

Paddock Wood Town Council

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

ISSUE 1 – Key Employment Areas

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

PWTC Response:

1. As we have set out in some detail [in our response to Matter 2, Issue 3 \(Employment Needs\)](#) the employment evidence is out of date and the Local Plan approach to employment is unjustified. A key flaw of the Local Plan is that it allocates approximately double the amount of employment land than what it states as its requirement. The ENS [CD 3.87] 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.
2. As discussed at the Matter 2 Hearings, the proposed Employment Allocation AL/RTW 17 – Land adjacent to Longfield Road has already been granted planning permission under Green Belt ‘very special circumstances’ pre-empting the independent examination of the Local Plan. [Table 2 of the Council’s response to Matter 2, Issue 3](#) , sets out the location, area and with an additional column providing commentary on the current planning status of the Local Plan employment allocations. As Table 2 sets out, the proposed allocation at Longfield Road in Royal Tunbridge Wells has a net developable area of 13.4 hectares which alone meets the Council’s stated employment land need.
3. Of the remaining three proposed Local Plan employment allocations, STR/SS 1 Land East of Maidstone Road in Paddock Wood is proposed for 4.6 hectares of employment land (it does not state what type of employment); and STR/SS 1 Land East of Transfesa Road is proposed for 7.3 hectares of employment (it does not state what type of employment). This equates to 11.9 hectares of employment land at Paddock Wood which is nearly double the Council’s stated employment requirement of 14 hectares.

Table 2: Employment land allocations proposed

Settlement	Site	Net developable area	Planning Status
Royal Tunbridge Wells	AL/RTW 17 - Land adjacent to Longfield Road	13.4	Outline planning permission granted (September 2020) for the development of up to 74,000 sqm of employment floorspace for use classes E, B2 and B8. Reserved Matters Pre-application discussions are underway for part of the site for B8 use and access road for a known major local employer.
Paddock Wood	STR/SS 1 - Land East of Maidstone Road	4.6	Preparation of a planning application is at an advanced stage and due to be submitted in early summer 2022 for 20,000 sqm employment floorspace on the southern part of this site (Swatlands Farm, to south of Lucks Lane) and a Planning Performance Agreement is in place.
Paddock Wood	STR/SS 1 - Land East of Transfesa Road	7.3	Site is being actively promoted by the agent through the Local Plan and as part of the Strategic Sites Working Group and has input to the Paddock Wood Masterplan document.
Gill's Green	AL/HA 6 - Hawkhurst Station Business Park	1.2	This is being actively promoted by the landowner/developer through the Local Plan.

4. Whilst the Economic Needs Study calculates the employment needs and requirements of Borough by the type of employment (offices, industrial, warehousing), given that this is a critical consideration for determining employment needs, TWBC does not attempt to reconcile its proposed employment allocations against its own evidence base (Economic Needs Study – August 2016).

Table 8.16: Employment Land Required (2013-2033 and 2013-2035)

	Labour Demand	Labour Supply	Past Take Up
Land required 2013-2033 (ha)			
B1a/b Office	5.9	5.6	1.6
B1c/B2 Industrial	-1.4	-2.3	4.6
B8 Warehouse	9.5	7.7	8.2
Total B	14.0	11.1	14.5
Land required 2013-2035 (ha)			
B1a/b Office	6.3	6.0	1.8
B1c/B2 Industrial	-1.8	-2.7	5.0
B8 Warehouse	9.6	8.1	8.9
Total B	14.0	11.4	15.8

Source: Turley – Sevenoaks and Tunbridge Wells Economic Needs Study – Final Report for Tunbridge Wells Borough August 2016

5. Policy ED 1 (The Key Employment Areas) provides no specification regarding the type of employment the Council considers is appropriate for employment at the allocations in Paddock Wood apart from a generic list of Class E, Class B, Class B8 – this could essentially be any type of employment. How, therefore, has the Local Plan tested the impacts of the potential mix of these employment types on

highways, landscape, heritage and flooding? How has the Council assessed the availability of labour supply? 11.9 hectares of Class E employment compared to Class B8 will have extremely different outcomes in terms of its impact and job creation. B8 clearly requires more land and creates less jobs and likely has more considerable landscape impact than an office development.

6. It is entirely unclear from its evidence how the Council has considered these potential development scenarios. The Sustainability Appraisal provides no detail on the employment land alternatives and their impacts.

Paddock Wood Eldon Way and West of Maidstone Road	Class E – financial, professional and other business uses Class B2 – general industry Class B8 - storage and distribution
Paddock Wood Transfesa Road East and West	Class E – financial, professional and other business uses Class B2 – general industry Class B8 - storage and distribution

Local Plan Policy ED 1 (Employment Areas) Table 12 Mix of uses appropriate in the defined Key Employment Areas

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

PWTC Response:

1. The policies map identifies ‘Key employment areas (ED1)’. It also identifies ‘Strategic Sites (STR/SS 1-3)’. These overlap each other. The key to the policies map also notes that, under site allocations, ‘Employment Uses’ is indicated in a deep blue shade. Despite the new employment land allocations in Paddock Wood, there is no reference to ‘Employment Use’ on the Paddock Wood inset plan. Whilst there may be some logic to this, with the ‘Strategic Sites’ overlay linking to those policies in the Local Plan which set out the growth strategy for Paddock Wood, it is quite clear from the text of the Local Plan and the supporting Strategic Sites masterplan that accompanies this, that specific areas of land are considered appropriate for employment uses. For the purposes of clarity, this should be identified on the policies map, with a differentiation made between existing employment areas and new allocations. This is important as different policies apply to these.

Q3. In locations not identified as Key Employment Sites, how would a decision maker react to a development proposal for the expansion of an existing premises, or the provision of new employment buildings?

PWTC Response:

2. In the absence of such a policy in the Local Plan, the draft Neighbourhood Plan includes a policy that establishes a set of principles to be considered by applicants and decision makers.

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

PWTC Response:

3. It appears from the Council's Matter 2 Hearing Statement¹ that it considers the proposed employment allocations will fulfil this requirement of the NPPF.

¹ See paragraph 70.

ISSUE 2 – Employment Site Allocations

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

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

PWTC Response:

4. This is for TWBC to answer.

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

PWTC Response:

5. No. Criteria 2(g) of Policy STRA/SS 1 simply refers to ‘significant new land for a mix of employment uses’, and then reads across to Policy ED1. On its own Policy STR/SS 1 is extensive, extending to almost three pages’, but lacks detail. Policy ED1 only sets out what land uses are appropriate in these locations, but is silent on quantum and mix, or breakdown between uses. Reference then needs to be made back to para 4.56 and Table 5 of the Local Plan which set out the net developable employment area at each of the allocations.
6. This does not though link through to how this quantum of land might be used for different types of employment nor how many jobs this might accommodate, and in what format, or what the impacts on traffic and place making might be. It is thus entirely unclear how proposals for employment land should be considered, whether they are responding to the identified employment requirements, and how the mix of uses is compatible with and contributes to the place-shaping agenda for Paddock Wood.
7. Information as to the type and amount of employment that will be generated is crucial to the sustainability of the plan as existing employment land in Paddock Wood is mainly warehousing which employs relatively few and at wage levels insufficient to live in the area so that workforce in the main is bussed in from outside the area. This is not a sustainable situation.
8. The policy needs to clearly identify what land is allocated, the mix of uses to be accommodated and important design principles to be met. In the absence of this, the draft Neighbourhood Plan includes a policy that establishes good design principles for new employment uses, but it does not quantify the scale and mix of appropriate uses, which should be clarified in the Local Plan.

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

PWTC Response:

9. This needs to be clarified by TWBC.

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

PWTC Response:

10. The employment sites do not have such links. There is no proposal for a North to South pedestrian and cycle line over the railway link from the eastern side of the town where the highest density of housing development is proposed. This, combined with the inadequate road link into Paddock Wood Town Centre via Church Road and no road link from north to south over the railway on this Eastern side of the town results in there being no active travel options to link the new employment areas north of the railway with southern side.

11. It is also unclear from any mapping provided by the Council how the western residential parcels both sides of the line will be linked to the new employment parcels on the Eastern side. There is no detailed planning for roads with adequate vehicle capacity and room for safe pedestrian footpaths and cycleways to join the parcels in a coherent master planned manner. There is already a dangerous pinch point for vehicle traffic where Church Road/Station Road meets Maidstone Road and 'dog legs' over the railway bridge. The railway bridge is only paved on one side and both the single pavement and the road itself are narrow and unsuitable for safe walking or cycling.