

Economic Strategy Topic Paper

Planning is a technical process, driven by legislation and government policy and advice. This topic paper uses a number of acronyms and technical terms, so the glossary below has been prepared to assist the reader.

Acronym	Term	Descriptions
AMR	Authority Monitoring Report	The Monitoring Report provides a framework with which to monitor and review the effectiveness of local plans and policies.
	Article 4 Direction	Restricts permitted development rights in relation to a particular area or site such as in a conservation area, or a particular type of development.
	Brownfield Land	See previously developed land
	Development Plan	Is defined in section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the local planning authority decides that the neighbourhood plan should not be made.
DPD	Development Plan Document	A DPD is a spatial planning document that is subject to independent examination. Under new regulations, DPDs are now known as local plans.
	Experian	Detailed monthly forecasts with supporting qualitative reports to help understand more about the UK economy - specifically how it will perform over the next cycle.
FEMA	Functional Economic Market Area	Key economic markets broadly corresponding to sub-regions or city regions
	Garden Settlement	A holistically planned new settlement which enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities
KMC	Kent Medical Campus	Permission granted for 98,000m ² A1, B1, C2 and D1 flexible accommodation for health, education and life science companies.
	Larger Villages	Most sustainable settlements in Maidstone's settlement hierarchy after the town centre, urban area and rural service centres: Boughton Monchelsea Coxheath

		Eyhorne Street (Hollingbourne) Sutton Valence Yalding
LIS	Local Industrial Strategy	Local Industrial Strategies are long-term, based on clear evidence and aligned to the National Industrial Strategy. They set out clearly defined priorities for the area that will help to maximise its contribution to UK productivity and allow places to make the most of their distinctive strengths.
LP17	Maidstone Borough Local Plan	The Maidstone Borough Local Plan is the key document that sets the framework to guide the future development of the borough. It plans for homes, jobs, shopping, leisure and the environment, as well as the associated infrastructure to support new development. It explains the 'why, what, where, when and how' development will be delivered through a strategy that plans for growth and regeneration whilst at the same time protects and enhances the borough's natural and built assets. The plan covers the period from 2011 and 2031.
	Main town centre uses	Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
NPPF	National Planning Policy Framework	The NPPF was published in February 2019 and it sets out the government's planning policies for England and how these must be applied. Local plan policies must be in conformity with the NPPF.
	Neighbourhood Plan	A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.
	Previously Developed Land	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.
PPG	Planning Practice Guidance	The PPG provides additional guidance on how the national policies in the National Planning Policy Framework should be interpreted and applied.
	Rural Service Centres	Most sustainable settlements in Maidstone's settlement hierarchy after the town centre and urban area: Harrietsham

		Headcorn Lenham Marden Staplehurst
SA	Sustainability Appraisal	The SA is a tool for appraising policies to ensure they reflect sustainable development objectives, including social, economic and environmental objectives.
SELEP	South East Local Enterprise Partnership	A body, designated by the Secretary of State for Housing, Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.
SFRA	Strategic Flood Risk Assessment	A study carried out by one or more local planning authorities to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and to assess the impact that land use changes and development in the area will have on flood risk.
SME	Small and Medium Sized Enterprise	A category of micro, small and medium-sized enterprises which employ fewer than 250 persons and which have an annual turnover not exceeding 50 million euro, and/or an annual balance sheet total not exceeding 43 million euro
SPD	Supplementary planning documents	An SPD provides further detail to a policy or a group of policies set out in a local plan. A SPD can provide additional detail about how a policy should be applied in practice. SPDs are a material consideration in planning decisions but are not part of the development plan.
	Town Centre	Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.
	Use classes	The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories
	Windfall sites	Sites not specifically identified in the development plan

Background/Context

This topic paper considers the strategic employment matters that include the location, quantity and types of employment development **from a spatial perspective only**. Non-strategic matters are dealt with separately.

Legislative Requirements

Planning and Compulsory Purchase Act 2004 (as amended) - Basis for making local plans and relevant requirements for producing plans; duty to cooperate requirements; and requirements for sustainability appraisals.

Environmental Assessment of Plans and Programmes Regulations 2004 - Sustainability appraisals incorporate the requirements of these regulations.

Localism Act 2011 - Introduced the duty to cooperate.

Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) - Prescribes the general form and content of local plans, policies maps, monitoring reports; the process for preparing local plans; the requirement to review local plans; consultation/notification; public participation; and examination.

National Policy and Guidance Requirements

National Planning Policy Framework (NPPF)

Overall need

The NPPF (paragraph 11) indicates that councils should positively seek opportunities to meet the development needs of the area, and local plans should meet objectively assessed needs. In doing so, councils are required to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth (paragraph 81.a). This includes identifying the pattern, scale and quality of employment and other commercial development over a minimum 15-year period from adoption of the Local Plan Review (LPR).

The Council's policies should set criteria or identify strategic sites to meet anticipated needs, seek to address potential barriers to investment and be flexible enough to accommodate needs not anticipated in the plan. There is an emphasis for the Council to create conditions in which business can invest, expand, and adapt (paragraph 80).

Employment types

Clustering of certain industries can play an important role in supporting collaboration, innovation, productivity, and sustainability, as well as in driving the economic prospects of an area. There is a requirement for the Council to recognise and address the specific locational requirements of different sectors, including making provision for clusters or networks of industries including

storage and distribution operations at a variety of scales and in suitably accessible locations (paragraph 82).

Rural economy

The NPPF supports the sustainable growth and expansion of *all* types of businesses in rural areas.

Importantly, the NPPF recognises that sites to meet local business and community needs in rural areas may be adjacent to or beyond existing settlements, and in locations that are not well served by public transport. Whilst this is not explicitly set out in the Maidstone Borough Local Plan 2017, it does not preclude sites coming forward in such locations provided the development would not result in unacceptable traffic levels on nearby roads.

The NPPF expects that policies should support sustainable rural tourism and recognises the importance of tourism and leisure development in supporting a prosperous rural economy. Tourism development is also listed as an acceptable main town centre use and will therefore be referred to in the Retail Topic Paper too.

National Planning Practice Guidance (PPG)

In terms of evidence needed to support plans and policies, the NPPG expects councils to liaise closely with the business community, taking account of any Local Industrial Strategy (LIS). The SELEP are working to produce a LIS – the most recent publication was 2018 Economic Strategy.

The NPPG also requires councils to assess the best fit Functional Economic Market Area (FEMA); existing stock of employment land, recent pattern of land supply and loss; market demand; wider market signals; and evidence of market failure.

The NPPG requires councils to develop an idea of future needs based on labour demand, labour supply, past trends, and consultation with relevant organisations, and studies of business trends. Councils also need to consider longer term economic trends and consider and plan for the implications of alternative economic scenarios.

A final consideration is that of the logistics industry. By its very nature, it has distinct locational requirements that need to be considered. Councils should also consider other forms of logistics requirements, including the needs of small and medium sized enterprises (SMEs) and of 'last mile' facilities serving local markets.

Ministerial statements

There are no Ministerial Statements that significantly change the overall approaches set out in this paper.

Maidstone Borough Local Plan 2017 (LP17) Policies: Strategic vs Non-strategic

The location, scale, quality and provision of development for employment and other commercial uses within Maidstone Borough is considered by the NPPF (paragraph 20) to be a strategic matter which needs to be addressed by the LPR's strategic policies.

Key Strategic Policies

There are a number of existing strategic policies pertaining to the location of employment growth across the borough within the plan period which either relate to the borough as a whole (policy **SS1**) or specific areas of the borough (policies **SP1-SP10**) where employment will be accommodated.

SS1 (Maidstone Brough spatial strategy) and supporting text sets out the borough's employment floorspace requirement up to 2031: 39,830m² for office use; 29,290m² for industrial use; 49,111m² for warehouse use; and 100,000m² for medical use.

SP21 (Economic Development) sets out how the Council aims to support and improve the economy of the borough and provide for the needs of businesses.

SP22 (Retention of Employment Sites) lists the borough's designated employment areas and sets out what type of development would be supported in these locations.

SP23 (Sustainable Transport) outlines improvements to public transport to and from Maidstone including increased frequency along radial routes to the town centre and railway stations, particularly during the morning and evening peak travel times.

RMX1 (Retail and mixed-use site allocations) sets out individual land allocations for retail and mixed use sites.

Specific employment site allocations are included as strategic policies **EMP1(1)-EMP1(4)** and as part of mixed-use allocation strategic policies **RMX1(1), RMX1(2), RMX1(4), RMX1(5)** and **RMX1(6)**.

Allocation **RMX1(1)** for a medical campus at Newnham Park (Kent Medical Campus), forms part of the North Kent Enterprise Zone focusing on a campus style cluster that brings together healthcare providers, scientific research and education. The LPR should continue to recognise and support this industry cluster, as well as addressing other sectoral requirements where there is an evidential need highlighted.

Through this LPR, there is a need to set a clear economic vision and strategy, as well ensuring provision of sufficient employment land to meet the identified needs over a minimum of 15 years from adoption of the LPR – to at least 2037. To have a clearer and more accurate understanding of the pipeline supply of employment land available, employment allocations should ideally specify an

expected floorspace capacity, or at the very least a floorspace range, that could be achieved. Currently, there are LP17 allocations without any quantum ascribed to them. Whilst this allows flexibility, it also creates ambiguity.

Non-strategic Policies

DM16 (Town centre uses) - insofar as relating to office provision.

DM35 (Live-work units).

DM37 (Expansion of existing businesses in rural areas).

LPR1iv (A review of employment land provision and how to accommodate any additional employment land needed as a result).

LPR1viii (Reconsideration of the approach to the Syngenta and Baltic Wharf sites if these have not been resolved in the interim).

Relevant Supplementary Planning Documents (SPD) and Planning Policy Advice Notes

Kent Design Guide 2005 (2009) - Sets out a guide for developers and others to achieve high standards of design and construction. This provides local authorities with a common approach to the main principles when assessing planning applications.

Maidstone Strategic Plan Requirements

The Strategic Plan sets out the Council's aspirations through to 2045. The vision is '*Maidstone: a vibrant, prosperous, urban and rural community at the heart of Kent where everyone can realise their potential*'. Relevant priorities based on the vision are:

Embracing Growth and Enabling Infrastructure

- The key outcome of which is that key employment sites are delivered. The focus between 2019 – 2024 is intervening where necessary in the market, to deliver key employment sites.

A Thriving Place

- The key outcome for 2045 being: "our town and village centres are fit for the future". The focus between 2019-2024 is: Building the innovation centre at Kent Medical Campus, promoting inward investment in the borough.

The requirement in meeting these priorities include:

- Ensuring sufficient land and floorspace is provided to support economic growth and the wider economic market area.

Kent County Council (KCC) Policy Framework

None of relevance for this topic paper.

Other Key Plans and Strategies (incl. Neighbourhood Plans)

Neighbourhood plans - Form part of the Maidstone Development Plan. There are four made plans:

- North Loose Neighbourhood Plan 2015 – 2031 (2016)
- Staplehurst Neighbourhood Plan 2016 – 2031 (2016)
- Loose Neighbourhood Plan 2018 – 2031 (2019)
- Marden Neighbourhood Plan 2017 – 2031 (2020).

The neighbourhood plans have consideration for the economic development needs of the neighbourhood plan area.

Industrial Strategy White Paper 2017 - Sets out a long-term plan to boost the productivity and earning power of people throughout the UK.

Maidstone Economic Development Strategy 2015-2031 - Sets out the vision: *'A model 21st century county town, a distinctive place, known for its blend of sustainable rural and urban living, dynamic service sector based economy, excellence in public services and above all quality of life'* to be achieved by 2031.

This strategy sets out five priorities:

- Retaining and attracting investment
- Stimulating entrepreneurship
- Enhancing Maidstone Town Centre
- Meeting the skills needs
- Improving Infrastructure.

Democratic Resolutions (Full Council/Committees)

Town Centre Article 4 Directions (SPI 10.09.2019) - Non-Immediate Article 4 Directions were made on 14 town centre sites to remove permitted development rights on office to residential development.

Business rates retail relief (Full Council 26.02.20) - Government recognised changing consumer habits and the need to intervene to help the high street to evolve. For this reason, changes to retail business rates were adopted.

Town Centre Opportunity Sites (SPI 05.11.2019) - Planning Guidelines were adopted as material planning considerations for 5 town centre sites.

Meeting Objectively Assessed Need

As required by the NPPG, the Council's economic development needs evidence has developed three different scenarios for future employment needs, based on: labour demand, labour supply, and past trends. The labour demand scenario is considered a suitably robust baseline position for the provision of employment land to support economic growth in the borough over the plan period. This identified employment need is further broken down by B-Use Class (B1/B2/B8) in order to confidently recognise and address the specific locational requirements of different sectors.

The Council's evidence has established that Maidstone's Functional Economic Market Area (FEMA) is largely consistent with the borough boundary, extending slightly into the neighbouring authorities of Tonbridge & Malling and Medway. There is a particularly strong economic relationship with the Malling part of Tonbridge & Malling. In purely quantitative terms, as a minimum, it is possible to accommodate the baseline objectively assessed economic growth needs (labour demand scenario) within the borough.

The issue of meeting need across wider market areas is also considered by those areas identified as having a strong linkage to Maidstone's economic market area i.e. Tonbridge & Malling (including the centres of Aylesford and Kings Hill), Swale and Medway. In summary, these authorities plan to accommodate their own business growth needs in full, with limited scope for over-provision of employment land but also no obvious requirement for 'spill over' capacity from Maidstone Borough.

Supporting Evidence (Current and Future)

Economic Development Needs Study (2019 & 2020) (EDNS) – The study identifies that Maidstone Borough falls within a Functional Economic Market Area (FEMA) that is largely consistent with the borough boundary, extending slightly into the neighbouring authorities of Tonbridge & Malling and Medway. It will be important for the Council to actively engage with authorities in these areas on any cross-boundary issues arising in relation to employment provision through the preparation of the LPR.

Through Experian data, the EDNS identifies that the health and social care sectors are expected to be the key drivers of employment growth within the borough over the plan period. Other sectors forecast to increase are education, specialised construction services, admin and support services, professional services and retail. The majority of these are non-B-use class sectors and land requirements for these uses are not quantified.

The EDNS provides different scenarios based on labour demand, labour supply and past trends. The preferred scenario at this point is the labour demand version as it gives a realistic indication of what the market can provide, therefore making the likelihood of deliverability strongest. However, there could be potential to go beyond this if the Council creates the conditions for greater inward investment through a strong and ambitious economic strategy.

The EDNS identifies a gross floorspace requirement of 101,555m² across all B-use classes over the plan period to 2037. This floorspace is further split by B-use class as 33% offices (B1), 27% manufacturing (B1c/B2), and 40% distribution (B8). The EDNS then translates this floorspace requirement into a land requirement, taking account of the area typically needed to accommodate the different uses e.g. landscaping, car parking, lorry turning. In total, across all B-uses, approximately 20.7 hectares of land is required, with approximately half of that (10.2 hectares) being required for distribution (B8).

In deciding where this land is allocated in the borough, it is important for the Council to consider where existing employment sites are and what type of employment they contain, understanding the benefits of clustering employment types. There is also the need to understand sectoral requirements in terms of accessibility and proximity to transport networks and workforce, as well as the composition of any allocations in terms of appropriate mix of uses.

The Council may choose to be more ambitious in terms of economic growth and seek to allocate more land than the labour demand scenario projections. This would be going beyond what is 'demanded' by the market and would therefore require a concerted effort to drive inward investment into the area, perhaps growing on the North Kent Enterprise Zone status of the Kent Medical Campus, encouraging more companies from the health sector into the area. This would require strong direction and consistency with the revised Maidstone Economic Development Strategy.

Maidstone Economic Development Strategy (EDS) (2015-2031) - This Strategy sets out an economic vision for the borough in 2031 through its 'ambition statement'. The strategy goes on to identify five priorities to capitalise on the borough's economic assets and to create the right conditions for growth. These are 1) retaining and attracting investment; 2) stimulating entrepreneurship; 3) enhancing Maidstone town centre; 4) meeting skills needs and 5) improving the infrastructure. Whilst the EDS is scheduled for imminent revision, the Council must prepare this LPR consistent with the EDS currently in place; making necessary revisions to the LPR as and when the EDS is updated.

Strategic Land Availability Assessment (SLAA) Draft - The purpose of the SLAA is to identify and assess the land which is available to meet all objectively assessed needs for the LPR. This includes meeting needs for housing, employment, retail, and infrastructure purposes. This will draw together the outputs from:

- Call for Sites 2019
- Call for Sites - Site Assessments
- Annual Monitoring Report into existing Local Plan progress
- Windfall Assessment update
- Retail, Employment, Housing, and G&T Needs Assessments
- Alternative sources of sites
- Garden Settlement Assessments.

The SLAA will list all site assessments of Call for Sites proposals, looking into the suitability and achievability of sites to be allocated in the Local Plan. A sub-

section of the SLAA will include an assessment of Garden Settlement proposals. The SLAA is a working document and will be published when finalised.

Kent Property Market Review 2019 - This annual report provides insight and analysis of the performance of the area's property by sector and the key projects supporting the county's growth and economic development.

South East LEP – Economic Strategy Statement (2018) - This is a Local Industrial Strategy being produced by SELEP. The latest document produced was an Economic Strategy Statement in 2018: "Smart, Faster, Together". The strategy identifies five priorities: Creating ideas and enterprise; Developing tomorrow's workforce; Accelerating infrastructure; Creating places; and Working together. The LPR will need to acknowledge the aims of the Strategy Statement.

Duty to Cooperate

The NPPF identifies employment development as a strategic cross-boundary issues, for which the duty to cooperate applies. Whilst there is currently no statement of common ground (SOCG) in place, there has been agreement on appropriate geographic areas (FEMA). The Council has also shared its proposed EDNS evidence base methodology in advance of undertaking its evidence gathering to ensure all neighbouring local planning authorities (LPA) were happy with the Council's approach. No issues were raised.

As the LPR progresses through to preferred approaches and Regulation 19 consultation, it will be important to continue to engage actively and on an on-going basis with neighbouring LPAs to ensure that any issues are identified and resolved as early as possible.

Development Management (DM) Input

There are no comments that seek to change the overall direction of relevant strategic policies.

Regulation 18a (Scoping Themes and Issues) References

In ensuring successful economic growth, different economic sectors will be assessed for their requirements. With regard to the criteria that successful employment locations share, these criteria are listed below:

- Good quality of provision
- Strong public realm
- Flexibility of space
- Appropriate space for activity in the area
- Realistic price point compared to the nature of the stock.

The LP17 provides a foundation for meeting future employment needs with an approach that identifies extensions to existing successful rural business sites, Maidstone town centre new office development opportunities, and the allocation at Woodcut Farm for a new mixed-use business park. There is also an allocation

at Newham Court for the Kent Medical Campus which is a specialist hub for medical related development.

Revisions to this Local Plan foundation will only occur if evidence necessitates it. The type of sites that may be required as part of the LPR could include mixed use sites where complimentary uses can be co-located; new business park locations; or extensions to established industrial and business parks.

It appears that all relevant matters have been addressed as part of this consultation, in relation to the economic strategy topic area.

Public Consultation Regulation 18a

OQ1: What can the Local Plan Review do to make the growth we need 'good growth'?

- Support for making use of brownfield land as a priority. Residents (283); Expert Agency (1); Resident Association (1); Parish Councils (2)
- Support for the provision of local jobs to reduce the need to commute. Residents (2); Developers (1)
- Support for the allocation of sufficient land to meet requirements. Residents (5); Developers (2); Expert Agency (1)
- Support for the re-use of sites allocated for employment use, but yet to be developed. Residents (5)

OQ2: What could the Local Plan Review do to help make our town and village centres fit for the future?

- Suggestion that industrial sites be relocated from rural areas to larger road network locations. Residents (1)
- Contain policies to deliver a mix of uses (including offices) within defined centres. Developers (2)
- Broadband: KCC welcomes the proposal to promote full fibre (fibre-to-the-premise connections) in both new and existing development, in line with current Government policy. It is recommended that full fibre connections are also delivered within town and village centres. Ashford Borough Council has developed a full fibre policy, (EMP6) which is widely promoted nationally as best practice, whilst being in line with the current National Planning Policy Framework.

OQ4: What overall benefits would you want to see as a result of growth?

- More local employment opportunities in the borough. Residents (4); Developers (1); Expert Agency (1); Councillor (1); Parish Council (3)

Issue/Question OQ6: How can the Local Plan Review help support a thriving local economy, including the rural economy?

- Transport infrastructure needs to be able to meet higher demands. Residents (286); Developers (2); Parish Councils (5); Resident Association (2)

- Allocate employment sites away from residential areas e.g. business parks. Residents (2); Developers (2)
- Improved digital connectivity e.g. 5G and WIFI. Residents (13); County Council (1); Councillor (1); Resident Association (1); Parish Councils (9)
- Take into account plans for local business development in rural areas. Residents (22); Developers (5); County Council (1); Resident Association (1); Parish Councils (5)
- Ensure sufficient commercial land is retained in the town centre. Residents (2)
- Protect allocated land for employment uses and high performing existing employment sites/premises. Developers (1)
- Make better use of unused brownfield land in rural locations. Residents (1)
- Broadband: KCC welcomes the proposal to promote full fibre (fibre-to-the-premise connections) in both new and existing development, in line with current Government policy. It is recommended that full fibre connections are also delivered within town and village centres. Ashford Borough Council has developed a full fibre policy, (EMP6) which is widely promoted nationally as best practice, whilst being in line with the current National Planning Policy Framework.

OQ7: How can the Local Plan Review ensure we have an environmentally attractive and sustainable borough that takes a pro-active approach to climate change?

- Suggestion that employment sites be located away from residential areas and served by public transport. Residents (1); Developers (1)

TQ8: Have we identified all the possible types of employment site?

- Suggestion that mixed use sites should only be allowed if the jobs go to local people. Residents (247); Resident Association (1); Parish Council (1)
- The Plan should consider both the quantitative and qualitative need for employment land. Residents (4); Parish Councils (5)
- Support for mixed use sites and business locations being planned alongside new housing. Residents (4); Developers (4); Expert Agency (1)
- Suggestion that Maidstone borough is good for micro-businesses, but does not offer sufficient space for businesses to grow. Residents (1); Councillor (1)
- Allocate land adjacent to existing commercial businesses in rural areas to support sustainable economic growth. Developer (1)
- Historic England: historic industrial and institutional buildings are often a good source of adaptable and flexible floorspace that particularly benefits small and medium sized enterprises, start-ups and creative industries businesses, and may be considered an additional type of site for employment provision purposes.
- KCC: recommends consideration of employment sites that are focused around existing and new transport hubs – including bus interchanges and rail stations that include good access to public transport and are well served by walking and cycling networks. The movement of goods is likely to warrant the consideration of locations where direct access to rail and/or strategic highway networks can be achieved. The County Council notes

the challenges raised in respect of employment space at M20 Junction 8 as to whether the economic benefits of major commercial development at this location outweighs the harm caused to the landscape, the adverse impacts on visual amenity and the setting of the AONB. The County Council would like to ensure that new sites proposed within the Local Plan Review provide sustainable opportunities for new employment growth moving forward.

TQ18: How can the Local Plan Review help ensure that local economic growth benefits everyone?

- Support for environmentally sustainable economic growth by developing sites near urban areas and communities. Residents (1); Expert Agency (2); Councillors (3)
- Support for the protection and enhancement of Maidstone Town Centre as a focus for new development. Residents (267); Parish Council (2)
- Support for the sustainable growth and expansion of business in rural areas, and possibly beyond the confines of the existing settlement boundaries. Residents (1); Developers (3)

Public Consultation Regulation 18b

To be completed following Regulation 18b consultation.

Public Consultation Regulation 19

To be completed following Regulation 19 consultation.

Deliverability

The LP17 uses projections based on an Experian labour demand scenario. It is reasonable, therefore, to use the same Experian labour demand scenario from the updated evidence i.e. employment floorspace need driven primarily by the market. This is a good baseline position and there is no reason, at this point, to suspect it is not deliverable over the full length of the plan period, even given current uncertainties around Brexit and more recently Covid-19.

For town centre sites, flood risk is an important consideration and all sites will be subject to Levels 1 and 2 SFRA. Any mitigation measures required may result in reduced viability and careful consideration will need to be given as to the viable mix of uses on each site to ensure deliverability.

At present, none of the Garden Settlements submitted through the Call for Sites has been demonstrated to be deliverable. Any approach to include one or more Garden Settlement(s) must therefore be treated with caution in terms of deliverability at this stage. However, if the Council adopted an approach that included one or more Garden Settlement(s), it is logical to assume that a certain amount of employment floorspace would be deliverable in any Garden Settlement to support a sustainable pattern of growth.

Another important factor to consider in the deliverability of employment sites is the level of developer interest. There are current LP17 allocations that have yet to come forward and others that have currently unimplemented planning permission. In any of the approaches, it will be important to understand developer interest and preference to seek to ensure that allocated sites are delivered.

Potential Objective(s)

The following objectives set out in the current Local Plan are pertinent:

2: To focus new development:

- i. Principally within the Maidstone urban area and at the strategic development locations at the edge of town, and at junctions 7 and 8 of the M20 motorway;
- ii. To a lesser extent at the five rural service centres of Harrietsham, Headcorn, Lenham, Marden and Staplehurst consistent with their range of services and role; and
- iii. Limited development at the five larger villages of Boughton Monchelsea, Coxheath, Eyhorne Street (Hollingbourne), Sutton Valence and Yalding, where appropriate.

This objective remains appropriate if an LP17 approach continues. It may require amending to include a Garden Settlement(s) if that is the preferred approach.

3: To transform the offer, vitality and viability of Maidstone town centre including its office, retail, residential, leisure, cultural and tourism functions together with significant enhancement of its public realm and natural environment including the riverside.

This objective remains relevant, but could require the strengthening of the town centre office renaissance if that is the preferred reasonable approach. It may be beneficial to change 'transform' to 'improve'.

4: To reinforce the roles of the rural service centres through the retention of existing services, the addition of new infrastructure where possible, and the regeneration of employment sites including the expansion of existing employment sites where appropriate.

This objective remains appropriate.

Reasonable Alternative Approaches

As demonstrated through the LP17 allocations, existing planning permissions, Call for Sites and the SLAA, there is sufficient availability and suitability of land across the borough to meet the objectively assessed employment need over the plan period. The main choice to be made is where this growth is allocated within the borough. To a certain extent, this decision will then dictate the specific types of B-use employment land allocated to each site. The LP17 allocates land for employment/mixed-uses across the borough including three town centre locations (RMX1(2), RMX1(5), RMX1(6)), two locations close to strategic motorway junctions (EMP1(4) and RMX1(1)), with the remaining allocations in

more peripheral dispersed locations of Marden, Headcorn and Yalding. In addition, there are 33 designated Economic Development Areas (EDAs) located across the borough providing a mix of business premises and site types. Sustainable growth and expansion of existing businesses in rural areas is also supported, subject to policy requirements.

Approach A: Continue current LP17 strategy (a dispersed approach)

The adopted Local Plan (LP17) provides a foundation for meeting future employment needs with an approach that identifies extensions to existing successful rural business sites, allocates Maidstone town centre for new office development opportunities, and allocates Woodcut Farm for a new mixed-use business park. There is also an allocation at Newham Park for the Kent Medical Campus which is being developed as a specialist hub for medical related development.

Continuation of this approach means that any sites within the town centre would contain B1a office uses (as part of mixed use residential/retail/office developments). Sites elsewhere in the borough have a mix of B1/B2/B8 uses, and the approach would continue to be a combination of entirely new sites (similar to Woodcut Farm EMP1(4)) and extensions to existing employment sites (similar to West of Wheelbarrow Industrial Estate EMP1(3)).

In purely quantitative terms, this is achievable by using the remaining LP17 allocations and the currently extant planning permissions. This would still leave a surplus floorspace figure of approximately 40,000m² (gross) and there would be no need to allocate any further land for employment.

The figures alone do not give a full picture. Some LP17 allocations are yet to come forward for development since the adoption of the MBLP. Whilst this is not wholly unexpected, given that the current plan period runs to 2031, it does require a review of the current LP allocations. First, to understand why they may not have come forward to date (e.g. issues of viability or site constraints) and second, to see if current allocations require amending or whether any additional new allocations are required to ensure there remains suitable qualitative choice. Any new allocations would need to accord with the current LP17 strategy and be located within Maidstone Town Centre; at the strategic motorway junctions; or adjoining existing employment sites in more peripheral locations across the borough.

Approach B: Allocate development to one or more Garden Settlement location(s)

This approach would see new employment floorspace focused within any new Garden Settlement(s). The general assumption at this point is a percentage of the overall Garden Settlement area would be dedicated to employment development. This is a key pillar of the Garden Communities principles, to bring jobs to rural areas.

In purely quantitative terms, any single Garden Settlement, in addition to current LP17 allocations will provide surplus employment floorspace – bringing

additional qualitative choice to the market and providing employment opportunities in conjunction with housing development, thereby supporting a sustainable pattern of growth. The location of any potential Garden Settlement would have implications for the type of B-use considered most appropriate. For example, a settlement close to the strategic road network would be preferable for B8 uses requiring larger vehicular access. A Garden Settlement in a more secondary location (in terms of accessibility) would be more broadly suited towards B2 uses.

Depending upon the amount of additional floorspace proposed to be allocated over and above the objectively assessed requirement, there would be scope to alter or deallocate some current LP17 allocations.

A combination of Garden Centres would theoretically mean no LP17 allocations or sites from the Call for Sites (excluding TC mixed-use sites) would be required, but it should be borne in mind that Garden Settlements would not be expected to come forward for development instantly following adoption of the LPR. Therefore, a range of other allocations is likely to be needed outside of a Garden Settlement, to ensure choice is available in the short to medium term for employment development. A strategy for delivery of employment land in particular areas, for particular B-uses and over particular timeframes should be considered.

The number of Garden Settlements allocated is the focus of the Garden Settlements Assessment, as well as Sustainability Appraisal and Transport Modelling.

Approach C: Office renaissance of Maidstone Town Centre

This approach would require a targeted economic strategy for inward investment into the borough, specifically focusing on the provision of high quality B1a office floorspace in Maidstone Town Centre as a prime location. This would not necessarily be provision of floorspace in the traditional sense, but also focused on newer ways of working such as serviced offices and co-working space. The ability to rent high quality office space, meeting rooms or reception/concierge services on an ad hoc basis accommodates more modern working practices such as remote/home working, and provides professional solutions to smaller start-up businesses too. Locating such office space close to rail links to/from London (Maidstone East/Maidstone West) further encourages businesses to locate in the town centre.

This approach would require the Council to revisit assumptions on mixed-use development in the town centre - increasing the percentage of office provision on each site. This may have to come at the expense of other uses, such as residential or retail provision. It may also require more intensive/higher density town centre office developments than previously permitted.

It is also important to acknowledge the employment opportunities provided for by the leisure and cultural sectors – particularly in the town centre. Lockmeadow Entertainment Centre, whilst not accounted for under B-use classes, provides significant employment opportunities within the town centre. The LPR should

acknowledge this and be flexible enough to accommodate the leisure and cultural sector in the context of the employment opportunities provided.

The remaining LP17 allocations would – in purely quantitative terms – provide floorspace for the remaining B2/B8 requirement over the plan period. However, as per Approach A, some LP17 allocations are yet to come forward for development since the adoption of the MBLP. Whilst this is not wholly unexpected, given that the current plan period runs to 2031, it does require a review of the current LP allocations. Firstly, to understand why they may not have come forward to date (e.g. issues of viability or site constraints) and secondly, to see if current allocations require amending or whether any additional new allocations are required to ensure there remains suitable qualitative choice. Any new B2/B8 allocations would likely accord with the current LP17 strategy and be located at the strategic motorway junctions; or adjoining existing employment sites in more peripheral locations across the borough.

Approach D: Maximising M20 J8 for employment use

This approach focuses the borough's employment floorspace allocations within a specific strategic location at Junction 8 of the M20. There is already an existing LP17 allocation at Woodcut Farm EMP1(4), and this approach would utilise other potential sites within the vicinity.

This would create a distinct strategic employment location, enabling co-location and clustering of employment sectors/uses. This could be in addition to the existing LP17 allocations in more peripheral locations/existing industrial estate expansions, or it could be in replacement of some of the smaller LP17 allocations.

It would be reasonable to expect town centre sites to continue to also provide office floorspace, although the amount may be reduced in favour of a business park office development at M20 J8.

Tests of Soundness

1. **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

All of the Reasonable Alternatives set out in this topic paper meet, as a minimum, the baseline job growth (labour demand) requirements as identified through the Economic Development Needs Study. The issue of meeting need across wider market areas is also considered in the 'Meeting Objectively Assessed Need' section of this topic paper.

2. **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

All of the Reasonable Alternatives set out in this topic paper are based on meeting the needs identified in the recent EDNS. The spatial approaches will be subject to transport modelling and sustainability appraisal to ensure that the most appropriate strategy is identified as a preferred approach.

3. **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

Comments/feedback on both the proposed FEMA and methodology for undertaking economic assessment were sought from neighbouring authorities, and no issues have been raised. Engagement with neighbouring planning authorities will become more focused as the potential development approaches progress. Effective and ongoing engagement with neighbouring LPAs should ensure that any cross-boundary issues of a strategic nature are identified as early as possible, and resolutions sought.

All Reasonable Alternative Approaches in this topic paper are deliverable over the plan period as the Council anticipates being able to meet its objectively assessed needs in their entirety within the borough boundary. Consequently, the Council is not relying on neighbouring LPAs to help deliver its needs over the plan period.

4. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

The evidence produced is based on the current NPPF and NPPG guidance, and all reasonable alternatives put forward are based on that evidence and are therefore compliant with the Framework (NPPF).

Unreasonable alternatives

An unreasonable alternative approach is to allow the market to bring forward employment sites anywhere in the borough on an ad hoc basis, without regard to a clear economic strategy.

Sustainability Appraisal (SA)

The SA will provide input to help select a preferred approach.

What Mitigations Are Required including Infrastructure and Design

To be completed following publication of the SA.

Are the Preferred Approach and Alternatives Reasonable (Yes/No)

To be completed following publication of the SA.

Matrix

	Criteria	Approach A: LP17	Approach B: One or more Garden Settlements	Approach C: Focus on Town Centre office renaissance	Approach D: Maximise M20 J8 strategic employment location
Policy	NPPF/ NPPG consistency	GREEN: With adjustments to update the LP17 employment floorspace requirements to reflect the latest evidence, allocations would meet objectively assessed needs in full to 2037. Some surplus land allows the required degree of flexibility. AMBER: Clear vision and strategy will be taken from Maidstone Economic Development Strategy (current version is to be reviewed and updated) – this assumes no major changes in EDS strategy.	GREEN: LP17 allocations plus allocations in one or more GS would more than meet objectively assessed needs in full to 2037. Some surplus land allows the required degree of flexibility. AMBER: Clear vision and strategy will be taken from Maidstone Economic Development Strategy (current version is to be reviewed and updated) – LPR and reviewed EDS would need to align. Cannot be certain at this time.	GREEN: LP17 allocations plus C4S allocations near/adjacent to LVs and RSCs would meet objectively assessed needs in full to 2037. Some surplus land allows the required degree of flexibility. AMBER: Clear vision and strategy will be taken from Maidstone Economic Development Strategy (current version is to be reviewed and updated) – LPR and reviewed EDS would need to align. Cannot be certain at this time.	GREEN: Would meet OAN needs in full. GREEN: Identifies strategic sites to meet needs. GREEN: With retention of some smaller sites, would be flexible to accommodate unanticipated needs. AMBER: Would require clear vision and strategy from revised EDS.
	Legislative compliance	GREEN: Compliant with current legislation.	GREEN: Compliant with current legislation.	GREEN: Compliant with current legislation.	GREEN: Compliant with current legislation.
	Strategic Plan alignment	AMBER: Guidance has been published by MBC/Savills to help bring forward key TC opportunity sites, including RMX1(2), RMX1(5) and RMX1(6). LP17 strategic site policies may need adjusting to align with recent guidance. GREEN: KMC is under construction. GREEN: Economic strategy and vision align with current EDS in terms of investment in the borough.	AMBER: Guidance has been published by MBC/Savills to help bring forward key TC opportunity sites, including RMX1(2), RMX1(5) and RMX1(6). LP17 strategic site policies may need adjusting to align with recent guidance. GREEN: KMC is under construction. AMBER: Economic strategy and vision align with current EDS in terms of investment in the borough. This approach would focus more attention on the GS and would therefore represent departure from current EDS. Unknown what future EDS may contain. Work with emerging EDS will be needed to ensure consistency of approach.	AMBER: Guidance has been published by MBC/Savills to help bring forward key TC opportunity sites, including RMX1(2), RMX1(5) and RMX1(6). LP17 strategic site policies may need adjusting to align with recent guidance. GREEN: KMC is under construction. GREEN: Strong promotion of inward investment in the borough	GREEN: Approach embraces growth AMBER: may undermine delivery of other key employment sites that are more challenging to bring forward.
	KCC Policy support	N/A	N/A	N/A	N/A
	Other Plans & Strategies	GREEN: No conflicts.	AMBER: Would need revised EDS.	AMBER: Would need revised EDS.	AMBER: Would need revised EDS.
Political & Public	SPI	GREEN: this approach supports SPI resolutions	AMBER: This approach may undermine the potential for the TC opportunity sites to be redeveloped if other opportunities for retail development exist in GS	GREEN: this approach supports SPI resolutions, particularly the non-immediate Article 4 Direction.	AMBER: This approach may undermine the potential for the TC opportunity sites to be redeveloped if other opportunities for retail/leisure/employment development exist elsewhere
	Full Council	GREEN: Retail business rates relief should encourage retail business and support the approach to delivering retail floorspace and creating employment opportunities	GREEN: Retail business rates relief should encourage retail business and support the approach to delivering retail floorspace and creating employment opportunities	GREEN: Retail business rates relief should encourage retail business and support the approach to delivering retail floorspace and creating employment opportunities	GREEN: Retail business rates relief should encourage retail business and support the approach to delivering retail floorspace and creating employment opportunities

	Public Consultation - Reg 18a	GREEN: Provides mix of uses in town centre locations. GREEN: Allocations are a mix of brownfield and greenfield sites.	AMBER: Would not use brownfield land. GREEN: Would provide local job opportunities.	GREEN: Would place strong emphasis on use of brownfield land. AMBER: Provide local job opportunities, but may also attract workforce from further afield. GREEN: Provides mix of uses in town centre locations.	RED: Would be greenfield. RED: Close to strategic road network, but not to existing settlements.
	Public Consultation - Reg 18b	N/A	N/A	N/A	N/A
	Public Consultation - Reg 19	N/A	N/A	N/A	N/A
Technical	Meeting Objectively Assessed Need	GREEN: This approach more than meets OAN, with surplus to provide degree of flexibility and choice.	GREEN: This approach more than meets OAN, with surplus to provide degree of flexibility and choice.	GREEN: This approach more than meets OAN, with surplus to provide degree of flexibility and choice.	GREEN: This approach more than meets OAN, with surplus to provide degree of flexibility and choice.
	Supported by evidence	GREEN: Meets, as a minimum, objectively assessed need. AMBER: Supports economic growth, but is not ambitious in its aims.	GREEN: Meets, as a minimum, objectively assessed need. GREEN: Supports economic growth. GREEN: Promotes sustainable growth – locating housing and employment in proximity to one another.	GREEN: Meets, as a minimum, objectively assessed need. GREEN: Supports economic growth and is ambitious. AMBER: No evidence that supports enhanced office provision – could come through revised ED strategy.	GREEN: Meets, as a minimum, objectively assessed need. GREEN: Supports economic growth.
	Duty to Co-operate	GREEN: No issues identified with EDNS evidence methodology or with FEMA. GREEN: Evidence findings not yet shared.	GREEN: No issues identified with EDNS evidence methodology or with FEMA. GREEN: Evidence findings not yet shared. AMBER: May create possible DtC issue if significant employment site is allocated in GS close to neighbouring authority boundary.	GREEN: No issues identified with EDNS evidence methodology or with FEMA. GREEN: Evidence findings not yet shared. AMBER: May create possible DtC issue if significant office floorspace above and beyond evidenced need is allocated. Potential to take draw from other neighbouring authorities.	GREEN: No issues identified with EDNS evidence methodology or with FEMA. AMBER: May create possible DtC issue if significant employment floorspace above and beyond evidenced need is allocated. Potential to take draw from other neighbouring authorities
	DM Input	N/A	N/A	N/A	N/A
	Deliverability	GREEN: Deliverable over plan period – continuation of LP17. May require intervention to bring stalled allocation forward.	AMBER: Garden Settlements have not been demonstrated to be deliverable as yet. AMBER: Likely to come forward later in the plan period – cannot be relied upon solely to provide all employment land – need short term availability too.	AMBER: No evidence that an enhanced office market offering within Maidstone TC would be deliverable. Further investigation/steer through reviewed EDS required to support this approach.	AMBER: Relies heavily on delivery of large strategic sites.
	Plan Period Implications	GREEN: This scenario allocates enough employment land to meet objectively assessed requirements to 2042.	GREEN: This scenario allocates enough employment land to meet objectively assessed requirements to 2042. AMBER: Delivery may go beyond end of plan period.	GREEN: This scenario allocates enough employment land to meet objectively assessed requirements to 2042.	GREEN: This scenario allocates enough employment land to meet objectively assessed requirements to 2042. AMBER: Delivery may go beyond end of plan period.
	Tests of Soundness	GREEN: Meets the tests – see text for more info.	GREEN: Meets the tests – see text for more info.	GREEN: Meets the tests – see text for more info.	GREEN: Meets the tests – see text for more info.
	Potential Objective for topic area	GREEN: Current objectives reasonable.	GREEN: Current objectives reasonable. Potential additional objective setting out employment provision in any new GS location(s).	GREEN: Current objectives reasonable. New or enhanced objective around enhanced office market provision in Maidstone TC.	GREEN: Current objectives reasonable. Potential additional objective setting out employment provision in new strategic location.
	SUSTAINABILTY APPRAISAL	N/A	N/A	N/A	N/A

What Mitigations are required incl. infrastructure and design?	N/A	N/A	N/A	N/A
Is the approach Reasonable?	N/A	N/A	N/A	N/A