growth of businesses that largely serve national and regional markets" If we mean junction 7 and 8 then we should say so. Alternatively we have to have some clarity to know that our Planning Policy officers and Economic Development officers are in agreement over this – and that, whatever that is, should be reflected both in the Economic Development Strategy and in the Local Plan. However the Lib Dems cannot give unqualified support to this section. We have serious concerns about the way development appears to be shaping at both junction 7 and 8. The appropriate place to voice those concerns currently continues to be through the shaping of the Local Plan.	Location for Growth	Agreed	It is not the role of the Economic Development Strategy to allocate sites. However since the draft EDS has been produced the findings of the Qualitative Employment Site Assessment, GVA (2014) have been reported to the Planning, Transport & Development Overview & Scrutiny Committee and the Economic and Commercial Development Overview & Scrutiny Committee on 21st October 2014. The committee report stated: "Overall, and significantly, there is also an identified lack of employment land supply in the locations most likely to be attractive to the type of occupiers economic growth will attract i.e. along the motorway corridor. It is considered that the selection of sites in the Regulation 18 version of the Local Plan would not meet the identified qualitative needs in a location well connected to the strategic road network. Based on the outcomes of the Strategic Economic Development Land Availability Assessment (SEDLAA) the only available, additional land at a motorway junction is at J8 of M20. Development in this location would better meet the gap identified through the evidential analysis in the Qualitative Employment Sites Assessment. It could also enable the quantitative demand for offices to be met which is not the case for the current selection of Regulation 18 sites." The Planning, Transport and Development Overview & Scrutiny Committee resolved that it wished to consider a planning policy for an employment allocation at Junction 8 incorporating appropriate constraints and mitigation. If sufficient safeguards could be incorporated into the policy to the Committee's satisfaction, the Committee would in principle support the development for employment land at Junction 8. The Location for Growth section will be reworded and the following added "Based on the outcomes of the Strategic Economic Development Land Availability Assessment (SEDLAA) the only available, identified land at a motorway junction is at J8 of M20. Development in this location would better meet the gap identified through the evidential analysis in the Qualitative Employment Sites Assessment. It could also enable the quantitative demand for offices to be met which is not the case for the current selection of Regulation 18 sites."
LD66	Action Plan: A2 Great care should be taken when making statements such as this. There is legislation covering what all levels of government may, or may not do, in assisting private companies which could give them an advantage over any competitor and the wording used here could all too easily be totally misinterpreted. What are you going to do when other businesses approach you for similar direct council intervention? This document is <u>not</u> to be used in this way regarding a single company. Also we have to repeat we do not <u>have</u> a Maidstone Medical Campus as yet but we do have a hospital. Please amend. Suggest something along the lines: <i>Work closely with KIMs to see the realisation and success of the Maidstone Medical Campus</i>	Action Plan	Not Agreed	In order to achieve the aim of creating 14,400 jobs and attracting higher skilled, higher paid work, Maidstone Medical Campus needs to succeed. It should be remembered that KIMs and MMC are in different ownerships. It is not proposed to offer Maidstone Medical Campus a direct MBC grant. Direct interventions could include working with owners on joint inward investment campaigns, bidding to government for funding, or commercial investment opportunities. State Aid rules governing public support for businesses are understood and complied with.
LD67	A3 Include reference to need to protect agricultural land in addition to reference to not sacrificing the environment	Action Plan	Not Agreed	The point being made in Action A3 is that the quality of the environment in its broadest sense is recognised as part of the reasons why Maidstone is an attractive place to live, work and visit. The quality of agriculture landspecifically is better considered by the Local Plan.
LD68	A6 We agree with the need to support the landowner to identify a new vision for Eclipse business park but disagree with tying it down so precisely to investigating a new master plan involving small scale format offices. This could be part of any new vision but as written is too prescriptive	Action Plan	Agreed	Reword A6 to read " Investigate a new master plan for employment at Eclipse Business Park (Junction 7 M20)."
LD69	Partnership Engagement and Demonstrating leadership: The reason there is an attitude in many businesses that Maidstone is not pro economic growth is primarily down to the lack of a Local Plan or robust policies to enforce and protect sensitive areas which residents and their elected councillors believe should be protected for the enjoyment of both current and future generations. This has left councillors, and the Lib Dems in particular, in the invidious position of fighting planning applications for economic development where businesses have been positively encouraged to progress a scheme where, in both planning and political terms, it is well known that it will be resisted. The sooner we get clarity and understanding of this fact, plus a local plan in place, the better for business, residents and councillors alike.	Overall	Noted	Businesses are always advised to obtain pre planning application advice to ensure that they understand the planning position regarding their development proposals. No change proposed.
Locate in Kent				
LIK70	P17-strengths-I think growth in knowledge based sectors is an opportunity rather than a strength.	C&O	Noted	This could be considered both a strength and an opportunity. However for the purposes of the SWOT it does not have a material impact.
LIK71	P17-weaknesses. I think a much clearer weakness that should be added is-lack of employment sites for major industrial building in suitable locations close to the transport network. This is very different to low level of delivery of commercial property.	C&O	Agreed	The SWOT will be changed and under Weaknesses the following will be added "Lack of available land close to the motorway corridor to meet the market demand for larger businesses premises in this location"
LIK72	P17-threats. Should add-Loss of employment sites and premises to other uses alongside lack of new sites/premises, leading to uncertainty for companies and inability to accommodate existing and new companies	C&O	Agreed	The SWOT will be changed and under Threats the following will be added "Use of new Permitted Development Rights to convert commercial premises to residential uses leading to uncertainty and displacement for businesses and loss of employment sites to residential through the planning process."

LIK73	What is the definition of S,M and L timescales?	Action Plan	Agreed	The definition of Short is 1-2 years, Medium 3-5 years and Long Term 5 year plus will be explained in the Strategy.
LIK74	Besides work with MMC there is no mention of how more companies are going to be attracted to move to/invest in the Borough. What is the strategy to do this going to be?	Retaining and Attracting Investment	Noted	Work in 2015/16 will set the investment framework for Maidstone Town Centre, establish the location of new employment sites across the Borough and see the opening of the Enterprise Hub (Maidstone Business Terrace) this together with the launch of a new business website will provide the foundation for targeted inward investment campaigns.
LIK75	Plans to reach 6,500 businesses, do 480 deeper appraisals etc are laudable. However they are also extremely ambitious, especially in the light of the short timescale. Locate in Kent, the inward investment agency for Kent and the only providers of an aftercare service in the county, is not listed as a partner. A high level of co-ordination is required.	Retaining and Attracting Investment	Noted	The Borough Council has invested in Tractivity a new CRM system and is in the process of establishing a clean, up to date, business database for the Borough. It will enable the Council to target all 6000 to 7000 business, begin to understand their business needs and support required. This intelligence will then be used to inform partners such as UKTI, Growth Accelerator, Kent International Business and indeed Locate in Kent. However these figures will be removed and targets set when the CRM system is clean and up to date and the new Business Support Service introduced.
LIK76	What type of company is going to be targeted for this? Targeting is essential if the work is going to achieve its targets, though the target outcomes are not stated.	Retaining and Attracting Investment	Noted	As above
LIK77	A3 This is of major, maybe underestimated importance. Locate in Kent owns the only comprehensive database of property in Kent and could be a partner. There is a pressing need for all types of quality commercial property and sites, from small flexible spaces to large sites in the most suitable locations. There is no mention of the loss of commercial space to residential within this section and this perhaps deserves its own action point.	Action Plan	Noted	MBC invests in Co Star, an online property database available on Locate in Maidstone. It provides a service to businesses seeking property and MBC with useful intelligence regarding the type of demand or property in the Borough. The loss of commercial space to residential through permitted development rights is being monitored.
LIK78	A4 These are massive targets and looking at events already being delivered, I cannot see 1,000 MDs and 250 companies as a realistic target	Action Plan	Noted	These draft targets are to be delivered over a medium term which is 3 to 5 years. In this context they are achievable but will be monitored and reviewed as the needs of businesses change.
LIK79	A5 Locate in Kent is a provider of business support	Action Plan	Noted	Locate in Kent will be included in the mapping of business support services.
LIK80	Following the refusal of several employment based applications, there is a need to change the perception of Maidstone to one that welcomes business, via a marketing campaign of some sort-but this needs to be demonstrated by a real business friendly approach.	Retaining and Attracting Investment	Noted	Agreed. Working through MEBP, ideas and opportunities to address this perception will be explored and implemented.
LIK81	There should be a very specific action re job retention, eg anticipating and identifying issues and doing what is necessary to retain employers, alongside Locate in Kent	Retaining and Attracting Investment	Agreed	MBC does have a programme of business visits designed to ensure that the needs of business are understood by the Council. The MEBP is also useful in identifying business issues. Closer working relationship particularly with regard to Locate in Kents Aftercare service is welcomed.
LIK82	There are other relevant partners, eg KCC on apprenticeships, and Guilds re sector skills. There may be insufficient critical mass within the Borough to deal with sector skills.	Meeting the Skills Needs	Noted	MBC is aware of KCC's role and is working closely with Mid Kent College on sector skills development.
LIK83	We agree with the general conclusions of this report. However, there is a shortage of sites for major distribution centres close to London/the M25, Kent has seen demand for these facilities, especially e-commerce related. Maidstone could become attractive for such uses if it wished to accommodate this type of use close to the major highway network.	Overall	Noted	No change
LIK84	We also support GVA in para 3.17 to 3.28 and also know that employers do not make their location decisions sequentially. Their business model and drivers will lead them to prefer a town centre site - if for example public transport access is important, or edge of or out of town location if access by car for staff/customers is more important. Our experience strongly bears out the conclusion in para 3.20.	C&O	Noted	This support is welcomed
Kent County Council				
KCC85	The vision set out in the draft Strategy of a '21st century county town' is welcome. Kent County Council has a significant role in helping to realise the vision, both through its role as a local authority and as a major employer, purchaser of business services and landowner in the town. We also welcome the five priority actions that you have identified.	Intro	Noted	MBC welcomes the support of KCC in helping to realise the vision and deliver the five priorities for action.
KCC86	The strategic context, challenges and opportunities and growth potential sections are based on the Maidstone Economic Profile, which provides a substantial evidence base. Overall, the SWOT analysis set out in para. 3.41 is appropriate.	C&O	Noted	This support is welcomed

KCC87	The Strategy perhaps underplays Maidstone's position in the sub-regional economy, especially the strong functional economic links that the Borough has with Tonbridge and Malling, Medway, Swale and Ashford and the complementary role that these areas could play in responding to aggregate commercial demand. While competition from neighbouring areas could be seen as a threat, growth elsewhere in the functional economic area also presents employment opportunities for Maidstone residents and supply chain opportunities for local businesses.	Overall	Noted	There are clear functional economic links between Maidstone and the sub region. However taking account of the available evidence, the NPPF requires the Local Plan to meet anticipated employment needs over the plan period and the onus is therefore for the borough council to meet its needs within its boundaries in the first instance. If this cannot be achieved, the prospects of other authority areas meeting the borough's needs through the Duty to Cooperate will need to be explored. Both the other authorities and the Local Plan Inspector will need to be convinced of the compelling reasons/constraints which prevent needs being met within the MBC area. Evidence such as the extent of the sub-regional market/s and commuting patterns should influence which authorities should be approached in the event of the borough not meeting its own needs.
KCC88	Historic reliance on the public sector presents Maidstone's economy with particular challenges, and we strongly support the strategy of diversification and encouraging growth in the private sector. We also welcome the establishment of the Maidstone Economic Business Partnership as a business-led strategic body and we would welcome further engagement with the MEBP as an equivalent body to the sub-county partnerships in North, East and West Kent.	Overall	Noted	This support is welcomed
KCC89	We note the significant resources that the Borough Council currently invests in support of private sector growth and the Council's strong and growing relationship with the local business community. We are keen to ensure that existing and new county-wide business support and investment programmes are complementary to local services and we look forward to working closely with you in the design and delivery of the new Kent and Medway Growth Hub and other new contracts.	Overall	Noted	This support is welcomed
KCC90	We note a number of supporting references within the draft Strategy to development at M20 motorway junctions. For example, paragraph 6.19 notes a qualitative requirement for additional land allocations to accommodate industrial and warehouse uses and it is stated, "... Future land allocations should prioritise space along the motorway corridor to support the growth of businesses that largely service national and regional markets". This is not a statement that the County Council would accept unreservedly. Any decisions as to geographic location where any proven qualitative requirement is to be met would be a matter for the Local Plan, which would have to be subject to strategic environmental assessment. Proposed employment sites should be consulted on and allocated on a case-by-case basis having proper regard to all relevant local and national policies as well as to relevant designations - and not merely on the basis that (for example) they lie alongside the motorway corridor.	Location for Growth	Noted	It is not the role of the Economic Development Strategy to allocate sites. However since the draft EDS has been produced the findings of the Qualitative Employment Site Assessment, GVA (2014) has been reported to the Planning, Transport & Development Overview & Scrutiny Committee and the Economic and Commercial Development Overview & Scrutiny Committee on 21st October 2014. The committee report stated: "Overall, and significantly, there is also an identified lack of employment land supply in the locations most likely to be attractive to the type of occupiers economic growth will attract i.e. along the motorway corridor. It is considered that the selection of sites in the Regulation 18 version of the Local Plan would not meet the identified qualitative needs in a location well connected to the strategic road network. Based on the outcomes of the Strategic Economic Development Land Availability Assessment (SEDLAA) the only available, additional land at a motorway junction is at J8 of M20. Development in this location would better meet the gap identified through the evidential analysis in the Qualitative Employment Sites Assessment. It could also enable the quantitative demand for offices to be met which is not the case for the current selection of Regulation 18 sites." The Planning, Transport and Development Overview & Scrutiny Committee resolved that it wished to consider a planning policy for an employment allocation at Junction 8 incorporating appropriate constraints and mitigation. If sufficient safeguards could be incorporated into the policy to the Committee's satisfaction, the Committee would in principle support the development for employment land at Junction 8.
KCC91	In a number of cases, the draft Action Plan identifies KCC as either a lead partner or as a supporting partner alongside the Borough Council and other agencies. We are very happy to participate in the delivery of the Action Plan, and you will be aware that regular officer meetings now take place between our two authorities to help us take a joint approach.	Action Plan	Noted	This support is welcomed. Effective ongoing engagement with KCC colleagues will be critical to the successful delivery of key actions.
Mid Kent College				
MKC92	Mid Kent College endorses the Council's draft Economic Development Strategy and support the key challenges that have been identified. The College agrees that transport infrastructure in Maidstone requires significant investment and restricts the responsiveness of the Borough and its ability to grow.	Overall	Noted	This support is welcomed
MKC93	The College, as the main provider of further and higher education and skills training in the Borough, is not highlighted as the key change agent to meet the skills needs identified and support the targeted business growth.	Meeting the Skills Needs	Agreed	In the chapter Meeting the Skills Needs the role of Mid Kent College is set out in in para 5.49, 5.50 and 5.51, however it does not explicitly refer to the College as the key change agent to meet the skills needs identified. At para 5.50 (or 5.58 of the final version of the EDS) the first sentence will be changed to read "Mid Kent College is the main provider of further and higher education and skills training in the Borough and is the key change agent to meet the skills needs locally."
MKC94	The link between employment growth for the Borough and other neighbouring Councils does not sufficiently recognise the likely employment growth of neighbouring areas - for example, Tonbridge & Malling, Swale and Medway -and the positive impact that this may have on housing growth in Maidstone.	Strategy for Growth	Not Agreed	Planning Practice Guidance was issued by Government in March 2014 on 'Assessment of Housing and Economic Development Needs'. In regard to employment trends, the Guidance indicates that job growth trends and/or economic forecasts should be considered having regard to the growth in working-age population in the housing market area. The Housing Market Area is considered to follow the Borough area and not include neighbouring areas who must aim to meet their own Objectively Assessed Housing Need in the first instance. If this cannot be achieved, the prospects of other authority areas meeting their needs through the Duty to Cooperate will need to be explored.

	MKC95	The EDS does not emphasise clearly enough the bold decisions that elected councilors will need to make to secure the long term prosperity of the Borough; for example, the need to make decisions on high level projects that may prove unpopular with existing residents.	Making it Happen	Not Agreed	In the chapter Making it Happen the leadership role of the Council is identified to ensure that the economic opportunities are maximised.
	MKC96	The Qualitative Employment Site Assessment is overly focused on existing office/business unit space opportunities to the extent that it restricts the possibilities for growth in alternative or new sectors, such as manufacturing, that have the potential to bring new investment and employment into the Borough.	Growth Potential	Not Agreed	As set in the introduction to the Qualitative Employment Site Assessment, MBC commissioned GVA to undertake an assessment of the potential scale and nature of future employment growth within the borough. The final report, titled 'Economic Sensitivity Testing' was published in February 2014. It this study that considered the recent sectoral performance of the local economy, the future growth expectations for these and wider technological and sectoral trends that may deliver new employment opportunities. The Qualitative Employment Site Assessment draws it recommendations from the Economic Sensitivity Testing report.
	MKC97	The EDS does not clearly elaborate the perceived stimulus for the predicted employment growth.	Growth Potential	Not Agreed	The Economic Sensitivity Testing report set out the stimulus and rationale for the predicted employment growth and is explained on page 19 of the draft EDS.
Harvestore Systems (Holdings) Ltd	HS98	Welcomes the clear recognition of the importance of the Maidstone Medical Campus to the future of Maidstone's local economy. In particular, it has significant potential to deliver high quality, well paid jobs, to raise productivity and broaden the Borough's economic base. However it is important the Local Plan policies are flexible to enable a range of uses on the site.	Action Plan	Noted	No change
	HS99	The EDS fails to acknowledge the benefits to the local economy that would be realised through some form of redevelopment of the existing Newnham Court shopping village. The current draft Local Plan policy recognises that redevelopment of the Newnham Court Shopping Village would be a planning benefit, although it is currently drafted in such a way that it would neither allow continuity of trade to existing retailers during redevelopment nor allow a sufficient increase in retail floorspace for any such redevelopment to be viable, as set out in previous representations to the Local Plan process.	Enhancing Maidstone Town Centre	Agreed	The Local Plan supports the redevelopment of the Newnham Court Shopping Centre and the policy context for this is set out in para 7.8 of the Local Pan. The Council would aim to enable continuity of trade through its consideration of any applications for temporary buildings to be used during construction. This support is not reflected in the draft EDS. The EDS will be changed at para 5.45, first sentence (para 5.53 in the final version of the EDS) to read, " The Council supports the redevelopment and expansion of Newnham Court Shopping Village but with a focus on complimentary rather than competing high street uses, as set out in paragraph 7.8 of the draft Local Plan Regulation 18 Consultation."
	HS100	Tthe identification of the M20 motorway corridor, and the area around M20 J7 in particular, as a key location for growth is fully supported.	Location for Growth	Noted	No change
Gallagher	G101	Gallagher consider the reports from GVA and Shared Intelligence that underpin the draft EDS to be a well-founded and realistic evidence base and MBC would be reluctant to ignore them	Overall	Noted	No change
	G102	The Council must support development at Junction 8 as it will maintain and improve the economic success of the Borough;	Location for Growth	Agreed	It is not the role of the Economic Development Strategy to allocate sites. However since the draft EDS has been produced the findings of the Qualitative Employment Site Assessment, GVA (2014) have been reported to the Planning, Transport & Development Overview & Scrutiny Committee and the Economic and Commercial Development Overview & Scrutiny Committee on 21st October 2014. The committee report stated: "Overall, and significantly, there is also an identified lack of employment land supply in the locations most likely to be attractive to the type of occupiers economic growth will attract i.e. along the motorway corridor. It is considered that the selection of sites in the Regulation 18 version of the Local Plan would not meet the identified qualitative needs in a location well connected to the strategic road network. Based on the outcomes of the Strategic Economic Development Land Availability Assessment (SEDLAA) the only available, additional land at a motorway junction is at J8 of M20. Development in this location would better meet the gap identified through the evidential analysis in the Qualitative Employment Sites Assessment. It could also enable the quantitative demand for offices to be met which is not the case for the current selection of Regulation 18 sites." The Planning, Transport and Development Overview & Scrutiny Committee resolved that it wished to consider a planning policy for an employment allocation at Junction 8 incorporating appropriate constraints and mitigation. If sufficient safeguards could be incorporated into the policy to the Committee's satisfaction, the Committee would in principle support the development for employment land at Junction 8. Add to the beginning of paragraph 6.20 "Based on the outcomes of the Strategic Economic Development Land Availability Assessment (SEDLAA) the only available, additional land at a motorway junction is at J8 of M20. Development in this location would better meet the gap identified through the evidential analysis in the Qualitative Employment Sites Assessment. It could also enable the quantitative demand for offices to be met which is not the case for the current selection of Regulation 18 sites."
	G103	The first chapters (1,2, 3 and 4) set out a good analysis of were Maidstone sits today in terms of its' economic profile and it is clear that Maidstone "stands at a crossroads". The town "needs to be in a position to benefit from the emerging growth opportunities". And,"without concerted action by the Council and partners, there is a risk that Maidstone's economy will continue to underperform".	Overall	Noted	No change

G104	Chapter 6 is no more than a commentary on the economic trends in the Borough today; the content and the conclusions of the GVA report would be better placed in the earlier chapters.	Location for Growth	Not Agreed	Chapter 6 provides essential context to the rationale and conclusions behind the suitability and demand for different types of employment uses in different locations, including the role of rural areas, the town centre, and motorway junctions.
G105	Gallagher argue that the EDS should take the lead and not be subservient to the Local Plan and identify locations and sites for growth. It should be identifying locations and sites for growth potential. The Economic Development Strategy is one of the Local Plan's suite of documents and provides the strategic basis for the Borough's economic strategy which can then be taken forward in the Local Plan. Paragraph 1.3.26 of the Council's report to Cabinet on 21 October 2014 states that "the selection of sites in Regulation 18 Version of the Local Plan would not meet the identified qualitative needs, in a location well connected to the strategic road network." Allocation of development at Junction 8 should therefore be a priority supported through the EDS.	Making it Happen	Not Agreed	The Economic Development Strategy does inform the Local Plan but it is not the role of the Economic Development Strategy to allocate sites. However since the draft EDS has been produced the findings of the Qualitative Employment Site Assessment, GVA (2014) has been reported to the Planning, Transport & Development Overview & Scrutiny Committee and the Economic and Commercial Development Overview & Scrutiny Committee held on 21st October 2014. The EDS will be amended at the beginning of paragraph 6.20 to read "Based on the outcomes of the Strategic Economic Development Land Availability Assessment (SEDLAA) the only available, additional land at a motorway junction is at J8 of M20. Development in this location would better meet the gap identified through the evidential analysis in the Qualitative Employment Sites Assessment. It could also enable the quantitative demand for offices to be met which is not the case for the current selection of Regulation 18 sites."
G106	Gallagher argues for greater flexibility in the economic uses permitted at Eclipse, (not just B1) as set out NPPG as this could support development of KIMs and MMC close by. We support Action A6 at paragraph 5.18 (a new master plan for Eclipse) and Gallagher's are prepared to work with the Council to explore this option further.	Strategic Context	Not agreed	The draft EDS aims to support new job opportunities in a range of sectors and occupations. An important factor in attracting and retaining businesses in to have a property portfolio that meets modern business needs. With regard to Eclipse Business Park the same GVA Site Assessment states that "Clearly the office market has shifted away from large scale spaces to smaller, high quality, flexible multi-occupier provision that more closely matches the size and requirements of the business community. This is reflected in the nature of more recent development and lettings in the area, with smaller units in rural areas (such as Hermitage Court and Abbey Court) demonstrating that when the stock profile is 'right' businesses will occupy the space." Eclipse Business Park is still considered a suitable site for office development but a mechanism needs to be established which will enable smaller more flexible office units to be delivered. A new masterplan for Eclipse will be explored to achieve this. Moreover DM18 of the draft Local Plan, as approved by Cabinet on 14th January 2015 states that "Within designated Economic Development Areas, mixed use proposals incorporating an element of non B class uses may exceptionally be permitted where such development would facilitate the regeneration of the site to more effectively meet the needs of modern business and where the overall employment capacity of the site is maintained."
G107	The Local Plan is at least 18 months from being adopted and as such, we feel that this document should take a more pro-active role in providing the decision makers with the robust evidence and guidance to release such suitable sites in advance of the plan being adopted, in order that existing businesses can make decisions on their future, or gain that greater certainty in the interim.	Overall	Not Agreed	The draft EDS, together with the Qualitative Assessment of Employment Land report and the Economic Sensitivity Testing report already provides strong evidence to support decision making.
G108	The land at Junction 8 should be supported for economic development. It is disappointing that the strategy does not go on to make specific Action Points (as in the previous sections) one of which would be to recommend the allocation of the land at Junction 8.	Location for Growth	Agreed	The Locations for Growth chapter will be amended to read "Based on the outcomes of the Strategic Economic Development Land Availability Assessment (SEDLAA) the only available, additional land at a motorway junction is at J8 of M20. Development in this location would better meet the gap identified through the evidential analysis in the Qualitative Employment Sites Assessment. It could also enable the quantitative demand for offices to be met which is not the case for the current selection of Regulation 18 sites."
G109	The points made about the need for the Council to strengthen its leadership role in the final chapter are encouraging and provides insight into how the Council would deliver the growth that it requires. But this section must go further and draw together the "Action" points made throughout the document into a cohesive plan.	Making it Happen	Agreed	The Action points have been drawn together into an Action Plan and added to the end of the Strategy.
G110	The document seems wholly reliant upon the draft Local Plan allocating 'appropriate sites' for the delivery of the economic growth. Its status as a key cornerstone of the Local Plan should be given greater recognition.	Making it Happen	Not Agreed	The EDS sets out through the action plan what the Council, in partnership with others needs to do to support economic growth such as creating the right conditions for investment in the Town Centre, making the case for new employment sites in the right locations, bidding for infrastructure funding for the SELEP and supporting start up and micro business growth.
G112	It is understood that this is a strategy for the future as well as the here and now, however it is not considered that this addresses adequately the requirements of local businesses within the present.	Making it Happen	Not Agreed	The Action Plan sets out proposals for the short, medium and long term with a number of actions planned for 2015/16. These will be renewed and refreshed annually to ensure they remain relevant.

	G112	The document does not make it clear the direction of travel that the Council aspires to - i.e. does it want to see substantial economic growth, and is it prepared to make bold decisions to support this? As a result, the document appears weak in its delivery, and needs a stronger Action Plan to give greater certainty for those looking to invest in Maidstone's future.	Making it Happen	Noted	The EDS will be amended at the beginning of paragraph 6.20 to read "Based on the outcomes of the Strategic Economic Development Land Availability Assessment (SEDLAA) the only available, additional land at a motorway junction is at J8 of M20. Development. In addition since the end of the draft EDS consultation process the Council has agreed to use the Business Rates Growth Pool to fund actions in the EDS. The EDS will be amended to reflect this.
	G113	A very good draft EDS. A very good evidence base from which to develop an Economic Development Strategy.	Overall	Noted	No change
Mr Cobett, Hollingbourne	CH114	Maidstone's transport links need to be improved especially for commuters who appear to earn more than people working in the Maidstone area according to a recent survey. How about an HS1 station on Bluebell Hill which could provide Maidstone and Medway commuters with faster times into London? The positioning of the station might even attract some business investment into the station area.	C&O	Not Agreed	It is recognised that transport links to London are weak compared to competing areas such as Ashford and Ebbsfleet. However only around 10% of Maidstone residents commute to London each day. Rail services will be improved in 2018 with the introduction of Thameslink. An Action in the EDS is to lobby for better High Speed Services. This could include the feasibility of introducing direct HS to the Borough at the end of the Local Plan period when population growth may make this huge investment viable. No change.
	CH115	Most new developments mooted in the Maidstone area appear to revolve around warehousing and distribution (e.g. Junction 8) which will be low paid. It is appreciated that the chances of persuading any major manufacturing employer to move to the town are slim so why not encourage Maidstone people to start making things? According to the GVA attachment there is masses of vacant property around Maidstone and I would suggest the Council takes a lease on a number of possibly adjoining or close properties with about 2000 to 3000 square feet in each of them. In exchange for a peppercorn rent and a two year lease Maidstone residents would be encouraged to set up manufacturing businesses with a minimum capital investment.	Location for Growth	Not Agreed	The draft EDS aims to support new job opportunities in a range of sectors and occupations. Maidstone Medical Campus, Eclipse Business Park, Newnhan Court and the Town Centre, together with a mix of rural based warehouse, industrial and office sites offer this range. If Junction 8 were to be allocated in the Local Plan, the policy would be guided by the Qualitative Employment Site Assessment, GVA (2014). Its states "It is clear that from our Assessment there is both a quantitative and qualitative need for additional employment land within the borough to enable the full economic potential ... to be realised" It goes on to say that "This will require the delivery of: a range of good quality, flexible small office spaces; Capacity for 'design and build' bespoke industrial units; and small to medium size distribution units." The focus is therefore not solely on warehousing. There is not a mass of vacant property in the Borough. GVA's analysis of the local industrial stock of employment floorspace has highlighted a lack of provision of units between 1,000qm and 1,500sqm and smaller units available for freehold purchase.
	CH116	In order to attract sufficiently affluent people to the County Town MBC and KCC need to invest more in the cultural activities and appearance of Maidstone.	C&O	Agreed	A Cultural Strategy will be commissioned and implemented to address how the Borough can build upon its cultural assets such as the Museums, Theatre and River etc...
Roxhill Developments	RD117	The promotion of the land at Woodcut Farm, Junction 8, would accord with the text at paragraph 3.16 of the Draft Strategy, which notes that growing businesses wish to relocate to more accessible parts of the Borough closer to the motorway network. Low level of delivery of new high quality floor space across all property types is noted as a weakness, the proposed investment by Roxhill Developments in around 50,000 sq m of new business floor space. It is accepted that the proximity of Junction 8 to the North Downs AONB means that this is a sensitive area for development, however the site specific proposals to come forward for Woodcut Farm, and the detailed studies including landscape impact on which they have been based, demonstrate that sensitively designed proposals can be achieved for this site, without causing harm to the setting of the AONB. (Paragraph 5.63).	Location for Growth	Agreed	It is not the role of the Economic Development Strategy to allocate sites. However since the draft EDS has been produced the findings of the Qualitative Employment Site Assessment, GVA (2014) has been reported to the Planning, Transport & Development Overview & Scrutiny Committee and the Economic and Commercial Development Overview & Scrutiny Committee held on 21st October 2014. The committee report stated: "Overall, and significantly, there is also an identified lack of employment land supply in the locations most likely to be attractive to the type of occupiers economic growth will attract i.e. along the motorway corridor. It is considered that the selection of sites in the Regulation 18 version of the Local Plan would not meet the identified qualitative needs in a location well connected to the strategic road network. Based on the outcomes of the Strategic Economic Development Land Availability Assessment (SEDLAA) the only available, additional land at a motorway junction is at J8 of M20. Development in this location would better meet the gap identified through the evidential analysis in the Qualitative Employment Sites Assessment. It could also enable the quantitative demand for offices to be met which is not the case for the current selection of Regulation 18 sites." The Planning, Transport and Development Overview & Scrutiny Committee resolved that it wished to consider a planning policy for an employment allocation at Junction 8 incorporating appropriate constraints and mitigation. If sufficient safeguards could be incorporated into the policy to the Committee's satisfaction, the Committee would in principle support the development for employment land at Junction 8. Add to the beginning of paragraph 6.20 "Based on the outcomes of the Strategic Economic Development Land Availability Assessment (SEDLAA) the only available, additional land at a motorway junction is at J8 of M20. Development in this location would better meet the gap identified through the evidential analysis in the Qualitative Employment Sites Assessment. It could also enable the quantitative demand for offices to be met which is not the case for the current selection of Regulation 18 sites."
	RD118	Roxhill support Action A3 ensuring that employment land allocated through the planning system is suitable for the needs of new and expanding employers, and that planning policies are flexible enough to achieve the balance between realising potential growth opportunities and not sacrificing the environment which is in itself an asset (Action A3, page 27).	Action Plan	Noted	No change

Thomas Ogden	TO119	I would agree with your observation at figure 4.2 that "Policy needs to be sufficiently flexible to adapt to the changing demands of the economy and to create the conditions for growth in a range of sectors". Importantly, planning policy must reflect this in the forthcoming Local Plan and flexibility in use class changes should be provided on existing employment sites.	Growth Potential	Noted	No change
	TO120	I would agree with figure 4.11 which recognises that the scale of housing growth in Maidstone should support the long-term growth of the construction sector. It should also be identified that the development of new business facilities and facilitating the expansion of existing businesses would also contribute to this.	Growth Potential	Agreed	Add to the end of the last sentence in paragraph 4.11 " as should the development of new employment sites, notably the proposal for the Paramount Theme Park in North Kent. "
	TO121	I recognise that development in the vicinity to the motorway to meet the needs of changing businesses, vehicle sizes and to increase the "export potential" of the borough beyond its existing boundaries. This of course has the added advantage of taking traffic away from the centre of town. A point which can only be supported.	Location for Growth	Noted	No change
	TO122	The draft report clearly sets out the declining position in Maidstone and when compared with other neighbouring authorities. If Maidstone as the County town, is to grow, we need to do everything possible to support economic development in the borough and this point must be endorsed. This may require tough and bold decisions to capitalise on opportunities, as recognised in figure 1.2 of the report, but such calls for action must be acted upon before the borough loses potential investment opportunities.	Intro	Noted	No change
	TO123	This report does show good intent but should, in my view, be more courageous in specifying specific locations for its preferred development around the M20, such as Eclipse Park at Junction 7 and Junction 8.	Location for Growth	Agreed	The Locations for Growth chapter will be reworded to set out the key employment locations.
Dr J M Speight	DR124	By asserting that the national economy is starting to grow, the draft Strategy starts off on the wrong footing (p.3, Executive Summary). Although at present there may be growth in the economy, there is no guarantee that it will persist, even for a short period of time and certainly not over the long interval covered by the draft EDS .	Ex Sum	Noted	The EDS will be kept under review along with the Action Plan and will be revisited if or when the national economy changes significantly.
	DR125	I note that "coordinating, promoting and actively working with the business community" appears to summarise the Council's position (last paragraph, page 3). I have to say my view is that the pronouncement that the Council has "a clear leadership role" goes too far. I say this, in spite of the claim that "a key message from the business community is a desire for Maidstone Borough Council to show more leadership and take a more proactive approach towards economic growth..." (para.7.2). I get the strong impression that the Council is intent on taking on the role of instigator rather than coordinator. I believe this goes too far. Less proactive, more advisory, participation would be healthier. Otherwise there could be accusations of involvement in areas where competition comes into play.	Ex Sum	Not Agreed	MBC will consider acting as necessary, and within its powers to do so, to create to the right conditions for economic growth in the Borough.
	DR126	Whilst positivity is to be expected in a document of this type, I believe that much of what is written in paragraphs 1.1 – 1.3 is over-optimistic. The opinions expressed are certainly based on an extremely short-term outlook. Clearly lessons have not been learned from what befell the country within a very short interval following the adoption of the 2008 EDS , drawn up as it was whilst wearing rose-coloured glasses.	Intro	Not Agreed	Paragraphs 1.1 to 1.3 are not considered over optimistic and include referenece to the fact that Maidstone is at a crossroads. The draft EDS is based on the available evidence at one point in time and will be reviewed if the evidence base and national economic context changes.
	127	To all intents and purposes two of the four parts of the work undertaken by <i>Shared Intelligence</i> (paragraph 1.4) are removed from the strategy itself. I would suggest that certainly the Action Plan should be an integral part of the main document, appearing at the end.	Intro	Agreed	The Action Plan will be an integral part of the final EDS.

DR128	The status of the <i>Maidstone Economic Profile</i> is questioned and whether it is part of the draft EDS for consultation or whether it is an approved and adopted document	Intro	Noted	The Economic Profile is a supporting document based largely on available statistics from the Office for National Statistics. It forms part of the draft EDS consultation.
DR129	I have been unable to locate in the draft <i>EDS</i> any mention of monitoring of the Strategy as a whole. This is a very different stance to that taken in the 2008 <i>EDS</i> , where in particular the overall performance of the Maidstone economy was to be monitored against a "range of relevant datasets".	Intro	Agreed	A range of of relevant datasets will be used to monitor the health of the local economy and these will be set out in the Appendices.
DR130	As regards the outline in paragraph 1.4 of the engagement undertaken by various means, I have no great criticism of it, except to say that it is a pity that a list of stakeholders who were interviewed is not included, unlike the position adopted in the 2008 <i>EDS</i> .	Intro	Agreed	The list of stakeholders approached will be set out in the end of the Strategy.
DR131	The three aims of the draft strategy listed in paragraph 1.9 focus on matters to do with employment. Whilst jobs are fundamental to economic development, where aims are concerned there are many more topics to which attention could be turned. I just find it odd that there seems to be a need to separate out some matters on which to focus. One of the consequences is that there is no clear linkage between the aims for 2031 and the Ambition Statement.	Intro	Not Agreed	The aims are a statistical means of demonstrating progress towards the goal of achieving the economic growth aspirations. The three aims have been chosen to reflect the impact on them through the successful delivery of the actions under each of the priorities (or objectives). The Ambition Statement sets more broadly what the outcomes of achieving the aims and objectives might look like for the Borough in 20 year's time.
DR132	I suggest that there is a need for a considerable rethink here as to how this section under the heading "Maidstone in 2031" is presented. Adherence to the logical format used in 2008 appears to me to be entirely satisfactory. Of course, then it would mean that the five priorities discussed in Section 5 ("Strategy for Growth") would be designated as objectives. Please note, this is a major criticism of the draft <i>EDS</i> ; a total rewrite is needed to bring related matters into proper alignment.	Intro	Not Agreed	The structure and use of language to describe aims, objectives or priorities within the EDS has not been raised as an issue following the consultation or caused confusion. No change.
DR133	As regards the substance of the three aims the one that stands out as being odd is the first. Whilst creation of jobs is fundamental to a strategy which proposes a growing economy, citing the number of jobs is far too specific. That number has been drawn from <i>GVA Grimley, Economic Sensitivity Testing and Employment Land Forecast</i> (February 2014), and the reasoning behind it is summarised in the draft <i>EDS</i> at paragraphs 4.3 to 4.6, and expanded thereafter throughout the rest of Chapter 4 of the draft <i>EDS</i> . One small point is that the figure referred to the interval between 2011 and 2031, not 2014 to 2031. Some form of adjustment is required. Another minor matter, to which I made reference above, concerns the end-date of the <i>EDS</i> . I cannot see why it is not a 20-year plan, along the same lines as the 2008 <i>EDS</i> . Coincidence with the end of the period of the Local Plan has not received justification.	Intro	Not agreed	It is recognised that forecasting economic growth and job creation over a long period of time is inherently difficult however some basis for planning and making provision for future growth needs to be established. GVA's forecasting methodology has been accepted by Planning Inspectors. The job creation figure should be seen as a guide rather than an absolute number to be achieved. The interval 2011 to 2031 is used is to align the evidence base to the period of the draft Local Plan. As there are clear linkages between employment site allocations and Local Plan policies and the draft EDS, it is sensible to align the draft EDS to the same 2031 period.
DR134	The <i>Economic Sensitivity Testing and Employment Land Forecast</i> was not listed on the Consultation page of the Council's website. It was a failure on the Council's part not to list the earlier GVA report on the web-page in question.	Intro	Not Agreed	Not every document referenced in the draft EDS was included in the consultation list of documents.
DR135	The 2008 EDS, which is referenced in the draft EDS is not easily found on the internet. The general public was not consulted on the 2008 <i>EDS</i> .	Intro	Noted	Consultation on the 2008 EDS took place but was focussed on key stakeholders, rather than the general public.
DR136	Paragraph 1.10 does little to explain that the Ambition Statement is an account of what the hope is for the situation in 2031, and that it is a round-about expression of the ambitions/aspirations for that scenario to come to fruition. If it is to be retained, considerable improvement is required either in the wording of the Ambition Statement or in the words introducing it.	Intro	Agreed	Whilst considerable improvement is not required changing the Statement to Vision rather than Ambition better reflects the hopes and values described in it.

DR137	In portraying the situation hoped for by 2031, the Ambition Statement is a collection of aspirations for the long-term. Ambition is one thing; feasibility is another. We are a full 17 years away from the finale. Surely the lesson to be learned from the last 6 years is that circumstances can change dramatically, and in a very short time. I firmly believe that the sort of approach set out in the Ambition Statement is the wrong one. In general strategies are a matter of reality and achievability, not hope. I advocate the removal of everything from paragraph 1.14, except the very first sentence of the Ambition Statement.	Intro	Not Agreed	It is not uncommon for a Strategy to include a Vision Statement and look long term. However the Strategy and Action Plan will be reviewed and refreshed annually to ensure they remain relevant.
DR138	I cannot argue with the vast majority of the content of the Strategic Context chapter. I can only agree that securing any available funding is of paramount importance. That is precisely why the EDS should be an understandable document with entirely credible content.	Strategic Context	Noted	No change
DR139	The strategic context since the 2008 EDS was approved has changed significantly. This is yet further affirmation of the need for regular reviews/monitoring of the EDS. A commitment to undertake this needs to be stipulated in the body of the document.	Strategic Context	Agreed	At the end of paragraph 2.1 add "The Strategic context of this document will be kept under review and the monitoring indicators listed at the back of this Strategy will be used to inform when a review of the Strategy is required to meet the changing national economic picture."
DR140	The only other point I would make on this chapter concerns the section, "What Makes A Successful Economy?" (paras. 2.18-2.21). Although the intent is very relevant to the EDS, it seems to me to be little to do with its strategic context. I would suggest that this section would be better employed as opening paragraphs to Chapter 5 of the EDS.	Strategic Context	Agreed	Move the section "What Makes a Successful Economy?" into the beginning of Chapter 5.
DR141	Bearing in mind that for the most part the content of Chapter 3 is factual, I commend its presentation, but, as I have said more than once before, revision of the strategy on a regular basis in the future is paramount.	C&O	Noted	No change
DR142	A small point – I think the wording in para. 3.10, "...its reliance..." would better read "...the level of its reliance...".	C&O	Agreed	Add to para. 3.10 "...the level of its reliance..."
DR143	SWOT: "Lack of suitable retail units that meet retailer requirements" could be interpreted as an invitation to provide out-of-town facilities.	C&O	Not Agreed	Whilst it is possible to interpret this statement as suggested it also indicates the need to provide suitable retail units in the town centre. No change.
DR144	SWOT: "Out commuting of higher skilled workers provides future business growth opportunities" – without qualification this sends a message contrary to what is intended.	C&O	Not Agreed	The intention is to attract high skilled residents to consider establishing businesses locally. Further elaboration would be inappropriate in a SWOT table.
DR145	SWOT: – the lack of a bullet-point and the typo "the" in the Opportunity beginning "To increase the attractiveness...".	C&O	Agreed	Amend as proposed.
DR146	SWOT: Last but two of the Threats, "Competition..." – the last part, "and inward investment opportunities", does not make sense.	C&O	Not Agreed	It is considered clear that competition from other areas could attract expanding Maidstone based businesses and attract investment that would otherwise come to Maidstone.
DR147	SWOT: "Proposals for out-of-town..." would better read as "Danger from out-of-town..."	C&O	Not agreed	As this statement falls within the "Threats" quarter of the SWOT it is explicit that proposals for out of town developments are a danger to the Town Centre.
DR148	Overall Chapter 3 is well set out. Strong agreement that the strengths, weaknesses, opportunities, and threats laid out in the draft strategy are clearly identified and totally pertinent.	C&O	Noted	No change
DR149	I could not agree more that the Council "must acknowledge the inherent uncertainties" (para.4.2).	Growth Potential	Noted	No change
DR150	Small point – in para. 4.3, it would be better to refer to consultants GVA Grimley, thus avoiding the confusion with GVA (Gross Value Added).	Growth Potential	Agreed	Stating Consultants before GVA makes it clear. GVA are no longer called GVA Grimley but Bilfinger GVA. All references to consultants GVA will be changed accordingly.

DR151	Whilst I cannot dispute that the draft Strategy's interpretation of GVA Grimley's report is anything but correct, the fact remains that the deductions in that report are very much open to debate. The validity of the methodology used to derive the jobs figure for example should have been questioned.	Growth Potential	Not Agreed	As set out at the beginning of the chapter, there are inherent uncertainties involved in forecasting growth. That said Bilfinger GVA's methodology has been accepted by Planning Inspectors elsewhere in the Country.
DR152	Reference to the report, <i>Economic Sensitivity Testing and Employment Land Forecast</i> , is unacceptable as few have the expertise to question the statistical data in that report. I think that many will bear some suspicions that it has been engineered to provide the answers that certain sectors of MBC wish to hear. Any such suspicions may be enough to undermine any confidence that the public as a whole, and maybe even some businesses, might have in the document. The GVA document in its entirety has never been thoroughly appraised or approved by Members at any level.	Growth Potential	Not Agreed	Both these documents are technical supporting evidence for the Local Plan. Each has been commissioned to comply with the requirements in the NPPF and NPPG.
DR153	In general terms the growth potential in terms of jobs requirements indicated, including those applicable individually to various sectors, is founded on a highly hypothetical assessment, with no element of contingency.	Growth Potential	Not Agreed	The Economic Sensitivity testing Report (GVA 2014) considered a number of scenarios for growth resulting in a range of jobs growth predications depending upon the success or otherwise of the interventions proposed in the draft EDS. These jobs growth figures are guides rather than absolute targets as it is recognised that the forecasting economic growth is notoriously difficult.
DR154	The 5 priorities listed in paragraph 5.1 would be more appropriately designated objectives and be joined and headed by the three aims listed in paragraph 1.9. As I then pointed out this would not only bring the three "aims" more into keeping with the format followed by the 2008 EDS, but also would make considerably more sense. It would allow for a proper explanation of the thinking behind those three topics, along the lines that the 5 "priorities" have benefitted from qualification.	Strategy for Growth	Not Agreed	The structure and use of language to describe aims, objectives or priorities within the EDS has not been raised as an issue following the consultation or caused confusion. No change.
DR155	The intent of Chapter 5 is commendable and, with the proviso that the priorities are renamed as objectives and are joined by the three aims, to a large extent I think this chapter would be suited to a strategy for growth.	Strategy for Growth	Noted	No change
DR156	Paragraph 5.3, whilst I can see the point that the Council can, at least to some extent, help to create a favourable backdrop, a less proactive more advisory, participation would be healthier. But then again, if this is truly what all, and I emphasise all, businesses have signed up to, it is not for me to argue the point any further.	Strategy for Growth	Noted	No change
DR157	Whilst the content of paragraph 5.7 recounts the current views of businesses in Maidstone, I think it needs to be emphasised that these are just that, current. A further point is to do with working with businesses "to encourage them to invest and grow in Maidstone". This is an unqualified endeavour.	Retaining and Attracting Investment	Noted	This is a statement of intent and the Action Plan sets out what the Council and its partners will aim to achieve. Should these investment and growth plans require planning permission this will be dealt with through the planning application process. Ongoing engagement with the business community will ensure that the views of business will be kept up to date.
DR158	Paragraph 5.8 talks of reliance; shouldn't this be worded as "too much reliance"?	Retaining and Attracting Investment	Agreed	The text will be changed as suggested in para 5.8 (para 5.13 in the final version of the EDS)
DR159	Regarding the wording in paragraph 5.11, I would argue that all sectors are likely to need support.	Retaining and Attracting Investment	Agreed	Business across all sectors of the economy may need support and the Council and its partners will aim to put in place relevant advice and guidance. Regarding para 5.11 the intention is to identify those businesses with high growth potential and ensure they are targeted for support through the Government's Business Growth Service. Para 5.11 (para 5.16 in the final version of the EDS) will be changed to read "Businesses which are identified with potential to grow will be targeted to receive support through the Government's Business Growth Service to help ensure that they deliver the level of jobs growth forecast."
DR160	Using the sub-headings, "Business Retention" and "Inward Investment" was a mistake. Under the first of these subheadings, paragraphs 5.12 to 5.14 are mostly about attracting businesses, not retaining it. Also, much of what is related under the second heading is relevant to retaining existing businesses.	Retaining and Attracting Investment	Not Agreed	Sub headings provide a clearer structure to this section. It is accepted that some statements could equally refer to business retention and inward investment.
DR161	I believe that Action A6 comes too close to being site-specific, and is really a matter for the Local Plan.	Retaining and Attracting Investment	Not Agreed	The Economic Development team plays a key role alongside the Planning Policy team to discuss and negotiate development opportunities on key sites with landowners and developers.

DR162	The section under the sub-heading "Stimulating Entrepreneurship" appears to be very sound, and congratulations are due. There are a few places where rewording would help get over the intent, e.g. "away from the public sector" and "close association between companies" (para.5.20), "the County" (Action B3).	Stimulating Entrepreneurship	Agreed	Change the text, first sentence of paragraph 5.20 (para 5.27 in the final version of the EDS) to "...away from <i>over reliance on</i> the public sector..." Change Action B3 to read "Work with <i>Kent County Council</i> ..."
DR163	The section under the sub-heading "Enhancing the Town Centre" on the whole is well-presented and germane. But it too has a few language problems. For example the word "increase" in paragraph 5.30 does not convey what is meant.	Enhancing Maidstone Town Centre	Noted	No change, the meaning is considered clear.
DR164	That "Maidstone has good multiple retail representation" (para.5.34) is a matter of opinion. Relative to its catchment it is adequately furnished with multiple retailers is a less opinionated way of expressing the situation. Indeed, the sentiment in paragraph 5.35 says just that.	Enhancing Maidstone Town Centre	Not Agreed	This statement is a fact presented in the DTZ Maidstone own Centre Assessment (August 2013) that Maidstone is well represented by multiple retailers.
DR165	The validity of some of the pronouncements in the last sentence of paragraph 5.38 is questioned. Where is the evidence that increases in footfall, consumer expenditure, job creation, and property values have ensued from the £4m regeneration scheme? I am open to persuasion if the claims can be substantiated.	Enhancing Maidstone Town Centre	Noted	The benefits attributed from investment in and improvements to public realm have been researched and publications produced by many organisations such as the Commission for Architecture and the Built Environment and set out in government publications such as "World Class Places, the Government's Strategy for improving quality of place" May 2009.
DR166	A longer term view of the future of retailing in the town centre is needed. Out-of-town developments, providing facilities for the motorist, as well as internet shopping, providing relatively hassle-free access to goods, are ever-growing threats to the viability and cohesiveness of retailing and the array of mutually dependent functions that currently operate in the town centre. The draft Strategy certainly has nothing to say about shopping on-line. I would add that Action C1 is extremely urgent, in fact long overdue.	Enhancing Maidstone Town Centre	Agreed	DTZ were commissioned to produce a Maidstone Town Centre Assessment in August 2013 which informed the draft Local Plan Regulation 18. A summary of their assessment of the town centre will be set out at the end of para 5.35 (para 5.40 in the final version of the EDS) to read "National trends in retailing include: <ul style="list-style-type: none"> •The reduction in multiple retailer representation across the UK, with a focus by brands on a smaller number of larger locations. •Tied into this is the growth of internet shopping. •The increased importance of restaurants/ eateries and leisure uses in terms of anchoring town centres and major new shopping centres. •Changing store formats such as the growth in "pop up" stores. •The importance of providing a high quality of experience (through the quality of the retail and leisure offer through to the quality of environment and accessibility) to shoppers in order to attract and retain their custom. •The importance of achieving an appropriate balance between independent and multiple retailers. The impact of these trends on Maidstone Town Centre needs to be properly understood and action taken to ensure its vitality and viability."
DR167	The section under the heading "Meeting the Skills Needs" is also commendable, although again a few observations may prove helpful.	Meeting the Skills Needs	Noted	No change
DR168	What is meant by "ensuring that businesses have the skills they need" (para.5.47); surely it should be about a skilled workforce.	Meeting the Skills Needs	Agreed	Amend the first sentence of 5.47 (para 5.55 in the final version of the EDS) to read "Ensuring that business have the skilled workforce they need to grow..."
DR169	The word "provision" in para.5.48 does not carry the intended meaning.	Meeting the Skills Needs	Noted	Paragraph 5.48 (para 5.56 in the final version of the EDS) needs to be revised as this action with schools is too specific. Replace with "Work is ongoing to improve pupils understanding of the career opportunities available to them, the skills required by employers and the different pathways they could take to meet their aspirations. Ofsted's report 'Going in the right direction?', published in September 2013, found that the majority of schools across the country needed to do more to ensure that all of their pupils had information on the full range of training and education options and career pathways to help them make informed choices about their future so that they could reach their potential. Encouraging employer engagement with schools, such as initiatives like "Inspiring the Future," which links business people and schools together to give career insight talks to young people, and arranging work experience which highlight employability skills is a key action in this Strategy."
DR170	In the last sentence in paragraph 5.51 surely the wording should be "... from each other".	Meeting the Skills Needs	Agreed	The text at 5.51 (para 5.59 in the final version of the EDS) will be amended as suggested.

DR171	I am not convinced that it is wise to quote specific examples of firms facing challenges as set out in paragraph 5.52. By their very nature they are likely to be transitory problems. A more generalised approach to the types of problems that may occur over the period of the Strategy might be a better way of dealing with the matter of employers' skills needs.	Meeting the Skills Needs	Noted	These skills issues appear to be challenges for the short and medium term and the examples are given to demonstrate the breadth of sectors facing skills shortages. No change proposed.
DR172	Paragraph 5.55 reads badly; something along the lines "... meeting the challenge of keeping these young people..." would be clearer.	Meeting the Skills Needs	Not agreed	Para 5.55 is considered to be clear.
DR173	The heading "Investing in Infrastructure" does not match with the wording in paragraph 5.1, nor in the consultation questionnaire, nor in the Summary document, nor in the Action Plan, where in all cases it reads "Improving the Infrastructure".	Improving the Infrastructure	Agreed	The heading "Investing in Infrastructure" will be changed to "Improving the Infrastructure" to be consistent with references elsewhere.
DR174	In paragraph 5.66, the wording should be "... identified by businesses as needing attention".	Improving the Infrastructure	Agreed	The text at para 5.66 (para 5.74 in the final version of the EDS) will be amended as suggested.
DR175	Action E1 would be clearer if it referred to the Local Growth Fund instead of its acronym.	Improving the Infrastructure	Agreed	The text will be amended as suggested.
DR176	The sub-title "Better suited to less traffic intensive sectors" is clumsy.	Location for Growth	Agreed	This section will be reworded and reorganised to set out the key locations for growth which will explore the issues of growth in rural areas.
DR177	Also worthy of a mention is that neither the Blue Bell Railway nor Tenterden are located in the Borough of Maidstone (para.6.9). I find it astonishing that the authors were unaware of this, and also that it was not picked up in proof-reading prior to release for public consultation. Also, "offers" should be "offer".	Location for Growth	Noted	This reference to Blue Bell Railway was deleted shortly after the consultation version of the draft EDS was published on line. Staying visitors often base themselves in the Borough as it is a good location from which to visit attractions in mid and north Kent. Blue Bell Railway is one of many attractions outside the Borough used to entice visitors. However it was clear that it could cause confusion and so was deleted.
DR178	It is suggested that the EDS is attempting to formulate policy regarding the amount and location of new employment land required in the Borough in the FAQs part of the consultation document, as it reads "The strategy is designed to provide enough land for business in the right locations..." This together with the references to and abstraction of material from the GVA report dictate in the draft EDS suggest a "hidden agenda"	Location for Growth	Not Agreed	The Economic Development Strategy does inform the Local Plan but it is not the role of the Economic Development Strategy to allocate sites. However since the draft EDS has been produced the findings of the Qualitative Employment Site Assessment, GVA (2014) has been reported to the Planning, Transport & Development Overview & Scrutiny Committee and the Economic and Commercial Development Overview & Scrutiny Committee held on 21st October 2014. The EDS will be amended at the beginning of paragraph 6.20 to read "Based on the outcomes of the Strategic Economic Development Land Availability Assessment (SEDLAA) the only available, additional land at a motorway junction is at J8 of M20. Development in this location would better meet the gap identified through the evidential analysis in the Qualitative Employment Sites Assessment. It could also enable the quantitative demand for offices to be met which is not the case for the current selection of Regulation 18 sites."
DR179	The GVA report entitled <i>Qualitative Employment Site Assessment</i> is annotated in the footnote as "Draft Final Report" and of the date August 2014. The document listed on the Consultation page on the Council's website is subtitled "Draft Report" and it is dated as September 2014. This lack of conformity leads to many questions, not least what amendments were made to the original draft and does this have a bearing on what is written in the draft EDS.	Location for Growth	Noted	At the time of writing the draft EDS had to rely upon the Qualitative Employment Site Assessment draft report of August 2014 version for information. There were no substantive changes in the September draft report.
DR180	The September version of the GVA report was given consideration at the joint-meeting of the Economic and Commercial Development Overview & Scrutiny Committee and Planning, Transport and Development Overview & Scrutiny Committee on 21st October. As far as I can ascertain the report has not been deliberated by Cabinet, certainly not before the consultation on the draft EDS got underway in December last year. Interestingly the resolutions emanating from the joint meeting of OSCs were almost entirely to do with development for employment use at Junction 8 of the M20. Naturally there will be those that suspect a deal of manipulation has been employed to embroil this controversial issue, albeit in a roundabout fashion, in the draft EDS. I am on record elsewhere as supporting development at Junction 8 of the M20, but I do have my reservations as to whether the EDS is the vehicle for putting forward the case, even though implicitly.	Location for Growth	Noted	The focus of deliberations by Councillors at the joint-meeting of the Economic and Commercial Development Overview & Scrutiny Committee and Planning, Transport and Development Overview & Scrutiny Committee on 21st October reflects the very sensitive nature of any consideration of development at Junction 8 M20.
DR181	Paragraphs 6.16 and 6.17 are missing.	Location for Growth	Agreed	This paragraph mis-numbering will be amended accordingly.

DR182	A more important observation is that practically the whole of the section under the subtitle "Employment Sites for Future Growth" is a summary of an extremely recently drafted report, which has received the minimum of scrutiny. The final sentence in this chapter says it all (para.6.20). The issues raised under this subheading are matters for the Local Plan.	Location for Growth	Noted	The Economic Development Strategy does inform the Local Plan and draws on the same evidence base.
DR183	The Borough Council's role should be as coordinator not leader.	Making it Happen	Not Agreed	MBC will consider acting as necessary, and within its powers to do so, to create to the right conditions for economic growth in the Borough.
DR184	As regards the Action Plans as a whole, although the intentions appear to be good, I am concerned that as regards the implementation there may be unforeseen stumbling blocks to the implementation. Naturally it is to be anticipated that I would stress the need for regular monitoring of the progress made.	Making it Happen	Noted	Regular monitoring of the final Action Plan will take place.
DR185	First and foremost the tabulated Action Plan should be an integral part of the <i>EDS</i> .	Action Plan	Agreed	The Action Plan will form part of the final <i>EDS</i> .
DR186	The Action Plan and text in the <i>EDS</i> is awash with acronyms. The <i>EDS</i> is desperately short of a glossary.	Action Plan	Agreed	A glossary will be added to the final <i>EDS</i>
DR187	The Action Plan has little to offer by way of the strategic actions for the future of the tourism industry.	Action Plan	Agreed	Detailed actions in support of the Tourism industry will be taken forward through the delivery of the Destination Management Plan and Cultural Strategy which are listed as key Actions in the Economic Development Strategy.
DR188	A strategy for setting out role of the Leisure industry, incorporating an Action Plan to support it, seems to be an omission. The reference in Action Plan C3 to MCL (which is unexplained, but I am guessing is Maidstone Leisure and Culture) is the closest anything comes to a mention.	Action Plan	Agreed	A Cultural Strategy will be commissioned and implemented to address how the Borough can build upon its cultural assets such as the Museums, Theatre and River etc... and other leisure attractions.