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Response to Inspector's Issues & Questions: Matter 10 Response
Land East of Transfesa

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1 Introduction

1.1 Background

- 1.1.1 This Statement has been prepared by DHA Planning on behalf of the landowner of Land East of Transfesa in response to the Inspector's Questions on Matter 10 (Employment, Economic Development and Infrastructure) in respect of the Tunbridge Wells Borough Council Local Plan Examination.
- 1.1.2 The landowner is promoting a 20 acre parcel of land at Land East of Transfesa, Lucks Lane (part of Call for Sites site 218) that forms part of the employment allocations proposed for the expansion of Paddock Wood within Policy STR/SS1 and ED1.
- 1.1.3 The site is located within what is currently open countryside. However it is not located within the Green Belt or an AONB.
- 1.1.4 The site forms part of one of the proposed employment sites as identified in Policy STR/SS1(g), which also confirms that the site will be a Key Employment Area to which Policy ED1 will apply. It forms part of the Northern Parcel as shown on Map 27 of the Submission Local Plan (SLP).
- 1.1.5 The Council's SHLAA assessment concluded that the land is suitable for development, being adjacent to the existing Limits to Built Development and the existing Transfesa industrial estate. The parcel is considered in the SHLAA to be a logical extension to these uses in a sustainable location.¹
- 1.1.6 The site is flat, and there is a right of access from the adjacent Transfesa Industrial Estate to the west. A public footpath (WT253) runs north-south along the western boundary, and a further footpath (WT252) crosses the centre of the site in a west-east direction. These are shown on the footpath plan at **Appendix 1**.

¹ [Core Document 3.77](#) Site 218 p.50

2 Issue 1: Key Employment Areas

2.1 Introduction

2.1.1 Where relevant, we respond to the Inspector's questions as follows.

2.2 **Q1. What are the Key Employment Sites, how have they been defined and is their inclusion in the Plan justified by appropriate, up-to-date evidence?**

2.2.1 We fully support the identification of the proposed development site as a Key Employment Site. The Council's SHELAA site assessment confirms that the site is suitable for economic uses, as a logical extension to a Key Employment Area.² We can confirm that it is both available and deliverable.

2.2.2 The site is deliverable in the short to medium term and therefore represents an excellent opportunity to deliver meaningful new employment, and by providing the type of units for which there is currently the highest level of demand.

2.2.3 On behalf of the landowner, DHA have contributed to the initial masterplanning work already undertaken by David Lock Associates and have attended the Paddock Wood Strategic Sites Workshops held to date. Whilst a detailed scheme has not been drawn up at this stage, we can confirm that employment development at this site would be designed in accordance with the masterplanning work which has been carried out to date.

2.2.4 NPPF paragraph 82d requires planning policies *"to be flexible enough to accommodate needs not anticipated in the plan... and to enable a rapid response to changes in economic circumstances."*

2.2.5 Whilst residential developers and future occupiers benefit from a wide range of sites and locations, commercial developers and occupiers are often constrained to a much more limited range. If one or more large sites do not come forward as expected, or if allocated sites do not meet the commercial needs of potential occupiers (and indeed existing companies looking to expand locally), they can often find themselves without suitable options. As a result, they can either miss the opportunity to grow, by staying where they are, or they choose to relocate further afield. Rarely will they compromise by investing significant sums of money in sites which do not meet their needs.

2.2.6 This is recognised in the Council's Economic Development Strategy, which concludes amongst other things that a shortage of sites is a major constraint for local businesses and is a barrier to inward investment.

2.2.7 We therefore agree with the Council's proposed strategy of ensuring that, as well as providing a minimum quantum of employment development land, other factors are taken into account including the need to provide a range of types of sites; the spatial spread of the main centres of employment; the suitability, availability and achievability of sites; and the need to maintain a continuity of supply of sites and premises. The Local Plan cannot and should not be reliant on too small a number

² [Core Document 3.77](#) Site 347, p.95

of employment allocations which may, for a variety of reasons, be unsuitable to meet the needs of particular visitors and/or may not be delivered quickly (or indeed at all).

2.3 Q2. Are the boundaries of the Key Employment Sites accurately shown on the submission version policies maps?

- 2.3.1 The whole of the site falls within the Key Employment Site designation as shown on the Policies Map, which is considered accurate and correct insofar as it relates to this site.

2.4 Q4. Does the Plan help to create the conditions in which businesses can invest, expand and adapt as required by paragraph 81 of the Framework?

- 2.4.1 We welcome the approach taken by TWBC to ensure that a range of employment site types and locations are provided for within the plan. We also welcome the flexibility shown within Policy ED1 in relation to the range of employment uses allowed for. Both of these factors are essential in ensuring that businesses can invest, expand and adapt as necessary.

3 Issue 2: Employment Site Allocations

3.1 STR/SS1 – Land East of Maidstone Road and Land East of Transfesa Road, Paddock Wood

3.1.1 Where relevant, we respond to the Inspector's questions as follows, in relation to the proposed development site.

3.2 Q7. For each site, how has the scale of proposed development been determined and is it appropriate and justified in this location?

3.2.1 We have taken part in the Paddock Wood Strategic Sites Workshops and contributing to the David Lock Associates masterplanning exercise for Paddock Wood on behalf of the landowner. Whilst detailed proposals have not yet been drawn up at this stage, the proposed site and location would be suitable for an employment development to provide a range of Class E, B2 and B8 uses in accordance with both the emerging Local Plan and the Strategic Sites Masterplanning and Infrastructure Main Report.

3.2.2 The site's location adjacent to and accessed from the existing Transfesa Industrial Estate makes it a natural continuation of that existing development. Employment development is clearly appropriate and justified in this location.

3.2.3 The vast majority of the site is outside of Flood Zone 3, and over half of our client's ownership falls within Flood Zone 1, which has the lowest risk of flooding.

3.2.4 The Strategic Sites Masterplanning and Infrastructure Main Report identifies that sewage capacity and the existing network's propensity to flood during storm events is a known concern within Paddock Wood. Following consultation with Southern Water, it reports that there is likely to be a need to upgrade the sewage works capacity at Paddock Wood to accommodate planned growth. Whilst the scope of these works is as yet unknown, it could include additional land requirements taken from our client's site. Our client is agreeable to this in principle, on the basis that if some or all of the land is no longer required for this use, it should be allowed to be developed for further employment-generating development.

3.3 Q8. Is it sufficiently clear to decision-makers, developers and local communities the type and amount of development proposed on each site?

3.3.1 We consider that Policy STR/SS1 and its cross references to ED1 are sufficiently clear about what is expected. It is essential that, in order to create the conditions in which businesses can invest, expand and adapt, planning policies allow flexibility and do not impose unnecessary constraints.

3.3.2 Individual businesses can have significantly different needs and are unlikely to want to invest in new commercial floorspace unless they can be confident that their needs will be met. Too many local plans have sought to provide arbitrary constraints on employment building sizes, layouts and uses which then constrain the potential for the sites to meet the needs of some local businesses. For

example, some authorities have sought to introduce policies restricting employment uses on a site to a particular sector or development type which it would like to attract, but the reality is that such restrictions do little to encourage such uses to the site – rather they just prevent other perfectly acceptable uses from coming there instead.

3.3.3 We therefore applaud the approach being taken by TWBC to identify land as employment land for a wide range of identified uses, and to then allow the details to be determined through planning applications.

3.3.4 Any development must still accord with the other development management policies set out in the plan, and so the Council continues to retain full control to ensure that the proposed uses, layouts and design are appropriate for the site. Various other parameters must still be considered – including for example flood risk, landscape impacts and ecological habitats.

3.4 Q9. How will each site be delivered? Will they be tied to the delivery of new housing or developed individually?

3.4.1 There is strong existing demand for additional employment in floorspace in Paddock Wood and so we see no reason to prevent the employment sites coming forward without delay. The landowner is happy to work closely with the local authority to ensure that future proposals accord with the wider masterplan, for example by ensuring that pedestrian and cycle links through the site can be connected into the wider networks envisaged through the masterplan.

3.5 Q10. How will the proposed employment sites include pedestrian links from the proposed new areas of housing, as required by Policy STR/SS1? (especially land east of Transfesa Road)

3.5.1 The proposed Paddock Wood masterplan shown in the Strategic Sites Masterplanning and Infrastructure Main Report identifies a network of pedestrian routes linking the proposed new areas of housing with the rest of the town. This includes routes linking this site directly with the Church Farm residential area immediately to the south of the railway, partly via existing rights of way, as shown in Figure 3.1.



Figure 3.1: Extract from the PW masterplan showing pedestrian routes (white dashed lines)

- 3.5.2 The masterplan proposals show that the pedestrian routes through and alongside the East of Transfesa Road site follow the existing public footpaths shown at **Appendix 1**. These link quickly and directly to the existing footbridge over the railway, from where there are existing links directly to the town centre, railway station and Church Road via existing residential areas. The approved planning application for the Church Farm site shows pedestrian links into the same footpath network, close to the railway footbridge, in accordance with the masterplan.
- 3.5.3 Pedestrian connections are also already in place with the existing public footpath network running to the south of Swatlands Farm, albeit involving a very short section along Lucks Lane. Alternatively, pedestrian connections exist along pavements through the Transfesa Estate. Both routes will provide direct connections into the residential areas planned to the west of the town.
- 3.5.4 As a result, it is clear that the Land East of Transfesa is already well connected into the public footpath network, and these routes will be enhanced by wider development within the Paddock Wood masterplan area.