

Planning and Transportation Policy Working Group	
Meeting Date	8 th August 2024
Report Title	Potential Local Plan Employment Sites Discussion
EMT Lead	Emma Wiggins, Director of Regeneration & Neighbourhoods
Head of Service	Joanne Johnson, Head of Place
Lead Officer	Natalie Earl, Planning Manager (Policy)
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. Members to discuss and note the potential employment sites available for allocation through the Local Plan; and 2. Members to recommend to Policy and Resources Committee their preferred sites for employment allocation for consultation through the Reg 18 Local Plan.

1 Purpose of Report and Executive Summary

- 1.1 The purpose of this report is to set out the potential employment sites that could be drafted into allocations in the Reg 18 Local Plan (LP).
- 1.2 As part of preparing the Reg 18 consultation document it is now timely for Members to discuss, and set out their preferences for, employment sites for allocation.
- 1.3 This discussion paper sets out the evidenced need figure for employment allocations through the Local Plan, and the available sites to meet that figure.
- 1.4 Providing the preferred employment sites for allocation in the Reg 18 LP will enable officers to complete strategic and site allocation policy writing and will also enable other pieces of evidence base such as Transport Modelling, the Sustainability Appraisal and Habitats Regulations Assessment to move forward.
- 1.5 The Employment Land Review Addendum 2024 recommended a need to allocate 73ha of industrial land and this report sets out the available sites across Swale that could meet that need figure.

2 Background

- 2.1 The recently agreed Employment Land Review Addendum (ELR) 2024 found an additional industrial land need requirement of 73ha – with a demand of 48ha, plus a margin of 25ha. This is a higher requirement than that of 2018 ELR which concluded that 41ha of industrial and warehouse land was required. The ELR suggested that the Council could view the 48ha (of new land) as the minimum needed for the plan period, with the higher 73ha requirement (inclusive of the 25ha margin) the target to aim for.

- 2.2 The unmet industrial need should be met by new site allocations. In considering sites to meet this need the ELR assessed sites for their suitability and attractiveness to the market. An important consideration for the supply of industrial land is ensuring as much as possible is on the western side of the Borough and particularly in Sittingbourne/Isle of Sheppey where demand is highest and land is most accessible to the Swale labour force and the strategic road network.
- 2.3 Informal discussions with members on the quantum of employment land to be allocated, resulted in officers looking for allocations to meet the higher figure of 73ha.
- 2.4 The ELR assessed all of the sites that were submitted through the call for sites for employment and it identified only a modest number of sites with good prospects. These total 17.7 ha – enough to meet half the minimum need, and these are mostly on the western side of the Borough. Ten ‘possibly suitable/deliverable’ sites are identified, and could collectively potentially provide almost 100 ha of employment development land. The ELR considered the borough’s general industrial needs over the Plan period could be met from a selection of these sites. The Council therefore have a choice of sites within this list as the Local Plan only needs to allocate a maximum 73ha out of the possible 100ha on the list in Table I in Appendix I.
- 2.5 The choices for employment sites need to be looked at in conjunction with the potential housing sites to ensure the LP is promoting sustainable development and to reduce unsustainable commuting levels and patterns.
- 2.6 It is recommended that:
- most of the sites in the table in Appendix I in the column titled ‘Good’ are put forward for allocation as the ELR has assessed those as being the most suitable of all of the available sites. If all those sites are chosen, they add up to 17.7ha.
 - the two large sites in Faversham (SBC17/094 and CFS50) are allocated only if those sites are also to be allocated for housing to ensure that they are sustainable, mixed use developments.
 - the remainder of the allocations are chosen from those sites in Sittingbourne, Sheerness/Queenborough and Rural West as they are in the area identified by the ELR as most in demand by the market.
 - Informal discussions with members have indicated that sites CFS47, 30 and CFS50 are potentially the most constrained. Removing those sites would leave a total of 72.8ha against a target of 73ha.
- 2.7 There are interdependencies between housing and employment allocations which mean a decision on employment land may need to be revised if a subsequent positive decision, at a future meeting, on a housing allocation is for a mixed-use

scheme which requires the employment element in order for it to progress (if this employment element was not initially favoured by members).

Offices

- 2.8 The requirement for offices has shifted significantly since the 2018 assessment. Both the demand for and the availability of office space remain low and broadly in balance, with the market serving essentially local businesses. The unmet need for new office floorspace is just 1.1 ha. The ELR recommends that the focus should remain on the refurbishment of existing stock and/or providing good quality flexibly industrial/hybrid space.
- 2.9 Due to the relatively small need figure there are choices to be made. The employment policies within the Reg 18 Local Plan could be written to actively promote the upgrading of existing offices, or 1.1ha of office space could be specifically allocated within one of the larger mixed use allocations once those have been agreed upon.
- 2.10 Another option is to not allocate any office space and to continue to allow the market to deliver the small requirement for office space through speculative planning applications, ensuring that they meet the criteria within the LP general employment policies and the criteria of Permitted Development (PD) rights. However, with increasing levels of office space being lost to residential through PD planning applications it may be considered worthwhile allocating the 1.1 ha to ensure that it is delivered.

3 Proposals

- 3.1 The proposal is that Members discuss and note the choice of potential employment sites for allocation which have been assessed through the ELR as good and possible (and are shown in the table in Appendix I) and recommend to Policy and Resources Committee their preferred sites for employment allocation for consultation through the Reg 18 Local Plan.

4 Alternative Options Considered and Rejected

- 4.1 Members could instruct officers to look for employment sites not currently assessed through the ELR but these would then need to be assessed with the same methodology used in the ELR and this could lead to a delay in the overall LP timetable as it would require work not currently timetabled. It is also unlikely that any significant sites would come forward due to the extensive call for sites undertaken and the detailed knowledge of the borough that the Economic Development and Planning teams have of the local economy who have both been unable to find any other suitable sites.

5 Consultation Undertaken or Proposed

- 5.1 The ELR is a piece of technical evidence and has therefore not been consulted on, however stakeholders can comment on its findings and how they have been interpreted at the Reg 18 stage of the LP consultation.

6 Implications

Issue	Implications
Corporate Plan	<p>The proposals in the report align with the following Corporate Plan action:</p> <ul style="list-style-type: none"> • A Local Plan with local needs and capacity at its heart.
Financial, Resource and Property	Through providing good quality employment space that meets the full demand, the Council will benefit through business rates and inward investment and through the provision of more employment opportunities for its residents.
Legal, Statutory and Procurement	Allocating an adequate quantum of employment land ensures the Council is meeting its statutory requirements as prescribed in the National Planning Policy Framework.
Crime and Disorder	No implications identified at this stage.
Environment and Climate/Ecological Emergency	Ensuring that the right employment is allocated in the right places to promote sustainable patterns of development could help to reduce out commuting and promote more sustainable patterns of commuting.
Health and Wellbeing	No implications identified at this stage.
Safeguarding of Children, Young People and Vulnerable Adults	No implications identified at this stage.
Risk Management and Health and Safety	No implications identified at this stage.
Equality and Diversity	No implications identified at this stage.
Privacy and Data Protection	No implications identified at this stage.

7 Appendices

7.1 The following documents are to be published with this report and form part of the report:

Appendix I: Table of potential sites assessed as 'good' or 'possible' in the ELR 2024

Appendix II: Map showing the spatial distribution of potential sites from Appendix I Table.

8 Background Documents

8.1 [Employment Land Review Update 2024](#)

8.2 [Employment Land Review 2018](#)