

MAIDSTONE BOROUGH LOCAL PLAN REVIEW

DRAFT PLAN FOR SUBMISSION (REGULATION 19)

OBJECTION TO SOUNDNESS ON BEHALF OF LENHAM PARISH COUNCIL

HEATHLANDS GARDEN SETTLEMENT

POLICY LPRSP4 (A) (4) (a) (d) AND POLICY LPRSP11 (B) (3)

EMPLOYMENT DELIVERY

LPC EIGHT

1. Policy LPRSP4(A)(4)(a) states that the Heathlands development should aim to provide for as close to 5,000 new jobs as reasonable and viable.
2. Policy LPRSP4(A)(4)(d) requires a minimum of 14 ha of dedicated new employment land.
3. Policy LPRSP11(B)(3) states that Heathlands is expected to provide approximately 19,110 m² of employment floorspace by 2037.
4. Policy LPRSP4(B)(4)(a) states that the Lidsing Garden Community should provide over 2,000 new jobs as feasible and viable due to the areas excellent connectivity to the strategic road network.
5. Heathlands is to provide 19,110 m² of new employment space by 2037. In comparison Lidsing is to provide 42,988 m² of new employment space by 2037 (Policy LPRSP11).
6. Heathlands is to provide a minimum of 14 ha of dedicated new employment land to serve 5,000 new homes. Lidsing is also to provide 14 ha of new employment space to serve just 2,000 new homes.
7. The Local Plan Review:
 - Makes reference to the excellent connectivity to the strategic road network enjoyed by Lidsing, but makes no similar reference to Heathlands.
 - Requires Lidsing to provide 42,998 m² of employment floorspace by 2037 compared to a requirement for Heathlands to provide only 19,110 m² of employment floorspace by the same time.
 - Requires Lidsing to provide 14 ha of employment land to serve 2,000 new houses, whereas Heathlands is only required to provide 14 ha of employment land to serve 5,000 new houses.

The above factors all combine to amount to a tacit recognition on behalf of the Local Planning Authority that Heathlands is not a location which could ever support new employment on the scale needed to achieve the required one new job to one new house ratio.

8. The above figures demonstrate a very clear distinction between the realistic prospect of securing significant new employment at Lidsing and a very much reduced expectation for the provision of new jobs at Heathlands.
9. The experience of Lenham Parish Council is that available employment land within the Parish is frequently not commercially attractive. The reason for this lack of market demand is simply the distance from the nearest motorway junction which is M20 Junction 8.
10. Analysis of the M20 in mid Kent reveals clusters of active employment business locations very close to motorway junctions.
11. Junction 4 gives direct access to Kingshill, a large and successful business park.
12. Junction 5 has access to the 20/20 Business Park at Allington.
13. Junction 6 provides access to two large motor vehicle maintenance and sales sites which provide an important local service function.
14. Junction 7 has Eclipse Park, a new, large business park almost completely built out and occupied over the last 10 or so years.
15. The Newnham Park (Kent Medical Campus) site is also located at Junction 7. This location has various permissions including the recently built Innovation Centre and associated Medical Campus buildings.
16. Woodcut Farm at Junction 8 comprises some 25.8 ha of business floorspace. Construction is currently underway on a scheme first granted planning permission in 2018. This will provide a maximum of 45,295 m² of mixed business floorspace. Paragraph 7.60 of the Review states that this site will contribute significantly towards the evidenced need for 74,330 m² of mixed business floorspace by the end of the Plan period.
17. Junction 9, within Ashford Borough, provides access to a newly built Business and Leisure Park with direct access to the motorway junction.
18. Junction 10 and Junction 10A, also within Ashford Borough, provide access to a number of business facilities which lie immediately to the south of the motorway junctions.
19. It can be seen therefore that, unlike Heathlands, many commercially attractive sites for business space lie within very close proximity to each of the seven existing motorway junctions along the M20 in mid Kent. Each one of these sites would be in competition with Heathlands for occupiers, as and when, any employment floor space became available in the new Garden Community.

20. The Maidstone Economic Development Needs Study – Stage 2 (April 2020) (MEDNS) contains the projection of future employment space requirements within Maidstone Borough. Table 2.18 on Page 13 of MEDNS, projects offices to be 11% of the requirement, manufacturing to be 40% and distribution to be 49%. Paragraph 2.20 assumes that smaller scale warehousing accounts for 80% of warehousing stock. Large scale, lower density units are assumed to account for 20% of the total warehouse stock.
21. Based on these figures, the projected distribution of employment uses within Heathlands could be as follows:

		Hectares (ha)	Plot Ratio	Floor Space (m ²)	Employment Density	TOTAL JOBS
Lower Density Offices	11%	1.5	0.4	6,000	12.5	480
Manufacturing	40%	5.6	0.4	22,400	45	500
Large Scale Warehousing	10%	1.4	0.4	5,600	80	70
Small Scale Warehousing	39%	5.5	0.4	22,000	65	338
TOTALS		14.0		56,000		1,388

22. The MEDNS in Paragraph 2.43 advises a plot ratio of 0.4 for each of the above uses.
23. Applying the floorspace proportions derived from the MEDNS gives the floor space for each use as shows above.
24. The employment density (jobs/m2) for each of the uses is given at Paragraph 2.20 of the MEDNS. These are shown above. When these densities are applied to the floor space the jobs in each category are as shown in table above. On this basis and based on Maidstone's own employment analysis the total jobs to be provided across the 14 hectares is estimated to be 1,388.
25. Lenham Parish Council has considered the employment which might be generated for local uses within the district and local centres. The amounts are as shown below:

Retail	110
Pub/Restaurant	60
Primary Schools	100
Health Centre	30
Residential Care	200
TOTAL JOBS	500

26. Lenham Parish Council regards the total of 500 jobs to be a robust and reliable estimate of the total number of jobs likely to be provided within local service provision, including 200 in residential care homes.

27. The total employment provision within Heathlands is estimated, therefore, to be some 1,888 jobs. The Parish Council reserves the right to bring additional expert evidence on this issue later should it be necessary.
28. The TCPA document '*Understanding Garden Villages: An Introductory Guide*' warns that "*without providing the right employment, community facilities and range of housing new Garden Villages risk becoming dormitory commuter suburbs – the antithesis of the Garden City idea*".
29. The Parish Council suggest that there is a significant risk that Heathlands will simply become a dormitory outlier commuter suburb. This is simply because the project is located in the wrong place to attract significant employment development on anything like the scale needed to support the provision of 5,000 new homes. The August 2020 Stantec Delivery and viability assessment report in Paragraphs 4.4.2 to 4.4.14 gives a comprehensive analysis of the transport difficulties which are likely to arise as a result of the Heathlands proposal.
30. Any employment that can be provided at Heathlands is most likely to be low wage jobs in sectors such as manufacturing, storage and distribution. There is no evidence that employees in such low wage jobs could afford the new houses to be provided at Heathlands.
31. Even the affordable housing units will not be effectively '*affordable*' to many who will be in the lower paid employment which is likely to be available. The Parish Council and the individual Parish Councillors have a myriad of experience of local residents seeking local housing which they are unable to afford when they are employed in the low wage jobs which are typically available locally. This problem can be especially apparent for school leavers trying to make their way in a relatively remote rural village.
32. Even if some employment can be provided, the jobs are likely to be taken to some extent by people living in the local population centres of Ashford, Maidstone and the Medway towns who will need to commute into Heathlands to work.
33. At the same time the occupants of the new houses will need to commute out of Heathlands to employment centres such as Ashford, Maidstone, the Medway towns and London.
34. The net result of choosing Heathlands would be a complex pattern of in and out commuting over long distances. Not only would this put trips on the network exacerbating acknowledged congestion problems it would also generate unnecessary carbon emissions contrary to national and local policies aimed at reducing emissions. Paragraph 73b of the National Planning Policy Framework warns that in planning for larger scale development the strategic Policy Making Authorities should ensure that their size and location will support a sustainable community with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment) or in larger towns to which there is good access. It is no surprise to Lenham Parish Council that Government guidance recognises the possibility of an unrealistic level of self-containment being claimed for such new communities.

35. Lenham Parish Council is not seeking any change to the planned employment provision as a consequence of this representation.
36. The Parish Council believes that Heathlands is inherently located in the wrong place to function as a self-contained Garden Community. The project is essentially car dependent in its conception, based on the proposition that an entirely new junction on the M20 could ever be both approved and funded. The project remains essentially car based in its execution. The so-called *business case* for a new railway station is a far cry from the approval, funding and implementation of such a new station. Even if a new station could be provided at any stage in the project, which the Parish Council considers to be highly unlikely, the capacity and location and speed of the train service will not be sufficiently attractive in comparison to the alternative which is the use of motor vehicles. As a consequence, Lenham Parish Council believes that Heathlands will only serve to encourage use of motor vehicles and should accordingly be deleted from the plan in its entirety.