

Steve Scott Brown
Maidstone Borough Council
13 Tonbridge Road
Maidstone
ME 16 8HG

3rd December 2007

Dear Steve,

Kent International Gateway, Land West of Junction 8 M20, Maidstone

Thank you for consulting SEEDA on this application. We have the following comments.

SEEDA supports the principle of modal shift of freight from road to rail. Strategic Multi-modal freight interchanges are a key way of achieving this modal shift. They will help to achieve the transport target in the Regional Economic Strategy (Target 9) and particularly the aim expressed in the target to facilitate modal shifts. As a result they will enable the logistics industry to support continued economic growth in a sustainable way.

Multi Modal freight interchanges need large sites (40-400 ha according to SRA) and excellent rail and road access. Such sites are scarce and as a result potentially suitable sites need serious consideration. This is clearly one such potential site.

The logistics industry itself is a key component of future economic growth in the region. Logistics operators require increasingly large buildings to accommodate what is an increasingly automated, technology driven sector. Productivity increases driven by innovation and technological change are a key way of delivering Smart Growth in the south east economy, which is a key objective of the Regional Economic Strategy, and a key component of sustainable economic growth. The Transport sector in the region, of which logistics is an important part, is forecast to deliver above average improvements in productivity over the next ten years. Strategic multi modal freight interchanges will therefore contribute to delivering the modern logistics facilities required by the industry as well as contributing to modal shift.

There is limited spatial planning guidance about where such strategic interchanges should go in the South East. The most detailed policy, the SRA freight interchange policy (from 2004) advocates 3-4 such interchanges in the Greater South East, at points where the main road and rail routes intersect with the M25. The South East Plan (Policy T13)



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restates this in a less specific way and sets some operational criteria, but no further independent research has been carried out since the SRA policy was produced. A criteria-based policy also appears in the Adopted Kent and Medway Structure Plan (TP23).

In the light of these policies SEEDA has concluded that the applicant should be asked to provide more information before we can offer definitive advice to inform your consideration of the economic and operational impacts of the application. SEEDA's advice as to what this information should be and how it would help you determine whether the criteria in TP23 and T13 are met is as follows.

Firstly on whether the proposal is necessary and viable (TP23) and operationally well located (T13): The reason the SRA report recommended locations close to M25 is that the Interchanges envisaged by SRA are intended to be mainly "rail-in, road-out". Goods will be brought to the interchange by rail for onward distribution to the customer in the region by road. Therefore the further from the M25 the interchange is the more extra lorry miles will result, causing extra congestion, carbon emissions and cost to the industry.

This raises some questions about the Kent International Gateway site. Does it aim to meet the SRA criteria? If this is its aim, then what impact will the location almost 20 miles from M25 have on its performance against sustainability and operational criteria? The applicants argue that the main function will be intercepting rail freight from the continent via the CTRL corridor, and argue that gauge limitations prevent a location closer to the M25. This leads to the question of what expectations the applicants have about the onward transportation of the freight once "intercepted"? Is it the SRA model of regional road distribution, in which case we still need to understand in operational terms what the implications of this departure from the SRA preferred location is for operational viability and sustainability? If it is a different model then we need to understand what is anticipated. At present the supporting information provided by the applicant, though extensive, does not answer these questions sufficiently.

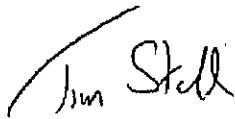
There is also the issue of required site size. In carrying out the alternative site search the applicants submission sets a minimum site size requirement of 50ha. The SRA report identifies a minimum site size requirement of 40 ha. We need to understand why the applicants consider that a higher minimum size is now required, as this could clearly reduce the available alternative sites.

The Structure Plan policy also requires an understanding of the economic impact. The applicant's submission concludes that the development will create 3,500 jobs. However this is based on a simple conversion of proposed floorspace into jobs using worker floorspace ratios. It is then compared with the number of unemployed people in Maidstone and Medway. This is not a robust economic impact assessment. We would expect to see a proper analysis of multiplier effects and substitution for example, and a proper assessment of where employees would be expected to come from, to understand local and wider impacts. In principle SEEDA is very supportive of proposals which

create substantial job opportunities, but we need to see a proper Economic Impact Assessment which verifies the likely impacts.

We recommend that you ask the applicants to provide more information about these issues, to enable us to understand how the proposal could help to deliver Regional Economic Development in a sustainable way, and assist in your understanding of whether the criteria in policy TP23 and T13 are met. When you receive this extra information we would wish to be reconsulted.

Yours sincerely

A handwritten signature in black ink that reads "Tim Stansfeld". The signature is written in a cursive style with a long, sweeping underline that extends to the left.

Tim Stansfeld

Head of Planning