



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

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 Icen Projects Limited on behalf of Maidstone Borough Council

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1. Introduction

1.1 This addendum outlines the changes to the Proof of Evidence of Matt Kinghan on need for employment land regarding the appeal made by Wates Developments relating to Land north of the A20, Ashford Road, Hollingbourne, Kent. This has been necessary for the following reasons:

- The replacement of the 2021/22 AMR with the latest 2022/23 AMR data;
- Updates to the quantum of floorspace by use class at Woodcut Farm to reflect the maximum B8 provision of 23,880 sqm.

2. Changes to the Proof of Evidence

AMR

Updated paras 4.2-4.5 in original proof of evidence:

- 2.1 The table below is taken from the authority's latest annual monitoring report (AMR 2022/23).
- 2.2 Across the reported period there have been substantial losses of B1a/E(g)(i) properties overall, most likely attributed to losses to residential. There have also been significant losses of B2 properties overall, although deliveries have improved in recent years. Net delivery has been positive regarding B8 permissions.
- 2.3 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 7-year target at 2022 would be 3,717 sqm so the actual delivery of B8 is significantly above this target (being 7,945 reported in the AMR). It is also of note that data provided by the council indicates a loss of 19,000sqm of scrap yard in 2022/23, which whilst reported as B8 is technically a Sui Generis use¹.
- 2.4 The council has confirmed that the principle reason for differences between the 2021/22 and 2022/23 AMRs in terms of adjustments to historic years data is due to a review of the timing of completions recording rather than volume.

¹ 18/505561/FUL – Bentletts Scrap Yard, Claygate Road and see policy H1(66) of the Maidstone Local Plan 2017

	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	-14,743	132	3,678	462	1,805	-8,666
2017/18	-10,047	28	-1,305	-17,934	-2,735	-31,993
2018/19	-13,125	0	-4,409	-15,364	1,153	-31,745
2019/20	10,692	960	1,653	638	26,994	40,937
2020/21	-3,122	20	-434	2,612	2,218	1,294
2021/22	3,405	1,741	-880	2,808	-1,713	5,361
2022/23	2,976	0	-148	14,306	-19,777	-2,643
Net total (sqm)	-23,964	2,881	-1,845	-12,472	7,945	-27,455
Consent (extant permissions)						
Net total (sqm)	-13,928	0	-9,292	21,604	71,130	69,514
Remaining net total floorspace (sqm) required to 2031	-46,148			9,132	79,075	42,059

Table 15: Net delivery of B use class floorspace, by type since 2016/17 (Source: MBC 2023)

Woodcut Farm

- 2.5 The maximum floorspace was incorrectly stated in the original Proof.
- 2.6 Conditions set in application 20/505195/OUT for Woodcut Farm set a maximum B8 of 22,500. This was subsequently increased to 23,880 in permission 21/506792/HYBRID.
- 2.7 Table 4.3 has been updated accordingly (see red).

Updated 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,	4,000 sqm (B1, B2, B8 use classes).	No application	Allocation of 4,000 sqm

Marden EMP1 (2)			(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 – at least 21,417 sqm B8 floorspace with permission for up to 23,880 sqm
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).	Unknown construction status 38,507 sqm residual outline permission

		Reserved matters August 2023 – 23/502118/REM – 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 ² 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>

² Economic Development Topic Paper

<p>Heathlands Garden Settlement</p>	<p>68,250 sqm (B1/B2/B8) with 19,110 sqm to be delivered during the plan period (2022-37) – 5,880 sqm office and 13,230 sqm industrial³</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>No application</p>	<p>Anticipated to commence 2029</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

2.8 **Updated para 4.7** “The table below shows the **2022/23 B8** current extant permissions for B8 warehousing in the borough, excluding site allocations, as per the 2022/23 AMR.

Updated Table 4.3: B8 Windfall 2022-23

	Net (sqm)
Commitments	1,024

Source: Maidstone AMR 2022/23

Woodcut Farm

2.9 Para 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 to not exceed a maximum of 10,000 sqm office (E(g)(i)or(ii)), 12,840 sqm of E(g)(iii) and 22,455 sqm of B8 uses.** In September 2022 a s73 amendment was

³ Economic Development Topic Paper

made to the consent (21/506790), reducing the minimum office floorspace to 7,500 sqm. The difference was provided in a hybrid application (21/506792/HYBRID) in an extension of the site.” **There is provision for up to 23,880 sqm of B8 floorspace when taking account of the additional 1,425 sqm allowed under the application 21/506792/HYBRID.**

- 2.10 Para 4.10 – “The table below details estimated floorspace by Use Class based on the reserved matters and hybrid applications and drawing on occupier data gleaned via CoStar. **Overall based on known occupier types / space advertising, it is estimated that B8 could utilise around 21,417 sqm of floorspace. Units A1 and A2 are yet to be built out and could provide a further provision of B8 floorspace, up to 23,800 sqm, based on their occupiers.**

Updated 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	Status
21/502637/REM - E(g)(iii) or B8 B4, A3-5 and A7-8 assumed to be B8 ⁴ Units B2, A6 and A9 assumed to be E(g)(iii) ⁵ Unit B1 and B3 assumed to be a mix of E(g)(iii) and B8 ⁶		5,872	8,495	8,585	22,952	B4 unlet, other occupied
21/506791/REM - E(g)(iii) or B8			2,900	4,322	7,222	Under construction

⁴ B8 use: A3 – Hitachi Construction Machinery (UK) Ltd, A4 – Maidstone Removals Ltd, A5 – AT&T(GB) Ltd, A7 – Edmunson Electrical Ltd, A8 – Amaro Signalling, B4 – Vacant but advertised as warehousing in brochure

⁵ B2 use: B2 – Va-Q-Tec Ltd, A6 – La Fabrications (South East) Ltd, A9 – ATAC Solutions

⁶ Mixed Use: B1 – Zehnder Group Ltd, B3 – BAE Systems (Operations) Ltd

Units A1, A2 unknown use and A13 assumed B8 ⁷						
23/502/387/REM – B8 Units A10, 11 and 12			8,597		8,597	Under construction
21/506792/HYBRID Unit E1 and D1 – office Unit E2 – B8	3,643		1,425		5,068	Under construction
Total	3,643	5,872	21,417	12,907	43,839	

2.11 The overall supply position has been updated as below.

⁷ A1 no occupier, A2 unknown occupier, A13 – Ocura Healthcare

Updated 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	-1,713		AMR 2021/22
Completed 22/23			-777*		AMR 2022/23
A: Subtotal completions			-2,490		
Permitted (Windfall)			1,024		AMR 2022/23
Permitted (at Allocations)	26,082	29,367	49,094**	12,907	Woodcut Farm, Syngenta & West of Barrowdale Farm
B: Subtotal permissions	26,082	29,367	50,188	12,907	
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	76,990	26,944	

* Adjusted from -19,777 to reflect Sui Generis Uses of 19,000 sqm

** Woodcut Farm (max B8 23,880 sqm) plus Syngenta Works (24,792 sqm) plus West of Barradale Farm (422 sqm)

2.12 **Para 4.12** – “The assessment indicates:

- A latest supply position of ~~56,485~~ **50,188 sqm** for B8 permitted, rising to ~~83,357~~ **76,990 sqm** of B8 when taking into account assumptions around the contributions of allocated garden settlements.”

Need for the site

2.13 **Para 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~~ **50,188 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~~ **76,990 sqm** of B8, which is ~~170%~~ **157%** of the identified need.
 - Of this supply, ~~25,461 sqm~~ **23,880 sqm** B8 at Woodcut Farm, which is ~~52%~~ **49%** 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.”

2.14 Para A1.6 – “The current permitted supply position in Maidstone Borough is ~~56,485~~ **50,188 sqm** B8. which exceeds the 'need' identified in the LPR evidence by 3%. 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~~ **76,990 sqm** of B8, which is ~~170%~~ **157%** of the identified need.”

2.15 Para A1.7 – “Of this supply, ~~25,461 sqm~~ **23,880 sqm** B8 at Woodcut Farm, which is ~~52%~~ **49%** 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.”

2.16 Appendix A2 – B8 Windfall Monitoring Data 2022-23 should be removed.

3. Conclusion

- 3.1 Overall, the changes in this addendum do not have a material impact on conclusions made in the original proof of evidence.
- 3.2 Using the 2022/23 AMR data in place of the 2021/22 AMR has improved the delivery position, with 7,945 sqm of B8 floorspace delivered, compared to the 2,914 sqm stated in the 2021/22 AMR. The latest 2022/23 position is exceeding the 7-year pro-rated need target of 3,717 sqm.
- 3.3 The B8 windfall commitments position has been updated by the use of the 2022/23 AMR, from 5,810 sqm in the original proof (6,880 not started plus - 1,070 under construction) to 1,024 sqm.
- 3.4 The adjusted position for Woodcut Farm takes the definitive B8 floorspace from 25,461 sqm to up to 23,800 sqm.
- 3.5 The changes described above results in an updated current permitted B8 supply position in Maidstone Borough of 50,188 sqm (from 56,485sqm in the original proof). The updated supply position exceeds the calculated B8 need of 48,940 sqm. Taking account of the contributions from the Garden Settlements takes this total to 76,990 sqm (from 83,357 sqm in the original proof).