

Examination of the Tunbridge Wells
Borough Local Plan

**Tunbridge Wells Borough Council
Hearing Statement**

**Matter 11: Retail, Town
Centres and Community
Facilities (Policies STR/RTW1,
ED8, ED9, ED10 and EN6)
Issue 1: Town Centre Hierarchy**

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Matter 11 – Retail, Town Centres and Community Facilities (Policies STR/RTW1, ED8, ED9, ED10 and EN6)

Issue 1 – Town Centre Hierarchy

Inspector’s Question 1: [re. Town Centre hierarchy]

How has the hierarchy of centres in Policy ED8 been established? Is it accurate and based on appropriate, up-to-date evidence?

TWBC response to Question 1

Introduction

1. Paragraph 86a) of the NPPF sets out the policy in relation to ‘Ensuring the vitality and viability’ of town centres and requires planning policies to “define a network and hierarchy of town centres and promote their long-term vitality and viability...”.
2. Paragraphs 6.507 – 6.512 of the Submission Local Plan sets out the hierarchy of centres within the borough and Table 13 of Policy ED 8 sets out the defined Centres Hierarchy for the purposes of paragraph 86a) of the NPPF.

Consideration

3. Tunbridge Wells Borough consists of a number of settlements and centres which range in their size and provision of services and facilities. The ‘Key Centres’ were previously defined within Table 10 and Policy CP8 – Retail, leisure and Community Facilities Provision, of the Core Strategy 2010 [[CD 3.118](#)] and were defined spatially within the Site Allocations Local Plan 2016 [[CD 3.119](#)] .
4. In town centre terms, as above, the NPPF requires planning policies to define the hierarchy of centres which Policy ED 8 seeks to do. The Retail and Leisure Study

2017 [[CD 3.30\(i\)](#)] provided commentary on the borough's 'Key Centres' at Section 4 of the study and the scope of the work and the centres to be assessed was discussed with the project team as part of the inception. At paragraph 4.2 of the study, it states that the analysis focused on the five centres of Royal Tunbridge Wells, Southborough, Paddock Wood, Cranbrook and Hawkhurst. It was considered that each of these centres *"fulfils a vital role in Tunbridge Wells by serving the needs of the immediate local community and often residents from the wider area. These centres also function as focal points of activity, by virtue of the range of services accessible to the local populations, comprising retail, employment, leisure and education facilities"*.

5. Section 4 of the 2017 study then considered the role and health of these centres and Section 9 provides recommendations and future retail strategy and again considers the role of these centres and the appropriateness of their status and boundaries.
6. The Retail, Leisure and Town Centre Uses Study 2021 [[CD 3.86a](#)] updated this work and at Section 5 – updates the 'health check' of the boroughs key settlements as set out at paragraph 5.1, where it states that *"This chapter of the report sets out our health check assessment to assess the vitality and viability of Royal Tunbridge Wells Primary Regional Town Centre', as well as Cranbrook, Paddock Wood and Southborough Town Centres, and Hawkhurst Rural Service Centre"*.
7. A thorough assessment of the 'Key Centres' is carried out as part of this health check work, including consideration of 'diversity of uses', proportion of vacant street level property', 'commercial yields', 'customers views and behaviour', 'retailer representation', 'commercial rents', 'accessibility', 'safety and crime', 'balance of independent and multiple retailers' and opening hours'.
8. Section 8 of the 2021 study provides recommendations and suggested policy approach. The study does not recommend any changes to the hierarchy or status of the defined centres which were assessed as part of this work.
9. The villages within the borough, were assessed and considered through the Settlement Role and Function Study [[CD 3.133](#)] which assessed the range of services and facilities within each of the villages. The coverage and extent of the Neighbourhood Centres were also reviewed as part of the preparation of the Local Plan and officers within the Planning Policy Team reviewed these defined areas via a

desk-top review and on the ground, site visits to ensure their appropriateness for continuing designation.

10. Table 13 within Policy ED 8 of the Local Plan breaks the type of centre down into Primary Regional, Town Centre, Rural Service Centre, Neighbourhood and Village Centres. Table 13 is replicated within Appendix 1 of this statement for ease of reference.
11. From this it can be seen that Royal Tunbridge Wells continues to perform and is allocated as such as a 'Primary Regional Centre', which is referred to within both the 2017 and 2021 Nexus work.
12. The other 'Key Centres' are still considered to be appropriately defined as 'Town Centres' in the case of Southborough, Paddock Wood and Cranbrook and a 'Rural Service Centre' in the case of Hawkhurst, reflecting its smaller status yet still serving the rural area in this location with a good range of town centre type uses, services and facilities.
13. As referred to above – the Village and Neighbourhood Centres have been reviewed and those included within Table 13 are still considered to provide a 'village' or 'neighbourhood' centre role. As part of this process 2 Neighbourhood Centres were deleted – 'Broadmead' to reflect the current limited scope of facilities in this location and Rusthall, which was re-defined as a 'Village Centre' reflecting the fact that it is now a parished area. Additionally, a new Neighbourhood Centre was identified at Knights Wood, reflecting the new development and importance of the supporting services and facilities as part of the new community. In addition, a new village centre is proposed as part of the proposals for a new garden village at Tudeley and new Neighbourhood Centres are designated at Paddock Wood. The justification and definition of these particular centres is provided in response to the Inspector's question 3 below.

Inspector’s Question 2: [re. status of Village Settlements]

What are the Village Settlements for the purposes of Policy ED8? Are they retail centres, or villages defined by Limits to Built Development?

TWBC response to Question 2

14. Policy ED 8: Town, Rural Service and Neighbourhood Centres, and Village Settlements Hierarchy, sets out the defined centres hierarchy for the borough which includes the defined primary regional, town, rural service, neighbourhood centres, and village settlements. As referred to above, the hierarchy is set out in Table 13 under this Policy on pages 451 and 452 of the Submission Local Plan (SLP) [[CD 3.128](#)]. The wording of Policy ED8 makes it clear that this is in relation to retail, leisure and other such uses.
15. As explained at the Hearing Session for Matter 3, Issue 1, the Council is actively considering how best to provide a settlement hierarchy (as distinct from the retail hierarchy) in relation to the role and function of each settlement Section 4.0 of the Plan.
16. In order to improve clarity, the Council considers that it would be appropriate to remove the term “Settlement” from “Village Settlement” in Policy ED8.

Inspector's Question 3: [re. Neighbourhood Centres at Tudeley Village and Paddock Wood]

What is the justification for including the proposed Neighbourhood Centres at Tudeley Village and Paddock Wood? How will they be defined for future decision-making purposes?

TWBC response to Question 3

Introduction

17. The Local Plan provides for the provision of new strategic growth sites: a new standalone garden settlement at Tudeley Village to provide 2,800 dwellings (2,100 over the plan period) (Policy STR/SS3); and the transformational expansion of Paddock Wood including land in east Capel to provide around 3,590 new dwellings (Policy STR/SS1).
18. Both strategic growth sites are to be delivered on garden settlement principles as required through the policy. These principles aim to deliver sustainable new communities by including, amongst other things, the necessary infrastructure to allow the community to function self-sufficiently on a day to day basis and provide a vibrant mixed community that supports a range of uses. It is this rationale that has driven forward the inclusion of neighbourhood centres at Tudeley Village and Paddock Wood. It is considered appropriate to establish the need for neighbourhood centres within Policies STR/SS1 and STR/SS3 at this time to ensure the proposed developments deliver the range of uses appropriate to create sustainable new settlements. It makes clear to all users of the Plan that there is an expectation for these facilities to be provided, and how they will fit in with the wider retail hierarchy across the borough.
19. Turning to Paddock Wood and east Capel first, policy STR/SS1 part 2b) requires three neighbourhood centres to be provided as part of the wider growth around Paddock Wood and east Capel: one in each of the three key development parcels as shown on Map 27 of the Local Plan. The policy sets out that the total commercial floorspace within these three centres, combined, should be around 2,000 sqm.
20. This approach has stemmed from both the masterplanning work undertaken for Paddock Wood and east Capel [CD 3.66a] and the evidence set out in the Retail,

Commercial, Leisure and Town Centre Uses Study 2021 prepared by Nexus Planning [[CD 3.86a](#), pages 161-164].

21. In line with the principles of providing a sustainable new community; the masterplanning work for Paddock Wood and east Capel determined it appropriate to direct a local centre to each of the key development parcels: one to the east of Paddock Wood, and two to the west (one to the north of the railway line and the other to the south). As set out at paragraph 5.61 of [[CD 3.66a](#)], local centres are shown on the Structure Plan (Map 28 in the Local Plan) to be *“located close to the centre of new neighbourhoods, and at key intersections of the active travel network. They are typically limited in scale to small shops and community facilities for the immediate neighbourhood”*. The Inspector will note that the Policy does not prescribe the exact location of the neighbourhood centre, other than to general development parcel, but requires these to be *“located to maximise accessibility by foot from dwellings to serve local shopping needs”* (Part2b) Policy STR/SS1).
22. The general quantum of floorspace anticipated, 2000sqm across the whole allocation, has stemmed from the analysis undertaken by Nexus [[CD 3.86a](#)], which provided an assessment of the quantum of retail floorspace that each of the projected populations stemming from each strategic site could deliver. This was calculated taking the projected available convenience and comparison expenditure of the proposed population in each location and applying this to suitable site densities to establish the amount of convenience and comparison retail (expressed in floorspace) that could be supported. Once the total available expenditure generated by the settlement was calculated, it was considered appropriate to assume that 80% of convenience expenditure and 20% comparison expenditure generated by the new settlements is retained by local facilities to account for purchases of day-to-day top up shopping needs. This is appropriate for the role of local shopping centres, and to not divert trade away from Paddock Wood town centre. The Inspector will note from Policy STR/SS2 that the Council is keen to ensure that Paddock Wood town centre will continue to act as the primary service centre for the new residents of the Paddock Wood and east Capel strategic growth site. It is anticipated that the additional population will provide additional expenditure that would strengthen the vitality and viability of Paddock Wood

town centre, in line with the objectives of Policy STR/SS2 (Paddock Wood Town Centre).

23. As shown in Table 7.14 of [CD 3.86a](#), Nexus determined that the proposed growth could support between 1,400- 2,400 sqm of convenience floorspace, and between 800-1,300 sqm of new comparison floorspace at Paddock Wood. The variations in scale is due to different sales densities which could be applied to support the retail provision, and the lower end was considered appropriate for the centres in this location (a small format “supermarket”).
24. It was deemed appropriate by the Council to consider the provision of floorspace based on the lower end of this scale. Accordingly, it is not considered appropriate to plan for all the forecast expenditure to be directed to the local centres and so the anticipated threshold as set out in the policy allows for a level of expenditure to flow out to other town centres including Paddock Wood.
25. The Council notes that the policy requirement is for “around” 2,000 sqm. This is not an upper threshold but provides an indication based on the evidence base underpinning the Local Plan [[CD 3.86a](#)] of the level of floorspace considered to be appropriate for this location. It will be through the development management process at planning application stage for this matter to be addressed and the retail policy tests as set out in the NPPF to be considered.
26. Turning to Tudeley Village, it is noted that when undertaking a similar assessment of available retail expenditure, Nexus’s analysis carried out in a similar manner to Paddock Wood suggests between 800 sqm to 2900 sqm would be appropriate. However, it is relevant to note that Tudeley Village is a new standalone settlement rather than a significant extension to an existing town.
27. Policy STR/SS3 plans for one village centre, and up to three neighbourhood centres to serve the new settlement. This reflects the Masterplan prepared by Hadlow Estate [Tudeley Village Delivery Strategy submitted at Regulation 19 Consultation Stage by Hadlow Estate Ref. PSLP_1630]. It does not prescribe a floorspace amount but supporting text at paragraph 5.222 anticipates that this could provide up to 10,000 sqm of commercial and office floorspace within the new village. This reflects the objectives of the Masterplan to provide a sustainable new community. As noted above,

there are no existing facilities within Tudeley Village and so it is considered appropriate to plan for a higher level of facilities in this location. Tudeley Village will provide 2,800 homes. This is comparable to the settlements of Cranbrook and Sissinghurst and Pembury (Table 2 of Settlement Role and Function Study [[CD 3.27](#)]). Both Cranbrook and Pembury as defined as Group A settlements (Table 5 of CD 3.27), which sit below the main urban area of Royal Tunbridge Wells and Southborough. They are considered to score highly based on the range of services and facilities they provide. It is sensible therefore for Tudeley Village to seek to provide a similar quantum of floorspace; if not higher, to ensure the sustainability of the new settlement can be maximised and internalisation of trips is secured wherever possible and reasonable to do so. The total floorspace within Cranbrook town centre is 10,930 sqm (Experian Goad, August 2020) which is comparable. The supporting text to Policy STR/SS3 (paragraph 5.222) makes clear that the commercial provision within Tudeley Village is primarily intended to serve the residents of the settlement only rather than draw trade from elsewhere, and evidence will be required to demonstrate that the level of floorspace sought within the village and neighbourhood centres does not detract from the vitality and viability of other nearby centres.

28. It is proposed that the location and boundaries of the Local Centres will be defined through the Framework Masterplan SPD. These will then be shown on Policies Maps in future Plan making stages.

Appendices

Appendix 1: Policy ED 8 – Table 13 – defined Centres Hierarchy

Type of Centre	Centre
Primary Regional Town Centre	Royal Tunbridge Wells
Town Centre	<ol style="list-style-type: none"> 1. Cranbrook 2. Paddock Wood 3. Southborough
Rural Service Centre	Hawkhurst
Neighbourhood Centres <ol style="list-style-type: none"> 1. Hawkenbury 2. High Brooms 3. Knights Wood 4. North Southborough 5. Sherwood 6. Showfields 7. Silverdale 8. St Barnabas 9. St Johns 10. St Peters 11. Within Paddock Wood and East Capel * 12. Tudeley Village* 	Village Settlements <ol style="list-style-type: none"> 1. Benenden 2. Bidborough 3. Brenchley 4. Five Oak Green 5. Frittenden 6. Goudhurst 7. Horsmonden 8. Lamberhurst 9. Langton Green 10. Matfield 11. Pembury 12. Rusthall 13. Sandhurst

	14. Sissinghurst 15. Speldhurst 16. Tudeley Village
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*New neighbourhood centres will be designated as part of the extension of Paddock Wood and east Capel and at the new Tudeley Village, which is expected to include a village centre, as well as a number of smaller neighbourhood centres, to be defined through the masterplanning process and the resultant Supplementary Planning Document.