



Issue 8: Are the quantum of new employment land and expectations for job creation and the delivery of retail and leisure needs justified, deliverable and consistent with national policy? Will the Local Plan ensure the future supply of land available for economic development and its sufficiency and suitability to meet identified needs?

i) The Rural Economic Assessment (EBD01) recommends a combination of site allocations and a market-led approach. How have these findings been translated into the Local Plan?

1. The approach to employment provision in the rural area is set out in paragraph 3.116 of the Submission version Local Plan.
2. The Rural Economic Assessment (EBD01) highlights the importance of the rural economy to the overall economic prospects of the Borough and recommends a combination of two broad policy approaches involving a site allocations approach that considers specific locations or sites that can provide a degree of certainty of delivery together with a market led approach which allows the location of additional employment space to be determined by the market regulated by the Development management process.
3. It goes on to recommend a plan led employment policy approach in Tenterden and that there may be scope in the Tier 2 villages (identified as Charing, Hamstreet and Wye) to make a contribution in accommodating small scale future employment land requirements. The identified Tier 3 settlements (Aldington, Bethersden, Biddenden, Chilham, Rolvenden and Woodchurch) along with the remaining rural areas provide an important source of additional supply and it is recommended that a market led approach is adopted here to provide employment space.
4. In terms of new site allocations, the starting point for the Council was the site submissions that had been submitted for commercial uses and these are set out in Appendix 6 of the Strategic housing and Employment Land Availability Assessment (SD12). This Appendix also assessed extant permissions or existing allocations/locations. In practice there were only 2 site submissions for proposed commercial development in the rural areas. In terms of the Tenterden and the Tier 2 villages there was an extension proposed to the Pickhill business Village on the edge of Tenterden (S25) and the redevelopment of the garden centre at Hamstreet.
5. As a result of these submissions the Local Plan then goes on to identify one new commercial/employment allocation at Pickhill Business Village, Tenterden (S25). The proposal is an extension of an existing successful commercial site on the edge of Tenterden that currently provides 16 units for a range of small - medium scale commercial units.

Council's Response to Inspector's Issues and Questions

Issue 8

27 March 2018

6. In terms of possible allocations in the Tier 3 settlements, the Wye Neighbourhood Plan (GBD02) identifies commercial/employment uses as part of WNP11, that deals with the former Imperial College London campus at Wye. The site is proposed for a mix of uses, including education, business, community infrastructure and housing. In this regard development proposals for this site shall redevelop part of the site as a business hub (B1 Office or A2 Research and development), retain and enhance the existing commercial land use along the southern side of Occupation Road for employment use (B1).
7. In addition a Neighbourhood Plan is currently being prepared for Charing which has not yet progressed to consultation draft stage.
8. The Rural Economic Assessment suggests a number of allocations are combined with a permissive plan policy and hence there are policies EMP1, EMP2, EMP3, EMP4 and EMP5 that all deal with employment uses within the rural areas including within rural settlements.
9. The latest employment monitoring data compiled to up-date the Annual Monitoring Report (GBD02) indicates that at February 2018 there was over 10,000 square metres of extant floorspace for B1 – B8 uses within the Ashford rural area. There have been some notable examples of successful developments that the market has delivered in the rural areas providing employment space such as Evegate and Mersham le Hatch, which have both provided new business space and a positive environment delivered by the market.
10. In addition, the ELR (EBD02) analysed a selected a sample range of rural employment locations and concluded that there was generally a strong level of occupation and activity across the sample of rural sites reviewed. There appears to be solid demand for high quality smaller scale units which have a combined retail function. host to rural economic activities which require low cost space.
11. The report suggested the local plan should protect these rural employment locations and adopt flexible policies through development management on a site specific basis in order to promote further growth.
12. The report did some indicate some concerns about the future supply of rural floorspace and it recommended a flexible approach to the extension of existing employment sites in the rural area and granting of planning permission for new employment development subject to market demand and site specific issues, in order to support he rural economy.

| | |
|------------|--|
| ii) | Where and how are the new employment land and jobs referred to in Policy SP3 to be delivered? |
|------------|--|

13. The Local Plan sets a target of 12,600 jobs over the Plan period which is based on the Strategic Employment Options Report (EBD04) baseline scenario. The SEOR then derives a future land requirement based on this jobs target of 70.9 hectares of land for B class uses over the period from 2010. Subsequent work on the Employment Land Review (EBD02) updated the land availability situation on key sites and revised the land requirement to a figure of 66 hectares for the period 2015 - 2030. The overall position in

Council's Response to Inspector's Issues and Questions

Issue 8

27 March 2018

terms of the supply and demand balance for employment space in quantitative and qualitative terms is set out in section 4 of the Employment Land Review.

14. The Local Plan concentrates employment growth within and around Ashford town and identifies a spatial approach that is set out in paragraphs 3.101 to 3.104 of the Local Plan. The identified challenge is to ensure that there is a choice of locations across the borough to support different business needs whilst meeting the overall target for land to generate the jobs identified in the SEOR (EBD04)
15. The Local Plan identifies four key strategic employment sites that are targetted at different types of employment provision that complement each other.
16. **Commercial Quarter – (para 3.105)** – the main business sector of the town providing large office space close to the domestic and international railway stations. The site is currently under construction and will comprise of the erection of a 6 storey building providing five floors of flexible office accommodation above a ground floor restaurant and cafe, and/or retail accommodation (Uses B1, A1, A2 and A3) with a rooftop plant enclosure plus a free-standing sub-station, cycle store and refuse store. There will also be 220 dedicated car parking spaces in total with 39 spaces immediately around the building and the remaining 181 parking spaces forming part of an extension to the Stour leisure Centre car park.
17. **Eureka Park – (para 3.106)** – a large office based business park close to junction 9 of the M20 where have been a number of phases of completed development for B1 uses. The potential remains for primarily office development with the area seen as a different to the offer in the Commercial quarter with lower density development in a landscaped setting. There is the potential to extend into other employment use such as light industrial and the role of Eureka Park is proposed to evolve with the introduction of higher quality residential, development on an extended site (Site policy S20). The site policy identifies an additional 20 hectares of commercial land in this location.
18. **Sevington** – (para 3.107) this site was identified in the Ashford Core Strategy and the Urban Sites and Infrastructure DPD as an employment site to cater for larger scale employment uses that are less suited to higher density, mixed use developments. There is a total site area of 38 hectares. Outline planning permission has been given, the details of which are set out in paragraph 3.108 of the Local Plan. The principal proposed use is large scale B8 storage and distribution with associated supporting uses. The site has excellent links to the M20 motorway and will be located directly adjacent to the new junction 10A.
19. **Waterbrook** – (para 3.111) this site lies relatively close to junction 10 of the M20 and is a large site that is identified for a mixed use development (site policy S16). The site lies adjacent to the existing Orbital Park commercial area, where there is currently limited land remaining to be developed. The Waterbrook site is capable of accommodating similar types of uses to those at Orbital such as smaller industrial, distribution, office and other sui generis uses to fulfil requirements that do not fit comfortably within the primary roles of the Commercial Quarter, Eureka Park or Sevington. The policy S16 identifies the site for 22 hectares of commercial development. Subsequent to the submission of the Local Plan a hybrid planning application has been submitted for the site for mixed-use development comprising (1) Application for full planning permission for the construction and operation of a 600-space truck stop; a 2,612sqm GIA service building providing

Council's Response to Inspector's Issues and Questions

Issue 8

27 March 2018

1,734sqm GIA of ancillary truck stop service facilities and 878sqm GIA of B1 offices; buildings providing 6,308sqm GIA of class B1, B2 and B8 floorspace for small and medium enterprises; associated access, parking and landscaping, including highway infrastructure works to Waterbrook Avenue and (2) Application for outline planning permission (with all matters reserved) for 8.9ha of employment uses comprising uses falling within use classes B1, B2 and B8, a class A1 superstore of up to 2323sqm, drive-through restaurants (use classes A3/A5), a petrol filling station and ancillary convenience store, and car showrooms (sui generis); and up to 400 residential dwellings, with class A1 neighbourhood retail uses, associated drainage, parking, landscaping and infrastructure.

20. The identification of the four strategic employment locations in the Local Plan is also supplemented by the more traditional industrial estates which contain a mix of employment generating uses. A number of these are covered by specific Local Plan site policies reflecting their relative significance and their previous status as part of the Ashford Urban Sites and Infrastructure DPD (GBD07)
21. **S21 Orbital Park** – recognising the previous importance of the site in delivering commercial development although there is limited space left to be competed and hence the significance of the adjoining Waterbrook site.
22. **S22 – Chart Industrial Estate** – recognising the important location of the area close to the town centre where there has been significantly improved accessibility.
23. **S23 - Henwood Industrial Estate** – there is limited space for new development here but there is potential for up-grading, improvement and replacement and this is reflected in the policy.
24. The detailed policies in Section B of the Local Plan, principally EMP1 and EMP2 deal with employment and commercial development in the urban area. Policy EMP1 promotes the provision of new employment uses and the redevelopment, enhancement and re-configuration of existing employment premises whilst Policy EMP2 deals with the proposed loss or redevelopment of employment sites and premises. These policies enable the Council to deal positively with employment proposals and the most recent AMR monitoring indicates that there was 21,800 square metres of B1- B8 floorspace with extant permission within the urban area, excluding the town centre, and principally concentrated around the existing and established industrial and commercial estates.
25. In terms of the Council's role in how jobs are being delivered the Council has pro-actively promoted the economic development of the borough and the Council's Corporate Plan 2015-2020 sets out the Council's priorities for delivery, which include the promotion and delivery of economic growth, including investment, jobs and skill levels. Priority 1 of the Corporate Plan is Enterprising Ashford: Economic Investment and Growth which sets out a number of actions that the Council is looking to deliver, these are:
 - A vibrant town centre and a supporting business centre
 - A range of jobs with an emphasis on increasing skills levels
 - Creating a new local plan that provides for economic growth by allocating sufficient space for new businesses and encourages a range of jobs, especially higher skilled jobs

Council's Response to Inspector's Issues and Questions

Issue 8

27 March 2018

- Well-planned and well-resourced infrastructure to maintain Ashford's prime location status.
- A thriving rural tourism economy and successful rural enterprise.

26. A big part of the economic success of the area will be facilitated through the Big 8 projects. These are:

27. **Ashford Commercial Quarter** – (see above) Developers Quinn Estates Ltd and George Wilson Holdings Ltd are taking forward the delivery of the first 80,500 sq ft office block, which will be completed and ready for occupation by May 2018. Alongside this development Ashford Borough Council own International House the largest office block in the Commercial Quarter. New public realm improvements around International House and Dover Place have also been completed. Ashford successfully applied to protect the Ashford Commercial Quarter Area from permitted development rights for conversion of office to residential, to retain this area as the Commercial Office Hub for the Town Centre.

28. **Junction 10a of the M20** - The future development of key employment area of Ashford has depended on new motorway junction capacity – specifically J10a of the M20. This project is now underway with the new junction due to open for traffic in August 2019. This facilitates the delivery of employment space at Orbital Business Park, Waterbrook, and the new Stour Park development at Sevington.

29. **Chilmington Green** - Outline planning permission was granted in October 2014 for a major new residential community that, subject to further planning consents, will see the development of up to 5,750 quality homes. There will also be schools and infrastructure, including major dualling of the A28, and the creation of over 1,000 jobs on the site in shops and education etc. in the next 20 years. Full planning permission has recently been obtained for the first 346 residential units on the site.

30. **Ashford Designer Outlet expansion** - The McArthurGlen-planned 100,000 sq ft expansion will attract up to 7 million visits a year, and delivering 500 further jobs within the centre. The expansion of the outlet centre will create stronger links to the station and having an offer that complements the town centre with different, significant retailers. Work has now started on the extension, with works due to be completed in the Autumn of 2019.

31. **Elwick Place** - Planning permission was granted in December 2015 for a town centre cinema offer with places to eat and drink around a new square and meeting place for the town centre. This first phase of the Elwick Place development opposite County Square Shopping Centre will help to bring extra vitality to the town during the day and evening. Work is underway and completion is expected by late 2018.

32. **Ashford New College Campus** - this is a new Ashford College Town Centre Campus offering further and higher education on a new £26m campus in a key location in the town centre. The college was taken over by Ofsted rated 'outstanding' Hadlow College on 1 August 2014. Phase 1 of the new college opened to students in September 2017 and was the first of the Big 8 projects to be completed.

Council's Response to Inspector's Issues and Questions

Issue 8

27 March 2018

33. **Javelin Way development and Jasmin Vardimon Centre** - A project to provide more cultural space for the Jasmin Vardimon Dance Academy to expand their offer, alongside new industrial space in Javelin Way is being lead by Kent County Council the owners of the development site. This project will bring forward both the Creative Laboratory and education space alongside 29 new industrial units.
34. **Ashford International Rail Connectivity Project** - This project has been delivered to provide a signalling solution for Ashford International Station, so that the next generation of Eurostar trains can stop at the station, as well as any future international operators. This secures International services for Ashford with the delivery of this project in Spring 2018.
35. Beyond the Big 8 projects Ashford has also been supporting the economic development of the area through a number of initiatives to stimulate business creation and jobs growth. These include:
- i) Scale Up Ashford – A tailored programme of intensive support for high growth companies in the area to stimulate indigenous growth. 6 companies completed the programme in 2017/18, with 10 companies programmed for 2018/19.
 - ii) Business Start-Up support and generic business support – The Council also commissions Kent Invicta Chamber of Commerce to provide start-up and generic support for businesses and residents in the Ashford area.
 - iii) AshfordFor Inward Investment Campaign – Ashford Borough Council have been developing the AshfordFor inward investment brand over the last 4 years to stimulate investor, developer and occupier enquiries for commercial space within the Borough. The success of this campaign can be seen by the delivery of space through the Big 8 projects, as well as investment from the likes of Champney's in Eastwell Manor Hotel, Curious Brewery in Ashford Town Centre, Industrial space being delivered at both Tavis House on Orbital Business Park and at Carlton Road in Cobbs Wood industrial estate.
 - iv) Ashford Broadband project – This has been assisting better broadband speeds for both residents and businesses through support of the roll out of the BDUK project including additional funding for rural areas, and stimulation of investment from other operators like Virgin Media through Project Lightning.
 - v) Rural Commercial Development and Tourism – Ashford Borough Council have been an integral part in the attraction of funding to support projects through the Kent Downs and Marshes Leader programme as well as the Marsh Million fund. This has provide grant and loan funding for businesses and projects to stimulate rural employment within the borough.
 - vi) Town Centre Regeneration – As one of the 27 original Portas Pilot towns, the Council has worked with businesses in Ashford Town Centre on a number of projects to support companies, increase footfall and reduce vacancy rates for shop premises. The Council also acquired Park Mall shopping Centre in Ashford town centre and have regenerated this area reducing the vacancy rates from 11 units to only 2 within the last few years.

Council's Response to Inspector's Issues and Questions

Issue 8

27 March 2018

| | |
|------|--|
| iii) | In criterion b) of Policy SP3 what is meant by the “appropriate retention”? What does the approach in criterion d) imply in practice and is it consistent with national policy? Is the impact of criterion e) sufficiently clear? How is the aspiration to improve workforce skills in criterion f) to be achieved? |
|------|--|

36. In terms of criterion b) of policy SP3, “appropriate retention” means that the Council would seek to retain employment uses unless policy EMP2 applies which specifies where the loss or redevelopment of employment sites would be acceptable. The NPPF stresses the importance of identifying a range of sites to facilitate a broad range of economic development and the Council's approach is to make specific policy provision for the retention of the existing stock of employment premises to complement the strategy of identifying areas for employment development. The Council acknowledges in the Plan that there may be circumstances where the continuation of an employment use on a site may be inappropriate. But otherwise, the Plan is clear that the loss or redevelopment of existing employment sites or premises will not be permitted unless certain criteria are met.
37. Criterion d) of Policy SP3 reflects para 83 of the NPPF that states that Local Plans should “Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth”. The Local Plan sets out the Council's overall strategic approach to employment development which has been based on initial work carried out but GL Hearn in their Strategic Employment Options Report (EBD04) which was supplemented by an employment land review that established an overall land requirement for the Plan period to reflect the jobs target in the SEOR. And the Plan goes on to set out a clear spatial approach that identifies key strategic employment areas in the urban area that is supplemented by the proposed approach in the rural area.
38. The Council's overall approach to the promotion of support for economic development is set out in the response to question (ii) above.
39. Criterion e) sets the overall context for the relevant EMP policies (EMP2, 3, 4 and 5) that deal with employment proposals in the rural areas.
40. In terms criterion f) on improving skills, the Council works closely with education providers and the business community to strengthen links between these organisations and progression into employment as well as continual development of the existing workforce and support Ashford College's Business Advisory Council. The Council has grant funded the new Ashford College to deliver out Phase 1 and 1a of their scheme and their aspiration to deliver out Phase 2 Higher Education provision.

Council's Response to Inspector's Issues and Questions

Issue 8

27 March 2018

| | |
|------------|--|
| iv) | Does the Retail and Leisure Needs Assessment (EBD03) provide an adequate assessment of comparison retail needs? |
|------------|--|

41. Yes, the Retail and Leisure Needs Assessment (RLNA) (EBD03) provides an adequate assessment of comparison retail needs. The assessment was conducted in 2015 by Carter Jonas and uses an approach that is consistent with the NPPF and PPG and has been used to support other Local Plans elsewhere. The key components of the methodology are summarised under section 7 of the assessment and include:

- A new household survey that identified shopping patterns for various categories of comparison goods. This allowed for a more detailed assessment of comparison market shares for the Borough, its various centres and competing centres. More information is contained within paras 4.4 to 4.8 of the RLNA.
- An assessment of the market share and retail capacity which was underpinned by the most up to date population and retail market forecasts available at the time. In particular, retail market forecasts were obtained from Experian Business Strategies (EBS) Retail Planner Briefing Note 12.1 (October 2014) which informs data on retail expenditure growth and retail sales growth. See pages 72 and 73 of the RLNA.
- The assessment was supplemented by estimates on retail sales densities and expenditure inflow into the study area based on comparable data and Carter Jonas's own expertise. See pages 77 of the RLNA which provides an overview of expenditure inflow, while an explanation of sales densities are referenced for committed development (pages 79 to 81 and paras 7.53 and 7.59 of the RLNA).
- An assessment of the turnover of pipeline comparison goods retail floorspace that provides detail on the retail schemes considered in the comparison goods assessment that inform the baseline capacity findings. See table 10 in appendix 8a of the RLNA.
- A review of the potential for existing vacant comparison retail floorspace in prime retail areas in Ashford Town Centre that could potentially accommodate some of the need identified. See paras 7.73 to 7.75 of the RLNA.

| | |
|-----------|---|
| v) | Should Policy SP4 set a target or requirement for the delivery of retail development both in Ashford town centre and at Tenterden and the other centres? |
|-----------|---|

42. The Council do not believe that it is necessary, in terms of the soundness of the Plan, to include retail targets or requirements in Policy SP4. Such targets are already clearly established in Table 2 and Table 3 of the Local Plan. However, should it be deemed useful to elevate these targets into policy, then the Council would have no objection.

Council's Response to Inspector's Issues and Questions

Issue 8

27 March 2018

vi) **Is there sufficient scope to meet the retail needs to 2030 identified in the Retail and Leisure Needs Assessment? Are specific allocations required to achieve this? Are the existing commitments and proposals in the pipeline likely to come forward during the plan period?**

43. The Council considers that the approach in the Local Plan is justified and that retail needs over the plan period will be met. It does not consider that specific allocations are required to cater for retail need as existing commitments and proposal in the pipeline will meet the needs identified, certainly in the short to medium term. In addition, a number of potential sites remain in the Town Centre area which could come forward for retail use in the future.
44. This position is reinforced through planning commitments secured since the RLNA was undertaken in 2015. The most notable retail commitments are set out below which quote net sales floorspace.

| | Food (sqm) | Non-Food (sqm) |
|--|---------------|-------------------|
| Non-food retail units. Cobbswood Industrial Estate | | 2,968 |
| Foodstore, Former Pledges Mill & South Kent College Site | 1,003 | 251 |
| Ashford DOC Extension | | 6,273 |
| Total Net Sales | 1,003 | 9,492 |

45. With regards convenience retail, Table 2 of the RLNA sets out that there is only limited need across the Plan period and the majority of this need is required between 2025 and 2030 where an overall residual figure of 1,127 m² net is identified. The table above shows that a total of 1,003 m² of convenience floorspace has been granted planning permission since 2015 which almost completely caters for the requirement identified.
46. With regards comparison retail, Table 2 of the RLNA sets out that this need is being met in the early parts of the plan but a 5,588 m² net need is identified by 2025. Much of the identified floorspace need is identified for the rest of the Borough, which is largely generated from out of centre retail schemes.
47. It should be noted that at the time of the Assessment, the extension to the Ashford Designer Outlet was not a committed scheme. However, its potential impact was assessed under paras 7.71 to 7.72 of the RLNA when it assessed likely trading characteristics and the likely future turnover of the scheme. This showed that the extension would effectively absorb the need identified by 2025 for comparison retail. The first phase of the extension to the Designer Outlet is currently under construction.
48. A further assessment of capacity then allowed for the re-occupation of existing floorspace in prime retail areas (i.e. in County Square and prominent units on the High Street) which would accommodate some of the identified need (see para 7.73 and 7.75 of the RLNA). This reduces the need for new comparison floorspace for the Borough (particularly in the Town Centre) which informed Table 3 of the Local Plan.
49. In summary, the above demonstrates that there is demand for retail development in Ashford and this is evident from the planned new schemes coming forward in the Borough since the completion of the RLNA in 2015. These schemes will cater for all of the capacity identified for both comparison and convenience retail up to 2025.
50. At this point, the Council will need to have formally reviewed the Local Plan in order to assess whether its objectives and policy targets are being met and it is at this point that the wider issue of meeting retail and leisure needs will need to be explored again. This approach is considered more robust than assuming now what the retail needs might be for the period between 2025 and 2030.
51. It is recognised within the industry that forecasting retail needs beyond five years is a

Council's Response to Inspector's Issues and Questions

Issue 8

27 March 2018

significant challenge given the various layers of assumptions and forecasts to identify need. Indeed, most recent forecasts on comparison goods expenditure (published in the latest EBS's Retail Planner Briefing Note 15 December 2017) identifies lower growth over the study period compared to those used to inform the RLNA in 2015. This reflects a general slowdown in the comparison goods retail market and re-affirms the need to treat longer-term capacity forecasts with a degree of caution.