

APPENDIX A: schedule of issues and responses for Policy EMP1

Policy Number EMP1	General comments/objections to Policy EMP1	
Number of Support / Object / General Observations		
Summary of issues	Officer Response	Proposed change
Support the policy (resident; parish councils)	Support welcomed	No change.
Additional criterion to guide planning decisions and ensure that existing underground sewers are not built over, and they can continue to fulfil their function (Southern Water)	Whilst supported, this is a detailed development design matter which would be dealt with at planning application stage. It is unnecessary to include it as a specific reference in the site allocation policies.	No change.
Plan does not provide sufficient employment land. The allocations in Policy EMP1 combined with those in Policy RMX1 provide for 51,100sqm of B1/B2/B8 provision, compared with a requirement in Policy SS1 of 70,201sqm for industrial and office uses, a shortfall of 19,101sqm. (developer)	Following the completion of the Qualitative Employment Sites assessment (2014), GVA, the updated employment land position was set out in a report to Planning, Transport and Development Overview and Scrutiny Committee on 21 st October 2014. The sites identified in Policies EMP1 and RMX1 serve to meet the quantative need for additional industrial/warehousing floorspace but do not provide sufficient new office floorspace. Further land allocations should be identified to satisfy future	Include a site allocation policy for Land at Woodcut Farm in Policy EMP1

	office needs ¹ . The allocation of land at M20 J8 for a mixed B class employment uses would serve to address this shortfall in the amount of office space planned.	
<p>The locations identified are unsuitable to meet the significant employment land requirements of the Borough, in terms of</p> <ul style="list-style-type: none"> • connections to the strategic road network • site capacity; sites unable to accommodate larger B1, B2 and B8 businesses • market interest • Sites will add to vehicular traffic including HGVs on the rural road network • Unsuitability of such sites has already been demonstrated, by the publicly confirmed plans of both ADL and SCARAB, to leave existing premises at Marden <p>Whilst locations such as Marden are suitable to accommodate further employment development, they will always be limited in function. It is necessary in qualitative terms to allocate additional sites capable of meeting the evidenced need. Land at M20 J8 should be allocated for employment development (businesses; business representative groups; developers)</p>	<p>The findings of the Qualitative Employment Sites Assessment, GVA (2014), and the implications for the Local Plan's approach to employment land, are set out in the report to Planning, Transport & Development Overview and Scrutiny Committee on 21st October 2014. This concludes that the balance of considerations weigh in favour of making at allocation at M20 J8 for mixed use B class business park form of development. This work has been further supplemented by the options assessment set out in the covering report.</p> <p>In addition, the sites currently allocated in Policy EMP1 are considered to be inherently suitable sites for B class employment. Retention of these sites in the policy is recommended to allow for some flexibility and choice of locations</p>	<p>Include a site allocation policy for Land at Woodcut Farm in Policy EMP1</p>

¹ NPPF paragraph 21

		for new/expanding businesses.	
Policy Number EMP1(1)	Site Name: Mote Road		
Number of Support / Object / General Observations			
Summary of issues		Officer Response	Proposed change
Site should be retained for car parking (CPRE)		This site is currently used as informal car parking for the adjacent office accommodation. Better use could be made of this town centre site through redevelopment and the site has the potential to contribute to the identified need for additional office floorspace over the timeframe of the Local Plan. An expired consent for the site would have delivered 8,000sqm of new office floorspace in a multi-storey building. This is the capacity proposed in the policy. The Qualitative Employment Sites Assessment (2014) identifies that market demand is now for more flexible, smaller scale units. Recognising that the market may favour a mix of smaller units on this site, it is proposed that the capacity be amended to state up to 8,000sqm.	Revise site capacity to <u>up to</u> 8,000sqm.

Policy Number EMP1(2)	Site Name: Land south of Claygate, Pattenden Lane	
Number of Support / Object / General Observations		
Summary of issues	Officer Response	Proposed change
Support (CPRE)	Support welcomed	No change
Concern about the unsuitability of the site to meet the significant employment land requirements of the Borough	The allocation of this site allows for the planned expansion of this established business area. Consent has been granted for a number of expansions to the Claygate site since the adoption of the 2000 Local Plan. The allocation of this and other sites in Policy EMP1 provides a number of different sites in varying locations to meet a range of B class needs over the timeframe of the Local Plan.	No change
Policy Number EMP1(3)	Site Name: West of Wheelbarrow Industrial estate, Pattenden Lane, Marden	
Number of Support / Object / General Observations		
Summary of issues	Officer Response	Proposed change
Concern about the unsuitability of the site to meet the significant employment land requirements of the Borough	The allocation of this site allows for the planned expansion of this established business area. Consent has been granted to extend the Wheelbarrow estate to the	No change

		north since the adoption of the 2000 Local Plan. The allocation of this and other sites in Policy EMP1 provides a number of different sites in varying locations to meet a range of B class needs over the timeframe of the Local Plan.	
Object as site extends into the countryside (CPRE)		The proposed allocation ‘squares off’ this site. The western boundary aligns with the existing commercial development to the south. The site includes an existing reservoir. In the face of a need for additional employment land it is considered that this is an eminently suitable site which forms a logical extension to the existing business park.	No change.
Policy Number EMP1(4)	Site Name: West of Barradale Farm		
Number of Support / Object / General Observations			
Summary of issues		Officer Response	Proposed change
Support (residents; parish council)		Support welcomed	No change
Concern about highway impacts (residents); <ul style="list-style-type: none">• traffic on A274 and rat running on rural lanes; (JPG)• Access to the motorway is via Maidstone.• relocate the existing access to the neighbouring		The Highways Authority has not raised any objections to the proposed allocation of this site. The site benefits from direct access onto A274, a main north/south route, thereby reducing the prospects of	No change.

<p>Stonestile Business Park in Stonestile Lane through the Barradale Farm site via an improved access point on the A274. This will then enable the existing Stonestile Business Park access to be permanently sealed up, thereby alleviating the significant traffic hazard created by commercial vehicles entering and leaving via the inadequate Stonestile Cross Roads and Stonestile Lane (residents; parish council)</p> <ul style="list-style-type: none"> • Also provision of a footway connection to the existing footway into Headcorn • Also a possible cycle route to the village via Tattlebury Lane and Ulcombe Road should be considered. (resident) 	<p>HGV movements on less suitable rural roads. Notwithstanding the nature of the site's connections to the motorway, this is a well-used site of modern premises . The link to the Stonestile Business Park proposed in a number of representations would have to be routed across the open field which currently separates Barradale Farm site and the Stonestile Business Park. This would create an additional visual intrusion into the landscape. KCC Highways has confirmed that crash data does not support the need for the additional link. It could also serve to increase the development pressure on the land that would become contained by the new access road. The draft policy provides for a new pedestrian link to the Stonestile Lane junction where there is an existing pavement along the eastern side of A274 towards Headcorn. There are no current proposals to create a cycle route along Tattlebury Lane. Whilst the narrow and rural nature of the lane does not suggest that a formally designated cycle route would be appropriate, the route is clearly open to cyclists to use in its current form.</p>	
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Concern that the site and Stonestile Lane floods and further development will displace floodwater to residential properties; (residents, parish council)	The Environment Agency has not objected to the inclusion of this site in the draft Local Plan. The north western extremity of the allocated site falls within flood zone 3 where the policy specifies that structural landscaping, rather than development, will be located. In terms of surface water run off, the Environment Agency requires that 'green field' run off rates are maintained after the development is completed. The policy specifies that surface water run off is to be managed using sustainable techniques.	No change
Concern about impact on power supply and sewerage system;	South Water, which is responsible for waste water management, has not objected to this allocation. Similarly no objection has been received from UK Power Networks.	No change.
Concern about the visual impact of existing buildings and the proposed expansion. Site would be inappropriate development in the countryside (CPRE)	In terms of visual impact, the policy provides for specific mitigation measures namely the incorporation of structural landscaping features along the boundaries of the site. Criterion 1 requires additional landscaping to screen both the existing and proposed new buildings. In the face of a need for	No change.

	additional employment land and the need for some flexibility and choice, and with the mitigation measures proposed, it is considered that this is a suitable site.	
Number of jobs created from industrial/warehousing uses will not be sufficient to match the housing growth planned for Headcorn (resident)	Based on an assessment of services and facilities, Headcorn is an identified Rural Service Centre which can accommodate an element of housing growth. The relationship between where people chose to live and where they work is a complex one, and for any individual will be influenced by a range of factors. Not all Headcorn residents will want, or be able, to work locally. The village's rail connection in particular will inevitably mean a proportion of people will commute out of the village for work. The Local Plan has a role in facilitating local job opportunities, including by protecting existing business sites (Policy DM18) and by allocating new land such as the site at Barradale Farm.	No change.
Unit size should be limited to 500sqm. (residents; parish council)	Existing buildings on the Barradale Farm site are 1,000+ sqm in size. In the context of these larger buildings, a restriction as proposed would be unduly prescriptive.	No change.
Concern about the unsuitability of the site to meet the significant	The allocation of this site allows for the	No change.

employment land requirements of the Borough		planned expansion of this established business area. The allocation of this and other sites in Policy EMP1 provides a number of different sites in varying locations to meet a range of B class needs over the timeframe of the Local Plan.	
Policy Number EMP1	Omissions from Policy EMP1		
Number of Support / Object / General Observations			
Summary of issues		Officer Response	Proposed change
<p>Waterside Park at M20 J8 should be allocated in the Local Plan for a range of employment uses including B1, B2 and B8 uses.</p> <ul style="list-style-type: none">It is the most appropriate site at M20 J8Waterside Park is able to accommodate the scale and type of building able to meet evidenced quantitative and qualitative need, <p>Woodcut Farm at M20 J8 should be allocated in the Local Plan:</p> <ul style="list-style-type: none">The significant economic advantages of the site outweigh the impact of development. The visual impact of development is capable of effective mitigation.Site offers opportunity for enhanced public access, including through the implementation of a travel plan.		<p>The findings of the Qualitative Employment Sites assessment (2014), GVA, and the implications for the Local Plan’s approach to employment land, are set out in the report to Overview and Scrutiny Committee of 21st October 2014. The conclusion of the analysis is recommended that the balance of considerations weigh in favour of making at allocation at M20 J8 for mixed use B class business park form of development.</p> <p>Both the Woodcut Farm and Waterside Park sites have been assessed in detail in the Strategic Housing and Economic Development Land Availability</p>	<p>Include a site allocation policy for Land at Woodcut Farm in Policy EMP1</p>

	<p>Assessment (2014). A comparison of the two sites was set out in the report to Cabinet of 25th July 2012 (paragraphs 1.3.33 to 1.3.41). This comparative assessment concluded “Given the size of the Woodcut Farm site and its capacity to provide for extensive structural and internal landscaping, as well as its capability to accommodate development within a parkland setting, it is recommended that this site be allocated for employment development”.</p> <p>Proposals for B class development at the Waterside Park site have recently been dismissed at appeal.</p>	
Support the omission of an allocation at M20 J8 in Policy EMP1 (residents; MP)	Support noted however it is now proposed that land at Woodcut Farm be allocated in Policy EMP1.	Include a site allocation policy for Land at Woodcut Farm in Policy EMP1
Ringles Business Park Headcorn, has been rejected by MBC. This is a brown field site and inclusion in the LP would have ensured more control as to the quality of the development, particularly when the existing glasshouses become redundant (resident) .	This site was assessed and rejected for development for the reasons set out in the Strategic Housing and Economic Development Land Availability Assessment (2014).	No change.
Include the land already allocated for employment at the west end of Lodge Road, Staplehurst. (resident)	This land referred to has extant consent for more than 10,000sqm of B class floorspace and this has been taken into	No change.

	<p>account when calculating how much additional employment land needs to be allocated in the Local Plan. As the site has consent, there is no additional necessity to specifically allocate it in the Local Plan. This land has been put forward as a potential new housing site by developers. SPS&T Committee decided to retain this site for employment at its meeting on 23rd July 2015</p>	
<p>Include Maidstone Livestock Market at Detling Airfield as site suitable for B1/B2 and B8 uses (landowner) .</p>	<p>Cabinet (14th January 2015) agreed that the Livestock Market be included within the defined boundary of the Detling Airfield Economic Development Area as suitable for B class uses (Policy DM18). There is no additional need to allocate the site in Policy EMP1.</p>	<p>No change.</p>
<p>Include Detling Aerodrome site (parish council; landowner). Existing site makes a significant contribution to employment. Site has scope to be redeveloped in a more efficient layout and expanded. This development would enable a new roundabout access off A249 to serve the showground and the employment area which would alleviate congestion at M20 J7 and A249/M2 junctions and alleviate dual movements when exiting the showground sites and reduce the accident rate on this stretch of road. Site would be attractive to businesses requiring ready access to the strategic road</p>	<p>The existing site has been identified as an Economic Development Area through Policy DM18. This policy would support redevelopment proposals to upgrade the commercial premises on the site within its existing confines.</p> <p>The site is located in the Kent Downs AONB. Significant expansion of the site for employment and/or housing would</p>	<p>No change.</p>

network(developer)	adversely impact on this nationally important landscape. This impact would be furthered by the proposed access arrangements onto A249.	
Allocate Brooklyn Park for B class uses (developer)	Cabinet agreed that Brooklyn Yard be included in Policy DM18 as an existing Economic Development Area at its meeting on 14 th January 2015 . The site has an extant consent for warehouse/distribution uses and a current application for B2 (industrial) use. In these circumstances it is not necessary to allocate this site in Policy EMP1.	No change.