

Examination of the Tunbridge Wells  
Borough Local Plan

**Tunbridge Wells Borough Council**  
**Hearing Statement**

**Matter 10: Employment,  
Economic Development and  
Infrastructure (Policies STR5,  
ED1, ED2, ED3, ED4, ED5,  
ED6, ED7, ED8 and ED12)**  
**Issue 2: Employment Site  
Allocations**

Document Reference: TWLP/054



# Contents

AL/RTW17 – Land Adjacent to Longfield Road, Royal Tunbridge Wells.....	4
Inspector’s Question 1: [re. Land Adjacent to Longfield Road, Royal Tunbridge Wells].....	4
TWBC response to Question 1 .....	4
Inspector’s Question 2: [re. planning permission and allocation].....	8
TWBC response to Question 2 .....	8
Inspector’s Question 3: [re. limits of floorspace use class].....	10
TWBC response to Question 3 .....	10
Inspector’s Question 4: [re. site boundary].....	12
TWBC response to Question 4 .....	12
Inspector’s Question 5: [re. exceptional circumstances].....	15
TWBC response to Question 5 .....	15
Inspector’s Question 6: [re. impact on the AONB].....	19
TWBC response to Question 6 .....	19
STR/SS1 – Land East of Maidstone Road and Land East of Transfesa Road, Paddock Wood .....	26
Inspector’s Question 7: [re. Scale and location of employment development at Paddock Wood].....	26
TWBC response to Question 7 .....	26
Inspector’s Question 8: [re. type and amount of employment development] .....	31
TWBC response to Question 8 .....	31
Inspector’s Question 9: [re. delivery of sites].....	32
TWBC response to Question 9 .....	32
Inspector’s Question 10: [re. provision of pedestrian links] .....	33
TWBC response to Question 10 .....	33
AL/HA7 – Hawkhurst Station Business Park.....	35
Inspector’s Question 11: [re. type and amount of development] .....	35
TWBC response to Question 11 .....	35
Inspector’s Question 12: [re. need for employment land and buildings] .....	39
TWBC response to Question 12 .....	39
Inspector’s Question 13: [re. sustainable transport modes].....	41
TWBC response to Question 13 .....	41
Inspector’s Question 14: [re. impact on the AONB].....	43
TWBC response to Question 14 .....	43

Inspector’s Question 15: [re. site boundary] .....	46
TWBC response to Question 15 .....	46
AL/HA8 – March’s Field, Limes Grove, Gill’s Green .....	48
Inspector’s Question 16: [re. justification for employment uses].....	48
TWBC response to Question 16 .....	48
Inspector’s Question 17: [re. timescales for development on site].....	51
TWBC response to Question 17 .....	51
Appendix 1: AL/RTW 17 – Allocation and Permitted Scheme plan .....	54
Appendix 2: Paddock Wood & east Capel High Level Masterplans .....	55

# Matter 10 – Employment, Economic Development and Infrastructure (Policies STR5, ED1, ED2, ED3, ED4, ED5, ED6, ED7, ED8, and ED12)

## Issue 2 – Employment Site Allocations

### AL/RTW17 – Land Adjacent to Longfield Road, Royal Tunbridge Wells

#### Inspector’s Question 1: [re. Land Adjacent to Longfield Road, Royal Tunbridge Wells]

*How has the scale of proposed development been determined and is it appropriate and justified in this location?*

#### **TWBC response to Question 1**

##### Introduction

1. This site is currently an undeveloped greenfield site located adjacent to the existing Limits to Built Development, immediately adjacent to the existing Key Employment Area at Longfield Road. It lies to the east of the commercial area at Kingstanding Way.
2. Policy AL/RTW 17 – Land adjacent to Longfield Road, Royal Tunbridge Wells allocates the site for ‘Use Class E Commercial uses to provide approximately 80,000sqm (net) office (E(g)(iii)), General Industrial (B2) and Storage and Distribution (B8) to be provided in the form of a business park’.
3. The site has outline planning permission under [19/02267/OUT](#) for the development of up to 74,000sqm GEA of floorspace within use classes B1 and B8, including creation of a new vehicular and pedestrian access, cycle way, landscaping, ancillary café and associated works, which was granted in March 2021.

## Consideration

4. The site was assessed for development potential as part of the SHELAA process. The entirety of that process is covered in (Matter 5 Issue 1 (TWLP/021) and the conclusions relating to AL/RTW 17 are found in the appropriate SHELAA sheet [[CD 3.77n](#)] (pages 48-53), which concludes that *'the site is considered to be suitable as an employment allocation within the Local Plan subject to appropriate mitigation*. In terms of the reason for its allocation, detail is provided within the SHELAA sheet and includes reference to the site's ability to provide "significant economic growth..." and that *"the economic benefits of development in the area would outweigh the Green Belt and landscape/AONB harm and the vital role that this site can play in promoting economic growth"*. This is also confirmed with the Sustainability Appraisal [[PS 013](#)].
5. The Landscape Sensitivity Assessment (LSA) [[CD 3.40](#)] provides an assessment of this site with regard to its landscape setting, character, boundaries, visual character and historical character. The LSA concludes on page 97 that *'the sub-area's location between commercial development on Kingstanding Way, Longfield Road and the A21 means that it is relatively well contained visually, and already significantly influenced by built development and traffic movement'*.
6. The LSA recognises that large-scale development on the rising ground within this site would have a greater impact upon landscape character than the existing commercial development, concluding that the site would have a medium high sensitivity to large-scale development. However, this site is only one of two around Tunbridge Wells itself, which the LSA considers would have a medium-high sensitivity to large-scale development, with the remaining sites having a high sensitivity. The approved outline scheme (19/02267/OUT) included its own Landscape and Visual Impact Assessment and followed a landscape-led approach in its design in order to provide a character to the development which is sympathetic to its setting. The planning permission also controls the overall building heights and development plots in order to minimise visual and character impacts.
7. The Landscape and Visual Impact Assessment [[CD 3.102b\(i\)](#)] prepared to inform the Local Plan considered this area and is referred to in more detail in response to Question 6 below.

8. The Economic Needs Study (ENS) [[CD 3.25](#)] provides the evidence and justification for the inclusion of this site within the Local Plan, and further detail is set out below. In relation to the appropriateness of the site, it is recognised by the Council that the site, although justified by its location and for the reasons set out below, is within a sensitive location within both the Green Belt and the High Weald AONB. Questions 5 and 6 below provide response to these two issues.
9. Within section 9 of the ENS [[CD 3.25](#)] a 'Site Assessment' is carried out which assesses the existing employment land portfolio across Tunbridge Wells borough and identifies any possible new employment sites/locations to meet the identified need. This assessed the existing North Farm/Longfield Road Key Employment Area. The summary at paragraphs 9.66-9.70 outlines the sites/locations with potential for development expansion. This includes the expansion of the North Farm/Longfield Road KEA at land to the east of Kingstanding Way and the area termed the '*A21 Corridor*' as "*providing an excellent opportunity to provide additional employment land for Tunbridge Wells*"..."*with a lack of expansion zones around existing employment locations this could be an exciting advancement for Tunbridge Wells' future employment aspirations*".
10. Within the 'Policy recommendations' section, at paragraph 10.27 of the ENS [[CD 3.25](#)] advised that there was the potential for the expansion of a number of the Key Employment Areas, including 'suitable land adjacent to Longfield Road/North Farm at Royal Tunbridge Wells'. Furthermore, paragraph 10.29 details areas of the borough where new supply (economic land) would be met with demand and include amongst others:
  - Areas close to the main arterial roads (such as the A21), where accessibility to the highway network for business operations is quick;
  - Areas which have a critical mass of employment uses and amenities. These areas will be attractive to investors and occupiers, as the highway and public transport infrastructure will be already in existence.
11. Paragraph 10.30 of the ENS [[CD 3.25](#)] also refers to the A21 corridor continuing to be a focus for transport investment and the allocation of new sites in the area having the potential to significantly improve the choice of sites to the market and create the flexibility to respond to the needs of occupiers and investors.

12. The Economic Development Topic Paper for Pre-Submission Local Plan, March 2021 [\[CD 3.84\]](#) also considers this site at paragraphs 4.23-4.24 and recognises the benefits that the site provides in this location.
13. In terms of the scale of the proposed allocation, as referred to above, the site was submitted and considered through the SHELAA process. The entire site that was submitted for consideration measures 36.72 hectares; however, it has been determined that 13.4 hectares constitutes the developable area as set out within Table 5 of the Local Plan 'Employment allocations identified in the Local Plan'. This equates to approximately 74,000 sqm of employment floorspace. It is recognised that this is a significant scale of development in this location; however, the evidence and justification for this allocation, and in particular recognition of its beneficial location adjacent to the existing commercial area and proximity to the highway network, is provided above. Notably, also as referred to above, and discussed in more detail below, this site has existing planning permission for economic uses and the scale was considered as part of the rigorous planning application process.
14. This site therefore forms a significant employment allocation within Royal Tunbridge Wells, and it provides employment and economic growth serving a wider area and is recognised as such at the supporting text at paragraph 4.25 and within Policy STR 1 – The Development Strategy of the Local Plan. At bullet point 5 of this policy, it is highlighted that to achieve the broad development strategy for the borough, the Local Plan '*...should provide for a prestigious new business park to the north of North Farm, Kingstanding Way, Royal Tunbridge Wells, well connected to the improved A21*".

## **Inspector's Question 2: [re. planning permission and allocation]**

***How does the allocation relate to planning permission Ref 19/02267/OUT?***

### **TWBC response to Question 2**

#### **Introduction**

15. As referred to above in response to Question 1, this site benefits from planning permission under [19/02267/OUT](#), which was granted in March 2021. This is for the development of up to 74,000sqm GEA of floorspace within use classes B1 (Business) and B8 (Storage and Distribution), including creation of a new vehicular and pedestrian site access, cycle way, landscaping, ancillary café (A3) and associated works.
16. The allocation of the land covered by AL/RTW 17 provides for use class E Commercial uses to provide approximately 80,000sqm (net) office (E(g)(iii), General Industrial (B2) and Storage and Distribution (B8) to be provided in the form of a business park.
17. The permitted outline scheme broadly reflects the allocation provided for by Policy AL/RTW 17. However, as illustrated on the plan provided at Appendix 1 – The area of land covered by the allocation for built development is smaller and doesn't include a narrow strip of land to the north of the site (that is included for built development within the permitted scheme). For the allocation boundary and the area considered suitable for built form was based on the findings of the Landscape and Visual Impact Assessment [[CD 3.96b](#)] work which led to the areas of land deemed appropriate for allocation. However, the planning application that was brought forward, included significant and more detailed evidence and justification, including landscape evidence that demonstrated Very Special Circumstances for that development which was accepted through the planning application process.

#### **Consideration**

18. The application for this site was submitted to the Council in August 2019 and the range of issues and constraints evident on the site were considered by the Planning Committee. In the [officer's report](#) to the Committee a detailed appraisal was carried out of the proposals considering; Principle of Development, Emerging Policy, National Policy, Sustainable Development, Impact upon archaeology and heritage assets, Trees,



Drainage, Layout and Design, Ecology, Residential Amenity, Impact on AONB, Impact upon the Green Belt, Highways and Parking and Other Matters, reflecting the range of issues relevant to the determination of the site, taking into account the constraints evident.

19. In the report's conclusion, it considers the following pertinent points:

*“In conclusion, whilst the proposed development is major development that is considered to cause harm to the landscape and AONB by virtue of the introduction of new build development on the site, when assessed against the requirements of para 172 of the NPPF, and having particular regard to the emphasis in the NPPF and NPPG on supporting sustainable development and contributing to the delivery of economic uses, this harm is considered to be outweighed by the significant economic benefits which would be delivered...The significant economic and public benefits would constitute Very Special Circumstances which would outweigh the impact upon the openness of the GB...”*

20. Since planning permission was issued in March 2021, there have been ongoing discussions with the developer relating to the next phases for the commencement of the development. Recent discussions have included draft designs for phase 1 as well as more detailed discussions planned this year. U&I, part of Landsec, are an established employment developer, and recent communication with U&I has confirmed its clear intention to deliver the development.
21. Whilst the site benefits from planning permission, development has not yet commenced on-site, as referred to above, and therefore the allocation as drafted provides the appropriate framework for any future proposals or amended proposals to be assessed against.

## Inspector's Question 3: [re. limits of floorspace use class]

***Does the Plan seek to limit the floorspace for each use class, for example, the amount of new office space?***

### **TWBC response to Question 3**

#### **Introduction**

22. Policy AL/RTW 17 allocates the site for 80,000sqm of floorspace, to include office (E(g)(iii)), General Industrial (B2) and Storage and Distribution (B8) to be provided in the form of a business park.
23. As previously referred to, the permitted scheme ([19/02267/OUT](#)) is in general conformity with Policy AL/RTW 17.

#### **Consideration**

24. Although the permitted scheme for the site is in accordance with Policy AL/RTW 17, it is set out within the outline planning permission that there are limits on the amount of each type of floorspace that is permitted. This is set out within paragraph 2.03 of the [officer's committee report](#), which states that the makeup of the development would comprise; no more than 47,700sqm of B1 floorspace within the site accommodated across five designated plots (plots 1, 5, 6, 8, 9, 10) as shown on the submitted parameter plans, no more than 26,100sqm of B8 floorspace within the site accommodated across four designated plots (1, 2, 3, 4) as shown on the submitted parameter plans, up to 200sqm of A3 floorspace within the site. The parameter plan shows that this would be focused at one centrally located plot (plot 7) and will comprise a café/bike storage facilities for use by future occupiers of the site. A condition is also imposed to secure these amounts as maximum limits of each floorspace, although with a potential uplift to a maximum of 37,000sqm of B8 floorspace within the overall limit of 74,000sqm (condition 4 of the [decision notice](#)). This is to allow some flexibility for the developer to react to market conditions and provides the ability of the scheme to adapt appropriately to meet the economic need.
25. Therefore, it can be seen from the above, that the Local Plan as drafted does not limit the amount of floorspace for each use class as per the permitted scheme. This is in order to allow flexibility over the plan period; should an alternative scheme come

forward for the site it could be considered at the appropriate time and the mix of employment uses assessed taking into account current circumstances at the time.

26. If, however, the Inspector is minded to include further detail on the precise quantum of different employment uses to be provided for within the allocation, or a limit on the different use classes, this could be considered and included as a modification to the policy if necessary.

## Inspector's Question 4: [re. site boundary]

***What is the proposed site boundary based on, and why does the allocation include land to the north which is not proposed for new development?***

### **TWBC response to Question 4**

#### **Introduction**

27. The allocation within the Local Plan provides for employment uses as set out within Policy AL/RTW 17; however, in the introductory text to the policy it makes it clear at paragraph 5.105 that *"The northern part of the site falls within Capel Parish; however, this part of the site is not proposed to be developed but retained as open space/buffer to the built development"*.

#### **Consideration**

28. The whole site is included within the SHELAA [\[CD 3.77n\]](#) and pages 48-53 relate to the site assessment of this area and confirms the site area that was submitted for consideration for allocation within the Local Plan. The site assessment sheet is clear on page 53 of the SHELAA, when considering the wider site area, that *'The top northern section of the site would not be considered suitable for built development due to the harm to the Green Belt, AONB and ancient woodland in this location'*.
29. Paragraph 5.105 refers to this area as detailed above - the northern area as shown on Map 17 – Site Layout Plan for AL/RTW 17 (which falls within Capel parish, albeit immediately adjacent to the boundary with Royal Tunbridge Wells) shows this area as falling within the allocation boundary, yet specifically being allocated as an area of Open Space and Landscape buffer. Criterion 5 of Policy AL/RTW 17 refers to this and states *"No built form to be located within the areas indicated on the site layout plan as open space and buffer, which are to be retained and managed for the lifetime of the development to provide mitigation for landscape and biodiversity effects"*.
30. The stage 2 Green Belt Study (CD 3.43bi page 8) identifies most of proposed area for built development as parcel TW4 with only a small part to the north beyond this indicating the potential for greater harm to the Green Belt from releasing the wider land to the north. The Landscape Sensitivity Study [\[CD 3.96b\]](#) identified an identical area as

a separate parcel PE3 rating it as a Medium-High level of sensitivity with land to the north (Pe1) as having a High sensitivity to large scale development. These studies predicate against releasing land to the north for built development.

31. The LVIA for this site [CD 3.96b page 18] recommended a slightly more restricted area than the Green Belt Parcel limiting development to a line of trees and Public Right of Way to limit harm to the wider AONB landscape and which could if enhanced form the northern boundary to built development.
32. The approved application for built development on this site went slightly beyond the area allocated for built development on the northern boundary. The wider area of landscape buffer/open space was included within the application for landscape and biodiversity enhancements making a positive contribution to AONB Management Plan Objectives and providing for a biodiversity net gain and as such contributed to the Very Special Circumstances that led to the approval of the permitted scheme. This is secured via condition of the consented scheme.
33. The Development Strategy Topic Paper for the Pre-Submission Local Plan, February 2021 [CD 3.126] provides helpful commentary on the approach to sites allocated within the Green Belt. Table 5, page 66 of this Study identifies additional site-specific factors, which includes Green Belt Outcome, mitigation and rationale. This makes it clear that in relation to this site, only part of it should be removed from the Green Belt, with the following explanation: "*The northern section is not to be built on and will remain in the Green Belt and the boundary will be drawn following a block of woodland running along the northern edge of the open grassland*". It also refers to a "*Strategic landscape scheme – the northern section of this allocation contains important features for landscape and ecology and is included in the allocation for landscape and ecological mitigation and is not to be built on*".
34. The approach to this site is therefore clear; that the northern section of the site should form part of the allocation but is neither allocated for built development nor to be removed from the Green Belt.
35. It is considered that it is necessary to include this area within the site allocation to ensure that the enhancements and compensatory improvements in relation to landscape, biodiversity and the Green Belt are provided for alongside the built

development to provide mitigation for any adverse effects. This aligns with the approach taken within the planning permission for this site ([19/02267/OUT](#)), subject to slight difference in development to the north, as explained above.

## Inspector's Question 5: [re. exceptional circumstances]

***Do exceptional circumstances exist to alter the Green Belt boundary in this location, having particular regard to paragraphs 140 – 143 of the Framework?***

### **TWBC response to Question 5**

#### **Introduction**

36. The Council's case for exceptional circumstances for the release of Green Belt as part of the overall spatial strategy is set out in response to the Inspector's questions on Matter 3, Issue 1 Spatial Strategy Questions 7 to 9 [[TWLP/014](#)], but in particular Matter 4 Principle of Green Belt Release Issue 3 Exceptional Circumstances Question 1 [[TWLP/018](#)].

#### **Consideration**

37. The responses to these questions refer the Inspector to the Development Strategy Topic Paper [[CD 3.126](#)] section 'I – Exceptional Circumstances for Green Belt releases'. The strategic exceptional circumstances for Green Belt release are set out at paragraphs 6.183 to 6.185 and are not repeated here. At paragraph 6.187 the Topic Paper identifies those site-specific issues that may be taken into account as part of exceptional circumstances, which include:
- The level of harm to the Green Belt that is likely to arise from the specific release
  - The predicted harm to adjacent remaining Green Belt
  - Localised need issues
  - Site specific measures available to ameliorate any harm
  - The context and nature of the site such as areas of previously developed land, site condition and locational advantages.
38. The Green Belt study Stage 1 [[CD 93a](#)] identified a parcel (TW4) for further study at Stage 2 which encompasses most of the proposed allocation and all of the proposed built development as well as a wider area between the existing industrial estate and the A21 (pre widening). The report identified that a key stage 2 consideration (page 39) was

the “*relationship between settlement and countryside with reference to the barrier role of A21*”.

39. The stage 2 Study Appendix A [\[CD 93b\(v\)\]](#) assessed the same parcel as TW4 against Green Belt Purposes and found a weak or no contribution to Purpose 2 (prevent neighbouring towns from merging), a relatively weak contribution to Purposes 3 (safeguarding countryside from encroachment) and 4 (setting of historical towns) and a moderate contribution to Purpose 1 (check the unrestricted sprawl of large built-up areas). Based on the highest ranking purpose, Purpose 1, check the unrestricted sprawl of large built-up areas, the report concluded an overall harm rating of moderate as shown on figure 6.5 page 33.
40. The site specific assessment sheet (page 9) notes that “*works to widen the A21 along the eastern edge of the sub-area are in progress*” and so the assessment has taken account of this and concludes in relation to Purpose 3 Assist in safeguarding the countryside from encroachment, that “*the parcel relates more strongly to the settlement than to the wider countryside*”. The conclusion under Green Belt Boundary Strength is that “*the A21 would constitute a stronger boundary to the east and the edge of Well Wood to the north coincides with Prowles Gill, a valley which marks the Green Belt edge on the adjacent industrial estate*”.
41. The Green belt study Stage 3 [\[CD 3.93c\]](#), assessed the release of the allocation as AL/RTW 12 (some site numbers changed in the Submission version of the Local Plan) which is a smaller area than the parcel and provided guidance on mitigation including for “*no built development to be located within areas indicated for open space and buffers*” to the north.
42. The Green Belt Study Stage 3 concluded at 4.15:
43. “AL/RTW12 makes a Relatively Strong contribution to checking the unrestricted sprawl of the large built-up area and to preventing encroachment on the countryside, and a Relatively Weak contribution to preserving the setting and special character of Tunbridge Wells. The impact of its release on the adjacent Green Belt will be Negligible. Harm resulting from the release of AL/RTW12 will be Moderate”.



44. This confirms the likely harm resulting from the release predicted at Stage 2 and contributes to the site specific information that supports the proposed Green Belt release.
45. The Development Strategy Topic Paper [[CD 3.126](#)] identifies additional site-specific factors in Table 5, page 68, which includes 'Green Belt Outcome', 'Mitigation' and 'Rationale'. 'Green Belt Outcome' and 'Mitigation' are detailed further in response to the Inspectors question above – Question 4 in relation to the justification for the site boundary and the inclusion of the northern part of the site. In terms of 'Rationale', the following is stated: *“Provides employment in sustainable location; A21 provide strong MGB boundary; Well Wood to north marks Green Belt edge on adjacent development.”*
46. Furthermore, paragraph 6.201 provides commentary on the Exceptional Circumstances to alter Green Belt boundaries of the Green Belt or to remove land from the designation in order to enable the Local Plan to include proposals for development in the Green Belt. Bullet point 4, states the following in reference to 'Extension to the main urban area of Royal Tunbridge Wells and Southborough (including in association with other sites not located in the Green Belt):
- “These are to deliver employment land to meet strategic development requirements in the Local Plan as well as land for leisure and recreation. This reflects the outcome of the Economic Needs Study (ENS) that recommended the expansion of Key Employment Areas, including that at North Farm/Longfield Road in Royal Tunbridge Wells. Additionally, the ENS recognised the area around the A21 Highway improvements as a location for significant growth potential. Both of these areas are predominantly located within the Green Belt”.*
47. The new Green Belt boundary in this location will be drawn around a block of woodland running along the northern edge of the open grassland. Additionally, the commentary in Table 5 of the Development Strategy Topic Paper for Pre-Submission Local Plan [[CD 3.126](#)] states that the site is adjacent to RTW safeguarded land at Colebrook House and there is a small strip of land between the two which, in order to provide a strong Green Belt boundary, will be removed. This will need to be considered in light of the Councils review of the safeguarding of the land at Colebrook House for employment use following discussion at earlier hearing sessions.



## Inspector's Question 6: [re. impact on the AONB]

***Does site allocation AL/RTW17 represent major development in the AONB, and if so, is it justified? How have the potential impacts of development on the character and appearance of the area, including the AONB, been considered as part of the plan-making process?***

### TWBC response to Question 6

#### Introduction

48. The Council has concluded that this is major development as defined by paragraph 177 of the NPPF. As referred to at paragraph 5.108 of the Local Plan, the site allocation AL/RTW 17 is located within the High Weald AONB and there are also areas of ancient woodland, as well as some trees with Tree Preservation Orders along the western boundary of the site. This is a large scale development fully within the AONB: the conclusion that it is major development has been agreed with Natural England.
49. The Council's strategic approach to development within the AONB, how it has approached the question of whether sites are major development or not, and whether major or other development within the AONB is justified at a strategic level and indeed how impacts on the AONB have been taken into account, is set out in response to Matter 2, Issue 1, Questions 5 AND 6 [[TWLP/011](#)]; Matter 3, Issue 1, Questions 6 and 9 [[TWLP/014](#)]; and Matter 5, Issue 1, Question 3 [[TWLP/021](#)]. The response to this question should be read in conjunction with those responses but addresses more directly the site-specific circumstances.

#### Consideration

50. The overarching consideration of 'exceptional circumstances' is set out in the Development Strategy Topic Paper [[CD 3.126](#)]. Section H, paragraph 6.150 and some of the site-specific matters that contribute to 'exceptional circumstances' are set out in Appendix 3 Table 10 and further site-specific measures are set out in response below:
- Major Development
  - Landscape/AONB assessment and considerations
  - Sustainability of the settlement of Royal Tunbridge Wells

- Economic need
- Other benefits
- AONB exceptional circumstances summary and conclusion

## Major Development

51. The Development Strategy Topic Paper [[CD 3.126](#)] Section H sets out the approach to development in the AONB, including the approach to determining whether sites are major or not (paginated page 48, electronic page 52), setting out the factors to be considered in determining whether sites are major, reflecting footnote 55 (now 60) in the NPPF. The methodology for the assessment of major/not major is set out in its Appendix 2, and the assessment of individual site allocations, as well as the cumulative findings, by settlement, are set out at Appendix 3.
52. Appendix 3, Table 10, on pages 110-111 of the Topic Paper gives the assessment for site AL/RTW 17, noting that in terms of ‘scale’ it is ‘very substantial’; in regard to ‘setting’ it is considered to be ‘reasonably related’, and in terms of ‘impact’ it would have a ‘high impact’. It also refers to the fact that the allocation would include large-scale buildings in an elevated location on the edge of Royal Tunbridge Wells with AONB features and undulating topography. However, it also refers to the fact that the site is adjacent to existing industrial development which exhibits some urban fringe issues and recent landscape/ecological mitigation as a result of the dualling of the A21 and associated works. It also recognises that there is ancient woodland which should be protected and enhanced. The LVIA conclusion is deemed to be ‘Medium/Low harm’
53. The conclusion drawn in Appendix 3 (final column) notes that the allocation is considered to constitute ‘Major’ development and states the following:

*“Very large site on the edge of the settlement close to ridge. Although significant changes in topography are expected boundary features to be retained.*

*Significant landscape and ecological mitigation area to the north close to PROW. Policy to control building heights.*

*One of very few sites close to existing industrial area of RTW that can provide the required economic land and meets the requirements of one of the largest employers in RTW”.*

### **Landscape/AONB assessment and considerations**

54. The Council’s Landscape Sensitivity Assessment of Countryside around Tunbridge Wells, February 2017 [[CD 3.102b\(i\)](#)] provides an assessment of the extent to which the character and quality of the landscape within the study area is, in principle, susceptible to change as a result of introducing particular types of development into certain landscape character areas. What the Council considers to be the suitable area for built development of allocation AL/RTW 17 is included within Sub-area Pe3 (electronic pages 20-22), which concludes that overall sensitivity to large development is medium-high and the sensitivity conclusions state the impact as *“Large scale development on this rising ground would have a greater impact on landscape character than the adjacent commercial development on lower ground to the west, which although prominent locally has a sense of being contained within the landscape rather than dominating it, so there is a medium sensitivity to medium-scale development and medium-high to large-scale development”*.
55. The Sensitivity Assessment provides guidance in mitigation and enhancement in the last text box on page 76 and states the following: *“Planting/landscaping should be used to maintain separation between commercial and residential development. Woodland planting should be used to restore screening from A21 where this has been lost to road widening, but consideration should also be given to the ‘gateway’ location of the A21/Longfield Road junction, and any opportunities to enhance the relationship between this area and the surrounding landscape”*.
56. The policy wording for this site incorporates these recommendations.
57. To assist with the Council’s assessment as to the suitability of the sites for inclusion in the Local Plan, all sites considered to be major in the AONB have been subject to an independent LVIA, which also considered any cumulative effects on the host settlement [[CD 3.96](#)].
58. The executive summary in the main report [page 1 of [CD 3.96a](#)] sets out the assessment process which includes:

- Background information (baseline).
  - Description of the proposed development.
  - Description of the likely effects on landscape and views.
  - Advice on mitigation.
  - A conclusion which advises whether the site with mitigation is suitable for development and whether additional policy wording needed.
  - An assessment of any cumulative effects on the AONB.
59. The work includes a study of the settlement context and settlement evolution, review of landscape character, historic landscape characterisation and landscape sensitivity and specifically identifies within each site the components of natural beauty and the likely effects upon them.
60. Both Natural England and the High Weald AONB Unit were consulted on the development of this methodology.
61. In summary, the conclusion reached in the site-specific assessments [[b page 20](#)] was: *“The development of the site in conjunction with the proposed mitigation (including restrictions on building heights) could be achieved without residual significant landscape or visual effects (from publicly accessible viewpoints). There is considerable potential for the open space proposals within the allocated site to enhance the landscape of the AONB”.*
62. The overall conclusion in the main LVIA document ([CD 3.96a](#)] (page 18) is presented in table form and predicts that the potential harm to the AONB would be reduced in level from that predicted at Regulation 18 stage as Medium to Medium/Low if recommendations within the LVIA report are followed. The LVIA work has informed the allocation and the policy wording, including the provision of a significant landscape buffer to minimise any adverse effects and to provide enhancements.
63. Having set out that the Council considers the site to constitute major development, the following sub-headings explain the ‘exceptional circumstances’ to justify the proposed development in the AONB.

## **Sustainability of the settlement of Royal Tunbridge wells**

64. In terms of the location, the site abuts the Built Development at its western boundary to Royal Tunbridge Wells, the main settlement within the borough. The site lies to the north of the Longfield Road Key Employment Area, linking Royal Tunbridge Wells with the A21. The site offers good connectivity with the main highway network travelling both west into the urban area and east to the A21 and beyond. There are also opportunities for new pedestrian and cycle links from the site to the surrounding network including to High Brooms Station, 2 km from the site.

## **Economic benefits**

65. The site provides opportunity for significant economic benefit through the creation of direct and indirect job opportunities with a valuable boost to the local economy. This would also include beneficial impacts on supply chains and construction jobs and secure future local employment opportunities. This would provide economic stimulus for both the borough and the wider local area.

## **Other site-specific benefits**

66. The site, although within the AONB and GB, seeks to retain a significant area of land as a buffer within the area to the north of the proposed allocation providing landscape, woodland and ecological mitigation and provides opportunity for future management of this area.

## **Exceptional Circumstances Summary and Conclusions**

67. As explained above, the Council considers Site AL/RTW 17 to be major development within the AONB and as such justification (exceptional circumstances) for development of this site is needed. The response above sets out site-specific matters that contribute to 'exceptional circumstances'. These include the significant employment and economic growth and employment floorspace to meet identified needs that would be delivered by this allocation, which would be in the public interest.
68. The Council considers that the factors set out and explained above together amount to 'exceptional circumstances' to justify the impact of this site in the AONB. There is significant economic benefit arising from development of this site that are in the wider

public interest. The factors, summarised below, warrant significant weight in the decision to allocate this site:

- Sustainability of the site in terms of its location adjacent to the main urban area of Royal Tunbridge Wells.
  - Significant economic benefits building on the success of the adjacent commercial area at Longfield Road/North Farm/Kingstanding Way as evidenced within the Economic Needs Study 2016 [[CD 3.25](#)].
  - Well located in relation to the existing highway network and the improvements to the A21 in this location as also evidenced in the above study, as well as opportunities for provision of sustainable transport modes and pedestrian and cycle links.
  - Opportunities for appropriate mitigation in relation to the landscape and woodland in this location.
69. These are significant public benefits, which would benefit existing and future residents of Royal Tunbridge Wells and the wider area and taken together provide ‘exceptional circumstances’ for allocation of this site in the AONB.
70. It is also important to highlight that this site already has planning permission granted in 2021, and as such has also undergone the ‘exceptional circumstances’ test as part of the determination of the planning application.

**How have the potential impacts of development in the character and appearance of the area, including the AONB, been considered as part of the plan-making process?**

71. In broad terms, the Council’s response to Matter 5, Issue 1 (Site Selection Methodology) [[TWLP/021](#)] explains how the Council has determined which sites to allocate in the Local Plan, including consideration of the evidence base supporting the Local Plan, which includes detailed work on landscape and the AONB. Question 3 of Matter 5, Issue 1 deals with, amongst other things, effects of development on landscape character, including the AONB and its setting. The Council’s responses to Matter 3, Issues 1 and 2 (Spatial Strategy and Distribution of Development) [[TWLP/014](#) and [TWLP/015](#)] set out in more detail the approach the Council has taken to sites in the AONB.





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

### **Inspector’s Question 7: [re. Scale and location of employment development at Paddock Wood]**

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

### **TWBC response to Question 7**

#### **Introduction**

72. There are three broad employment sites proposed to be allocated for employment development in Paddock Wood: Land to the east of Maidstone Road (comprising the site to the north of Lucks Lane (Keylands Farm); the site to the south of Lucks Lane (Swatlands Farm); and land to the east of Transfesa Road.
73. These sites form part of the strategic allocation for growth around Paddock Wood and east Capel (Policy STR/SS1), as shown on the Policies Map [[CD 3.59\(i\)](#)]. Part 2g of Policy STR/SS1 sets out that the expansion of Paddock Wood and east Capel will deliver “*significant new land for a mix of employment uses on sites to the north and south of Lucks Lane, and to the east of Transfesa Road*”. Reference within the Policy is made to these sites being Key Employment Areas and cross reference is made to Policy ED 1 (the key policy in relation to Key Employment Areas).

#### **Consideration**

74. The employment sites within Paddock Wood were assessed for development potential as part of the Strategic Housing and Economic Land Availability Assessment (SHELAA) and Sustainability Appraisal (SA) process. The SHELAA and SA were prepared simultaneously. The purpose of the SHELAA is to determine which parcels are suitable, available and achievable for development, to inform site allocations in the Local Plan. The role of the SA is to appraise the social, environmental and economic effects of the Plan. Commentary from the SA is included on individual site assessment sheets in the SHELAA and has informed the findings and outcomes of the SHELAA process. It is important to read both documents alongside each other to understand the decisions reached by the Council in terms of strategy. The entirety of that process is covered in

(Matter 5 Issue 1 (TWLP/021). The conclusions relating to the employment sites covered by Policy STR/SS1 are found in the appropriate SHELAA sheets [[CD 3.771](#)] (see Site 218 page 50-53, Site 340 page 82-86 and Site 347 page 94-98) and page 147 onwards in the SA [[PS 013](#)]. The SHELAA assessments concluded that the parcels would form a logical extension of the existing economic area in Paddock Wood, and would form a suitable allocation in conjunction with the other site submissions for the strategic expansion of the settlement.

75. The Economic Needs Study (ENS) [[CD 3.25](#)] provides the evidence and justification for the inclusion of this site within the Local Plan. Section 9 of the ENS assesses the existing employment land portfolio across Tunbridge Wells borough and identifies any possible new employment sites/ locations to meet the identified need. This assessed the existing Land East of Maidstone Road Paddock Wood Key Employment Area (paragraph 9.47 – 9.50). The Study concludes that this is a “*good employment site*” which “*should be retained*”. It is noted that there is limited scope for further development within the existing Key Employment Area boundary and the Study notes that there are a number of sites which do exist on both sides of Maidstone Road which “*may be suitable for further development and expansion*”. At paragraph 9.67 this area of Paddock Wood is one of three areas the Study recommends is the focus of future employment growth.
76. Within the Policy recommendations of the ENS [[CD 3.25](#), paragraph 10.27, it is noted that the identification of suitable land at Maidstone Road has the potential to address the identified need for employment land across the borough and would help create a balanced portfolio of employment land, ensuring the needs of businesses in the north and rural areas are being catered for. Importantly it would also help ensure new job opportunities area being created alongside housing provision.
77. The sites are also considered within the Economic Development Topic Paper [[CD 3.84](#)] at paragraphs 4.26 to 4.30.
78. In terms of scale, Table 5 of the Submission Local Plan (page 43) identifies the net developable area of the proposed Key Employment Areas. This identifies 6.6 hectares for land east of Maidstone Road, and 4.6 hectares of land to the east of Transfesa Road. This table accompanies Policy STR 1 ‘The Development Strategy’.

79. The net developable area figures for the Paddock Wood Key Employment allocations have stemmed from the comprehensive masterplanning exercise undertaken by David Lock Associates in relation to the growth around Paddock Wood and east Capel [Strategic Sites Masterplanning and Infrastructure Study, [CD 3.66a](#)]. This is underpinned by the Paddock Wood Economic Opportunities Report prepared by SQW [[CD 3.66b](#)]. This report makes an assessment of the socio-economic profile of the town and the local commercial property market. This ensured the sites promoted for employment uses are considered holistically with the growth proposed around Paddock Wood to this is fully integrated and is delivered in line with garden settlement principles.
80. As a further part of its instruction, DLA has prepared draft high-level masterplans for the northern employment parcels. This document has been shared with members of the Strategic Sites Working Group and Paddock Wood Town Council. This is enclosed at Appendix 2. This masterplanning work builds upon the Structure Plan prepared by DLA through the Strategic Sites Masterplanning and Infrastructure Study [[CD 3.66a](#)] and provides further detail on the employment areas proposed to the north and north-east of the town. This provides the overall masterplanning principles of and character for the allocation, before presenting layers for land use, movement, green and blue infrastructure, community facilities and urban design as appropriate. This will form the basis of future SPDs are required through Policy STR/SS1.
81. It is through this work that the proposed net developable areas have been determined. The masterplanning of the employment sites has assumed relatively low-density, large footplate industrial and distribution units (whilst allowing for a mix of units to be provided such a workshops/offices), in line with the existing employment areas in the town and the prevailing employment types as outlined in the economic report prepared by SQW [[CD 3.66b](#)]. The layout has been determined taking into consideration the flood risk constraints and need for drainage solutions, along with landscaping considerations.
82. The proposed Key Employment Areas proposed at Paddock Wood form natural extensions to the existing employment areas to the north of Paddock Wood town centre. As set out above, the anticipated uses and buildings are expected to relate to those existing in the town, and as considered appropriate for this location. Significant growth is proposed around Paddock Wood, including land in east Capel, through Policy STR/SS1 to provide around 3,500 new homes. It is considered entirely appropriate to

incorporate land for significant employment uses to serve the expanded settlement and to create a sustainable place to live.



## **Inspector's Question 8: [re. type and amount of employment development]**

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

### **TWBC response to Question 8**

83. When reading the Plan as a whole, it is considered clear to decision makes, developers and local communities the type and amount of development proposed on each site.
84. The land is allocated as part of the growth around Paddock Wood under Policy STR/SS1 and shown on the Policies Map [[CD 3.59\(i\)](#)]. The sites will be allocated as a Key Employment Area and Policy STR/SS1 makes specific reference to Policy ED 1 in relation to these employment sites.
85. Policy ED 1 sets out the proposed uses for each Key Employment Area allocation. For the Paddock Wood sites this is Class E- financial and professional and other business; Class B2 – General Industry; and Class B8- storage and distribution. The type of development proposed is therefore clear.
86. With regard to the amount, please see the response to Question 7. Detailed masterplanning work has informed the scale of development to be allocated on each of the Paddock Wood employment sites. This is reflected in Table 5 of the Plan which is related to Policy STR 1 'The Development' Strategy'.
87. Whilst the Council considers the position is clear, it would be agreeable to a modification to Policy STR/SS1 to refer to the scale of the anticipated employment development expected on the Paddock Wood sites for clarity.

## **Inspector's Question 9: [re. delivery of sites]**

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

### **TWBC response to Question 9**

88. The employment sites are being promoted by individual promoters separate to the housing delivery. Land to the north of Lucks Lane is being promoted by Lambert and Foster; land to the south (Swatlands Farm) by Gallaghers (an established employment developer) and land to the east of Transfesa Way, DHA.
89. All of the employment land promoters and / or their agents form part of the Strategic Sites Working Group and have been a key stakeholder in the masterplanning work undertaken by David Lock Associates [[CD 3.66a](#)].
90. These sites can and will come forward separate to the delivery of housing. A planning application is due to be submitted shortly on Swatlands Farm by Gallagher who have been working proactively with the Council to deliver this site for employment uses. Early discussions have also taken place on land to the north of Lucks Lane but formal pre-application has not yet commenced.
91. The Council does not consider it would be appropriate to tie the delivery of the employment uses to the delivery of housing, or vice versa.



## **Inspector's Question 10: [re. provision of pedestrian links]**

***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)***

### **TWBC response to Question 10**

92. The delivery of the employment sites in Paddock Wood must be in accordance with Policy STR/SS1. Policy STR/SS1 at criterion 9 requires all development to provide walking and cycling linkages within the wider site strategic site, together with links to Paddock Wood town centre, employment areas and surrounding countryside (criterion 9). This reflects the overall firm intention that the growth around Paddock Wood and east Capel on garden settlement principles. Criterion 2 i) requires that there be walkable links from the new neighbourhoods to the employment areas.
93. The Structure Plan (Submission Local Plan Map 28) for Paddock Wood and east Capel, prepared through the Strategic Sites Masterplanning and Infrastructure Study [[CD 3.66a](#)] identifies a network of pedestrian and cycle links throughout the expanded settlement including the employment areas. This has been further developed through the draft High-Level Masterplans (Appendix 2).
94. It will be a requirement of future planning applications to demonstrate that they will be able to facilitate the linkages within the application site itself and provide appropriate solutions to allow for the ongoing connectivity of these linkages on land outside their control. This matter has been considered as part of the evidence base to the Local Plan. The LCWIP Stage 2 report [[CD 3.115bi](#)] provides a series of design recommendations for cycling and walking routes within Paddock Wood, including within the existing and proposed employment areas to promote active travel measures. Alongside, the Strategic Sites Masterplanning and Infrastructure Study {CD 3.66a} includes infrastructure measures to facilitate permeable linkages from the employment sites to the town centre and existing and proposed residential neighbourhoods. For example, development to the east of Paddock Wood will be required to open up the historic Hop Pickers Line which will provide a direct route to an improved pedestrian footbridge over the railway line and into the existing employment areas to the north of the railway line. Land to the east of Maidstone Road include linkages to the B2160 to the town centre

and westwards onto the new neighbourhoods west of Paddock Wood including the proposed Wetlands Park. Connections are also proposed for inter urban cycle routes to connect westwards to Five Oak Green and Tudeley Village.

95. These measures have been identified and included within the infrastructure framework to be delivered as part of the Strategic allocation at Paddock Wood, as covered by Policy STR/SS1. Appropriate contributions may be secured through planning applications for active travel measures outside of the application site in line with the Infrastructure Framework prepared for this allocation [[CD 3.66a](#)]. This will then be delivered by TWBC in conjunction with other relevant stakeholders including KCC, Network Rail for example.
96. Each application will be subject to a Design Review Panel, in accord with Policy STR/SS1 and this is proving to provide a detailed forum for connectivity within the scheme design to be actively pursued and included within the proposals.

## **AL/HA7 – Hawkhurst Station Business Park**

### **Inspector’s Question 11: [re. type and amount of development]**

***Is it sufficiently clear to decision-makers, developers and local communities the type and amount of employment development proposed at the Hawkhurst Station Business Park?***

### **TWBC response to Question 11**

#### **Introduction**

97. The Economic Needs Study (ENS) [\[CD 3.25\]](#) provides an objective assessment of the need for (traditional B1, B2, B8) employment land over the emerging plan period to 2033/2035, reflecting guidance set out in the NPPF and PPG. The overall findings of the study conclude that the Council should plan positively for economic growth and should ensure a choice of available and suitable sites and allocations to deliver growth in a range of sectors over the plan period. Importantly, the study recommended that the Council should allocate sites to accommodate at least 14 hectares of new employment land (taking into account any residual capacity of existing employment allocations) over the plan period to 2035.
98. The ENS recognises (at paragraph 3.45) that The Local Plan 2006 allocation at Hawkhurst Station Business Park for B Class employment uses provided an opportunity for residents to work locally and reduce out commuting. The ENS confirms (at paragraph 9.37) that this site is a good rural employment site, and *“it is considered there is potential to extend the site to the south west to accommodate further B2 and B8 uses”*, with it being noted at paragraph 9.38 *“that any future development would need to be sensitive to the landscape character of the area and compatible with the residential properties which would border the potential expansion site; for example a buffer zone would most likely be required to screen any potential development”*.
99. A number of policy recommendations and enabling actions are set out within the concluding chapter of the ENS, including the potential for the expansion of a number of Key Employment Areas (KEA). To reflect the conclusions of the ENS about the suitability of the Hawkhurst Station Business Park to provide employment opportunities, the potential for its expansion was included in these recommendations. It is the case

that the role of the ENS was to assess the need for employment land, and to identify potential sites to meet this need. But it did not seek to specify an amount of employment land in specific locations within the borough.

100. Hawkhurst Station Business Park (also referred to as Gill's Green Business Park) is an established KEA, located within the High Weald AONB to the north of the built-up area of Hawkhurst, at Gill's Green and on the A229 Cranbrook Road. The Business Park serves this rural part of the borough. As explained more fully in the response to Matter 10, Issue 1, Question 1 [TWLP/053], the KEAs are long established existing areas of employment and economic activity within the borough in well located sustainable locations with good accessibility to the main highway/railway network. As set out in the Economic Development Topic Paper March 2021 [page 20 of [CD 3.84](#)], the identification of KEAs is a well-established policy approach to support and protect these main clusters of economic activity. They were originally defined within the Tunbridge Wells Core Strategy 2010 [[CD 3.118](#)] and prior to that as 'Economic Development Areas' within the Tunbridge Wells Local Plan 2006 [see Chapter 7 of [CD 3.120](#)].
101. The Hawkhurst Station Business Park has been popular for businesses to locate and expand and therefore an area of undeveloped land is identified and allocated under Policy AL/HA7, to the south of the existing KEA for further employment generating uses within use class E/B2 and B8. The area proposed for expansion (not including areas identified for open space/landscape buffer) is approximately 1.27 hectares. To put this into context, the existing area designated in the Site Allocations Local Plan as a Key Employment Area (that is the land immediately to the north of AL/HA7) is approximately 3.74 hectares in area.
102. Furthermore, the Hawkhurst Neighbourhood Development Plan 2018 (modified 2020) (HNDP) [[CD 3.123](#)] at paragraph 10.19 confirms that "*Tunbridge Wells Borough Council has identified Gills Green as an employment hub and there is support in the village for reasonable expansion. Therefore, the development of an employment hub at Gills Green, building on the strength and success of existing businesses in that part of the parish, will be encouraged*" and the HNDP Policy CM4 Protection of Community Services and Employment land, at criterion (1) states that "*existing employment, retail and ancillary facilities in the parish will be protected and enhanced during the neighbourhood plan period*".

103. The Submission Local Plan Policy ED 1 The Key Employment Areas clarifies that this Business Park is designated for the provision of employment uses. The retention of existing, and proposals for new, employment provision will be acceptable within the defined area of the Business Park, to deliver the following uses: Class E – financial, professional and other business uses, Class B2 – general industry, and Class B8 - storage and distribution.
104. Policy ED 1 also clarifies that ‘proposals for the retention of existing floorspace and the encouragement of new floorspace in the Key Employment Areas on allocated and non-allocated and vacant sites, and through the intensification or redevelopment of existing sites, will be supported in principle.

### **Consideration**

105. Policy AL/HA 7 Hawkhurst Station Business Park confirms that the Hawkhurst Station Business Park at Gill’s Green is allocated for employment uses (E/B2/B8). The policy sets out a list of criteria that development proposals at this location will be required to meet.
106. Inset Map 16 (Gill’s Green) of the TWBC Submission Local Plan [[CD 3.59j](#)] clearly shows the location and extent of the area covered by Policy H7.
107. The area included within Policy AL/HA 7 is an area of land to the south of the existing KEA for further employment generating uses within use class E/B2 and B8. The Draft Local Plan [[CD 3.9](#)] included Policy AL/HA 9 that sought to allocate a similar area for employment uses (B1/B2/B8), the main difference between the approaches proposed in the draft Local Plan and the Submission Local Plan being the requirement within Policy AL/HA 7 for areas of open space and landscape buffers along the western and southern boundaries of the site. This reflects the outcome of the landscape assessment work carried out after the Regulation 18 consultation. It is also to be noted that a further separate area of land immediately to the north of the KEA is identified as a safeguarded site for future employment uses by Policy AL/HA 8 Site at Limes Grove (March's Field).
108. Table 5 in section 4 of the Submission Local Plan ‘Employment land allocations identified in the Local Plan’ identifies a net developable area of 1.2 hectares for this site. This has been arrived at taking account of the site’s sensitive location, minimising any

impact of development on the surrounding rural area located within the High Weald AONB.

109. Policy AL/HA 7 – together with Table 5 - therefore provides a clear guide about the type, quantity and location of development proposed for Hawkhurst Business Park. The allocation of the site at Gill's Green in Hawkhurst will provide expansion space at an existing, successful business area in the east of the borough.
110. If, however, the Inspector is minded to include further detail on the precise quantum of different employment uses to be provided for within the allocation this could be considered and included as a modification to the policy if necessary.

## **Inspector's Question 12: [re. need for employment land and buildings]**

***How does the allocation respond to the identified need for employment land and buildings?***

### **TWBC response to Question 12**

#### **Introduction**

111. The Economic Needs Study (ENS) [[CD 3.25](#)] provides an objective assessment of the need for (traditional B1, B2, B8) employment land over the emerging plan period to 2033/2035, reflecting guidance set out in the NPPF and PPG. The overall findings of the study conclude that the Council should plan positively for economic growth and should ensure a choice of available and suitable sites and allocations to deliver growth in a range of sectors over the plan period. Importantly, the study recommended that the Council should allocate sites to accommodate at least 14 hectares of new employment land (taking into account any residual capacity of existing employment allocations) over the plan period to 2035.
112. A number of policy recommendations and enabling actions are set out within the concluding chapter of the ENS. These included the potential for the expansion of a number of Key Employment Areas, including at land at Gill's Green, Hawkhurst, (Hawkhurst Station Business Park) and new sites should be allocated in response to evidenced need.
113. As detailed above as part of the Council's response to Matter 10, Issue 2, Question 11, to reflect the conclusions of the ENS about the suitability of the Hawkhurst Station Business Park to provide employment opportunities within the rural eastern part of the borough, the potential for the expansion of the KEA at Gill's Green will ensure the continuing availability of employment land within this area to meet localised needs.

#### **Consideration**

114. The Submission Local Plan Policy ED 1 The Key Employment Areas clarifies that the Hawkhurst Station Business Park is designated for the provision of employment uses. The retention of existing, and proposals for new, employment provision will be acceptable within the defined area of the Business Park, to deliver the following uses:

Class E – financial, professional and other business uses, Class B2 – general industry, and Class B8 - storage and distribution.

115. Policy AL/HA 7 Hawkhurst Station Business Park confirms that the Hawkhurst Station Business Park at Gill's Green is allocated for employment uses (E/B2/B8). The policy sets out a list of criteria that development proposals at this location will be required to meet.
116. The area included within Policy AL/HA 7 includes an area of land to the south of the existing Key Employment Area for further employment generating uses within use class E/B2 and B8. Inset Map 16 (Gill's Green) of the TWBC Submission Local Plan [[CD 3.59j](#)] clearly shows the location and extent of the area covered by Policy H7, including those areas required for open space/landscape buffers.
117. It is therefore the case that Policy AL/HA 7 reflects the recommendations of the ENS for the Key Employment Area at Gill's Green, Hawkhurst, that is the Hawkhurst Station Business Park. That is to:
- ensure a choice of available and suitable sites: the Key Employment Area at Gill's Green is a long established employment site
  - the ENS has included a recommendation to consider the potential for the expansion of a number of Key Employment Areas, including at land at Gill's Green, Hawkhurst, and that new sites should be allocated in response to evidenced need
118. It is therefore the case that this allocation will facilitate the delivery of new employment land in a suitable location, immediately adjacent to an existing Key Employment Area, that is considered to be a successful business area providing opportunities for employment provision in the rural eastern part of the borough.



## Inspector's Question 13: [re. sustainable transport modes]

***Is the proposed development accessible by sustainable modes of transport for potential future occupiers of the site?***

### **TWBC response to Question 13**

#### **Introduction**

119. Background information on the location and history of the Key Employment Area (KEA) at Hawkhurst Station Business Park (also referred to as Gill's Green Business Park) is provided in the council's response to Question 11 above.

#### **Consideration**

120. The site assessment process carried out through the SHELAA [\[CD 3.77a\]](#), and summarised in the assessment sheets for Hawkhurst [\[CD 3.77i\]](#) (reference Site 102), identifies that the site is adjacent to the LBD at Gill's Green and to existing economic uses.
121. The site's location adjacent to an existing employment site but nevertheless at some distance from the services provided at Hawkhurst is recognised in the Sustainability Appraisal (SA) (reference Site 102) [\[CD PS 013\]](#).
122. The summary commentary in the SA included in the table 'Scores for Reasonable Sites in Hawkhurst (part 2 of 7)' (page 421) comments that the *"Gills Green is a Key Employment Area and several objectives are scored as neutral or positive to reflect suitability of allocation for employment use. Travel and air quality objectives score poorly due to the topography and distance for reaching the services at Hawkhurst using active travel. Landscape issues are also negative due to far reaching views and the impact upon the character of the AONB. Land use score reflects the loss of greenfield land and useful soils within the AONB. 2020 Grassland study found site to have low botanical importance and moderate ecological importance. Biodiversity score adjusted slightly. 2020 LVIA confirms development could take place here without significant adverse effects on the AONB. The air score reflects the risk this relatively large site creates to air quality in the AQMA that is about to be declared, and dependency on private car use in this location"*.

123. The site assessment sheet summary for this site in Appendix 5 of the ENS [[CD 3.25](#)] (page 227) states at paragraph 9.36 that “*The KEA is accessed from the A229 and is highly visible. There are bus stops at c.60m and 150m to the south of the site. However, the area is around 18 miles from the M25 therefore connections to the strategic motorway network are somewhat limited.*” However, the ENS also concludes that “*Due to new units being developed on site the industrial estate is assumed to be meeting the requirements of the commercial sector. However the distance to the main highway network implies that the business operates in a local market*”.
124. The Hawkhurst Station Business Park (and confirmed at para 3.45 of the ENS) provides an opportunity for residents to work locally and reduce out commuting from the eastern part of the borough. Gills Green is located approximately 1.5 miles from the centre of Hawkhurst on the A229 and could therefore be accessed by cycle although the perception is that it is probably too far to be easily accessed on foot – particularly given the local topography, although there is pavement access from Hawkhurst to Gills Green; there is no pavement access to Cranbrook. There is a bus stop on the A229 outside the business park – the number 5 bus that runs from Maidstone to Sandhurst, via Cranbrook, provides an hourly service.
125. The location of this employment site in very close proximity to Hawkhurst, within a short distance of Cranbrook (under 3 miles) and accessible by different modes of transport, allows a variety of locally based businesses to provide local employment opportunities that would otherwise be met in locations much further away requiring longer journeys to work.

## **Inspector's Question 14: [re. impact on the AONB]**

***Does site allocation AL/HA7 represent major development in the AONB, and if so, is it justified? How have the potential impacts of development on the character and appearance of the area, including the AONB, been considered as part of the plan-making process?***

### **TWBC response to Question 14**

**Does the site allocation AL/HA 7 represent major development in the AONB, and if so, is it justified?**

126. The Council does not consider that the proposed allocation HA7 constitutes major development, having regard to paragraph 177 of the NPPF. This conclusion has been agreed with Natural England.
127. The Council's strategic approach to development within the AONB, how it has approached the question of whether sites are major development or not, and whether major or other development within the AONB is justified at a strategic level and indeed how impacts on the AONB have been taken into account, is set out in response to Matter 2, Issue 1 [ [TWLP/011](#) ], Questions 5 and 6]; Matter 3, Issue 1 [ [TWLP/014](#) ], Questions 6 and 9; and Matter 5, Issue 1 [ [TWLP/021](#) ], Question 3. The response to this question should be read in conjunction with those responses but addresses more directly the site-specific circumstances.
128. The methodology for the assessment of major/not major is set out in the Development Strategy Topic Paper [ [CD 3.126](#) ] Section H and at Appendix 2; the assessment of individual site allocations, as well as the cumulative findings, by settlement, are set out at Appendix 3. For HA 7 it concluded (page 121) that: it will be seen in the context of the existing employment site as a natural extension onto land previously used in association with the railway yard and related economic development. Site is well

## How have the potential impacts of development on the character and appearance of the area, including the AONB, been considered as part of the plan-making process?

129. In broad terms, the Council's response to Matter 5, Issue 1 (Site Selection Methodology) [\[TWLP/021\]](#) explains how the Council has determined which sites to allocate in the Local Plan, including consideration of the evidence base supporting the Local Plan, which includes detailed work on landscape and the AONB. Question 3 of Matter 5, Issue 1 [\[TWLP/021\]](#) deals with, amongst other things, effects of development on landscape character, including the AONB and its setting. The Council's response to Matter 3, Issue 1 [\[TWLP/014\]](#) and Issue 2 [\[TWLP/015\]](#) (Spatial Strategy and Distribution of Development) sets out in more detail the approach the Council has taken to sites in the AONB.
130. More specifically, the sites at Hawkhurst have been assessed through the SHELAA process [\[CD 3.77a\]](#) main report and Hawkhurst site assessment sheets [\[CD 3.77\]](#), which found them to be available, suitable and achievable.
131. As plan making progressed, the allocations and in particular sites in the AONB were reviewed in consultation with both Natural England and the High Weald AONB Unit, which resulted in the commissioning of additional evidence base work, specifically individual LVIAs for any site proposed at regulation 18 considered either individually or cumulatively to be major. At reg 18 this site (then HA8) was larger and was connected to another site (HA9, that was proposed to be allocated in the Draft Local Plan for approximately 38 dwellings within the southern part of the site) and together it was considered that cumulatively they would constitute major development and so it was included within the LVIA work.
132. The LVIA work [\[CD 3.96f\]](#) at page 32 recommended a reduction in the area proposed for built development in HA7 (then HA8) and it was recommended that the adjacent site (HA9) was not included as allocation in the Submission Local Plan, therefore reducing the area being allocated for built development in this location. The SHELAA site assessment outcome [\[CD 3.77\]](#) (Site 422) concluded that the adverse impact upon the AONB landscape and the location of the site well outside of Hawkhurst, and some distance from its services, does not support its allocation for residential development.

The area being allocated in the Submission Local Plan for employment use (Site 102) was considered suitable given its location adjacent to the existing KEA; the LVIA work included recommendations for a range of policy requirements that would deliver mitigation measures to reduce the impact of development upon the surrounding landscape character, and these are discussed below.

133. The LVIA work also provided recommendations for mitigation which have been incorporated into the policy wording and the Site Layout Plan. These recommendations are set out within a table on page 32 of the LVIA.

## Inspector's Question 15: [re. site boundary]

***What is the proposed site boundary based on, and why does the allocation include land to the south and west as an open space and landscape buffer?***

### **TWBC response to Question 15**

#### **Introduction**

134. The Council's response to question 14 above explains why this site was included within the LVIA work for major sites in the AONB even though it is no longer considered to be major development. It also explains how the results of that work were taken into account with regards the policy wording and Site Layout Plan.
135. The Site Layout Plan shows green space to the south and the west which accurately reflects that shown in the LVIA on Figure H24: Strategic Green Infrastructure page 32 [CD 3.96f]. On the same page the recommended additional mitigation measures include
- "Retain the western and southern part of the site as open space, within which enhancements to the landscape of the AONB are expected.
  - Provision of additional structural tree planting on the western edge of the site".
136. On page 33 of the LVIA the last column sets out the "*Potential to avoid or reduce adverse effects*" and which includes:
- "The retention of boundary features, would help to contain views of the proposals. The additional open space and buffer planting to the west of the site would help to soften views of the proposals from known viewpoint locations. Additional screening could also be introduced to the south of the site, if additional views are identified through more detailed LVIA work.
  - The open space provision would allow for localised enhancements to features and habitats within the site. Naturalistic surface water drainage systems (e.g. ponds, basins or swales) could be located within the open space, forming complementary habitats.

- The additional open space to the north-west would allow the phased replacement of the Leylandii hedgerow with some more characteristic and wildlife friendly buffer planting, which would benefit the routeway (Slip Mill Lane) in the long term”.
137. These measures would reduce predicted effects on the amenity of the existing routeway, local views and would protect key features that contribute to the character of the site.
138. And concludes at the end of that column that “these measures would reduce predicted effects on the amenity of the existing routeway, local views and would protect key features that contribute to the character of the site”.
139. The buffer is then a result of detailed analysis and recommendations included within the LVIA report and is required to reduce and mitigate the impact of development on the High Weald AONB.

## **AL/HA8 – March’s Field, Limes Grove, Gill’s Green**

### **Inspector’s Question 16: [re. justification for employment uses]**

***What is the justification for safeguarding land at Limes Grove for future employment uses?***

### **TWBC response to Question 16**

#### **Introduction**

140. This site is a former woodyard located opposite, to the north of, the Hawkhurst Station Business Park. There are no existing buildings on the site although there are areas of hardstanding. The site area is 0.63 hectares in total, the net area for reserving for future employment uses being 0.42 hectares.
141. Policy AL/HA8 reserves the site for employment uses (E/B2/B8), to be released for development if monitoring indicates that other employment allocations have not come forward, or there is evidence that further employment provision is required in the eastern part of the borough, or potentially at the five-year review of the Local Plan.

#### **Consideration**

142. Paragraph 5.413 of the Submission Local Plan explains that *“In view of the proposed extension to the existing Hawkhurst Station Business Park to the south under Policy HA 7, it is not clear whether further employment land will be required. However, to provide some contingency, it is considered reasonable to reserve this site for such purposes to be released only if there is a demonstrable need, either because monitoring indicates that other employment allocations have not come forward, or there is evidence that further employment provision is required in the eastern part of the borough. If the site is not required in the plan period, it would still be appropriate to safeguard it for employment in the longer term”*.
143. The site assessment process carried out through the SHELAA [[CD 3.77a](#)], and summarised in the assessment sheets for Hawkhurst [[CD 3.77i](#)] (reference Site 55), concludes *“that this a PDL site adjacent to the LBD at Gill’s Green. It is considered that the site would be a logical extension to the existing economic area”*.



144. The site's location adjacent to an existing employment site but nevertheless at some distance from the services provided at Hawkhurst is recognised in the Sustainability Appraisal (SA) (reference Site 55) [\[CD PS 013\]](#). The summary commentary in the SA included in the table 'Scores for Reasonable Sites in Hawkhurst (part 2 of 7)' (page 421) comments that "Gills Green is a Key Employment Area and several objectives are scored as neutral or positive to reflect suitability of allocation for employment use. Travel and air quality objectives score poorly due to the topography and distance for reaching the services at Hawkhurst using active travel. Landscape issues are also negative due to far reaching views and the impact upon the character of the AONB. Land use score reflects the loss of greenfield land and useful soils within the AONB. The air score reflects the risk this relatively large site creates to air quality in the AQMA that is about to be declared, and dependency on private car use in this location".
145. The Employment Needs Study (ENS) [\[CD 3.25\]](#) does not make a specific reference to the approach to safeguarding employment land for future expansion of the Hawkhurst Business Park, or make a specific reference to this site (March's Field).
146. This site is available, suitable and deliverable, as identified through the SHELAA site assessment process. The issue of employment needs were discussed through Matter 2, Issue 3 [\[TWLP/013\]](#) and it is recognised that for the borough as a whole there is an over-provision of employment land in the Submission Local Plan. However, this over-provision is largely at Kingstanding Way in the main urban area of Royal Tunbridge Wells as well as at Paddock Wood. Apart from the Hawkhurst Station Business Park, there are no other KEAs serving the rural eastern part of the borough and it is therefore considered appropriate to follow the approach being taken by Policy AL/HA 8 to reserve the site for employment uses (E/B2/B8). This is considered to be a proactive approach to ensure that any future requirements for employment land could be met through further expansion of the Hawkhurst Station Business Park on a suitable site located immediately adjacent to the existing KEA.
147. Policy AL/HA 8 would only allow for the land to be released for development under specific circumstances. This is (a) if monitoring indicates that other employment allocations have not come forward, or (b) there is evidence that further employment provision is required in the eastern part of the borough, or (c) potentially at the five-year

review of the Local Plan that would include an assessment of future employment land requirements both borough-wide and the more local level for this part of the borough.

## **Inspector's Question 17: [re. timescales for development on site]**

***Is it sufficiently clear to decision-makers, developers and local communities when development will be permitted at the site? When referring to other developments not coming forward, is this within the plan period or within five years following adoption of the Plan?***

### **TWBC response to Question 17**

#### **Introduction**

148. Policy AL/HA8 reserves the site for employment uses (E/B2/B8), to be released for development if monitoring indicates that other employment allocations have not come forward, or there is evidence that further employment provision is required in the eastern part of the borough, or potentially at the five-year review of the Local Plan.

#### **Consideration**

149. The circumstances when land included within Policy AL/HA 8 could be considered for release for development for employment uses (E/B2/B8) are considered below:
- If monitoring indicates that other employment allocations have not come forward: the council carries annual monitoring of the gain/loss of employment floorspace within the borough. This monitoring is reported in the Authority Monitoring Report (AMR) [AMR 2020/21](#) For the 2020/21 version this information is provided on page 56 Table 28: Permitted Employment Floorspace Across the Tunbridge Wells Borough for Monitoring Year 01 April 2020 – 31 March 2021 (Source: TWBC Monitoring, 2021). Similar annual monitoring of the net gain/loss of employment floorspace will be carried out in subsequent years, and it is expected that this information will be provided at a more detailed level, for example by Parish. The annual review provides a comparison of the net gain of employment space against the anticipated rate of delivery. A judgement can then be made based on this information, together with discussions with the developers of employment sites within the borough to reach a conclusion about whether this site should be considered for release. This could occur within the five year period post adoption, but also within the remaining plan period; or if there is evidence that further employment provision is required in the eastern part of the borough. This could be evidenced through the Council's work on other corporate

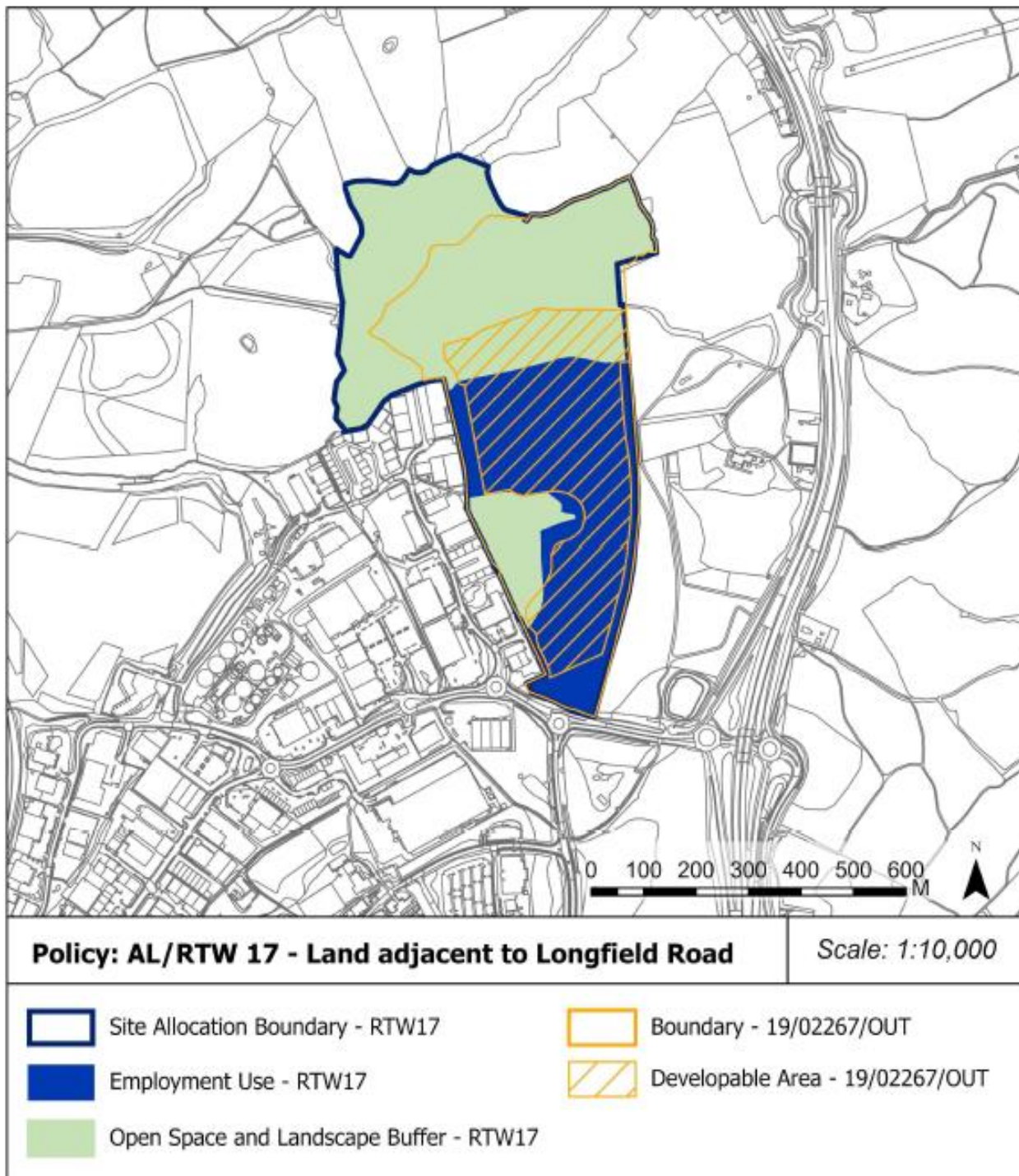
strategies – such as the Economic Development Strategy - (or by local Parish Councils' evidence base prepared to support the preparation/update of a Neighbourhood Development Plan), or through an evidence base prepared by the site promotor to support release of the site for employment development. Additionally, if at the five-year review of the Local Plan the updated evidence base indicates that there is a requirement for the delivery of additional employment land that cannot be met through Policy AL/HA 7. This could be due to all of the available land included within Policy AL/HA 7 being fully developed and/or an ongoing requirement for additional employment land that will not be fully met by Policy AL/HA 7.

150. The Council therefore conclude that the wording within Policy AL/HA 8 provides sufficient clarity for decision-makers, developers and local communities about when development will be permitted at the site.

# Appendices

# Appendix 1: AL/RTW 17 – Allocation and Permitted Scheme plan

Map 17 Site Layout Plan



© Crown Copyright and database rights 2022 Ordnance Survey 100024298

# Appendix 1: Paddock Wood & east Capel High Level Masterplans

An aerial architectural sketch of a town development, showing buildings, roads, and green spaces. A large, semi-transparent blue rectangle is overlaid in the center, containing the title and subtitle. The sketch is rendered in a light blue and grey color palette.

# TUNBRIDGE WELLS

**Paddock Wood & east Capel  
High Level Masterplans**



# 00

# CONTENTS

<b>1.0 INTRODUCTION</b>	<b>4</b>	<b>5.0 NORTHERN &amp; NORTH-EASTERN EMPLOYMENT AREAS</b>	<b>38</b>
Purpose and Scope	4	Overview	38
<b>2.0 NORTH WEST EXPANSION AREA</b>	<b>6</b>	Structure	38
Overview	6	Land Use	40
Structure	6	Movement	41
Land Use	8	Urban Design Framework	42
Movement	9	<b>6.0 TOWN CENTRE</b>	<b>44</b>
Green & Blue	10	Overview	44
Community Wellbeing	11	Background	45
Urban Design Framework	12	Economic Analysis	48
Detail Study: Local Centre	14	Baseline Urban Design Analysis	50
<b>3.0 SOUTH WEST EXPANSION AREA</b>	<b>16</b>	Opportunities	52
Overview	16	Illustrative Masterplan	53
Structure	16	<i>Indicative Capacity</i>	58
Land Use	18	Implementation	59
Movement	19	Delivery Process	62
Green & Blue	20	<i>Visioning</i>	62
Community Wellbeing	21	<i>Design &amp; Planning</i>	62
Urban Design Framework	22	<i>Assessing the need for Funding</i>	62
Detail Study: Sports Hub	24	<i>Procurement &amp; Delivery</i>	62
Detail Study: Landscape Character	26	Potential Funding Sources	63
<b>4.0 EASTERN EXPANSION AREA</b>	<b>28</b>	Viability	64
Overview	28	Timescales	65
Structure	28		
Land Use	29		
Movement	30		
Green & Blue	31		
Community Wellbeing	32		
Urban Design Framework	34		
Detail Study: Landscape Character	36		

# FIGURES

Figure 1: Structure Plan extract for northwestern masterplanning area	7	Figure 18: Mobility plan extract for eastern masterplanning area	31
Figure 2: Land Use plan extract for northwestern masterplanning area	8	Figure 19: Green and blue infrastructure plan extract for eastern masterplanning area	32
Figure 3: Mobility plan extract for northwestern masterplanning area	9	Figure 20: Community infrastructure plan extract for eastern masterplanning area	33
Figure 4: Green and blue infrastructure plan extract for northwestern masterplanning area	10	Figure 21: Urban Design Framework plan for eastern masterplanning area	35
Figure 5: Community infrastructure plan extract for northwestern masterplanning area	11	Figure 22: Eastern landscape character design principles and detail study	36
Figure 6: Urban Design Framework plan for northwestern masterplanning area	12	Figure 23: Structure Plan extract for northern employment masterplanning area	39
Figure 7: Local centre design principles and detail study	14	Figure 24: Land Use plan for employment allocations	40
Figure 8: Structure Plan extract for southwestern masterplanning area	17	Figure 25: Mobility plan extract for northern employment masterplanning area	41
Figure 9: Land Use plan extract for southwestern masterplanning area	18	Figure 26: Urban Design Framework plan for northern employment masterplanning area	43
Figure 10: Mobility plan extract for southwestern masterplanning area	19	Figure 27: Paddock Wood land use before and after expansion in line with Structure Plan Option 1	46
Figure 11: Green and blue infrastructure plan extract for southwestern masterplanning area	20	Figure 28: Expansion of employment land away from town centre	47
Figure 12: Community infrastructure plan extract for southwestern masterplanning area	21	Figure 29: Existing town centre movement infrastructure	50
Figure 13: Urban Design Framework plan for southwestern masterplanning area	23	Figure 30: Barriers to movement & existing pedestrian and cycling accessibility	51
Figure 14: Sports hub design principles and detail study	25	Figure 31: Illustrative Masterplan for Paddock Wood town centre	54
Figure 15: Western landscape character design principles and detail study	26	Figure 32: Movement of different modes in Paddock Wood town centre	55
Figure 16: Structure Plan extract for eastern masterplanning area	29	Figure 33: Residential character areas and precedents	57
Figure 17: Land Use plan extract for eastern masterplanning area	30	Figure 34: Commercial and mixed use character areas and precedents	57
		Figure 35: Land use 'clusters' in Paddock Wood town centre	58

# 01 INTRODUCTION

## Purpose and Scope

- 1.1 This document accompanies the Structure Plan (set out in the Strategic Sites Masterplanning and Infrastructure Document prepared by DLA) for Paddock Wood and East Capel and Infrastructure Framework for Paddock Wood, East Capel and Tudeley, which forms part of the evidence base for the emerging Tunbridge Wells Local Plan.
- 1.2 The High Level Masterplans included in this document provide a further level of detail over that in the Structure Plan, for the following allocations relating to draft Policy STR1/SSI:
  - Expansion Areas to the north-west, south-west and east of Paddock Wood
  - Employment Areas to the north and north-east of the town
  - Town Centre development opportunities within Paddock Wood
- 1.3 The document sets out the overall masterplanning principles and character for the allocations, before presenting layers for land use, movement, green and blue infrastructure, community facilities and urban design as appropriate. It is anticipated that these may form the basis for future Supplementary Planning Documents (SPD) to guide planning applications. SPDs would provide scope to provide detailed guidance on a wide range of place making matters.
- 1.4 Where necessary, illustrative detail studies demonstrate how masterplanning principles may be applied to key placemaking opportunities within the Structure Plan.
- 1.5 This document should be read in conjunction with the main Strategic Sites Masterplanning and Infrastructure report.





# 02 NORTH WEST EXPANSION AREA

## Overview

- 2.1 The northwestern area is a significant expansion of around 1,400 new homes, and is the first significant residential land use north of the railway line in Paddock Wood. The masterplan has been prepared to reinforce strong active travel connections within the development and into the town centre to ensure that the developments are not isolated and car-dependent for daily needs. These active travel connections mesh with proposals for the town centre, described later in this document.
- 2.2 The landscape of the northwestern area is flat and open, and has good visual links with the Medway Valley to the north. It does not have strong existing tree lines, and has existing managed watercourses running between fields. Much of the land is within Flood Zones 2 and 3, and this informs the pattern of development, retaining natural drainage patterns where possible.
- 2.3 As a result the character of place will be strongly related to natural and open landscape corridors, with good visual connections to the surrounding landscape, with a strong 'village centre'-style local centre that provides for daily needs. An illustrative plan for the local centre is included.
- 2.4 This chapter presents annotated layer diagrams based on the Structure Plan to provide a further level of masterplanning detail, based on the overall character of place defined above.

## Structure

- 2.5 The following extracts from the Structure Plan highlight the overall urban structure of the area, which responds to the natural features of the site. Areas suitable for development are connected by routes for all modes of transport, with onward travel to the town centre and surrounding countryside. The development will be housing led, and will be supported by a primary school and a small local centre intended to meet day-to-day convenience needs. A green infrastructure network will provide generous open space for recreation needs, flood and surface water management, food production, childrens' play and a wetland park to support the creation of ecological habitat.





Figure 1: Structure Plan extract for northwestern masterplanning area

## Land Use

- 2.6 The proposals are in accordance with the requirements of the NPPF in adopting the sequential approach to development within floodzones.

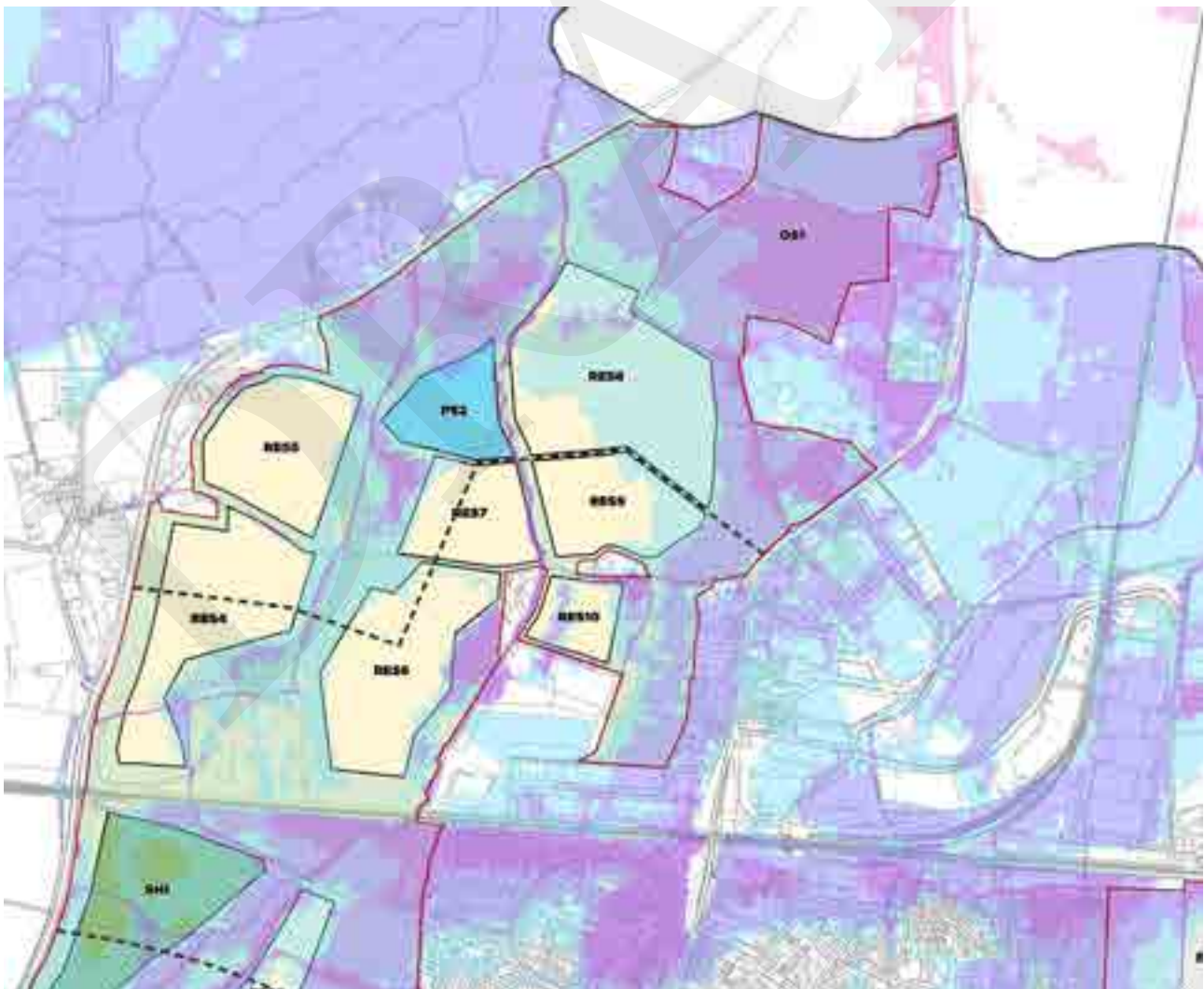


Figure 2: Land Use plan extract for northwestern masterplanning area

## Movement

- 2.7 High levels of permeability for pedestrians, cyclists and buses are proposed to encourage minimal use of private cars. A bus gate is proposed to limit through traffic and discourage driving to the town centre. Paddock Wood is a compact town and direct connections to the town centre and the station would ensure it can be reached on foot or bicycle in a very short time.
- 2.8 There is a need to cross the flood plain, and the suggestion is made that roads are constructed over causeways, with culverts to maintain the flowpath of flood and surface water.

**A** Causeway over flood plain



**B** Pedestrian/cycle bridge



Figure 3: Mobility plan extract for northwestern masterplanning area



## Green and Blue

2.9

Generous green space results from the pursuit of the sequential test, ensuring easy access for recreation and a green setting for all homes. Green space should be multi-functional, and include opportunities for extensive wetland habitat.

**A** Landscape character detail study  
(see p26-27)



**B** 'Wetland park'



- Potential Area for Strategic Growth
- Sports hub
- Wetland park
- Trees and structural planting
- Flow of Water
- Other open space
- School playing fields
- Flood defence measures
- Sewerage Works Improvements



Figure 4: Green and blue infrastructure plan extract for northwestern masterplanning area

## Community Wellbeing

2.10 The provision of local centre services at the heart of the northwestern neighbourhood builds on the principle of the 'walkable neighbourhood'. Alongside a new primary school, and local convenience shop, there is potential for community centre and nursery. This site also offers one of two potential locations for a new GP surgery.



- Potential Area for Strategic Growth
- Primary / Secondary Schools with associated Playing Fields
- Local Centres
- Sports Hubs
- Potential Health Centre locations

**A** Local centre detail study  
(see p14-15)



Figure 5: Community infrastructure plan extract for northwestern masterplanning area

## Urban Design Framework

- 2.11 Building on the layers of the Structure Plan, the urban design framework establishes the initial design parameters for effective placemaking, ensuring the new expansion areas are legible, varied, have a sense of place and distinctive character, and integrate well with their surrounding context and landscape setting. They provide an extra level of design detail over the Structure Plan and assist in graphically establishing the key features that proposals coming forward should demonstrate.
- 2.12 The northwestern expansion area is strongly defined by pre-existing Flood Zone 2 and 3 areas, creating the structure of development parcels. It is based around a single main local centre, and extensive internal and external active movement links.
- 2.13 The urban design framework establishes a range of key placemaking principles:
- Strong street frontages along the main street
  - Landmark buildings creating a distinctive place at the local centre
  - Landmark buildings at key internal viewpoints to aid navigational legibility
  - Views towards the south (High Weald hills) and towards the north (Medway Valley) to anchor the new development within its landscape
  - Frontages along the edges of open space to create defined edges
  - Landscape features or nodes where the main street and active travel corridors cross the main north-south open space corridors

**A** Open views towards Medway Valley





Figure 6: Urban Design Framework plan for northwestern masterplanning area

## Detail Study: Local Centre

- 2.14 Each new neighbourhood in the expansion areas (north-west, south-west and south-east) is based around a small mixed-use local centre, walkable from all homes. This detail study presents an illustrative configuration for such a local centre.
- 2.15 The illustrative local centre example is based on the north-western local centre illustrated in the Structure Plan. Due to its location north of the railway and the larger scale of development in this parcel, this local centre has the potential to be marginally larger in scale and facility than others in the southwest and southeast. Nevertheless, the principles demonstrated of people-friendly spaces, integrated active movement, and co-location and concentration of facilities hold for the other local centres.
- 2.16 Concentration of day-to-day services within the local centre ensures day-long activity levels on the streets, and reinforces its vitality and creates a sustainable catchment for services located there. Located at a walkable distance from homes in the neighbourhood, this will reinforce the use of active travel for regular services.
- 2.17 The local centre study demonstrates the principle of integrating the following potential land uses:
- Primary school
  - Mid-size food store (approx. 1,350m<sup>2</sup> gross floorspace)
  - Nursery
  - Care home / elderly accommodation / day care facility (use class C2/C2A)
  - Community space and garden
  - Smaller retail and café units
  - Housing – apartments and terraced houses
- 2.18 In addition, the local centre study illustrates the following movement principles:
- Use of a bus gate along the main street to restrict through vehicle movement to public transport only. ANPR or pneumatic bollards offer means by which through traffic can be prevented.
  - Integration of dedicated cycling and pedestrian routes to encourage active travel
  - Integration of car parking for some uses
- 2.19 The study also demonstrates the integration of existing blue and green infrastructure networks, retaining existing mature trees, use of existing watercourses, and the use of planting and landscaping within streets to provide an attractive environment and manage surface water runoff effectively.





- |                                                                |                                                                                                                    |
|----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| 1 Primary School                                               | 10 Bus stop                                                                                                        |
| 2 Residential Care Home + Day Care Facility (use class C2/C2A) | 11 Bus Gate                                                                                                        |
| 3 Nursery                                                      | 12 Bus Only Section of Carriageway                                                                                 |
| 4 Community Facility                                           | 13 Parking for Care Home                                                                                           |
| 5 Food Store (approx 1350m <sup>2</sup> )                      | 14 Square Parking (shared for food store and other facilities) - one for each eastern and western vehicle accesses |
| 6 Ground Floor Retail with Apartments above                    | 15 On-Street Parking                                                                                               |
| 7 Apartments / Flats                                           | 16 Pedestrian Footbridge                                                                                           |
| 8 Terraced Houses                                              | 17 Retained Mature Trees as Focal Points                                                                           |
| 9 Semi-Detached Houses                                         | 18 Teardrop Lakes and Weirs                                                                                        |
|                                                                | 19 Existing 're-wilded' watercourse with leisure routes                                                            |

Figure 7: Local centre design principles and detail study

# 03 SOUTH WEST EXPANSION AREA

## Overview

- 3.1 The southwestern expansion area is the smallest of the three major residential expansion areas, and the most constrained physically. It is also one of the best connected to the existing town, but the edges of development will need to be handled with care to ensure it does not contribute to perceived coalescence with surrounding hamlets.
- 3.2 The landscape character of the southwestern area is dominated by natural and open spaces with water running through. It is continuous with that of the northwestern area, but differs in that it has strong existing tree lines, and has visual interconnectivity with the High Weald to the south. As a result, it has a more enclosed, treed feel, with development sitting within this framework. Active travel connections through the landscape towards the town centre are prominent.
- 3.3 This area is of a more limited scale than the northwestern and southeastern expansion areas, and has a local centre more limited in size.
- 3.4 The southwestern area hosts the comprehensive sports hub facility, which should be designed to integrate into the surrounding landscape and open space corridors. A detail study of an illustrative configuration is presented.
- 3.5 This chapter presents annotated layer diagrams based on the Structure Plan to provide a further level of masterplanning detail, based on the overall character of place defined above.

## Structure

- 3.6 The Structure Plan extract highlights the limited development capacity of this area, and the predominance of open green space, which offers real potential to develop a garden village character.





Figure 8: Structure Plan extract for southwestern masterplanning area



## Land Use

- 3.6 Development parcels are located outside flood zones, in accordance with the sequential test. Detailed design work and flood analysis will be required to determine the final limits of each development parcel.

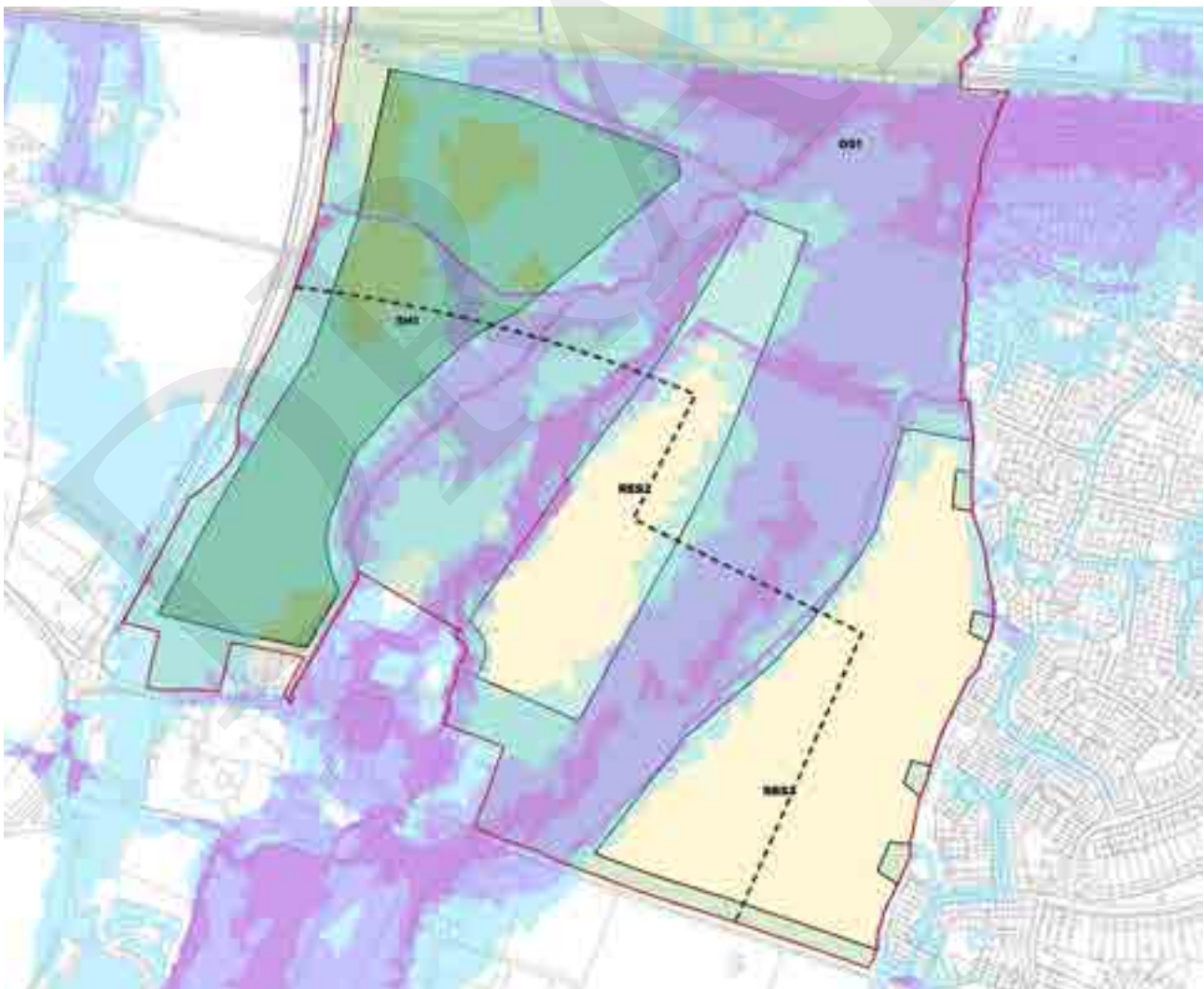


Figure 9: Land Use plan extract for southwestern masterplanning area

## Movement

- 3.7 Mobility proposals are consistent with those for the north-western area in that they incorporate a bus gate as a key means of controlling through traffic. Again, the floodplain is crossed by a causeway.
- 3.8 Strong cycle and pedestrian connections with the adjacent residential area should be provided. New pedestrian and cycle crossing of the railway in the north-east corner of the site will be required.

**A** Causeway over flood plain



**B** Pedestrian/cycle bridge



Figure 10: Mobility plan extract for southwestern masterplanning area



## Community Wellbeing

3.10 This area will accommodate a new sports hub to meet the formal open space requirements of the urban expansion sites, in accordance with the Council's Recreation Open Space SPD. Sports pitches could cater for a broad number of sporting activities, whilst an indoor facility could provide changing and meeting space, a gym, indoor sports courts and potentially a new swimming pool. Furthermore, the site offers a potential location for a new GP surgery; the combined facility could be used to promote general health and wellbeing, preventative healthcare, physiotherapy and other treatments. A small local centre will provide scope for a small convenience shop and community meeting place.



**A** Sports Hub detail study (see p24-25)



Figure 12: Community infrastructure plan extract for southwestern masterplanning area

## Urban Design Framework

3.11 An urban design framework establishes the initial design parameters for effective placemaking, ensuring the new expansion areas are legible, varied, have a sense of place and distinctive character, and integrate well with their surrounding context and landscape setting. They provide an extra level of design detail over the Structure Plan and assist in graphically establishing the key moves that proposals coming forward should adhere to. Further guidance will be provided in the form of SPDs, to inform the preparation of planning applications.

3.12 The southwestern development area is highly constrained by pre-existing Flood Zone 2 and 3 areas, and development parcels are defined strongly by this.

3.13 The urban design framework defines several key placemaking features:

- Orientation of main north-south streets and spaces that allow views southwards towards the High Weald
- Strong street frontages and landmark buildings defining these north-south streets
- A key node where the main street crosses the landscape corridor, to create a distinctive place within the landscape
- An eastern edge that backs directly onto existing gardens, to form a continuous extension of the existing town
- Use of planting and buffers to distance development from Badsell Road and the setting of the listed buildings in the south west
- A strong planted edge on the west to define a new edge to the Green Belt



**A** Retention of tree lines to structure development



**B** Buffer to Badsell Road





Figure 13: Urban Design Framework plan for southwestern masterplanning area

## Detail Study: Sports Hub

- 3.12 The proposed Sports Hub in the Structure Plan integrates all of the sports pitch requirements for the expansion areas (North West, South West and South East) in a single location. This co-ordinated approach provides the opportunity to create a centre with a concentration of facilities, with the potential to have a better overall sports and leisure offer for Paddock Wood.
- 3.13 This detail study demonstrates a potential layout, integrating a wide variety of pitches and facilities on the 10ha of land earmarked for the centre.

- 1 Sports Centre with 25m Pool
- 2 Pavilion / Changing facilities (4 teams)
- 3 Maintenance facility
- 4 Football
  - A U9 / U10 pitches 2no.
  - B U11 / U12 pitches 2no.
  - C U13 / U14 pitch 1no.
  - D Senior pitches 2no.
- 5 Rugby Senior pitch 1no.
- 6 Cricket Senior pitch 1no.
- 7 Netball / Tennis Outdoor courts 6no.
- 8 Artificial Grass Multi-sport Pitch (hockey and recreational football) MUGA facility 1no.

## Design Principles

### Northern Parcel

Grouping the 'built' facilities and elements and those with flood lighting together, on the northern side of the new access road will enable efficiencies in construction and services / utilities and also help to reduce their visual prominence.

The MUGA and outdoor sports courts along with parking are located to the western edge where they can be screened to a degree from the Green Belt by the existing tree belt, road embankments and adjacent rail line.

The grass pitches are located to the east where their open, grassed appearance will sit more comfortably with the adjacent linear park.

The Sports Centre building is located next to the access road for ease of access and improved legibility. It also sits more centrally between the northern and southern elements of the Sports Hub.

### Southern Parcel

The grass sports pitches and associated changing facilities are grouped together and located to the south of the new access road. The less-intrusive nature of construction, lack of flood lighting and open grassed character will sit comfortably adjacent to the new linear park as well as retain a strong sense of

'openness' adjacent to the Green Belt in this more visually exposed part of the site. The changing facilities are located centrally in order to provide a more balanced service. The building could also function as a pavilion facility for the cricket pitch.

### Access and Movement

Safe and convenient access is provided to and from the Sports Hub facilities with direct links to the walking and cycle path network to encourage active travel as well as centrally-located bus stops and parking including bays with permeable surfacing. Recreational paths provide an extra layer of permeability to serve the nearby community.

Vehicular access to the Pavilion / Changing Facilities are indicated as being directly off of the A228. Should this not be desirable, access could be provided directly from the New Link Road running south.

### Integrating with the Wider Open Space

In addition to the formal sports pitches and facilities, there is the opportunity to provide informal 'trim trail' exercise stations alongside a recreational path network. This would encourage more people to access and use the open space helping to further integrate the Sports Hub into the open space network and wider community.



- 9 Bus stop
- 10 Car parking
- 11 Garden / outdoor meeting space
- 12 Cycle paths
- 13 Recreational paths
- 14 Trim Trail exercise station
- 15 Tree belt for screening
- 16 Existing hedgerow
- 17 Linear park
- 18 Vehicular access point

Figure 14: Sports hub design principles and detail study



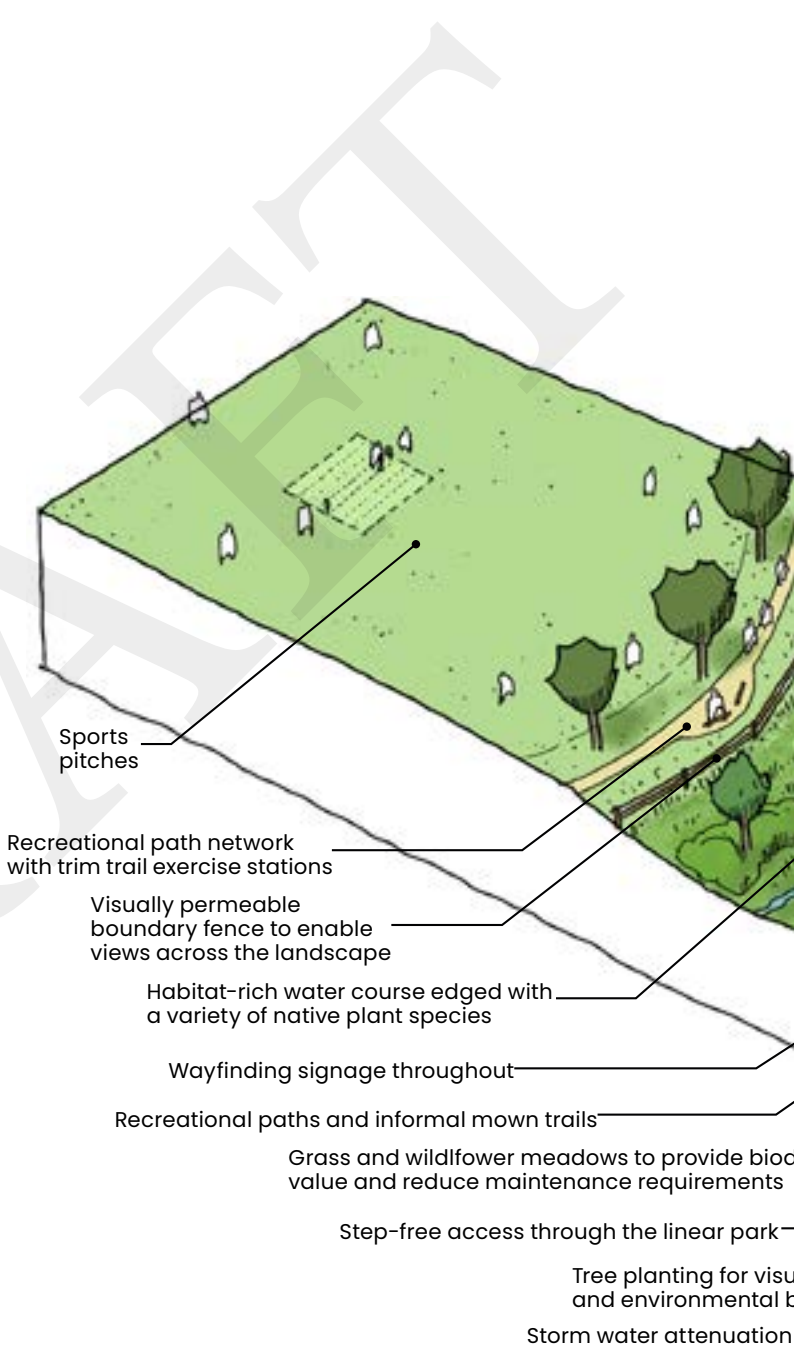
## Detail Study: Landscape Character

3.14 The design of open space between residential development will play an essential role in defining sense of place and character of the expansion areas. As outlined in the Structure Plan, this varies considerably between eastern and western expansion areas, reflecting their very different landscapes and masterplanning conditions.

3.15 This detail study presents a transect through an open space corridor, to demonstrate potential landscape and open space typologies suitable for this site.

3.16 The landscape character detail study presented here is also broadly applicable to the north-western expansion area, due to their continuous connection north-south. In line with the north-western site's greater capacity to hold floodwaters, and more open landscape character towards the north, detailed landscape treatments will vary, but the principles of a natural and open landscape remain.

3.17 Open space on the western side of Paddock Wood and in east Capel is mostly natural in form, integrating water management throughout, and breaking up development into smaller parcels and creating expansive active travel movement networks. As such landscape design should be strongly influenced by existing vegetation and watercourses, with well-integrated active movement networks.



## Design Principles

### Accessible

A network of connected walking and cycling trails and paths will extend through the landscape to provide a variety of opportunities for travel, recreation, play and exercise.

### Visual Connectivity

Visual connectivity across the landscape will enable views and sightlines between 'landscape types', increasing the sense of openness and scale of the linear park.

### Wildlife-rich

The variety within the western landscape will create a mosaic of habitat types to suit a wide variety of flora and fauna as well as provide for amenity and recreation for residents and visitors.

### Variety

The scale and character of the western landscape will provide a variety of opportunities for travel, recreation, play and exercise.



Figure 15: Western landscape character design principles and detail study

# 04 EASTERN EXPANSION AREA

## Overview

- 4.1 The eastern expansion area is of a similar scale of development to the northwestern expansion area, but is on the southern side of the railway line and better connected through existing streets to the town centre and urban fabric. It will also deliver bus, cycle and pedestrian connections to recently permitted growth areas such as the Church Farm scheme by Countryside.
- 4.2 The landscape character of the eastern expansion area is more agricultural, with good visual relationships to the existing town and surrounding farmland. The land is less dominated by water, and as a result less physically constrained.
- 4.3 This area will be more closely connected to the existing urban fabric, and as a result the character of development will feature more formal and linear open space, with views to surrounding farmland and landmarks such as oast houses and the existing area of Paddock Wood. This character will be reflected in a local centre based around a formal green open space, with links along the former Hop Pickers railway line to the town centre and surrounding countryside.
- 4.4 This chapter presents annotated layer diagrams based on the Structure Plan to provide a further level of masterplanning detail, based on the overall character of place defined above.

## Structure

- 4.5 The eastern expansion area should be a well connected neighbour of Paddock Wood, with the design of the site referencing the built settlement along the western flank and the open countryside to the south and east. Existing watercourses, tree planting, a north-south spine route for buses, and heritage assets such as the former Hop Pickers railway line shape the plan.





Figure 16: Structure Plan extract for eastern masterplanning area

## Land Use

4.6 Figure 17 demonstrates the limited influence of surface and flood water on the Structure Plan. Development is focused along the spine route, with peripheral properties benefiting from a view across greenspace.

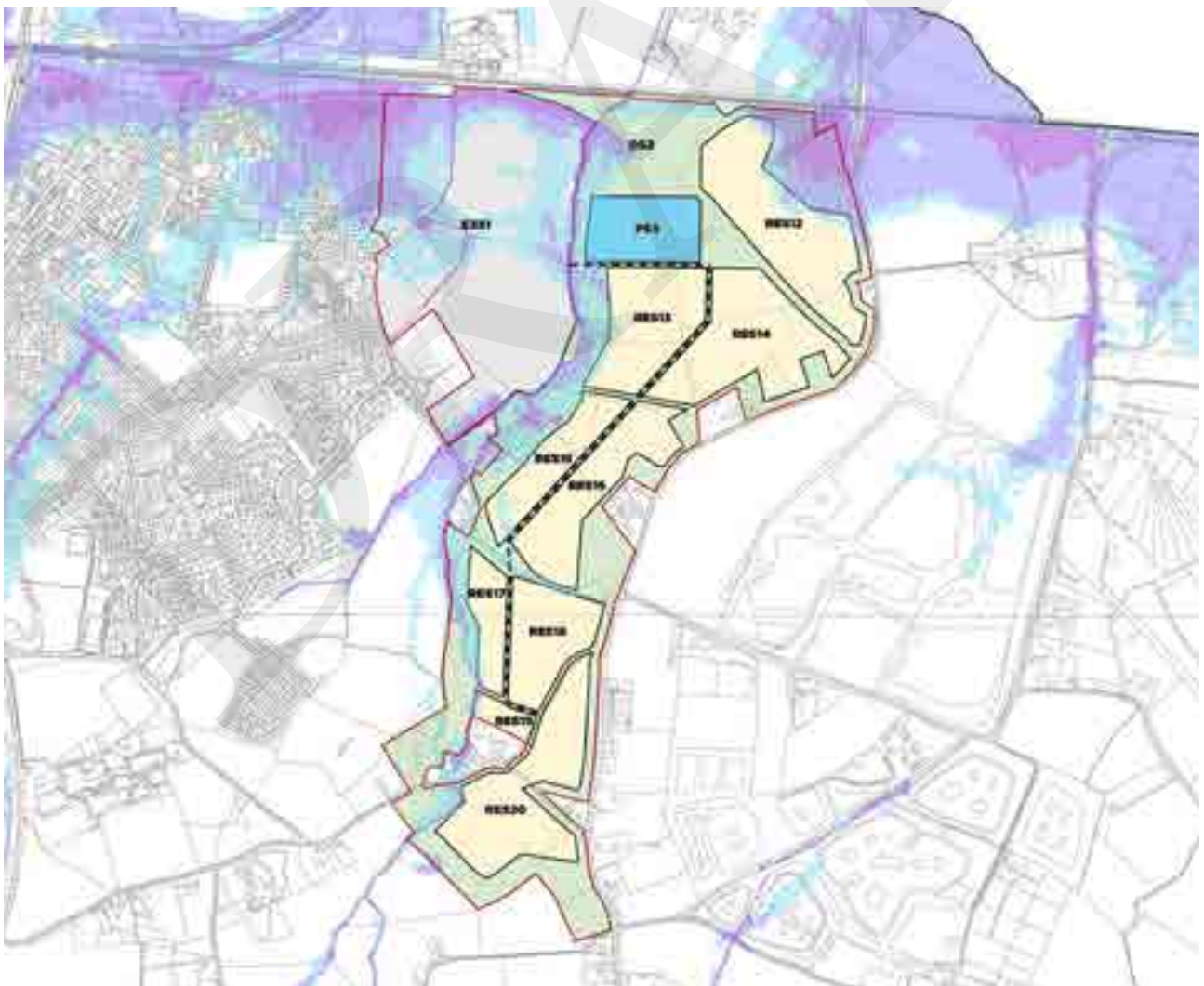
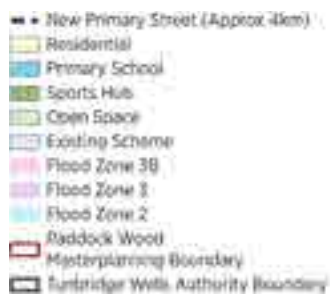


Figure 17: Land Use plan extract for eastern masterplanning area

## Movement

4.7 North-south connectivity through the site is important for all modes of travel, but cars will be prevented from travelling through the adjacent development at Church Farm by a bus gate. Walking and cycling routes should afford priority to pedestrians and cyclists.

**A** Connection to the Hop Pickers Line



**B** Bus Gate



Figure 18: Mobility plan extract for the eastern masterplanning area

## Green and Blue

4.8 The green and blue infrastructure framework follows the north-south alignment of the site and acts as a key structural element. Greenspace should be informal, offering high levels of residential amenity and ecological habitat. Substantial planting belts along the eastern edge and in the south of the site should help to filter views and broker a transitional relationship with the open countryside beyond.

**A** Landscape character detail study  
(see p26-27)



- Potential Area for Strategic Growth
- Sports hub
- Wildland park
- Trees and structural planting
- Flow of Water
- Other open space
- School playing fields
- Flood defence measures
- Sewerage Works Improvements



Figure 19: Green and blue infrastructure plan extract for heastern masterplanning area

## Community Wellbeing

- 4.9 A new primary school and local centre, with scope for a convenience store and community meeting place should be located within the north of the site to complement a new, consented primary school which is being developed near the southern end of the site. Mascalls Secondary School is within easy walking and cycling distance.



Figure 20: Community infrastructure plan extract for eastern masterplanning area



## Urban Design Framework

4.10 An urban design framework establishes the initial design parameters for effective placemaking, ensuring the new expansion areas are legible, varied, have a sense of place and distinctive character, and integrate well with their surrounding context and landscape setting. They provide an extra level of design detail over the Structure Plan and assist in establishing the key requirements that proposals coming forward should adhere to.

4.11 The eastern expansion area is less constrained physically, and in line with Structure Plan design principles, is more closely integrated into the existing town's urban fabric.

4.12 The urban design framework establishes the following key placemaking principles:

- Landmark buildings fronting onto a green space forming the heart of the local centre
- Re-use of the Hop Pickers' line as an active travel link to the town centre and countryside
- Views from main streets and the local centre towards the south (High Weald hills), and the eastern agricultural landscape, to anchor the development within its surrounding landscape
- Strong street frontages along the main north-south street
- A planted eastern edge retaining the rural nature of Queen Street



**A** Views south to High Weald



**B** Views to Oast Houses





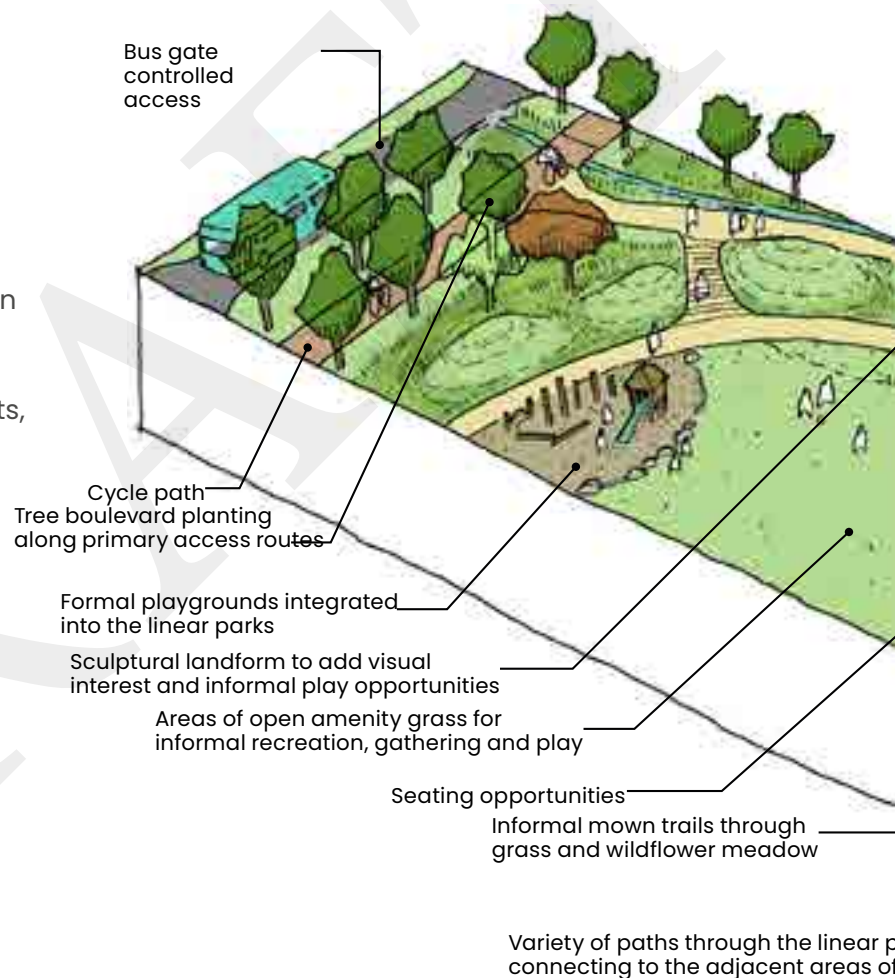
Figure 21: Urban Design Framework plan for eastern masterplanning area

## Detail Study: Landscape Character

4.13 The design of open space between residential development will play an essential role in defining sense of place and character of the expansion areas. As outlined in the Structure Plan, this varies considerably between eastern and western expansion areas, reflecting their very different landscapes and masterplanning conditions.

4.14 This detail study presents a transects through an open space corridor, to demonstrate potential landscape and open space typologies suitable for this expansion area.

4.15 The eastern expansion areas are less physically constrained for development, and as a result open space is less expansive and takes on a parkland character, with integrated uses such as allotments, play areas and orchards. The eastern site will be more continuously linked into the urban fabric of the existing town.



## Design Principles

### Accessible

A network of connected walking and cycling trails and paths will extend along and through the landscape connecting to the adjacent neighbourhoods

### Landscape Rooms

A varied landscape, comprised of a series of distinct areas which provide for a wide diversity of peoples day-to-day travel, recreation, social interaction, exercise and play needs

### Informed by heritage

The linear parks will reference the productive landscape of the past through the retention of some existing and creation of new community orchards and allotment gardens, positively integrated into the open space network

### Resilient

The open spaces will incorporate measures for a resilient future including SuDS and stormwater attenuation, a varied and suitable plant species palette and a considered approach to future management which can help reduce maintenance requirements



Figure 22: Eastern landscape character design principles and detail study



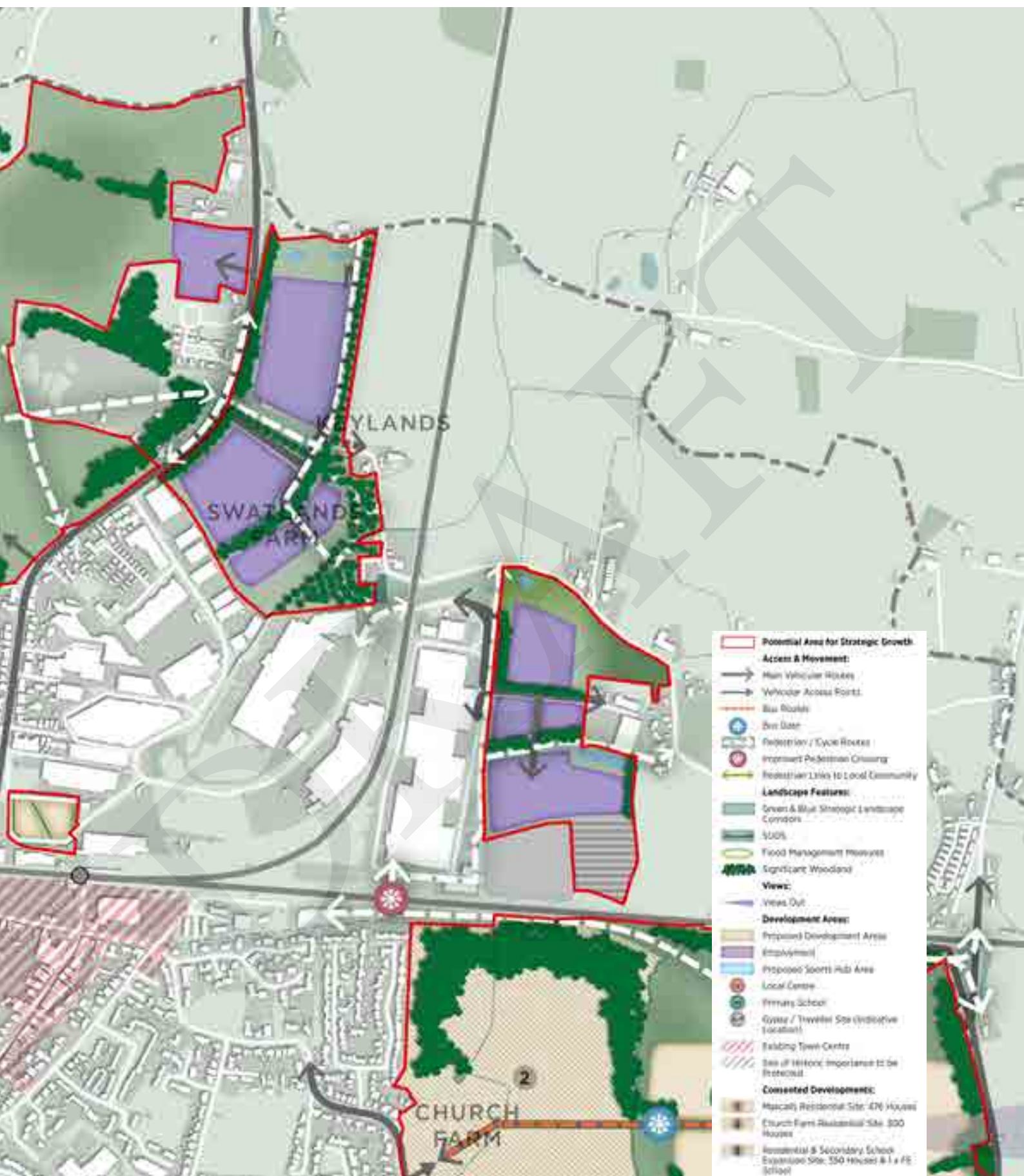
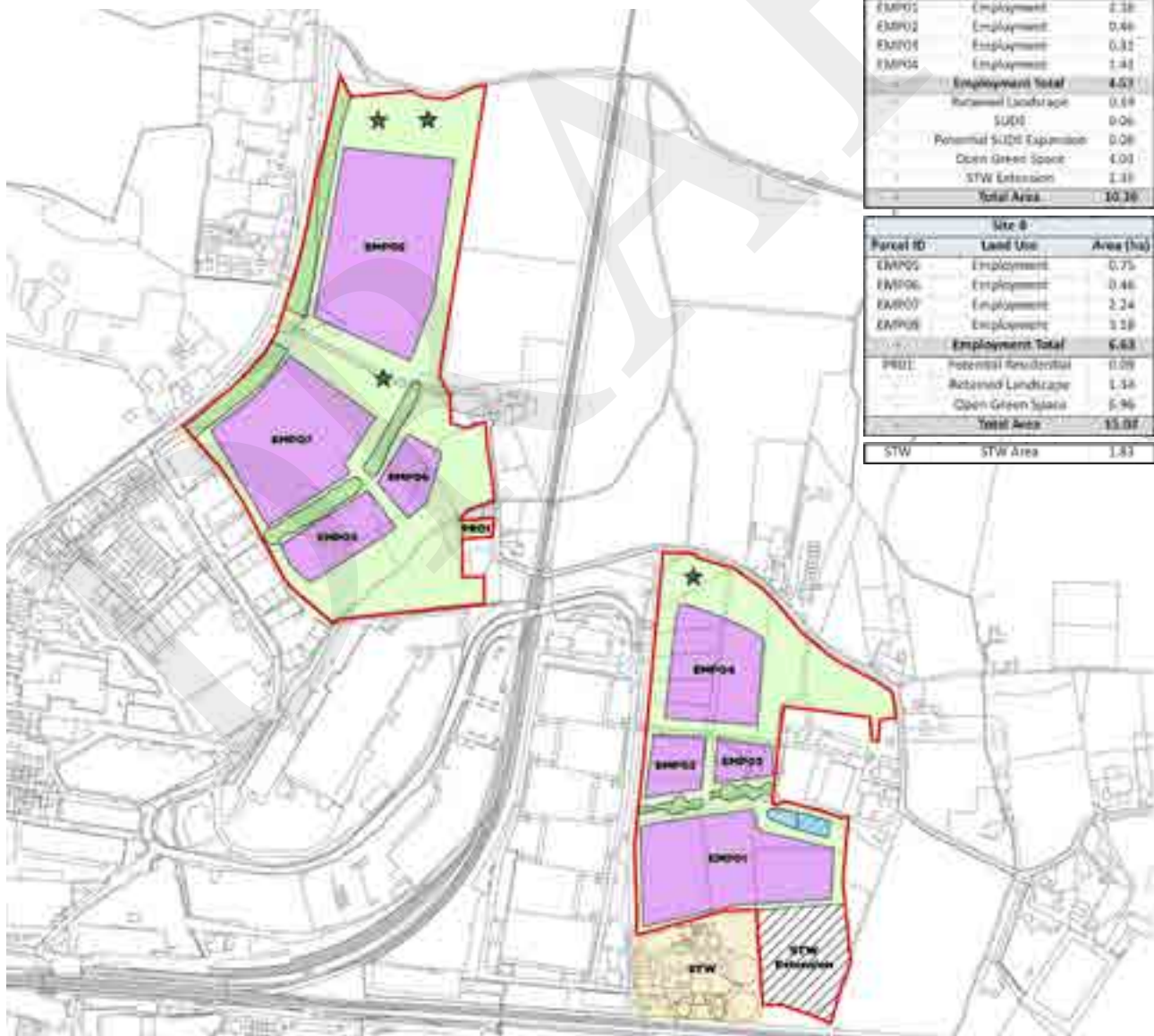


Figure 23: Structure Plan extract for northern employment masterplanning area

## Land Use

- 5.5 Development parcels (pink) are regular shapes and suitable for subdivision.
- 5.6 Potential locations for drainage attenuation ponds as part of a SuDS scheme are located at the northern boundaries of the northern and north-eastern parcels, using the natural topography of the site to retain water within boundaries .
- 5.7 Land at the far south-eastern corner of the north-eastern parcel is earmarked as potentially being required for an extension to Paddock Wood’s sewage works, as discussed in the main Structure Plan and Infrastructure Framework report. Should Southern Water confirm this land is not required, it could accommodate further employment uses.



Site A		
Parcel ID	Land Use	Area (ha)
EMPO1	Employment	2.38
EMPO2	Employment	0.46
EMPO3	Employment	0.32
EMPO4	Employment	1.41
<b>Employment Total</b>		<b>4.57</b>
Retained Landscape		0.69
SuDS		0.06
Potential SuDS Expansion		0.08
Open Green Space		4.01
STW Extension		1.31
<b>Total Area</b>		<b>10.38</b>

Site B		
Parcel ID	Land Use	Area (ha)
EMPO5	Employment	0.75
EMPO6	Employment	0.46
EMPO7	Employment	2.24
EMPO8	Employment	3.18
<b>Employment Total</b>		<b>6.63</b>
PR01: Potential Residential		0.09
Retained Landscape		1.34
Open Green Space		5.96
<b>Total Area</b>		<b>15.02</b>
STW	STW Area	1.43

Figure 24: Land Use plan for employment allocations

## Movement

5.8 Access to the sites is provided from the Maidstone Road and Transfesa Road, with a potential through connection from the north-eastern parcel to the Maidstone Road. Provision of this through connection would be subject to impact on existing trees and highway considerations, but is the preferred approach.

5.9 Each development plot has access to the primary access street running through the sites, to ensure efficient servicing and vehicular access.

5.10 Active travel links with the town centre and residential expansion areas are continued through the sites, and improvements to the pedestrian bridge over the railway line into the town centre is included in the Infrastructure Framework. These routes are intended to complement similar measures within the residential sites to ensure easy walking and cycling between home and work. Routes should be well-lit, safe and convenient.

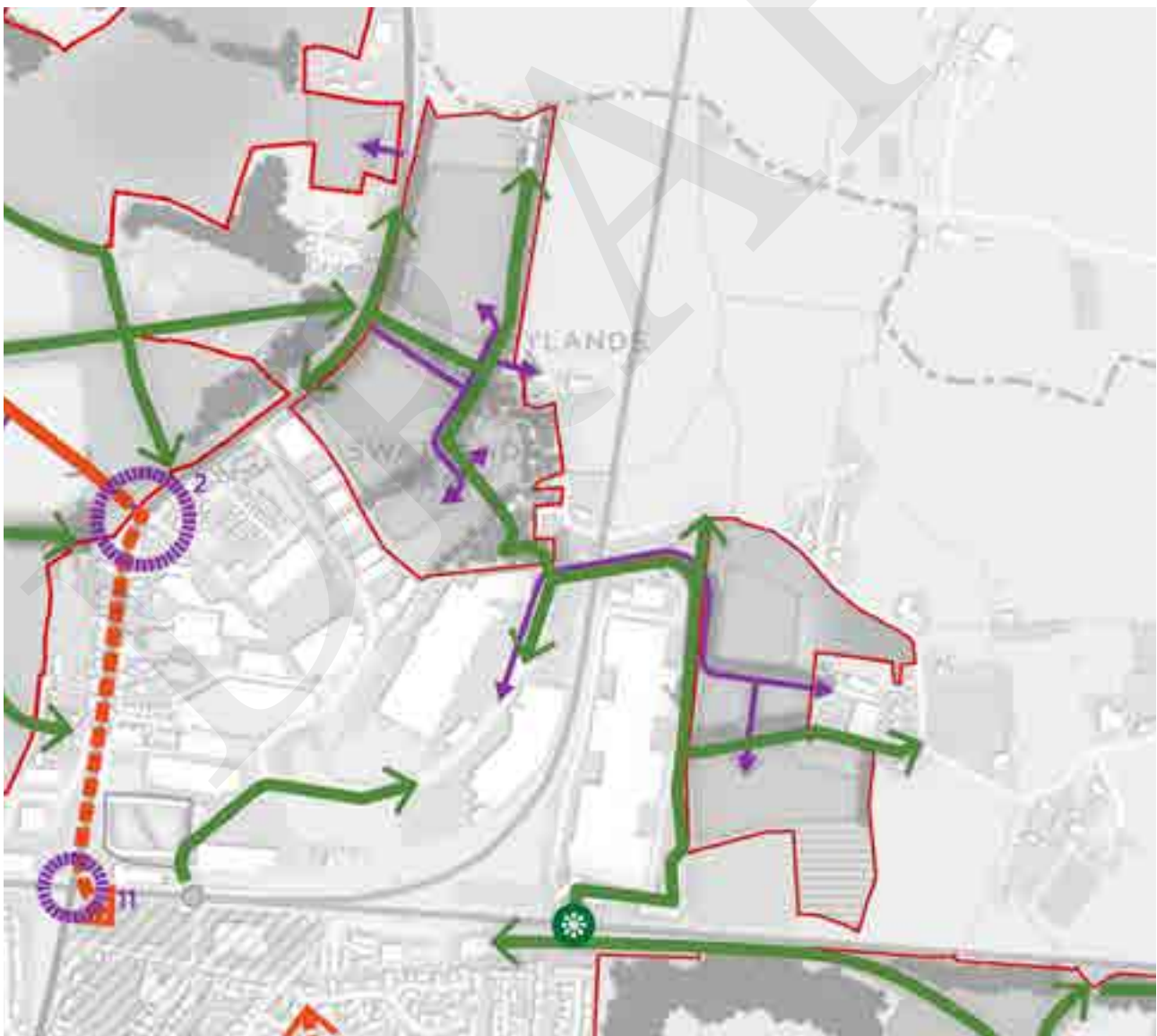


Figure 25: Mobility plan extract for northern employment masterplanning area



## Urban Design Framework

5.11 The urban design framework for the employment sites sets out basic parameters for more detailed masterplanning of the sites. They set out the following key design principles:

- Gateway features at the primary vehicular entrances to each site
- Frontages onto the main streets and movement corridors
- Use of planting and landscaping to create legible nodes where main streets cross green active travel corridors and existing mature hedgerows
- Use of planting to provide visual screening of some larger units . This includes the retention of mature tree planting along Maidstone Road and Lucks Lane.





Figure 26: Urban Design Framework plan for northern employment masterplanning area

# 06 TOWN CENTRE

## Overview

- 6.1 This chapter presents a study of Paddock Wood's town centre in the context of the significant anticipated expansion of the town over the Local Plan period. It includes a masterplanning framework to maximise the opportunities for regeneration and development in the town centre that an increase in population presents.
- 6.2 The policy context and baseline situation for the town centre allocation is set out in the full Structure Plan and Infrastructure Framework report.

## Background

- 6.3 The growth of Paddock Wood over the Local Plan period to 2038 have significant implications, changing the scale of the town, and this has particular implications for the town centre. The draft allocation suggests that the population of the town is likely to double from present levels, with a significant increase in the provision of employment land as well.
- 6.4 Such levels of growth demand a holistic understanding of what this might mean for the function, form and opportunities for the town centre. If planned for, growth could underpin viable new services and an increase in activity and vitality within the town centre.
- 6.5 This study is taking place during the period of the COVID-19 pandemic, which has had significant effects on lifestyles and places across the UK. Its long-term implications are not yet known, but it is clear that changes in working patterns and lifestyle could have potentially positive effects on town centres such as Paddock Wood, if planned for proactively.
- 6.6 The masterplanning work that has formed the Structure Plan aims to provide good pedestrian and cycling connections to Paddock Wood town centre, and to ensure that new neighbourhoods are positively connected to the town centre without creating alternative centres within the town (beyond those intended to serve the immediate neighbourhood). This approach aims to strengthen the core and provide critical mass for new services. The compact nature of the town supports an active travel-led movement strategy to bring people into the town centre.
- 6.7 This study takes in the defined town centre, but also looks more widely at other potential long-term opportunities. These include redevelopment of some land north of the railway line, such as that currently occupied by BarthHaas.

6.8 At present, Paddock Wood’s urban area, nearly all residential land and town centre is concentrated to the south of the main railway line (east-west). Dedicated employment land is located entirely to the north of the railway. Under the growth scenario outlined in the Structure Plan, this would change, with a significant number of homes located to the north of the railway.

6.9 Historically, employment land has been located adjacent to the railway due to industrial need for access to the railway for movement of products (in particular hops). This need for adjacency is no longer present, and the sidings at Paddock Wood are used exclusively as a Network Rail maintenance depot. With planned growth, large format employment uses have the opportunity to move northwards, towards the strategic

- Town Centre
- Homes
- Employment
- Primary road
- Rail line
- Paddock Wood rail station
- Pedestrian access



Figure 27: Paddock Wood land use before (left) and after (right) expansion in line with Structure Plan Option 1

road network, and away from the town centre. This could provide betterment for those businesses (such as Barth Haas) with improved buildings, and a more appropriate use of land adjacent to the railway station and town centre, in this case, residential. This presents an opportunity to better connect land north and south of the station, to 'straddle' the tracks, forming a bridging link to the draft growth allocation to the northwest of the town.

6.10 There is only one route from the north into the town centre; the Maidstone Road bridge over the railway line. This has restricted pedestrian and cycling space. Addressing this movement issue will be an essential part of a town centre strategy.

6.11 Growth to the west of the town has the potential to provide fluvial flood betterment to the town centre. This intervention offers the possibility of increased residential development in the town centre, supporting viability and activity, as well as maximising sustainable transport opportunities by offering dwellings close to buses and rail transport.

- Town Centre
- Employment
- Homes
- Primary road
- Rail line
- Paddock Wood rail station
- Pedestrian / cycle access
- Bus route

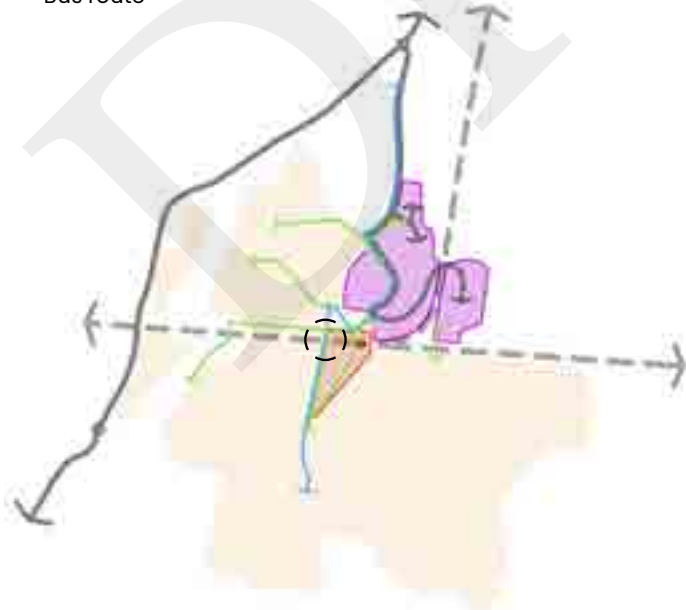


Figure 28: Expansion of employment land away from town centre

## Economic Analysis

6.12 This town centre masterplanning study has been informed by a report from SQW on the economic opportunities for Paddock Wood presented by planned growth over the Local Plan period. The town centre is considered a critical location for building on the opportunities for growth, with its central and well-connected location in relation to the expanding population.

6.13 The report found that

- The wider population base is relatively highly skilled, and Tunbridge Wells has particular strengths in sectors of the knowledge economy, but the skills-base of the resident population is significantly lower qualified overall than compared with nearby Tunbridge Wells.
- As of 2011, approximately 30% of residents live and work in Paddock Wood; the rest commute to Tunbridge Wells, Tonbridge and Malling and Maidstone; a further 10% commute to London.
- Paddock Wood's town centre 'offer' is relatively functional and responds to the day-to-day needs of the town's residents along with those of its rural hinterlands.
- Paddock Wood's office market is limited in scale and offer

- The sectoral and locational economic impacts of Covid-19 across the Kent economy have been varied, but are nonetheless significant.
- The emerging policy context for Paddock Wood clearly promotes a comprehensive, masterplanned approach to the regeneration, revitalising and diversification of the town centre, and encourages a mix of uses in the town centre
- Increasing demand is emerging and anticipated to grow for flexible workspaces in locations previously considered as either suburban or satellite residential locations to support blended ways of more localised working closer to employees' homes.
- The increasing shift towards more localised working – typically in higher-value knowledge and service economy related sectors – could both demand and catalyse the further diversification and offer of local town centres.

6.14 In regard to interventions within the town centre, key findings from the report included:

- A flexible workspace 'hub' of c.150–200sq m in the centre of Paddock Wood should form a central part of the proposed masterplan for Paddock Wood town centre (as per PSLP Policy STR/SS2).
- Site Allocation wording for Baarth Haas site to acknowledge potential economic/employment implications of site release (i.e. promote mix of uses)

6.15 The full report can be read in an attached Appendix to the main Strategic Sites Masterplanning and Infrastructure Study.





Figure 29: Existing town centre movement infrastructure

## Baseline Urban Design Analysis

6.17 Paddock Wood's town centre is bounded to the north by the railway line and station. To the east it is bounded by the B2160 Maidstone Road. Within the town centre Commercial Road is the main shopping street and heart of activity. Bus stops are located near the railway station and at the southern end of Commercial Road. Bus stops to the north of the station are some distance away. Opportunities for easy interchange are not evident.

6.18 There are significant barriers to movement from the north and the west. The railway line prevents all movement except along the B2160, and the embankment for the railway bridge constrains movement from residential areas to the west.

6.19 The railway bridge on the B2160 is the single town centre crossing from the north, and carries buses, cars, HGVs and pedestrian traffic. Pavement widths are extremely narrow. The bridge over the tracks within the railway station is behind the station ticket line and is not a public right of way.

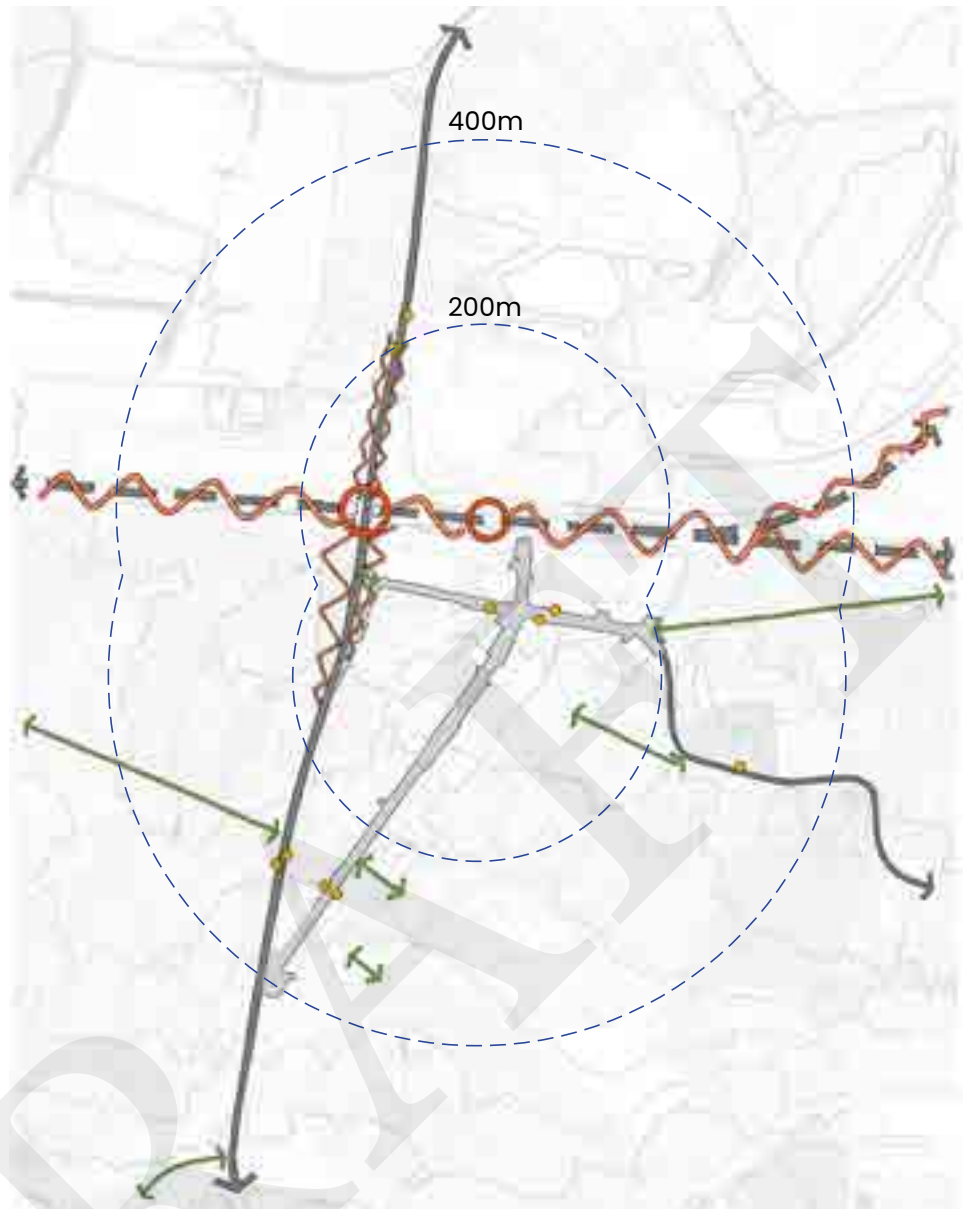


Figure 30: Barriers to movement and existing pedestrian and cycling accessibility

6.20 Pedestrian and cycling access into the centre is surprisingly limited. Many routes are through alleyways behind back gardens, which may be perceived as unsafe, particularly after dark. Routes from the east are concentrated along Church Road, which arrives in the centre outside the Waitrose service yard. There is poor permeability from the B2160 across to Commercial Road from the west.

6.21 At the northern end of Commercial Road, near the station, the public realm is compromised by the service yard of Waitrose, which faces this natural point of activity and focus.

6.22 Commercial Road has a mix of high quality frontages interspersed with more recent development of varying scale, design and quality.

## Opportunities

- 6.23 At the northern end of Commercial Road, a natural point of focus and activity is present but is currently underutilised with poor public realm and few facilities. This could be the focus of a high quality civic space, which the town currently lacks.
- 6.24 There is a smaller opportunity north of the station to create improved public realm and enhance the arrival and departure experience for passengers heading north by other modes.
- 6.25 Opportunities for improvements to accessibility are also present. North-south connections across the railway could be enhanced with a new pedestrian and cyclist bridge adjacent to the existing bridge, as well as a 'street' bridge at the railway station to provide north-south connectivity without needing a rail ticket.
- 6.26 Improved connections into Commercial Road from the west and east are also possible, utilising existing vacant or undeveloped land.
- 6.27 Away from the movement network, there are several opportunity sites to accommodate new uses and development that would be made viable by planned growth. These are primarily concentrated at the northern end of Commercial Road or in the railway station environs. Land ownership in these areas is more consolidated, aiding potential redevelopment and intensification.
- 6.28 Finally, although only the Barth Haas site is being promoted during this Local Plan period, by providing improved connections across the railway, there is a long-term opportunity to redevelop more employment land north of the railway line more intensively to create higher-density neighbourhoods, focused around the railway station. This possibility should be future-proofed for, with the proviso that there should be no net loss of employment land within the town.

## Illustrative Masterplan

- 6.29 To support the growth of Paddock Wood, and build upon its opportunities, the illustrative spatial masterplan outlines:
- Key interventions
  - Access and movement considerations
  - Character areas with precedents
  - Potential for land use clusters
- 6.30 Several key interventions are proposed:
- A civic space at the northern end of Commercial Road, adjacent to the station, as a focus for community activities
  - Improvements to connectivity and permeability to improve access to the centre
  - A new residential quarter to the north of the railway, connected by a new overbridge from the civic space to the south
  - Development on the land adjacent to the station, made possible by the consolidation of car parking into multi-storey car parks
  - A car park to the north to reduce vehicle traffic through the town centre, and a car park to the south with access away from the new civic space
  - Core retail, employment and entertainment uses remain concentrated along Commercial Road to strengthen it as a focus of activity
- A secondary mixed-use area is located west of Commercial Road to expand the town centre's service offering
  - The potential to restrict HGV movements on the B2160 bridge, or reduce it to a 'shuttle' traffic light arrangement (with a single lane carriageway across) with space reallocated to pedestrian and cycling movement
- 6.31 The masterplan builds on the following principles:
- Concentrating activity in the centre through provision of high quality public realm
  - A permeable walking and cycling network, with continuing vehicle access and parking but with reduced impact on pedestrians and Commercial Road
  - Improve bus access to the railway station
  - Reflecting Paddock Wood's heritage as a railway town with terraces and compact development adjacent to the station
  - Space for emerging uses such as an employment hub, flexible commercial and leisure units and residential development



- 1 New Civic Square
- 2 Mews-style space
- 3 New public footbridge over railway tracks
- 4 Square north of station
- 5 Residential street grid
- 6 Parking and link through to Commercial Road
- 7 Shared space junction
- 8 Station Multi-Storey Car Parks
- 9 Potential HGV or Traffic Restrictions on bridge
- 10 Potential new pedestrian/cycle bridge over railway
- 11 New pedestrian route to access town centre from north
- 12 Business Hub Co-Working Space
- 13 Community Facility
- 14 Apartments over small retail units
- 15 Small office units near railway station
- 16 Apartment block with podium car parking
- 17 Potential future terraced housing
- 18 Churchill Retirement Living Scheme
- 19 Bus / Taxi / Rail Interchange

Figure 31: Illustrative Masterplan for Paddock Wood town centre

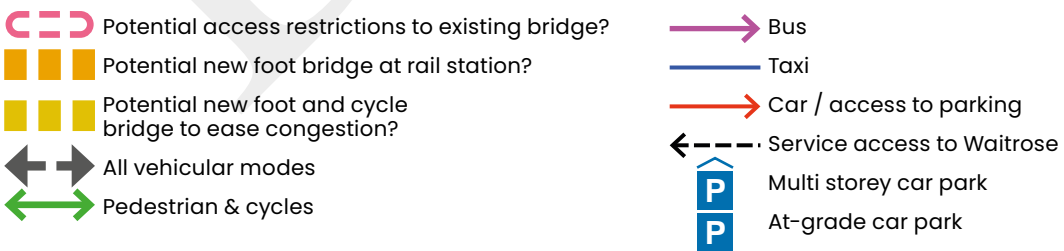


Figure 32: Movement of different modes in Paddock Wood town centre



Active travel spine



Quiet green lane



Industrial-style townhouse / apartments

Fine-grain in-fill mixed use development



Figure 33: Residential character areas and precedents



Cladding treatments to car park structures

Upgraded station & setting



Employment 'hub'

Flexible commercial leisure / retail units / pavilions

Built form and public realm interface



Figure 34: Commercial and mixed use character areas and precedents



## Indicative Capacity

- Sites West of Commercial Road: 30 residential units as a mix of houses and apartments, plus ground floor flexible retail or commercial units
- Land south of railway line: business hub employment use
- DPC14 (BarthHaas site): up to 140 apartment residential units



Figure 35: Land use 'clusters' in Paddock Wood town centre

## Implementation

- 6.32 Tunbridge Well Borough Council will have a key role in driving the preparation and delivery of a Strategic Framework.
- 6.33 Paddock Wood Town Council (PWTC) is in the process of preparing a Neighbourhood Plan, which will address issues of growth and the implications for the town centre. This study could offer a starting point and evidence for the preparation of that plan. Detailed design guidance, such as shop frontages, block typologies and other considerations, are also best handled at a local community level within the Neighbourhood Plan.
- 6.34 The development of the framework is intended to set out the aspirations for the growth of the town centre during the Local Plan period and to establish the policy parameters within which this growth will be managed.
- 6.35 Historically, such significant growth in local demand may have been met through the development of a new purpose built Shopping Centre. This would typically be anchored by a food store or a large national multiple trader and would be deigned to meet the needs of the multiple retailers. With the changes in shopping habits and the way that the more recent working age generation views and uses town centres, such an approach is now anachronistic. They are more likely to appreciate a local farmers market or food hub than another big supermarket, and a range of independent shops offering more artisan products over standard national retailer fare. They will want society, entertainment, services and places to work, whether formal or informal, within an attractive, clean healthy and appealing setting.
- 6.36 Key to long term delivery of such a vision will be the identification of a range of short, medium and longer term projects, rather than a big intervention such as the historic Shopping Centre approach.
- 6.37 The implementation of each project will depend on its specific circumstances, such as ownership, proposed or suitable mix of uses, relationship with the wider movement and accessibility strategy for the town, and the specific stakeholders involved. The role of the Local Authority and the Development Framework is to curate this growth so that it is specific to Paddock Wood and reflects the real demands of the growing population.



Artist's impression of town centre redevelopment opportunities



## **Delivery Process**

- 6.38 The delivery process will vary from project to project dependent on the stage of preparation.

### **Visioning**

- 6.39 For projects at the concept stage, visioning and development will be needed, possibly including option appraisal and consultation showing how these fit in with the development framework, and contribute positively to the evolution of the town centre e.g. proposals to better integrate and enhance the Station approach.

### **Design & Planning**

- 6.40 The next step is more detailed design. At this stage, more detailed costings can be carried out and delivery options refined, enabling specific planning applications to come forward. Experimental schemes may require more information or testing prior to full design e.g. implementing changes to the Maidstone Road bridge, if HGV crossing is prohibited, or developing more public use of the footbridge link at the station.

### **Assessing the need for Funding**

- 6.41 The costs and values identified and the certainty of deliverability derived from the planning process will enable, if required, a funding strategy to be developed. This will identify existing sources of finance and the need for specific funding applications to be made to address any gaps.

### **Procurement & Delivery**

- 6.42 It is anticipated that procurement and delivery will be a mixed economy of pure private sector development, public and private sector partnerships, and for some of the public realm projects, wholly public sector led and delivered.

## Potential Funding Sources

- 6.43 Public Sector – A level of investment will be needed to ensure the implementation of the public realm improvements to the Town Centre. Such investment can be used as the basis for match funding bids to agencies such as the Local Economic Partnership (LEP).
- 6.44 A funding and bidding strategy will need to be developed potentially using opportunities presented in the government’s post COVID initiatives aimed at supporting town centres and economic rebuilding.
- 6.45 Private Sector Investment – The prospects of wider growth and the presence of a clear town centre framework for development will increase private sector confidence and to help create an environment for investment. An open dialogue with developers will help to ensure high quality development will be achieved.
- 6.46 Developer Contributions (S106 Agreements) – To ensure that development in Paddock Wood makes its full contribution to mitigating its impact on the environment and on the plans for improved public realm infrastructure; the Borough Council will seek to enter into legal agreements with private developers under Section 106 of the Town and Country Planning Act 1990. This could include agreements for contributions to projects within the masterplan such as:
- The improvement to public realm and development of place in the Town Centre.
  - Amending traffic circulation and improving facilities for pedestrians and cyclists and car parking.
  - Infrastructure requirements.

## Viability

- 6.47 Securing development and appropriate level of contribution to place making and infrastructure will be predicated on the financial viability of the schemes as they come forward. A number of sites with immediate development potential have been identified in and around the town centre that may be able to support early interventions and establish the tone and context for change. However the majority of development proposals are likely to come forward in the medium to longer term.
- 6.48 The NPPF requires allocations within the Local Plan to have been proven to be broadly viable at the plan making stage through the testing of a range of development typologies. The viability process assumes that policy compliant development proposals will be able to generate a value in excess of the Existing Use Value of the site to provide the context in which a land transaction will take place, and development will be delivered. The viability work undertaken for the local plan to date broadly indicates that there is a strong prospect of viable residential development coming forward.
- 6.49 For mixed use commercial, employment, service, social and residential development, together with the range of public realm and infrastructure improvements required for the town centre to grow sustainably, viability will only be able to be determined as suitable development proposals come forward. Such proposals will come forward over time so the market in which individual elements are promoted will reflect the wider population growth that has then taken place. They do not and cannot therefore relate to viability based on current levels of cost and value, or current existing use land values. For example, the employment areas to the north of the railway line will become more obsolete over time and may well be relocated as wider employment sites become available. Their current Existing Use Value will not be the same at the point they come forward, and the current value of appropriate alternative uses similarly will change as the demand profile changes. There will be a tipping point where the demand for more town centre related uses, including elements of residential development, justify a change of use. This, however, cannot be demonstrated in advance of the demand coming forward to support those alternative uses.

6.50 The commercial circumstances and financial viability profile of a 15,000 immediate catchment population, compared to an 8,000 population, and a 23,000 population compared to a 15,000 population would render such viability testing of the town centre development framework as a meaningless snap shot in time, and may hinder the Council's ability to establish and safeguard spaces and routes necessary for sustainable town centre growth that will inevitably be needed to meet the growing local demand.

6.51 To guess at the impact of future changes in demand, cost and value would be unwise and unprovable and would therefore do nothing to indicate long term viability. A standard viability test for the town centre development framework could at this stage limit the ability for the town to meet the long term needs of its growing population, and to accommodate a sustainable mix of uses and activities in future.

## Timescales

6.52 Timescales related to the delivery of any development process are uncertain. In many cases they are reliant on third party involvement and commitment, and a complex range of activities such as relocations and the unravelling of existing lease structures that involve varying lead in times.

6.53 For the Paddock Wood town centre development framework, we therefore advocate identifying short term (0-5 years) known development opportunities, medium term (5-10 years) site areas with clear prospects for accommodating the types of uses likely to be associated with sustainable town centre growth, and broader areas where longer term (10 + years) growth will be supported in the future. The longer term would include, for example, include the areas to the north of the station and railway line, and that can support improved linkages with the surrounding planned residential growth. The longer term the opportunity, the wider the types and mix of uses that might be appropriate, so long as they contribute to the overall vitality, viability and sustainability of the town centre as a whole, and do not prejudice development or the provision of infrastructure that would also be similarly beneficial.



