

CPRE Kent

Brian Lloyd; Jillian Barr

Swale Borough Local Plan – Matter 3: Jobs and the Economy

3.1 Economic growth / building a strong economy and jobs target (4.4.25, ST2, table 4.2.2)

(i) Is the adoption of the higher economic growth scenario justified?

(ii) Is the job target for 7053 jobs (ST2) justified and deliverable?

1. Comment **LP234** submitted by CPRE Kent explains in detail the concerns about the likelihood of jobs being created at the rate proposed in the plan. Regionally there are clear targets for employment growth at Sittingbourne and Sheppey at the regional level, most recently set out in the South East LEP: Growth Deal and Strategic Economic Plan 2014 and the Thames Gateway Plan for Growth 2014 – 2020. The predictions in these plans for jobs growth are significant, but unreliable given existing infrastructure and environmental constraints, including issues of highway capacity.

2. CPRE maintains its view that the jobs target represented by the ‘higher economic growth’ scenario and indeed the above regional growth plans, remains unrealistic under current evidence. There is underlying and long term weaknesses in the Swale economy¹. It is not clear how allocation of land for employment purposes will change this situation. The most likely outcome of overly-ambitious targets and unrealistic targets would be either undeveloped land, or inward migration to fill the jobs that might be created. This is clearly something that Swale BC understands, since the suggested spur to the M2 to serve the Kent Science Park is not intended to improve accessibility for those living in Swale.

3. It is imperative that jobs targets in the local plan are realistic and take account of the fact that surrounding local authorities are similarly seeking growth. Competition, from elsewhere in the Thames Gateway, Ashford and Maidstone in particular, should have a significant moderating influence on the economic targets of Sittingbourne and Sheppey. The potential sources of competition are recognised in the Council’s Topic Paper 5, which makes the following statement:

“There are a number of major development proposals in adjoining districts, and

1. The SHMA (2015) document does, however, confirm the CPRE Kent view that the economy in Swale is weak at para 7.37, stating:

“Our more detailed testing of the Experian model draws similar headline conclusions. The local economy is weak in Swale. The labour market is not labour market constrained so providing more new homes (and a higher labour supply) will not deliver additional jobs”

Matter 3

ID429231

Representation

Numbers:

LP224, LP234, LP240,
LP243, LP253, LP262,
LP263, LP276, LP279,
LP280, LP282, LP283,
LP291, LP292, LP293,
LP294, LP295, LP296,
LP303, LP364.

elsewhere in Kent, some with potential to compete with Swale for future employment development. In terms of office space, significant emerging supply in Maidstone and Ashford is likely to be a threat. The large distribution sites in Medway – the Isle of Grain site (192 ha) with potential for port and distribution uses and the Kingsnorth site (66 ha) for industrial uses – could also compete to some extent with Swale for such firms. Other large developments in Kent, such as Kings Hill, Ebbsfleet and Crossways Business Park, appear unlikely to be major threats as they either serve different markets or are higher cost locations than Swale. No other Kent district has a Science Park although several have smaller scale, high technology innovation centres existing or planned”.

4. In view of the continued impact of constraints on growth, it remains necessary to reflect on the actual jobs growth experience in the Borough. In the Kent Economic Indicators 2015 (KCC, 2015) the total number of employees in the borough was calculated as 44000 in 2009, falling slightly to 43800 in 2015 (2013 dataset), suggesting no overall job growth during this period. Although these figures are substantially generated during a recessionary period (and a realistic job target should be generated for the plan), there must still be uncertainty in the extent of the economic recovery and caution in jobs growth targets is still necessary to ensure the plan is deliverable. In its comment **LP234** CPRE Kent suggests a job target of approximately 4000 for the period of the plan. This is appropriate given the record of growth in the Borough, the clear and significant environmental and infrastructure constraints and the impact of competition from ambitious (probably over-ambitious) growth targets across Kent. This is a challenging target and was broadly in line with the level of the baseline economic growth scenario in the SHMA update 2013.

5. According to KCC’s data, (<http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/population-and-census> downloadable spreadsheet) the increase in population in Kent between 2011 and 2031 is 48,100 (20 to 65 year-olds). Using the ONS average South-east participation rate of 81% (<http://www.ons.gov.uk/ons/rel/lmac/participation-rates-in-the-uk-labour-market/2014/art-1-overview.html#tab-Regional-and-international-comparisons>) gives an increase in the labour force of 38,961. So, putting it in context, Swale’s target of about 7000 jobs is about 18% of the entire increase for Kent.

6. CPRE Kent notes the new SHMA, published at the end September 2015. This investigates the implications of updated evidence base and a ‘re-based’ plan period, reflecting the likelihood of the plan being at least 5 years into the proposed plan period if adopted in 2016. CPRE understands the Council is currently preparing a commentary on the Experian employment forecasts supporting the new SHMA and CPRE **would like to reserve the right to respond to the conclusions**. It is clear, however, that a target to deliver 10,900 jobs over the period of the plan (643 per year) – the policy-off job creation potential - would be entirely unrealistic and over - optimistic. It would not have been properly tested by sustainability appraisal, nor public consultation.

7. CPRE notes recent (if unclear) announcements to carry out improvements to Junction 5, M2. CPRE Kent agrees that congestion at M2 Junction 5 does represent a constraint on growth and employment generation in the District. Limited details are available on what works are proposed, however, from which to make an assessment of the changes to capacity at the junction that will emerge. Further caution is needed because capacity is an issue elsewhere on the A249, and at Maidstone in particular (Southbound A249 at junction 7 M20 is also at capacity). Additional transport modelling / assessment will be required to determine what impact the proposed works will have on the capacity of the network generally, before this can be used to justify higher development targets. CPRE Kent is, therefore, concerned that limited improvements to junction capacity should not be used to justify growth without proper modelling evidence of its impacts, particularly if the relationship of the junction to the rest of the network has not been considered. A review

of the plan (once trigger points are reached) is a suitable mechanism to consider the implications of capacity improvements.

8. CPRE Kent notes the Council’s position statement (SBC/PS/031), following the publication of the 2015 SHMA. CPRE Kent is very concerned about potential increases in development targets, and believes that there are overwhelming environmental and infrastructure constraints, as set out in the Council’s December 2014 ‘Swale Development Targets’ topic paper that mean that this is not deliverable. At this late stage in the process, and in the absence of adequate evidence of the assessment of impacts, including transport assessment, HRA and SA/SEA, no significant changes to the targets should be proposed.

(iii) Are the floorspace and land requirements set out in Table 4.3.2 deliverable and based on robust evidence?

9. CPRE Kent recommends that a lower jobs target than that proposed by the Council would be appropriate and justified. It therefore follows that floor space needs will also reduce, although the Council must ensure a sufficient range of sites remain in the plan to ensure that the availability of suitable sites does not constrain delivery. CPRE Kent has considered this issue in its comments on employment and mixed use sites (see response to Matter 3.3 below and response to Matter 4.9(ii)). Representation **LP240** sets out the CPRE concerns that significant areas of greenfield land are being identified for development that need not be.

3.2 Economic growth distribution (ST3, 4.3.4 – 4.3.6, 5.1.7, CP1, 6.10).

(i) Is the approach to distributing the provision of new jobs across the two planning areas supported by evidence?

10. The differential distribution of jobs across the two planning areas is a necessary approach that reflects the regional economic growth plans, as well as the local constraints and needs. The South East LEP: Growth Deal and Strategic Economic Plan 2014 and the Thames Gateway Plan for Growth 2014 – 2020 are up to date plans indicating the focus for growth in the region. Growth potential associated with the Thames Gateway (national priority area for regeneration) is focused around four strategic corridors: including the A249 from M2 to Sheerness. It is therefore the west of the Borough that becomes the clear emphasis for growth and which will benefit from proposals in the Strategic Economic Plan, which include:

- Investment in infrastructure;
- Addressing market failures and low investor confidence;
- Increasing skills levels;
- Supporting business innovation.

11. It is also noteworthy that the west of the borough, as far as the science park, is included the ‘Medway-Swale-Arc’ which achieved Assisted Area Status in 2014.

12. There has historically been a distinction in development policy between the Swale Thames Gateway and the Faversham/ rest of Swale areas. The robust historic and current reasons for the difference in policy and

the reasons for the proposed distribution of jobs is set out in detail in the Council's Technical Paper No. 4. It is logical, and indeed essential that development of an appropriate scale is directed to areas that most need regeneration, and have a greater range of less constrained sites.

13. Although CPRE Kent supports the broad distribution of growth identified in the plan it does have concerns about the scale of job growth currently proposed, as explained in response to Matter 3.1.

14. Please note CPRE comments **LP243**, **LP253** and **LP262** make detailed comments on the Area Strategy Policies ST5, ST56 and ST7 respectively.

(ii) Is the approach to existing strategic employment locations consistent and effective?

15. CPRE Kent supports the Council's approach to Existing Strategic Employment Sites and our representations **LP263** and **LP364** makes detailed comments. The 'Existing Strategic Employment Sites' should be carefully defined and identified on the proposals map.

16. Two additional 'Existing Strategic Policy Sites' are identified at paragraph 8.1.27: The Port of Sheerness and the Kent Science Park. They are not, however, listed at paragraph 5.1.7, and paragraph 8.1.27 makes the statement that 'they do not form part of the Local Plan Strategy'. This is confusing and unhelpful. Sites that do not form part of the Local Plan Strategy and are not a local plan allocation should not be identified in this way.

17. Part 14 of Policy CP1 should be deleted. There is sufficient flexibility in the policy already at Part 5(a).

(iii) Does the identification of longer term opportunities "signposted" in 6.10 represent positive planning, with particular reference to the Kent Science Park and Port.

18. The Local Plan is used to guide decisions on development proposals. It would not be appropriate for the plan itself to make comments on the future of sites which are not part of the plan (**LP224**). This approach would result in predetermining the future of the sites without the proper scrutiny and safeguards of the plan-making process. The "signposted" sites are unlikely to have received much attention from the public and statutory consultees and the Council cannot be confident that it knows what the views of its stakeholders are. They will not have benefited from incorporation in the detailed SA/SEA process.

19. CPRE Kent explains in its comment (**LP303**) the reasons why Kent Science Park and Sittingbourne Southern Relief Road are both undeliverable within the time period of the local plan. They have little prospect of public funding support. Any development led proposal would require substantial release of development land and this should be pursued through a development plan. An approach which suggests (Policy ST2) that 'tangible progress' on one of the sites could trigger a review is unacceptable. This is contrary to the plan-led planning system and clearly not positive planning.

20. The Port of Sheerness, has also not been allocated in the local plan. Despite opportunities for regeneration, a long history of development proposals that have not been implemented, suggests there has been issues with site deliverability.

3.3 Employment Site Allocations (ST4, ST5, ST6, ST7)

3.3 (i) Should ST6 include reference to physical expansion of the Port?

21. Physical expansion of the port should not be included in the policy in the absence of an allocation for future development. There are uncertainties about future proposals and timescales for delivery. The approach the plan has taken to the Port is confusing. It appears to signpost the Port for future development at para 6.10.3, calls it a 'Existing Strategic Employment Site' at Policy ST6 and fails to list it as an 'Existing Strategic Employment Site' at Paragraph 5.1.7. It is also not defined on the Policies Map.

22. CPRE accepts there are opportunities for regeneration at and around the Port, but has concerns about the 'Longer Term Opportunities' approach taken in the plan (**LP303**).

3.3 (ii) Employment site allocations. A1: Existing Committed Employment Allocations

23. Comment **LP278**: No further comment.

3.3 (ii) Employment site allocations. A2: Land south of Kemsley Mill

24. Comment **LP279** sets out the CPRE representation to this allocation. There is no need to allocate this site for development and it should be deleted from the Plan for the following reasons:

- This is an open area of countryside;
- There are long views to the site across a sensitive and open marshland landscape;
- The heritage context is significant, close to the Castle Rough Scheduled Ancient Monument;
- The site is adjacent to The Swale SPA and the biodiversity interest of this locality is significant and sensitive;
- Noise and activity at the site could adversely affect the amenity enjoyed by residential properties nearby.

25. The benefits of extension to the Milton Creek Country Park and the implications of increased recreation use on the SPA would need to be carefully considered. Indeed, it is likely that the essential archaeological, design and ecological requirements of this site will have implications for the viability of development.

3.3 (ii) Employment site allocations. A3: Land south of West Minster, Sheerness

26. Comment **LP280** sets out the CPRE objection to this allocation.

3.3 (ii) Employment site allocations. A5: Land at Selling Road, Faversham

27. Comment **LP282**: This site is considered sound.

3.3 (ii) Employment site allocations. A6: Land at Graveny Road, east of Faversham

Comment **LP283**: This site is considered sound.

3.3 (iii) Mixed Use Allocation: Policy MU1- Land at North West Sittingbourne

28. Comment **LP291** sets out the CPRE Kent's objections to this site. The employment element to this allocation (Grove Hurst Farm to the north of the Swale Way) should be deleted. This land is an open and visible landscape, which forms an important separation function between the Sittingbourne and Iwade. The importance of this visible landscape is recognised in the Landscape Capacity Assessment, which confirms it is not suitable for large commercial buildings and recommends in the section titled 'guidelines and mitigation': 'maintain a buffer of open landscape between Sittingbourne and Iwade'. Proximity to the marshes to the north suggests that there may be habitat enhancement opportunities to extend wetland habitat in this location and that is supported by identified habitat network opportunities in the Landscape Character Assessment.

3.3 (iii) Mixed Use Allocation: Policy MU2- Land at North East Sittingbourne

29. Comment **LP292** sets out the CPRE Kent representation on this site. The employment element of this development has been permitted. This is now an allocation for residential development and the policy should be recast to this effect.

3.3 (iii) Mixed Use Allocation: Policy MU4 – The Oare Gravel Workings, Oare Road

30. Comment **LP293**: This site is considered sound.

3.3 (iii) Mixed Use Allocation: Policy MU5 – Land at Lady Dane Farm, Faversham.

31. Comments **LP294, LP295 and LP296** set out the CPRE Kent objection to development at this location.

3.3 (iii) Mixed Use Allocation: Policy MU6 – Land north of Graveny Road

Comment **LP297**: This site is considered sound.