



Proof of Evidence of MATTHEW KINGHAN (for the Planning Authority) on NEED FOR EMPLOYMENT LAND

Appeal made by WATES DEVELOPMENTS

LOCAL PLANNING AUTHORITY – MAIDSTONE
BOROUGH COUNCIL REFERENCE 23/500899/OUT

PLANNING INSPECTORATE REFERENCE
APP/U2235/W/23/3329481

RELATING TO: Land north of the A20, Ashford Road, Hollingbourne,
Kent.

Produced Iceni Projects Limited on
behalf of Maidstone Borough
Council

December 2023

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1. Qualifications and Experience

1.1 I am Matthew Kinghan, BSc (Hons) MSc Assoc.MRTPI MIED, an associate member of the Royal Town Planning Institute and member of the Institute of Economic Development. I have a masters in Local Economic Development from the London School of Economics. I commenced working in the profession in 2004.

1.2 I have worked in planning and economic development since 2004. I have advised over 70 local authorities on employment land needs and a range of developers and occupiers. I have dealt with economic impact assessment matters on a number of nationally significant projects including HS2, London Luton Airport Expansion and Hinckley National Rail Freight Interchange.

1.3 I am a Director in the Iceni Project's Economics Team which I joined in 2020. I was previously a Director of GL Hearn's Economic Team from 2016.

1.4 Examples of my work include:

- Hastings and Rother Housing and Economic Development Needs Assessment 2020
- Eastbourne and Wealden Employment and Economy Study 2022
- Royal Borough of Kensington and Chelsea Employment Land Study 2021
- West Northamptonshire Housing and Economic Development Needs Assessment 2021
- Birmingham Housing and Economic Development Needs Assessment 2022
- Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change, (Leicester and Leicestershire Authorities) 2021

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- Warehousing and Logistics in the South East Midlands (South East Midlands Local Economic Partnership) 2022
 - Greater Cambridge Employment Land and Economic Development Evidence Study (2020 / 2023 Update)

- 1.5 Recent Local Plan examinations where I have provided evidence include Liverpool City, Bassetlaw, Eastleigh, Blackburn with Darwen, Charnwood, Solihull and North Warwickshire.
- 1.6 I confirm that my Proof has drawn attention to all material facts which are relevant and have affected my professional opinion.
- 1.7 I confirm that I understand and have complied with my duty as an expert witness which overrides any duty to those instructing or paying me, that I have given my evidence impartially and objectively, and that I will continue to comply with that duty as required.
- 1.8 I confirm that I am not instructed under any conditional or other success-based fee arrangement.
- 1.9 I confirm that I have no conflicts of interest.
- 1.10 I confirm that I am aware of and have complied with the requirements of the rules, protocols and directions of the appeal.
- 1.11 I include my Summary Proof of Evidence as Appendix A1.

2. Introduction

- 2.1 This proof of evidence considers the employment land needs for Maidstone Borough and in particular in relation to the need for the proposed employment site.
- 2.2 The proposal is for 10,788 sqm at Land north of the A20, Ashford Road, Hollingbourne, Kent. The site is directly south west of junction 8 of the M20 around 1 mile east of the edge of the Maidstone urban area.
- 2.3 The development proposal is for “Outline application for the erection a building for storage and distribution (Class B8 use) with a floorspace up to 10,788sqm (Gross External Area), ancillary offices, associated car parking, HGV parking, landscaping and infrastructure (All matters reserved except for access)”. Whilst in outline, an illustrative master plan has been provided showing a single building on the east part of the site.
- 2.4 This proof of evidence considers the following matters:
- The policy and evidence position.
 - The monitoring position on delivery of employment land for the adopted plan and the supply of employment land in relation to the emerging plan.
 - The appellant’s information supplied with the plan.
 - Market evidence.
 - Overall considerations on the need for the site.
- 2.5 Overall, this proof finds that:
- The needs assessment for employment is compliant with national guidance and up to date.

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- The authority's supply response is wholly adequate to meet the assessed needs.
 - There is additional supply expected to be forthcoming in the wider functional economic market area.
 - Therefore the proposed site is not required to meet needs as identified.

3. Policy and evidence position

- 3.1 The Maidstone Local Plan was adopted 25th October 2017. The Maidstone Local Plan Review was submitted to the Secretary of State for independent examination on 31st March 2022. Following hearing sessions, the consultation on the Main Modifications ran from 29th September to 13th November 2023.
- 3.2 Below the key policies and evidence of the local planning framework are set out.

Adopted Local Plan 2017

Policy SP 21: Economic Development - The council is committed to supporting and improving the economy of the borough and providing for the needs of businesses. This will be achieved through the allocation of specific sites and through a number of actions including:

- The retention, intensification, regeneration of the existing industrial and business estates identified as Economic Development Areas as defined on the policies map;
- The retention, intensification, regeneration and expansion of the existing economic development premises in Maidstone urban area and the rural service centres provided the site is in an appropriate location and suited to the economic development use in terms of scale, impacts and economic viability;
- Supporting proposals that encourage highly skilled residents to work in the borough to reduce out-commuting.

- 3.3 A significant proportion of Maidstone's growth in B class uses is expected to come from office-based employment. In addition to town centre office sites, there is a complementary role for offices at beyond centre sites which are well

connected to the highway network, such as Eclipse Park in recognition of the differing market demand that such sites meet.

- 3.4 The proposed strategic site allocation at Junction 7 is a particular opportunity to create a hub for medical related businesses, capitalising on the development of the Kent Institute of Medicine and Surgery, to attract high value, knowledge intensive employment and businesses as a boost to the local economy. This site will also deliver additional general office space in a high quality environment. Outline consent has recently been granted for the medical hub. The further specific sites allocated for additional employment development, including storage, warehousing and industrial development in line with identified needs, will help provide for a range of jobs of differing skill and wage levels as a way of helping to maintain a low unemployment rate going forward.
- 3.5 **Policy SP 21: Economic Development** - The sites allocated under policies EMP1 (1-4) will deliver approximately 75,800 sqm of employment floorspace to help meet employment needs during the plan period.
- 3.6 **EMP1 (1) – West of Barradale Farm** is allocated for development of 5,500 sqm employment floorspace (B1, B2, B8 use classes).
- 3.7 **EMP1 (2) – South of Claygate** is allocated for development 6,800 sqm employment floorspace (B1, B2, B8 use classes).
- 3.8 **EMP1 (3) – West of Wheelbarrow Industrial Estate** is allocated for development of 14,500 sqm employment floorspace (B1, B2, B8 use classes).
- 3.9 **EMP1 (4) - Woodcut Farm** is allocated for development for up to 49,000 sqm mixed employment floorspace ((B1a, B1b, B1c, B2, B8). There is a unique opportunity in the borough to provide a prestigious business park at Junction 8 of the M20 that is well connected to the motorway network and that can provide for a range of job needs up to 2031. The site will meet the ‘qualitative’ need for a new, well serviced and well connected mixed-use business park in the borough which can meet the anticipated demand for new offices, small business orientated space, stand-alone industrial and manufacturing space built for specific end users and smaller scale distribution businesses. The key priority for

the Woodcut Farm site is the delivery of new office/research & development floorspace (B1a/b). The site will provide at least 10,000 sqm of B1a/b floorspace. As the viability of office development may be challenging in the shorter term, land will be safeguarded specifically for B1a/b uses, and for no other purpose, pending the viability position improving in the later part of the plan period. This approach will help ensure that the site delivers a genuine mixed B class use business park, which is what is required, rather than a logistics park or conventional industrial estate. Industrial (B2) and distribution (B8) uses are nonetheless appropriate as part of the mix of uses on the site and, in addition to the office requirement, the allocation will help deliver the quantitative need for the 7,965 sqm additional warehousing floorspace which is needed in the borough by 2031.

- 3.10 RMX1 (1) – Newnham Park** is allocated for a medical campus up to 100,000 sqm of which 25,000 sqm will provide for associated offices and R&D, a replacement retail centre of 14,300 sqm and a nature reserve (3 ha).
- 3.11 RMX1(2) – Maidstone East and former Royal Mail Sorting Office** is allocated for up to 10,000 sqm comparison and convenience, 4,000 sqm of offices, and 210 dwellings.
- 3.12 RMX1(4) – Former Syngenta Works** – the council will support the redevelopment of the brownfield site, provided a comprehensive scheme of flood mitigation which addresses the identified flood risk will be delivered in association with the development.
- 3.13 RMX1 (6) – Mote Road** is allocated for residential-led mixed use development to include a minimum of 2,000 sqm of office floorspace.

Local Plan Review – Draft for Submission (Regulation 19) October 2021

Policy LPRSS1 – Spatial Strategy

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- 3.14 Between 2022 and 2037 provision is made through the granting of planning permissions and the allocation of sites for a minimum of:
- 33,430m² floorspace for office use;
 - 27,135m² floorspace for industrial use;
 - 40,990m² floorspace for warehousing use.
- 3.15 **Garden Settlements** - New, sustainable Garden Settlements are identified at Lenham Heath and Lidsing which will provide new homes, jobs and services, all delivered to garden community principles.
- 3.16 **Employment Sites** - A prestigious business park at Junction 8 of the M20 that is well connected to the motorway network will provide for a range of job needs up to 2037. The site will make a substantial contribution to the need for new office space in the borough as well as meeting the 'qualitative' need for a new, well serviced and well connected mixed use employment site suitable for offices, industry and warehousing, and will thereby help to diversify the range of sites available to new and expanding businesses in the borough. Redevelopment of the former Syngenta Works site near Yalding will make a significant contribution to the provision of employment uses. A number of smaller sites for employment use are allocated around the borough to accommodate a diverse range of employment types.

LPRSP4 (A) Heathlands Garden Community

- 3.17 Approximately 5,000 new homes, including 1,4000 within the 2029-37 period. Development should aim to provide for as close to 5,000 new jobs as feasible and viable. A new District Centre adjacent to a potential new railway station, including a significant knowledge-based employment offer. Two new Local Centres, one as part of the early phases of development, and one as part of later phase, each including an element of employment space.

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- 3.18 A minimum of 14 hectares of dedicated new employment land. Flexible business space and communal workspace facilities will be provided for new and established local companies and for those that reside locally.

LPRSP4 (B) Lidsing Garden Community

- 3.19 The site will deliver 2,000 new homes, with 1,300 within the plan period up to 2037. The site contains the opportunity for a significant employment offer (14 ha) as part of the development mix, and the council considers that this is appropriate given the strategic access granted to the M2 via Junction 4. Additionally, there is potential to add a new arm to the M2 J4 roundabout, which aims to improve how that junction functions as well as providing a new direct access to the motorway network from North Danes Way.
- 3.20 Development should exceed 2,000 new jobs as feasible and viable due to the area's excellent connectivity to the Strategic Road Network;

LPRSP11 – Economic Development

- 3.21 The council is committed to supporting and improving the economy of the borough and providing for the needs of businesses. This will be achieved through the allocation of a range of sites across the borough, including new strategic sites in both Garden Settlements (see policy LPRSP11(b)), and through a number of policies including:
- The retention, intensification and regeneration of the existing industrial and business estates identified as Economic Development Areas as defined on the policies map;
 - The retention, intensification, regeneration and expansion of the existing economic development premises in Maidstone Urban Area and the Rural Service Centres provided the site is in an appropriate location, when considered against other policies of the plan, and suited to the economic development use in terms of scale, impacts and economic viability;

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- Supporting proposals that encourage highly skilled residents to work in the borough to reduce out-commuting;

- 3.22 The strategic site allocation at Junction 7 (Local Plan Policy RMX1(1)) is a particular opportunity to create a hub for medical related businesses, capitalising on the development of the Kent Institute of Medicine and Surgery (KIMS), to attract high value, knowledge intensive employment and businesses as a boost to the local economy. This site will also deliver additional general office space in a high-quality environment. Outline consent has been granted for the medical hub and delivery of the permission is underway.
- 3.23 The former Syngenta Works site in Yalding is an allocation largely carried over from the Local Plan 2017, although it is now proposed for a mix of employment uses only. A former agrochemicals production plant, this site is expected to deliver in excess of 46,000sqm of office, industrial and distribution floorspace. Similarly, Woodcut Farm strategic site is also allocated for a mix of employment uses delivering up to 49,000sqm of floorspace. It gained outline planning consent in 2018 and will remain an allocation as carried over from Local Plan 2017, until the site is delivered.
- 3.24 The new garden communities at Heathlands and Lidsing will be delivered according to recognised garden city principles. This includes the provision of a wide range of jobs within easy commuting distance of homes. Both communities will include strategic employment locations offering a bespoke mix of floorspace types; capitalising on their unique opportunities such as proximity to the strategic road network, as well as reflecting their important landscape setting location. They will also offer further employment opportunities in their district and/or local centres.
- 3.25 Further specific sites across the borough are allocated for additional employment uses, including offices, storage, warehousing and industrial development to meet, as a minimum, identified needs. These sites will help provide for a range of jobs of differing skill and wage levels as a way of helping to maintain a low unemployment rate going forward.

Woodcut Farm EMP1(4)

- 3.26 There is a unique opportunity to provide a prestigious business park at J8 of the M20. The Woodcut Farm site will meet the 'qualitative' need for new, well serviced and well-connected mixed-use business park in the borough which can meet the anticipated demand for new offices, small business orientated space, stand-alone industrial and manufacturing space built for specific end users and smaller scale distribution businesses.
- 3.27 The key priority for the Woodcut Farm site is the delivery of new office/research & development and warehousing floorspace. Outline permission was granted in 2018 for a mixed-use commercial development comprising B1(a), B1(b), B1(c) and B8 units, with a maximum floorspace of 45,295m². The split is approximately 50/50 B1 and B8 uses and will contribute significantly towards the evidenced need for 74,330 sqm of this type of floorspace by the end of the plan period. Whilst the site is yet to deliver floorspace, works are occurring on site relating to pre-commencement conditions attached to the outline permission and should deliver over the next couple of years.
- 3.28 The site will provide at least 10,000 sqm of office floorspace, thereby contributing significantly towards the evidenced need for 24,600 sqm of this type of floorspace by the end of the plan period. High quality office development is sought providing complementary provision to the town centre. As the viability of office development may be challenging in the shorter term, land will be safeguarded specifically for E(g) uses, and for no other purpose, pending the viability position improving in the later part of the plan period. This approach will help ensure that the site delivers a genuine mixed B class use business park, which is what is required, rather than a logistics park or conventional industrial estate. Industrial (B2) and distribution (B8) uses are nonetheless appropriate as part of the mix of uses on the site and, in addition to the office requirement, the allocation will help deliver the additional floorspace which is required in the borough by 2037.

Former Syngenta Works RMX1(4)

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- 3.29 An outline planning application for the redevelopment of the site to provide a new business park of up to 46,447 sqm of B1(c), B2 and B8 accommodation with associated access, parking and infrastructure works, was submitted to the Council in 2019. This is broken down as: up to 21,655 sqm light industrial uses (B1(c), now E(g)(iii) use class); and up to 24,792sqm of warehouse use (B8 use class). The proposal is for the site to be able to run 24 hours per day, 7 days per week.

Newnham Park (Kent Medical Campus) RMX(1)

- 3.30 Newnham Park remains allocated for a mix of uses, as it was in the 2017 Local Plan. Various permissions have been granted on the site and build out of the Innovation Centre and other associated Medical Campus buildings is well underway. Newnham Court Shopping Village has been developed (and continues to develop) in a piecemeal fashion over time, and, consequently, the visual appearance of the site is poor. In 2018, permission was granted for the redevelopment of the retail site in accordance with policy RMX1(1), however the works remain unimplemented. The policy will therefore remain in place to ensure the delivery of employment and retail floorspace over the plan period.

Policy LPRSP11 (B) – Creating New Employment Opportunities

- 3.31 As well as the remaining allocations carried forward from the 2017 Local Plan, the Local Plan Review provides a range of additional sites to accommodate new employment and town centre uses, to increase the range and choice of sites available to address the desire for self-containment of settlements in terms of home/jobs/services balance.
- 3.32 Allocated employment sites - The sites allocated under policies LPREMP1(1), LPREMP1(2), LPREMP1(4), LPRSAEMP1, and LPRSA260 will deliver approximately **105,000 sqm employment floorspace** to help meet employment needs during the plan period.
- 3.33 Allocated mixed use sites - The sites allocated under policies LPRRMX1(1), LPRRMX1(3), LPRSA078, LPRSA144, LPRSA145, LPRSA146, LPRSA147, LPRSA148, LPRSA149, and LPRSA151, will deliver a mix of approximately

27,439 sqm employment floorspace and 6,862 sqm of net retail floorspace, along with new homes to help meet the borough's needs over the plan period.

3.34 Heathlands Garden Settlement is expected to provide approximately **19,110 sqm** of employment floorspace 2037. Lidsing Garden Settlement is expected to provide approximately **42,998 sqm** of employment floorspace to 2037.

3.35 On non-allocated sites within Maidstone Urban Area or the Rural Service Centres, permission will be granted for industrial or business development, recognising the specific locational requirements of different sectors, provided that the proposals would:

- Be of a type and scale of activity that does not harm the character, appearance or environments of the site or its surroundings or to the amenity of occupiers of nearby properties;
- Be readily accessible by public transport, wherever possible, and by bicycle and foot, or contribute towards provision of new sustainable transport infrastructure to serve the area, in order to make the development accessible by those modes; and
- Have a layout, access, parking, landscaping and facilities that are appropriate to the site and its surroundings.

Draft Allocations

3.36 **Maidstone East, Maidstone Town Centre – LPRSA146** – a draft allocation for the development of a minimum of 500 dwellings, 2,000 sqm new retail and 5,000 sqm business (E(g) office) and other appropriate town centre uses.

3.37 **Maidstone Riverside, Maidstone Town Centre – LPRSA148** - A draft allocation for the development of approximately 650 dwellings, 5,148 sqm of retail use and 2,574 sqm of employment.

3.38 **Mote Road, Maidstone Town Centre – LPRSA151** - A draft allocation for the development of approximately 172 dwellings and approximately 1,250 sqm of

new employment floorspace. The development should seek to optimise the level of commercial floorspace that can be achieved on site with the aspiration to achieve a minimum of 2,000 sqm of office floorspace.

3.39 Ashford Road, Lenham – LPRSA260 - A draft allocation for the development of 2,500 sqm of employment floorspace (E(g), B2 and B8 uses).

3.40 Land East of Lodge Road, Staplehurst – LPRSA066 - A draft allocation for the development of approximately 78 dwellings on 3.8 ha and approximately 1,000 sqm of employment on 0.3 ha.

Local Plan Review – Inspector’s Findings

3.41 On 11 January 2023 the Inspector wrote to the council (PINS/U2235/429/10). Two matters to highlight:

- the plan period needs to be extended to at least 2037/8 to ensure a minimum 15-year plan period upon plan adoption... The start date of the plan period will also need to be adjusted. My recommendation is 1 April 2021.
- The submitted plan is underpinned by comprehensive Economic Development Needs Studies... The Council has selected the ‘labour demand’ scenario and my final report will explain why this would be appropriate, would not constrain the economic potential of the Borough and is ***therefore sound*** [emphasis added]... Given the extended plan period above, it will be necessary for soundness to extrapolate the employment land (floorspace) requirement as a proposed main modification...

Local Plan Review – Main Modifications September 2023

3.42 The Local Plan Review is currently undergoing Examination. Following the hearing sessions, the Main Modifications consultation ran from 29th September

to 13th November 2023. The relevant Main Modifications have been summarised below:

3.43 The Plan period to be changed from 2022-2037 to 2021-2038.

3.44 Relevant main modification extracts are as follows:

3.45 **LPRSS1:** *Between 2021 and 2038 provision is made through granting of planning permissions and the allocation of sites for a minimum of 119,250 sqm of employment space as follows:*

- 36,650 sqm office use (previously 33,430 sqm)
- 33,660 sqm industrial use (previously 27,135 sqm)
- 48,940 sqm warehousing use (previously 40,990 sqm)

3.46 **LPRSP11 (B):**

3.47 *Allocated sites – employment*

3.48 *The sites allocated under policies LPREMP1(1), LPREMP1(2), LPREMP1(4), LPRSAEmp1RMX1(4), and LPRSA260 will deliver approximately **105,000m²** employment floorspace to help meet employment needs during the plan period. Development will be permitted provided the criteria for each site set out in the detailed site allocation policies are met.*

3.49 *Allocated sites – mixed use*

3.50 *The allocated sites under policies RMX1(1), RMX1(3), LPRSA066, LPRSA078, LPRSA144, LPRSA145, LPRSA146, LPRSA147, LPRSA148, LPRSA149, LPRSA151, and LPRSA362 will deliver a mix of approximately **34,239 sqm** employment floorspace.*

3.51 In addition to the above, are the contributions of the garden settlements of 14 ha each.

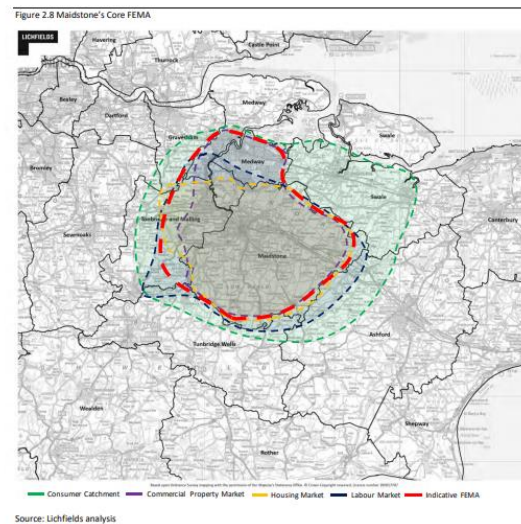
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- 3.52 MM63 removes reference to 2,574 sqm of employment floorspace at LPRSA148 (Maidstone Riverside) and 1,034 sqm of employment floorspace at LPRSA149 (Maidstone West) and replaces with 'TBD'.

Plan Evidence

- 3.53 Selected relevant evidence for the plan is reported and summarised below.

Economic Development Needs Study Stage One 2019 (CD6.10)

- 3.54 This report provides a commercial and economic baseline to the Borough. 'It suggests that Maidstone's FEMA is largely consistent with the Borough boundary, slightly extending to the neighbouring authorities of Tonbridge and Malling and Medway.



- 3.55 Commercial market analysis reveals a net reduction in office and industrial floorspace 2010-16 and a relatively smaller industrial market compared to neighbouring authorities. There have been larger gross losses of industrial, office and warehouse floorspace than gains.
- 3.56 The Borough is reported as generally perceived to be a good industrial location, benefiting from the strong transport links, good supply of skilled local labour and historically reasonable supply of land for new development. Industrial uses account for most demand for space, with most demand falling within a size range of 5,000-20,000 sqft (465-1,858 sqm). Demand for industrial space tends to increase with proximity to the M20 motorway.

Economic Development Needs Study Stage Two 2020 (CD6.11)

- 3.57 This Economic Development Needs Study Stage Two report (EDNS) undertaken by consultants Lichfields provides a future needs assessment for employment, as well as retail and leisure needs. Regarding employment, in line with the PPG, it considers needs in terms of labour demand, labour supply and past completions.
- 3.58 Labour demand 'Scenario 1' is based on Experian forecasts, which indicate an overall growth of 11,200 jobs 2022-37, including a growth of 3,210 B class jobs, 2,210 of which are office-based.
- 3.59 'Scenario 2' uses average net completions over the 2010/11-2017/18 period, all of which are negative, with the most significant losses in offices.
- 3.60 Labour supply 'Scenario 3' is based on population projections and other demographic assumptions that have been used to inform the Maidstone 2019 Strategic Housing Market Assessment (SHMA). It is estimated that 21,141 jobs, 6,846 of which are B class, would result in the population growth associated with the local housing need of 1,214 dwellings per annum.
- 3.61 An allowance of 10% is added to all positive floorspace requirements to reflect normal levels of market vacancy in employment space, furthermore a 10% uplift has been applied to floorspace need projections as a 'margin' to allow for delays and replacement of older sites or those lost to other uses.
- 3.62 The table below sets out the requirements emerging for different assumed Plan periods.

Table 3.1 Economic Development Needs Study Requirements

Table 2.13 Gross Floorspace Requirements by Scenario 2022-37 (GEA sqm)

Use	1. Baseline Job Growth	2. Past Development Rates	3. Labour Supply
Offices (B1a/B1b)	33,430	-147,960	57,915
Manufacturing (B1c/B2)	27,135	-31,200	90,765
Distribution (B8)	40,990	-23,340	111,080
All B Uses	101,555	-202,500	259,760

Source: Lichfields analysis (totals rounded)

Table 2.14 Gross Floorspace Requirements by Scenario 2022-42 (GEA sqm)

Use	1. Baseline Job Growth	2. Past Development Rates	3. Labour Supply
Offices (B1a/B1b)	45,660	-197,280	n/a
Manufacturing (B1c/B2)	43,940	-41,600	n/a
Distribution (B8)	56,875	-31,120	n/a
All B Uses	146,475	-270,000	n/a

Source: Lichfields analysis (totals rounded)

Table 2.15 Gross Floorspace Requirements by Scenario 2019-37 (GEA sqm)

Use	1. Baseline Job Growth	2. Past Development Rates	3. Labour Supply
Offices (B1a/B1b)	35,740	-177,552	69,500
Manufacturing (B1c/B2)	36,625	-37,440	108,900
Distribution (B8)	55,310	-28,008	133,290
All B Uses	127,675	-243,000	311,690

Source: Lichfields analysis (totals rounded)

- 3.63 The EDNS recommends that the Council consider planning to accommodate at least the labour demand (job growth) based requirement (scenario 1) to ensure business growth potential is not constrained by lack of capacity in the future.
- 3.64 The EDNS reviews the Borough's supply, including the four allocated employment sites, the five allocated mix-use sites and extant permissions for B class development on non-allocated sites contribute a supply of 125,840 sqm of employment floorspace. This is reported below.

Table 3.2 Economic Development Needs Study Supply Assessment

Table 6.1 Supply of Employment Floorspace in Maidstone Borough (at February 2020 – latest available position)

Source		Remaining Employment Space Supply (sq.m)			
		Office (B1a/b)	Industrial (B1c/B2/B8)	Mixed B	Total B
Employment Allocation	EMP1 (1) West of Barradale Farm		1,936	3,564	5,500
	EMP1 (2) South of Claygate, Marden			6,800	6,800
	EMP1 (3) West of Wheelbarrow Industrial Estate, Marden			10,193	10,193
	EMP1 (4) Woodcut Farm, Bearsted			49,000	49,000
Mixed Use Allocation	RMX1 (1) Newnham Park, Maidstone	24,750			24,750
	RMX1 (2) – Maidstone East and forming Royal Mail sorting office	4,000			4,000
	RMX1 (4) Former Syngenta works, Yalding			41,451	41,451
	RMX1 (5) Powerhub Building and Baltic Wharf, Maidstone	Not specified			
	RMX1 (6) Mote Road, Maidstone	2,000			2,000
Extant planning permissions on non-allocated sites (not started)		-748	-17,106		-17,854
Total		30,002	-15,170	111,008	125,840

Source: Maidstone Borough Council / Lichfields analysis (totals rounded)

3.65 As below, under the Baseline Job Growth model (preferred approach) and Past Development models there is sufficient employment space to meet needs up to 2037.

Table 3.3 Economic Development Needs Study Supply / Demand

Table 6.2 Demand/Supply Balance of B Class Employment Space in Maidstone Borough (2022-2037)

	1. Baseline Job Growth	2. Past Development Rates	3. Labour Supply
Gross requirement for B Class Space (GEA sq.m)	101,555	-202,500	259,760
Available Employment Space (sq.m)	125,840		
Surplus / Shortfall (sq.m)	+24,285	+328,340	-133,920

Source: Lichfields analysis

3.66 The EDNS does recommend that the Council should evidence how its portfolio of allocations and other development opportunities will support delivery of new space over the short, medium and long-term (structured broadly in five-year periods).

Economic Development Needs Study (EDNS) Addendum 2021 (CD6.9)

- 3.67 The Economic Development Needs Study Addendum (EDNSA) undertaken by Lichfields provides updated economic evidence, particularly in light of COVID-19, to inform decision making and support the preferred spatial strategy and approaches going forward into the draft Local Plan (Reg 19). The report partially updates the findings of the EDNS.
- 3.68 The Borough’s workforce is expected to recover to pre-pandemic levels by 2022, with steady growth then predicted for the remaining years of the local plan. These forecasts imply higher overall levels of employment growth for Maidstone over the Local Plan period 2022-37 when compared to the previous (September 2019) vintage, however most of this increase can be attributed to a Covid-19 ‘catching up’.
- 3.69 When converting to employment land requirements an additional 20% is understood to be added as per the 2020 EDNS, this includes a 10% allowance “added to positive floorspace requirements to reflect ideal levels of market vacancy in employment space”, in addition to a “10% ‘buffer’ allowance to account for delays in development sites coming forward, replacement of some ongoing losses of employment space during the Plan period, and other relevant factors in the local market” (p16).

Table 3.4 Economic Development Needs Study Addendum Requirements

Use	2022 to 2037		2022 to 2042	
	Floorspace (GEA sqm)	Land (ha)	Floorspace (GEA sqm)	Land (ha)
Offices (Class E)	39,520	4.3	56,930	6.3
Industrial (B2 & Class E)	44,320	11.1	64,905	16.2
Warehouse (B8)	56,270	14.1	84,830	21.2
Total Office, Industrial & Warehouse	140,110	29.5	206,665	43.7

Source: Lichfields analysis (totals rounded)

- 3.70 The employment land need is higher than the September 2019 forecasts, driven by stronger job forecasts for industrial and warehousing.

3.71 Taking into account the supply of existing employment and mixed-use allocations, draft allocations including two garden settlements and extant planning permissions, there is surplus of employment space.

Table 3.5 Economic Development Needs Study Addendum Supply / Demand

Table 3.5 Demand/Supply Balance of Employment Space in Maidstone Borough

	2022 to 2037	2022 to 2042
Gross requirement for employment space (GEA sq.m)	140,110	206,665
Available Employment Space (sq.m)	237,430	
Surplus (sq.m)	+97,320	+30,765

Source: Lichfields analysis

3.72 Notwithstanding the above, the EDNSA concludes that EDNS **not** the EDNSA provides the minimum needs position “the ‘minimum’ quantum of employment floorspace set out within the Local Plan Review (Regulation 18 – Preferred Approaches), at 101,555 sq.m over the period to 2037, remains reasonable and justified” (Para 5.6).

3.73 This is due to the unemployment consequences of COVID-19 which are impacting on the employment growth in the EDNSA forecasts, and this ‘catching up’ does not imply a need for employment space but is simply people returning to the workforce.

3.74 *“The employment floorspace requirements indicated by the December 2020 Experian forecast – equivalent to 140,110 sq.m between 2022 and 2037 – are around 40% higher than those resulting from the September 2019 forecast included in the EDNS, reflecting the higher overall level of job growth implied by the latest projections over the Local Plan period between 2022 and 2037 (and 2042), and the Covid-19 ‘catching up’ effect at the beginning of the study period as sectors that experience job decline as a result of the pandemic gradually recover to pre-pandemic levels of economic activity. It is therefore likely to be the case that some of Experian’s projected job growth within office, industrial and warehousing sectors over the first few years of the Local Plan period may not require additional employment floorspace capacity, and this suggests that*

associated floorspace requirements may exaggerate the true quantum of 'economic need' arising within the Borough over this time.” Para 5.5

Garden Settlements Economic Report 2021 (CD6.12)

- 3.75 The purpose of the report is to consider the future employment, retail and leisure contribution that two proposed garden settlements within Maidstone could be expected to make over the new Local Plan period and beyond.
- 3.76 Two 'bottom-up' scenarios are used to consider the potential quantum of employment space that will be needed at each garden settlement in order to realise the Council's ambition to deliver employment opportunities.

Heathlands Garden Settlement

- 3.77 Scenario A uses a benchmark of 1 new job for each new home and suggests Heathlands could accommodate around 1,580 office, industrial and warehousing jobs once complete and operational, in turn supporting 54,750 sqm of employment floorspace, equivalent to 11.6ha of land. During the Plan period to 2037, this will deliver 506 jobs, 17,520 sqm of employment floorspace and 3.7ha of employment land.
- 3.78 Scenario B considers the number of jobs and the associated requirement for employment space that would be necessary to match the forecast growth of the working-age and economically active residents. Heathlands could accommodate 1,712 office, industrial and warehousing jobs, supporting 59,320 sqm or 12.6 ha of employment land. It is estimated that by 2037, 548 office / industrial / warehousing jobs 18,980 sqm and 4.0ha of employment land would be delivered.

Lidsing Garden Settlement

- 3.79 Scenario A indicates the settlement could accommodate around 630 office, industrial and warehousing jobs once complete and operational, requiring 21,900 sqm of employment space or 4.6ha of land. During the Plan period to

2037, this will deliver 410 jobs, 14,235 sqm of employment floorspace and 3.0 ha of employment land.

3.80 Scenario B forecasts that Lidsing could accommodate 685 office, industrial and warehousing jobs, requiring 23,730 sqm of employment floorspace or 5.0 ha of employment land. By 2037, this equates to 445 office / industrial / warehousing jobs, 15,420 sqm and 3.3 ha of employment land will be delivered.

3.81 Due to the sites strategic access to the M2 via J4, there could be a greater focus on B-class employment, delivering up to 10 ha over the course of the development of the site.

Meeting Wider FEMA Needs

3.82 The report argues that Maidstone's functional economic relationships are much stronger with northern and western parts of Kent than eastern parts. It is likely that the proposed garden settlements will share economic relationships with adjoining areas of Medway and Ashford. This is particularly likely at Lidsing located on the Medway boundary and in reality, some of the employment provision within the two settlements will accommodate business needs arising from adjoining local economies.

Economic Development Topic Paper (CD6.13)

3.83 The site details, availability and deliverability of the 7 existing allocations and 1 newly proposed allocation were reviewed to generate a potential floorspace supply trajectory to show when floorspace is likely to come forwards for delivery over the plan period.

3.84 The 8 sites analysed in detail are considered to be 'available' and 'deliverable'. The deliverability of the Maidstone East site is currently bordering on 'uncertain' due to issues of viability relating to the potential mix of uses.

3.85 For industrial uses, the short-term supply comprises a combination of the two large allocations of Woodcut Farm and the Former Syngenta Works sites, plus

the smaller allocations of: West of Barradale Farm, South of Claygate, and Ashford Road, Lenham. All of these are adjacent to existing industrial estates and represent expansions to employment floorspace in locations where preconditions exist for delivery early on in the plan period, over the short to medium term.

- 3.86 Over the medium to long term, similar to the office floorspace provision, industrial and mixed-use employment floorspace will be delivered as the Garden Settlements emerge. The proposed floorspace quantum expected from each Garden Settlement are commensurate with the anticipated level of housing delivery.

Table 3.6 Economic Development Topic Paper Delivery Trajectory

Table 3: Indicative employment floorspace trajectory, by site and five-year period

Site ref	Site name	Total floorspace (sqm, gross)	Indicative delivery trajectory (sqm)											
			Short term (0-5 years)			Medium term (5-10 years)			Long term (10-15 years)			Beyond plan period (15+ years)		
			Office	Industrial	Mixed	Office	Industrial	Mixed	Office	Industrial	Mixed	Office	Industrial	Mixed
EMP1(1)	West of Barradale Farm	3,500	-	-	1,750	-	-	1,750	-	-	-	-	-	-
EMP1(2)	South of Claygate	4,000	-	-	2,000	-	-	2,000	-	-	-	-	-	-
EMP1(4)	Woodcut Farm	49,000	-	-	16,333	-	-	16,333	-	-	16,333	-	-	-
RMX1(1)	Newnham Park (Kent Medical Campus)	21,270	7,090	-	-	7,090	-	-	7,090	-	-	-	-	-
LPRSA146	Maidstone East	5,000	2,500	-	-	2,500	-	-	-	-	-	-	-	-
LPRSAEmp1	Former Syngenta Works	46,000	-	-	15,333	-	-	15,333	-	-	15,333	-	-	-
LPRSA151	Mote Road	1,169	1,169	-	-	-	-	-	-	-	-	-	-	-
LPRSA260	Ashford Road, Lenham	2,500	-	-	2,500	-	-	-	-	-	-	-	-	-
Garden Community	Lidsing	66,150	-	-	-	4,095	17,404	-	4,095	17,404	-	4,410	18,743	-
Garden Community	Heathlands	68,250	-	-	-	1,680	3,780	-	4,200	9,450	-	15,120	34,020	-
Sub-total			10,759	-	37,917	15,365	21,184	35,417	15,385	26,854	31,667	19,530	52,763	-
Total		266,839 (194,547 in plan period)	48,676			71,965			73,905			72,293		

FEMA evidence - Tonbridge and Malling Economic Development Needs Study Part One – 2022 (CD5.10)

- 3.87 This study was published in August 2022 and prepared by Lichfields (also the consultants responsible for the employment evidence for Maidstone).
- 3.88 The study considers employment land needs in a similar way to the evidence for Maidstone, namely through trends, labour demand and labour supply.

3.89 The table below shows future floorspace needs under the three scenarios, including a 'margin' equivalent to two-year average gross-take-up for industrial and net take-up for office and no adjustment for losses.

3.90 The study notes that “the labour demand scenario would appear to provide the most balanced view of future requirements” p55. Therefore:

- The distribution (B8) needs are 162,870 (40.7 ha)
- The combined light/general industrial and storage & distribution requirements are 252,940 sqm (60.7 ha)

Table 3.7 Tonbridge and Malling Economic Development Needs Study Requirements

Table 5.9 Gross Employment Floorspace Requirements in Tonbridge & Malling, 2021-2040 (GEA sq.m)

Type of Space/ Use Class	Scenario 1: Labour Demand	Scenario 2: Past Trends	Scenario 3: Labour Supply 839 dpa
Office E(g)(i)/(ii)	53,320	16,300	153,180
Light Industrial E(g)(iii)	48,310	-28,470	142,650
General Industrial B2	31,760	-143,560	114,170
Distribution B8	162,870	-99,330	434,690
Total	296,260	-255,070	844,690

Source: Lichfields analysis

Note: totals rounded

3.91 The study notes that taking account of the 95,390 sqm emerging supply (extant permissions), there is a shortfall of 147,550 sqm. This suggests that in the preparation of a new Local Plan the authority will have a significant amount of employment space to allocate. Whilst the Plan is delayed, Tonbridge and Malling have continued to permit new warehousing space including Click Aylesford in 2022 (TM/21/02866/FL).

FEMA evidence – Medway Employment Land Needs Assessment 2020 (CD5.11)

- 3.92 This study was published in October 2023 and prepared by Avison Young.
- 3.93 The forecast model is based on the employment growth projections provided by Experian Business Strategies (2020 data).
- 3.94 The ‘base’ forecast is reported below, including allowance for windfall and churn.

Table 3.8 Medway Council Employment Land Need Assessment 2020

Table 6 – Baseline Forecast Requirements

Change 2020-2040 (B Class Only)	Base
Employment	4,021
Office (B1a)	1,081
Other Business Space (B1b/c, B2)	799
Warehouse (B8)	2,140
Floorspace (sqm)	293,112
Office (B1a)	70,804
Other Business Space (B1b/c, B2)	37,376
Warehouse (B8)	184,932
Land (Ha)	62.7
Office (B1a)	7.1
Other Business Space (B1b/c, B2)	9.3
Warehouse (B8)	46.2

Source: Avison Young, 2020

- 3.95 Other scenarios are also considered, being:
- Manufacturing Growth
 - Expansion of Logistics and Distribution
 - Demographic Led Needs
 - Supply Chain Impact of London Resort
 - Impact of Covid-19

-
- 3.96 These are used to generate two synthesis forecasts, which have upwards and downwards effects on the total employment and the B8 needs, for B8 forecast 1 being 212,076 sqm and for forecast 2 being 183,359 sqm (compared to the baseline above of 184,932).
- 3.97 The latest Medway AMR 2021/22 notes that the amount of available floor space for B1/B2/B8/Mixed B with planning permission (not started plus under construction) net of potential losses is 631,315 sq.m which is expected to be delivered in the next 15 years. Of this, 184,308 sqm is B8 (table 1 section 8, AMR Vol2 21/22). Substantial permissions are at:
- London Medway Commercial Park
 - National Grid Property Holdings Grain Road Grain

Summary

- The latest evidence for employment land in Maidstone - Economic Development Needs Study Addendum (2021) (CD6.9) identifies a higher employment land need than the 2020 Economic Development Needs Study notably for labour demand - but recommends that the previous 2020 Economic Development Needs Study findings are preferred ,due to inflated jobs growth in the Addendum associated with COVID-19 unemployment returns.
- The Economic Development Topic Paper (CD6.13) for the Local Plan Review provides a trajectory of the delivery of employment floorspace for the Plan. This forecasts a delivery of c.195,000 sqm employment by the end of the Plan period which exceeds the requirements of the evidence base.
- The Maidstone Local Plan Review has undergone Main Modifications consultation post hearings, with the Inspector considering that the labour demand model identified as preferred through the evidence being a sound approach.

-
- Recent evidence publications in other parts of the Maidstone FEMA / adjoining authorities use same broad forecasting method as the Maidstone evidence, suggesting that considerable supply is likely to come forward in due course.

4. Monitoring and supply position

- 4.1 This section considers the historic delivery of floorspace in Maidstone and thereafter the latest supply position.

Monitoring

- 4.2 The table below is taken from the authority's last annual monitoring report (AMR 2021/22 (CD5.12)).
- 4.3 There have been substantial losses of B1a/E(g)(i) properties, most likely attributed to losses to residential.
- 4.4 Net delivery has been positive regarding B2 and B8 permissions.
- 4.5 The net targets were negative for B2 in the last plan, whilst the net targets for B8 were positive at +7,965, or 531 sqm p.a. over 15 years. The pro-rated 6-year target at 2021 would be 3,186 sqm so the actual delivery of B8 is marginally below this target (being 2,914 reported in the AMR). Taking into account B2 deliveries as well as B8, the 'general industrial' of B2&B8 is much higher than the requirement. Furthermore the net total of extant permissions at 2021/22 is much higher than the requirement.

Table 4.1 AMR employment data at 2021/22

	Use Class					Total
	B1a E(g)(i)	B1b E(g)(ii)	B1c E(g)(iii)	B2	B8	
Net requirement 2016-31 (sqm)	24,600			-18,610	7,965	13,955
Completions (per annum)						
2016/17	-14,472	132	3,678	5,361	1,805	-3,496
2017/18	-10,048	28	-1,305	-3,656	-2,734	-17,715
2018/19	-11,085	8	-4,359	-4,108	1,153	-18,391
2019/20	-320	960	1,148	638	4,671	7,097
2020/21	-2,515	20	-1,010	2,612	-2,884	-3,777
2021/22	-1,927	1,741	-824	2,808	903	2,701
Net total (sqm)	-40,367	2,889	-2,672	3,655	2,914	-33,581
Consent (extant permissions)						
Net total (sqm)	2,901	5,182	14,173	20,147	51,099	93,502
Remaining net total floorspace (sqm) required to 2031	42,494			-42,412	-46,048	-45,966

Table 4.11: Net delivery of B use class floorspace, by type since 2016/17 (Source: MBC 2022).

Supply

- 4.6 The table below updates the provision of floorspace within the employment allocations and their planning and construction status using the latest information at November 2023.

Table 4.2 Nov '23 Supply Position, Local Plan Review Allocations

Site Allocation	Local Plan Review 2021 Policy	Planning	Status
West of Barradale Farm EMP1(1)	3,500 sqm (B1, B2, B8)	22/503965/FUL – Extension to unit B3 and B3 (B2 and B8 use class) – 2,273 sqm (1,840 sqm B2, 422 sqm B8) – Not started	Residual allocation of 1,291 sqm (B1/B2/B8)
South of Claygate, Pattenden Lane, Marden EMP1 (2)	4,000 sqm (B1, B2, B8 use classes).	No application	Allocation of 4,000 sqm (B1/B2/B8) remaining

Woodcut Farm, Ashford Road, Bearsted EMP1(4)	49,000 sqm (B1a; B1b; B1c; B2; B8). At least 10,000 sqm of B1a/B1b floorspace as an absolute minimum.	See table 4.5	Part constructed – permission for 25,461 sqm B8 floorspace
Newnham Park, Bearsted Road, Maidstone RMX1(1)	21,270 sqm B1a/b remains allocated for a mix of uses, as it was in the 2017 Local Plan. Various permissions have been granted on the site and built out - the Innovation Centre and other associated Medical Campus buildings is well underway.		Residual outline permission of 21,270 sqm remains for B1a/B uses.
Maidstone East and former Royal Mail Sorting Office, Sandling Road, Maidstone RMX1(2) / LPRSA146	Up to 10,000 sqm comparison and convenience retail , 5,000 sqm (B1a) and approx. 210 dwellings	No application	Full allocation remaining – 5,000 sqm (B1a)
Former Syngenta Works, Hampstead Lane, Yalding RMX1(4)	Redevelopment of the brownfield site. 46,000 sqm B1, B2, B8.	Granted October 2021 - 19/504910/OUT – outline application for the redevelopment to provide a new business park up to 46,447 sqm of B1(c) , B2 and B8. Outline application breaks down floorspace as: up to 21,655sqm light industrial uses (B1(c), now E(g)(iii) use class); and up to 24,792sqm of warehouse use (B8 use class). Reserved matters August 2023 – 23/502118/REM –	Unknown construction status 38,507 sqm residual outline permission

		Phase B: 7,940 sqm B2/B8	
Mote Road, Maidstone RMX1(6) / LPRSA151	Development of approximately 172 dwellings, and approximately 1,250 sqm of new employment floorspace. Developments should have the aspiration to achieve a minimum of 2,000 sqm of office floorspace.	20/505707/FULL – Demolition of Shandon House and redevelopment of the site and adjacent car park with two buildings comprising of 172 apartments and 1,169 sqm B1(a) floorspace.	No further development potential
Ashford Road, Lenham LPRSA260	Development of approximately 2,500m ² of employment floorspace (E(g), B2 and B8 uses).	Application refused and dismissed at appeal (22/505409/OUT) – only a smaller floorspace quantum is achievable	Capacity for c.1,000 sqm mixed use
Lidsing Garden Settlement	66,150 sqm (B1/B2/B8) with 42,997 sqm to be delivered during the plan period (2022-2037) – 8,190 sqm office and 34,807 sqm industrial ¹ Of the 2,000 new homes, 1,340 (67%) are expected to be delivered within the plan period. Applying this to the employment land it would be expected that approximately 9.4ha of employment land will be delivered within the plan period.	No application	Starting in approximately 2027 <i>Estimated: 34,807 sqm industrial floorspace split 44% B2 (15,336 sqm) and 56% B8 (19,471 sqm) in line with employment needs forecast.</i>
Heathlands Garden Settlement	68,250 sqm (B1/B2/B8) with 19,110 sqm to be delivered during the plan period	No application	Anticipated to commence 2029

¹ Economic Development Topic Paper

	<p>(2022-37) – 5,880 sqm office and 13,230 sqm industrial²</p> <p>A minimum of 14 ha of dedicated employment land.</p> <p>Of the 5,000 new homes, 1,550 (31%) are expected to be delivered within the plan period. It would therefore be expected that 4.3 ha of employment land will be delivered within the plan period.</p>		<p><i>Estimated: 13,230 sqm industrial floorspace split 44% B2 (5,829 sqm) and 56% B8 (7,400 sqm) in line with employment needs forecast.</i></p>
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Windfall Supply / Completions

- 4.7 The table below shows current extant permissions for B8 warehousing in the borough, excluding site allocations based on work undertaken by Maidstone Borough Council prior to the publication of the 2022/23 AMR (see Appendix A2).

Table 4.3 B8 Windfall 2022-23

	Gain (sqm)	Loss (sqm)	Net (sqm)
Not started	9,052	2,172	6,880
Under construction		1,070	-1,070
Complete	2,647	1,548	1,099

Woodcut Farm

- 4.8 In March 2021 outline planning permission (20/505195/OUT) was granted for 45,295 sqm of E(g)(I, ii, or iii) or B8 floorspace, with the condition of a minimum of 10,000 sqm office floorspace(E(g)(i)or(ii)) and a maximum of 12,840 sqm of E(g)(iii). In September 2022 a s73 amendment was made to the consent (21/506790), reducing the minimum office floorspace to 7,500 sqm. The

² Economic Development Topic Paper

difference was provided in a hybrid application (21/506792/HYBRID) in an extension of the site.

4.9 As a result, the B8 floorspace provided in the outline application could range from 24,955 sqm to 37,795 sqm, taking account of the use class restrictions.

4.10 The table below details floorspace by use based on the reserved matters and hybrid applications and drawing on occupier data gleaned via CoStar. There is a provision of **25,461 sqm** of B8 floorspace.

Table 4.4 Woodcut Farm Floorspace by Use Class Breakdown

	E(g)(i) / E(g)(ii)	B2/ E(g)(iii)	B8	Mixed / Unknown Use	Total
21/502637/REM - E(g)(iii) or B8 Units B4, A3-5 and A7 assumed to be B8 ³ Units B2, A6 and A9 assumed to be E(g)(iii) ⁴ Unit B1, B3 and A8 assumed to be a mix of E(g)(iii) and B8 ⁵		5,872	7,523	9,089	22,484
21/506791/REM - E(g)(iii) or B8 Units A1, A2 and A13 ⁶			7,916		7,916
23/502/387/REM – B8 Units A10, 11 and 12			8,597		8,597
21/506792/HYBRID Unit E1 and D1 – office Unit E2 – B8	3,643		1,425		5,068
Total	3,643	5,872	25,461	9,089	44,065

³ B4 – Advertised as warehousing in brochure, A3 – Hitachi Construction Machinery (UK) Ltd, A4 – Maidstone Removals Ltd, A5 – AT&T(GB) Ltd, A7 – Edmunson Electrical Ltd

⁴ B2 – Va-Q-Tec Ltd, A6 – La Fabrications (South East) Ltd, A9 – ATAC Solutions

⁵ B1 – Zehnder Group Ltd, B3 – BAE Systems (Operations) Ltd, A8 – Amaro Signalling Ltd

⁶ Brochure advertising as warehousing

4.11 The table below summarises the overall latest supply position drawing together previous tables. This includes reasonable assumptions regarding the contributions of the garden settlements.

Table 4.5 Maidstone Employment Supply Summary (sqm)

	B1a/b	B2 / B1(c)	B8	B1/B2/B8 (Mixed B)	Notes
Completed 2021/22	-186	1,984	903		AMR 2021/22
A: Subtotal completions			903		
Permitted (Windfall)			5,810		Appendix 2, in house monitoring
Permitted (at Allocations)	26,082	29,367	50,675	9,089	Woodcut Farm, Syngenta & West of Barrowdale Farm
B: Subtotal permissions	26,082	29,367	56,485	9,089	
C: Remaining at allocations (estimated)	19,070	21,165	26,872	14,037	Lidsing & Heathlands Garden Settlement
Total Supply B+C	45,152	50,532	83,357	23,126	

Summary

4.12 The assessment indicates:

- A latest supply position of 56,485 sqm for B8 permitted, rising to 83,357 sqm of B8 when taking into account assumptions around the contributions of allocated garden settlements.

5. Appellant's case

- 5.1 The appellant's case is assumed as being presented in the Economic Needs Assessment (ENA) (August 2022) (CD1.6) provided with the application, undertaken by Avison Young on behalf of Wates Ltd.
- 5.2 Key elements of the ENA are reported below.
- 5.3 The geographies used in the ENA are:
- Maidstone authority
 - The 'sub region' defined as Maidstone, Tonbridge and Malling, Medway and Ashford (fig 3)
 - M20 Industrial Corridor Industrial Area, running from Ashford into Greater London along the A20, up to the urban area at Swanley, radius of corridor not defined (fig 4).
 - FEMA - defined as Maidstone, Tonbridge and Malling, Medway and Ashford (para 2.45) which appears as interchangeable with the sub region definition. Of note this differs from the EDNS FEMA definition, which notably excludes Ashford and only part Tonbridge and Malling / Medway.
- 5.4 Points made in the ENA regarding the overall market include:
- Para 1.3 "Kent logistics market has seen unprecedented levels of take-up throughout 2020-21".
 - Para 1.4 "In terms of Kent's supply, there is very little coming forward in terms of speculative development at the larger end of the market and the majority of this is clustered closer to the M25 south of the River Thames around Dartford and Belvedere. Given the increasing demand/supply imbalance, there is an acute need for further Grade A Logistics space (>100,000 sq.ft) to be provided in the region in the immediate term".

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- Para 3.9 “The stock [in the sub-region] is also of a fairly low quality, with an average rating of 2.5 out of 5 in the CoStar assessment. This, in part, reflects the fact that most of the stock is relatively old, with the average industrial property being built in 1983.”
 - Para 3.10 “Key logistics occupiers require well located units of a high specification to support their operations”.
 - Para 3.26-31 indicate vacancy rates in the sub-region and M20 corridor are 2.7-3.5%.

5.5 Regarding the Maidstone evidence the ENA notes:

- Para 4.2 “The Maidstone EDNS Addendum, produced in 2021 recognised the importance of an update to the employment land requirements post-Covid-19. In just a one-year period, land requirements indicated by the Experian forecast were around 40% higher than those from the previous version of the EDNS. Importantly, the report indicated that industrial and warehousing uses accounted for most of this increase in floorspace due to the significant job growth outlook for industrial and warehousing sectors.”

5.6 The ENA at Para 4.9 undertakes a new assessment of demand - provided through:

- ‘traditional’ econometric based projects of employment growth – sourced from Experian;
- An estimate of ‘suppressed demand’ that may have arisen in the market by historic lack of supply – this will align with the methodology published by the BPF;
- Sector specific factors that are driving demand outside of that which can be forecast – including changing floorspace typologies, the drive towards more sustainable premises, shifts in consumer behaviour.”

-
- 5.7 In terms of **labour demand** - the ENA notes that the Lichfield's EDNS used a jobs density "1 workforce job per 65 sqm for general, smaller scale warehousing (assumed to account for 80% of warehousing stock in Maidstone) and 1 workforce job per 80 sqm for large scale, lower density units (assumed to account for 20% of total stock)" – para 4.14.
- 5.8 Using up to date Experian forecasts, employment floorspace need in Maidstone is calculated in the ENA for 2021-41 as (paras 4.27-4.31):
- Calculation 1: 104,308 sqm (EDNS density) – 41,445 sqm distribution (10 ha)
 - Calculation 2: 109,793 sqm (HCA density) – 46,930 sqm distribution (12 ha)
- 5.9 For the sub-area, employment floorspace is forecasted to be (para 4.31-4.36):
- Calculation 3: 475,934sqm (EDNS density) – 280,317 sqm distribution (70 ha)
 - Calculation 4: 692,659sqm (HCA density) – 317,418 sqm distribution (79 ha)
- 5.10 The ENA also considers **suppressed demand** at Figure 20 and para 4.46 "Data indicates an annual suppressed demand for industrial stock in Maidstone of 11,266sqm. Spread across five years, this figure reflects 112,664sqm. This indicates a notional 5-year land need of c. 28 ha of industrial stock".
- 5.11 ENA Para 4.48 "[Regarding the sub-area] the analysis indicates a heightened need for additional industrial stock, with an annual suppressed demand of 21,933sqm. This reflects a 5-year suppressed demand of 219,326sqm and a notional 5 year land need of 55ha".
- 5.12 It is not considered to be clear how the suppressed demand figures are to be relied upon in the overall needs assessment.
- 5.13 The ENA general discussion notes:

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- Para 4.51 “A variety of forces have combined to generate heightened demand for industrial and distribution space...A combination of changing consumer demand and the emergence of new sectors provide new economic drivers for the demand for large spaces in well-connected locations. These are not captured in historic economic forecasts and therefore are not included in most of the evidence base reports that direct local employment land policy.”
 - Para 4.68 “historic forecasts significantly under-estimate the scale of growth in the sector over the period they covered. This is a critical point when considering land supply as it directly shows that the basis on which land needs have been determined fail to capture the new dynamics and needs of the sector”.
 - Para 5.9 “...only the allocation at Woodcut Farm, Bearsted, directly adjacent to the subject site, presents a potential scheme capable of accommodating the type of units the sector needs to respond to demand dynamics. Given this lack of appropriate supply, it will be critical that Maidstone considers the potential of the subject site to help meet identified need”.
 - Para 5.13 “...there is limited competition across the M20 between Swanley and Ashford, further reflecting the need for additional B8 space.”

5.14 The ENA Table 24 identifies competing developments in the M20 corridor, which highlight some alternative supply to the proposed development:

- Beaver Lane, Chart Leacon Depot (247,856 sqft) – “the scheme being deliver accommodates a train depot... an offer targeted at a market incomparable to the logistics sector” Para 5.15;
- LOC8 (191,825 sqft) – True availability is 106,259 sqft [9,872 sqm] because “two have been pre-let...the units are half the size of the proposed unit at the subject site. These units do not meet all demand anticipated in the market and address a different range of businesses needs to the proposal site” Para 5.16;

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- Click Aylesford (302,854 sqft) – True availability is 273,330 sqft [25,393 sqm] as “units 5 and 6 have been pre-let... Of the units remaining, Unit 2 is the only one is of the scale that would compete with the proposed development” Para 5.18;
 - Panattoni Park 52,010 sqft (230,000 sqft [21,268 sqm]future capacity) – “80% is let, with just two further units coming forward (due to be complete 2023). These units are 130,277 sqft and 100,697 sqft” Para 5.19;
 - Goya Distribution Hub 161,192 sqft – “with units ranging from 26,581-55,212 sqft. The smaller nature of these units would likely attract a different occupier to the subject site and is therefore not competing directly.” Para 5.20

5.15 In concluding the ENA reports:

- Para 6.3 “When considering econometric forecasting, there is a requirement for 12ha of additional employment land in Maidstone, and 79ha in the wider sub-region between 2022 and 2041. Critically, this acts as a starting point rather than a ceiling...”

Summary and comments

5.16 The ENA uses various spatial geographies used and assessed including Maidstone authority, the ‘sub region’ defined as Maidstone, Tonbridge and Malling, Medway and Ashford, the M20 Industrial Corridor Industrial Area and the FEMA. It is evident that the nature of need being argued for the Proposed Development is one that is not site specific but suitable for accommodation across an array of locations.

5.17 The market information points to increased levels of demand in 2020 and 2021 for B8 premises, which is not contested. The case is argued in the ENA that there is very little supply – although a limited number of alternatives are highlighted.

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- 5.18 The ENA refers to a labour demand model and also considers suppressed demand although it is not clear how the latter should be considered as part of the assessment or relied upon more generally.
- 5.19 The appellant's ENA labour demand calculations see demand for B8 in Maidstone for 41,445 sqm - 46,930 sqm of B8 for the 2021-2041 period – prorated this is an upper end of 2,347 sqm per annum. This compares to a forecast of needs in the LPR pro-rated as 2,878 sqm (as calculated in section 7). Of note, the LPR supply position far exceeds both these numbers.

6. Market evidence

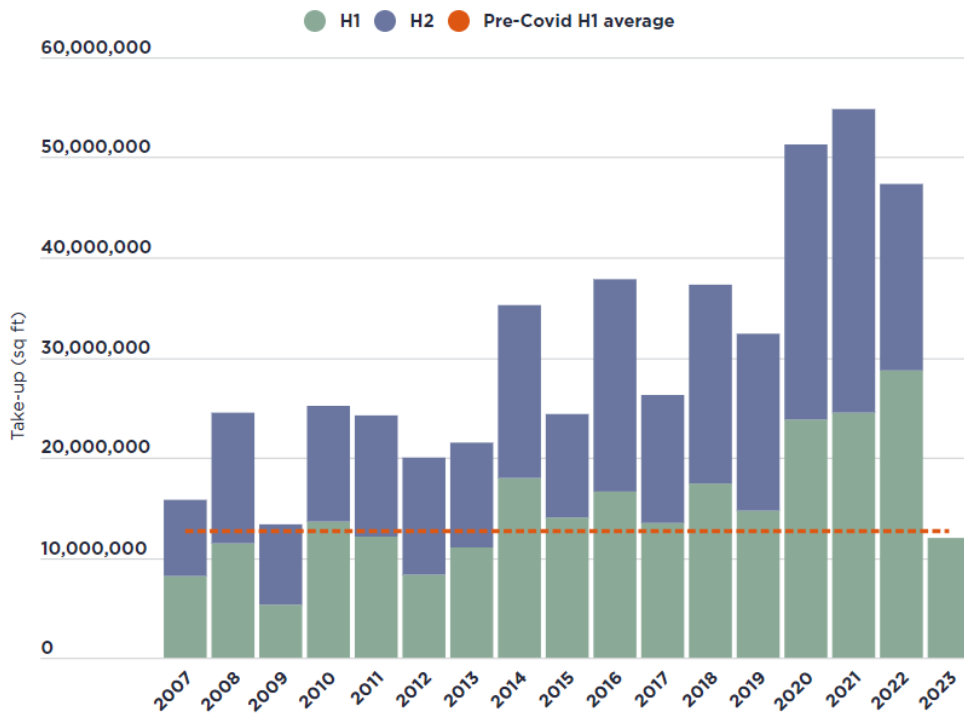
- 6.1 The market evidence provided by the appellant is not contested in the round.
- 6.2 This section includes a limited review of the market as of November 2023 via third party publications (Savills). Overall this recognises that demand levels for warehousing did rise significantly 2020 – 2022 through the pandemic, however there has been some slowdown in demand entering 2023 across the UK and the South East of England, whilst supply has been increasing.

Savills UK Big Shed Briefing July 2023 ⁷ (CD5.13)

- 6.3 “Take-up - At a national level, take-up for the half year has reached 12.49m sqft across 56 separate transactions, which is the lowest H1 take-up since 2013, albeit just 1% shy of the pre-Covid H1 average. At a deal count perspective, the level of individual transactions is in line with long-term averages, but with just six deals this year over 400,000 sqft, this has had a dampening effect on the average deal size, which has fallen from 272,000 sqft over the last three years to 222,000 sqft in 2023.”

⁷ https://www.savills.co.uk/research_articles/229130/349329-0

Figure 6.1 Savills Big Shed Breifing July 2023, take up of ‘big sheds’ UK



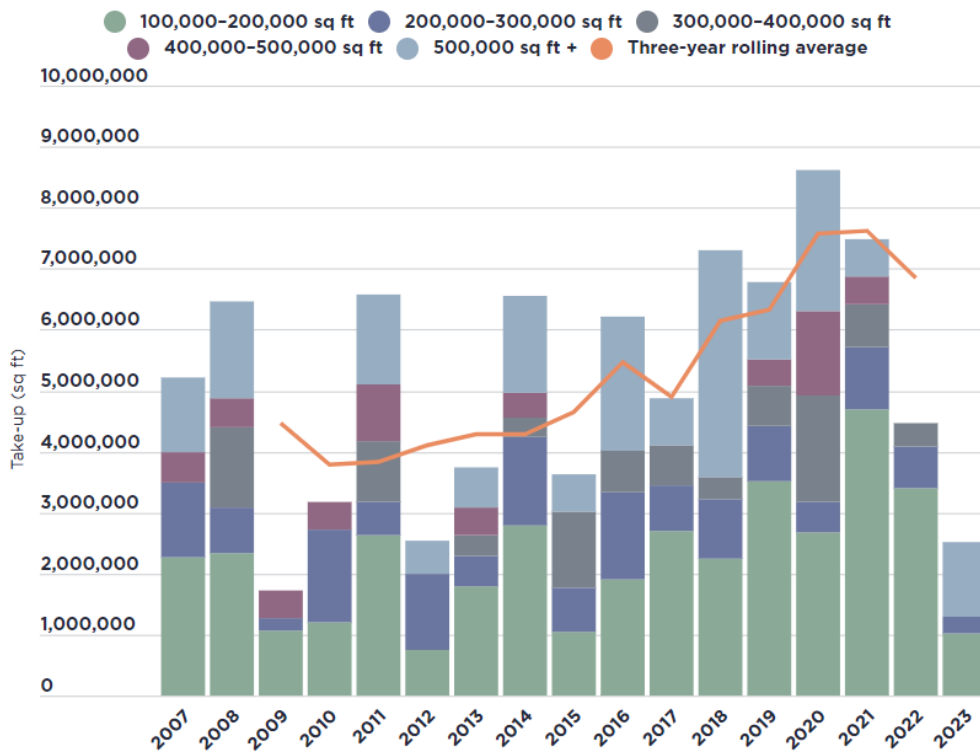
Source: Savills Research

Savills The Logistics Market in London and the South East July 2023 ⁸ (CD5.14)

6.4 “Take-up - Take-up in 2023 has reached 2.52m sqft across 11 transactions, which is in line with the long-term average. In 2023, 73% of transactions have been within the 100,000–200,000 sqft size band, 9% within the 200,000–300,000 sqft size band, and 18% over 500,000 sqft. The average deal size this year was 229,108 sqft.”

⁸ https://www.savills.com/research_articles/255800/349331-0

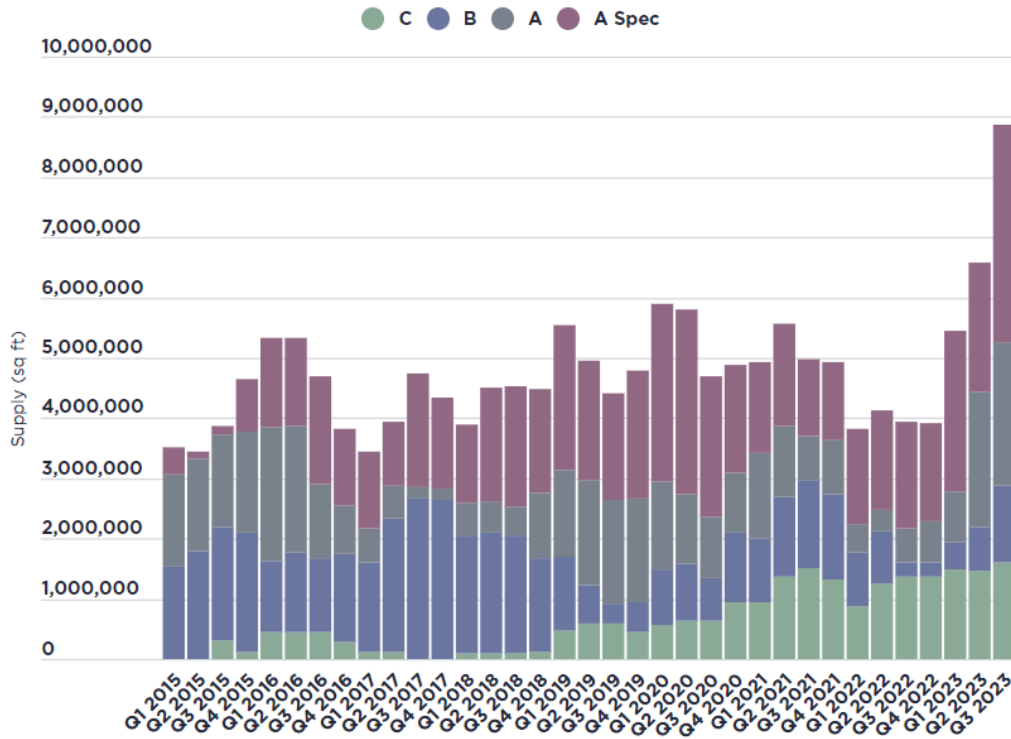
Figure 6.2 Savills London and South East Breifing July 2023, take up



Source: Savills Research

6.5 In terms of supply, Savills report a considerable increase in 2023. “Over the past year, the supply of warehouse space over 100,000 sqft has witnessed a 128% increase, reaching a total of 8.98m sqft across 51 units. This growth can be attributed to the completion of multiple units as well as the inclusion of grey/occupier-controlled space [leased space not required, so being offered as a sub lease], which now accounts for 14% of the overall availability. In terms of regional distribution, there is currently 6.48m sqft of warehouse space available in the South East across 37 units, while London offers 2.5m sqft across 14 units.”

Figure 6.3 Savills London and South East Breifing July 2023, supply



Source: Savills Research

7. Conclusions on whether there is a need for the proposed site

7.1 This section considers the evidence in the round as contained above.

Local evidence of need

7.2 The evidence in the EDNS 2020 (CD6.11)/ EDNSA 2021 (CD6.9) can be considered as up to date and wholly compliant with the PPG. There is no suggestion to the contrary. The Local Plan inspector in January 2023 (PINS/U2235/429/10) concluded that the labour demand models used “would not constrain the economic potential of the Borough and is therefore sound.”

7.3 The EDNSA recommends that the minimum level of need be that identified in the 2020 EDNS, because the higher rates of requirement arising in the EDNSA are inflated due to COVID-19 unemployment effects returning to work.

7.4 Extending the Plan period from 2022-2037 to 2021-2038 means that the need identified in the EDNS needs to be updated. This is calculated as below:

Table 7.1 Updated B8 needs 2021-2038

		B8 sqm	Notes
2022-37	A	40,990	
2022-42	B	56,875	
2019-37	C	55,310	
2019-22 p.a.	$D=(C-A)/3$	4,773	2021-2022 need
2037-42 p.a.	$E=(B-A)/5$	3,177	2037-2038 need
2021-38	C+D+E	48,940	

Source: EDNS, Icen / MBC calculations

7.5 Therefore the need should be considered as at least 48,940 sqm for B8. This includes a 20% uplift applied to base floorspace need projections - a ‘margin’ to allow for delays and replacement of older sites or those lost to other uses.

7.6 This needs position is in accordance with a PPG complaint identified need.

Local supply position

7.7 The current (November 2023) B8 supply position as assessed is:

- Permissions providing a total of 56,485 sqm for B8 permitted, which exceeds the 'need' identified in the LPR evidence by 15% and exceeds the appellant's ENA labour demand need.
- A further 26,872 sqm expected at allocated Lidsing & Heathlands Garden Settlements in the longer term.
- An expected total supply of 83,357 sqm of B8, which is 170% of the identified need.
- 25,461 sqm B8 at Woodcut Farm, which is 52% of the total B8 requirement and will be providing B8 at a strategic motorway location available in the near term.
- An estimated 19,471 B8 at Lidsing Garden Settlement expected in the Plan period, which is 40% of the total B8 requirement and will providing B8 near a strategic motorway location later in the Plan period.

7.8 The emerging Plan has therefore clearly met and exceeded the requirements of its evidenced need, which is considered sound, and made a contribution to the strategic B8 needs amongst other types of B8 in the authority area.

Wider FEMA supply position

7.9 In Tonbridge and Malling, the 2021 evidence indicates both a substantial need of around 296,260 sqm of which the distribution (B8) needs are 162,870 – and the combined light/general industrial and storage & distribution requirements are 252,940 sqm (60.7 ha). The evidence notes that taking account of the 95,390 sqm emerging supply (extant permissions), there is a shortfall of 147,550 sqm.

7.10 This indicates that there is likely to be a significant provision of B8 premises coming forward in Tonbridge and Malling in the future, directly to the west of Maidstone Borough. This is in addition to the substantial redevelopment of the

printworks by Panettoni delivering a 90 acre (36 ha) logistics park of which it is understood that 750,000 sqft (70,000 sqm) remains unlet. Tonbridge and Malling have continued to permit new warehousing developments despite the Plan delays.

- 7.11 In Medway the 2020 evidence, provided by Avison Young, indicates a base need of 293,112 sqm overall of which 184,932 sqm B8 and two sensitivities arriving at B8 needs for 212,076 sqm to 183,359 sqm.
- 7.12 The latest Medway AMR 2021/22 Vol1 notes that the amount of available floor space for B1/B2/B8/Mixed B with planning permission (net of potential losses) is 631,315 sqm which is expected to be delivered in the next 15 years. Of the Medway supply, 184,308 sqm is B8 (table 1 section 8, AMR Vol2 21/22).
- 7.13 In Medway there is likely to be a substantial provision of warehousing space forthcoming.

Appellant's position

- 7.14 The appellant provides a range of market indicators for the authority, sub region and M20 corridor. Market indicators are not contested in the round however it is clear that the 'requirements' for the space sought is not location or Maidstone specific.
- 7.15 The appellant's position on quantitative need appears to follow a similar method and forecast dataset to that of Maidstone, being an Experian based labour demand forecast. The outcomes for Maidstone are demand for B8 for 41,445 sqm - 46,930 sqm for the 2021-2041 period. Pro-rated this is (upper) 2,347 sqm per annum and for the adjusted Plan of 2021-38 is 39,891 sqm. This is below the 48,940 sqm arising from the adjusted period EDNS outcome as above, even when allowing for a 20% uplift. The appellant argues this is a minimum, however the current B8 supply position far exceeds this.

Need for the site

- 7.16 Overall there is not considered to be a need for the application site given:

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- There is an up to date and sound assessment of local need, adjusted for the revised Plan period being 48,940 sqm. This is described as a minimum in the EDNSA.
 - The current permitted supply position in Maidstone Borough is 56,485 sqm B8, which exceeds the 'need' identified in the LPR evidence by 15%. A further 26,872 sqm is expected at allocated Lidsing & Heathlands Garden Settlements in the longer term. This creates an expected total supply of 83,357 sqm of B8, which is 170% of the identified need.
 - Of this supply, 25,461 sqm B8 at Woodcut Farm, which is 52% of the total B8 requirement and will providing B8 at a strategic motorway location available in the near term. A further 19,471 B8 at Lidsing Garden Settlement expected in the Plan period, which is 40% of the total B8 requirement and will providing B8 near a strategic motorway location later in the Plan period. Therefore the majority of the need can be met at locations readily accessible to the strategic network.
 - There is considerable anticipated provision in adjoining Boroughs of Medway and Tonbridge and Malling, which will provide sites in due course.
 - No clear evidence of need specific to this location over and above that which the Plan is providing.

A1. Summary of proof

- A1.1 This proof of evidence considers the need in employment land terms for application 23/500899/OUT in Maidstone Borough. The proposal is for 10,788 sqm at Land north of the A20, Ashford Road, Hollingbourne, Kent. The site is directly south west of junction 8 of the M20 around 1 mile east of the edge of the Maidstone urban area.
- A1.2 The development proposal is for “Outline application for the erection a building for storage and distribution (Class B8 use) with a floorspace up to 10,788sqm (Gross External Area), ancillary offices, associated car parking, HGV parking, landscaping and infrastructure (All matters reserved except for access)”. Whilst in outline, an illustrative master plan has been provided showing a single building on the east part of the site.
- A1.3 The adopted Plan is from 2017, whilst the Local Plan Review is well advanced having completed the examination hearing sessions and main modifications consultation. The plan inspector reports that the employment evidence supporting is sound and that the labour demand models used “would not constrain the economic potential of the Borough and is therefore sound.”
- A1.4 The 2021 Maidstone employment evidence Economic Development Needs Study Addendum finds a higher need than its 2020 predecessor but recommends that the minimum level of need be that identified in the 2020 Study, because the higher rates of requirement arising in the Addendum are inflated due to COVID-19 unemployment effects returning to work.
- A1.5 Main modifications extending the Plan period from 2022-2037 to 2021-2038 mean that the need identified in the EDNS is to be updated. This is calculated as at least 48,940 sqm for B8.
- A1.6 The current permitted supply position in Maidstone Borough is 56,485 sqm B8, which exceeds the ‘need’ identified in the LPR evidence by 15%. A further

26,872 sqm is expected at allocated Lidsing & Heathlands Garden Settlements in the longer term. This creates an expected total supply of 83,357 sqm of B8, which is 170% of the identified need.

- A1.7 Of this supply, 25,461 sqm B8 at Woodcut Farm, which is 52% of the total B8 requirement and will providing B8 at a strategic motorway location available in the near term. A further 19,471 B8 at Lidsing Garden Settlement expected in the Plan period, which is 40% of the total B8 requirement and will providing B8 near a strategic motorway location later in the Plan period. Therefore the majority of the need can be met at locations readily accessible to the strategic network.
- A1.8 The emerging Plan has therefore clearly met and exceeded the requirements of its evidenced need, which is considered sound, and made a contribution to the strategic B8 needs amongst other types of B8 in the authority area.
- A1.9 There is considerable anticipated need and provision in adjoining Boroughs of Medway and Tonbridge and Malling, which will provide sites in due course.
- A1.10 The appellant's position on quantitative need appears to follow a similar method and forecast dataset to that of Maidstone. The outcomes for Maidstone are demand for B8 for 41,445 sqm - 46,930 sqm for the 2021-2041 period. Pro-rated this is (up to) 2,347 sqm per annum and for the adjusted Plan of 2021-28 is 39,891 sqm. This is below the 48,940 sqm arising from the adjusted Plan period.
- A1.11 Overall there is not considered to be a need for the application site given:
- There is an up to date and sound assessment of local need. This is 48,940 sqm for the Plan period, compared with a permitted supply position in Maidstone Borough of 56,485 sqm B8, plus an estimated contribution from Garden Settlements taking to the total to 83,357 sqm of B8, which is 170% of the identified need.

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- The Maidstone supply includes provision at locations with access to the strategic road network. There is considerable anticipated provision in adjoining Boroughs of Medway and Tonbridge and Malling, which will provide sites in due course.
 - There is no clear evidence of need specific to this location over and above that which the Plan is providing.

A2. B8 Windfall Monitoring Data 2022-23

Description	Status	B8 Gain	B8 Loss	B8 Net
Lawful Development Certificate for a proposed outbuilding with B8 storage and distribution use with the construction of an access track and remodelling the pond.	Completed	1,306		1,306
Prior notification for the change of use of agricultural building to a flexible commercial use within storage or distribution (Class B8) and commercial/business/service (Class E). For its prior approval to: -Transport and Highways impacts of the development. - Noise impacts of the development. - Contamination risks on the site. - Flooding risks on the site.	Completed	496		496
Conversion of existing store and gas store into a retail unit with new frontage	Completed		1,477	-1,477
Change of use from B1 (office) and B8 (storage and distribution) and agricultural use to provide a mixed-use unit incorporating B1 office use, B1 light industrial use and B8 storage and distribution use, with additional infrastructure to include staff parking, delivery bays and a bin/recycling collection point.	Completed	427	71	356
Prior notification for the change of use of agricultural building to a flexible use within Class B8 (storage) and B1 (light industrial). For its prior approval to: Transport and Highways impacts of the development - Noise impacts of the development - Contamination risks on the site - Flooding risks on the site.	Completed	418		418
Demolition of existing building and construction of 20 no. 1 and 2 bedroom flats with 10 no. car parking spaces.	Under Construction		890	-890
Approval of Reserved Matters for Landscaping, Design, Layout and Scale pursuant to 19/505434/OUT - Outline application for the demolition of existing commercial building and	Under Construction		180	-180

erection of a 2-storey self-build dwelling (Access being sought). (Allowed on Appeal).				
Outline application with access matters sought for demolition of two existing buildings and erection of four residential dwellings. (Matters of appearance, landscaping, layout and scale are reserved for future considerations.)	Not started		457	-457
Proposed demolition of existing commercial units and re-modelling of an existing dwelling and the erection of 7no. self-build dwellings with associated landscaping and parking	Not started		979	-979
Removal of existing LPG tank enclosure, construction of a single storey B8 storage building ancillary to the use of The Granary. Installation of roof mounted solar panels, entrance gates and replacement sewage treatment plant.	Not started	144		144
Erection of new warehouse building to create 3no. additional units (re-submission of 20/504015/FULL).	Not started	370		370
Erection of an extension to an existing warehouse including parking, access, landscaping and associated works.	Not started	2,277		2,277
Conversion of an existing storage and distribution building into a 5no. bedroom dwelling with associated parking.	Not started		422	-422
Outline application for proposed development of site with light industrial/storage business units and associated facilities (Access being Sought).	Not started	365		365
Change of use from Class E (Formerly B1c) (Light Industrial) to B8 (Storage and Distribution) and insertion of 12 high-level vents on the north-east and south-west elevations of existing Unit 17, and provision of two collapsible security bollards and fire security door.	Not started	428		428
Erection of Commercial building of 4 units and erection of a single storey extension to existing warehouse, all for Use Class B8 (storage and distribution) with incidental and ancillary offices only.	Not started	741		741

Erection of a store building.	Not started	656		656
Erection of a storage/packaging and research building.	Not started	117		117
Change of use and creation of two data centre cabins (Use Class B8 Storage and Distribution) with associated fencing, access, and provision of two generators. Relocation of two shipping containers and extension to main car park to provide nine parking spaces and installation of 14 collapsible bollards.	Not started	86		86
Demolition of 3no. existing single storey commercial units/structures and replacement with a two-storey commercial building comprising of 10 units, provision of a new internal road layout including additional entrance from the private access road serving the development, revisions to on-site vehicle parking, construction of a detached refuse bin store, and associated landscaping.	Not started	151	67	84
Erection of a storage building with landscaping, access and associated works.	Not started	1,530		1,530
Change the use of building 5 from B8 consent to B1 light industrial. Alteration to fenestration to buildings 4 and 5 including associated parking area and recycling collection point.	Not started		167	-167
Prior Notification for change of use of two agricultural buildings to storage or distribution (Use Class B8). For its prior approval to: Transport and Highways impacts of the development - Noise impacts of the development - Contamination risks on the site - Flooding risks on the site.	Not started	380		380
Conversion of part of a barn into a public cafeteria.	Not started		80	-80
Prior notification for the change of use of agricultural building to a flexible use for its prior approval to: Transport and Highways impacts of the development - Noise impacts of the development - Contamination risks on the site - Flooding risks on the site.	Not started	77		77

Proposed change of use of land from equestrian to storage of commercial items, with 3 containers and associated works	Not started	860		860
Change of use of agricultural land to Scaffolder's Storage and Distribution Yard Use Class B8 (Retrospective) (Resubmission of 22/502164/FULL).	Not started	870		870
		Gain	Loss	Net
Completed		2,647	1,548	1,099
Under Construction		0	1,070	-1,070
Not Started		9,052	2,172	6,880
U/C and N/S				5,810

Source: Maidstone Borough Council