

Examination of the Tunbridge Wells  
Borough Local Plan

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

**Matter 4: The Strategy for Paddock  
Wood**

**Issue 6: Employment Land**

**Document Reference: TWLP/139**



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# Matter 4 – The Strategy for Paddock Wood

## Issue 6 – Employment Land

**Inspector’s Question 1: [re. Will the strategy for employment be justified?]**

**What is the justification for the suggested changes to the Plan? As suggested to be modified, will the strategy for employment be justified and consistent with national planning policy?**

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

#### **Introduction**

1. The Councils Submission Local Plan [[CD 3.128](#)] (SLP) is supported by the Development Strategy Topic Paper [[CD 3.126](#)] which sets out that an Economic Needs Study (ENS) was prepared, jointly for Sevenoaks and Tunbridge Wells Borough Councils in 2016 to inform the Local Plan and make recommendations for the future provision of employment land (use classes B1, B2, and B8) across the borough [[CD 3.25](#)] which has regard to the desirability of facilitating economic growth and increasing the choice of sites to ensure that the needs of different sectors can be met as far as possible over the plan period. The findings of the ENS recommends that a minimum target for new employment land over the plan period (2020 -2038) should be accommodate at least 14 hectares, with further consideration of the mix and distribution of sites.
2. As part of a strategic release of sites to enable the “transformational” growth of Paddock Wood proposed under Policy STR/SS1, the Submission Local Plan allocates some 11.2 hectares of employment land, made up of two employment allocations, both to the north of the town, as identified at Table 5 of Policy STR1, being:
  - Land east of Maidstone Road - 6.6 ha
  - Land east of Transfesa Road - 4.6 ha

3. In addition, the Submission Local Plan contains a separate 'Strategy for Paddock Wood Town Centre' – Policy STR/SS 2 which provides for (at part 2): "A mix of town centre uses to provide commercial, leisure, residential, and employment uses (to include a flexible workspace of around 150-200sqm) to sustain the town centre's future vitality and viability", there is also provision within Policy STR/SS 1 for three neighbourhood centres, providing approximately 2,100sqm of commercial floorspace (Class E) in total.
4. The Inspectors Initial Findings [\[ID 012\]](#) acknowledges the SLP position for significant expansion for Paddock Wood and that around 3,500 houses and roughly 11 hectares of employment land would be allocated. The Initial Findings raise queries regarding the delivery of employment land allocations insofar as they relate to land which is at higher risk of flooding, and states that *'Given that the employment allocations are not linked to other parcels (i.e. they are coming forward in isolation by separate developers) what is the justification for their redevelopment?'*
5. Comprehensive review for site allocation STR/SS 1 Paddock Wood and land at east Capel (PWeC) has been undertaken in the context of a review of the flood modelling. A consequence of the revised modelling is that there is less land to develop in Flood Zone 1 and that there would be a need to reorganise the scale and location of infrastructure that would be necessary to support a reduction in dwelling numbers, and consequently a reduction in the amount of land available for employment purposes owing to a significant portion of that now being identified in Flood Zone 3.
6. NPPF requires that 'Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development' (paragraph 20), and further that 'the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns...In doing so, they should: ...b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself' (paragraph 73).

## Consideration

7. The Councils Development Strategy Topic Paper Addendum [[PS\\_054](#)] (DSTPA) sets out that further consideration has been given to the location of the proposed employment allocations, taking into account recent flood risk modelling, and applying the sequential test accordingly. The assessments on the relationship between the scale of employment land provisions and the amount of housing growth (as amended in response to the Initial Findings) are set out in a separate additional Paper on 'Employment Land Provision at Paddock Wood' [[PS\\_045](#)].
8. PS\_045 states that the review of the reduced level of housing growth, and estimates the broad scale of employment land needs at Paddock Wood, which are regarded as needing to be in the range between 8 and 11-12 hectares, with the lower end being a proportional reduction in strategic growth, while the upper end is based on a "self-containment" approach to jobs growth.
9. The Council has identified through the sequential approach (see hearing statement for Matter 4 Issue 1 [TWLP/134]) and potentially suitable sites, firstly in flood risk terms (the "sequential test") and then also in relation to their deliverability and other factors affecting their suitability. Consequently there is no available and suitable land to meet local employment space needs in the low-risk flood zone (Flood Zone 1), although the sequential assessment does examine an option to the north-west of the town. This assessment goes on to review land in Flood Zone 2 only and finds that land east of Transfesa Road Key Employment Area (4.25ha), albeit with slightly changed areas, is both suitable and available.
10. The DSTPA concludes that this 4.25ha of land, together with the recently approved scheme at Swatlands Farm (4.27ha) which already has planning consent, and other employment generated in Paddock Wood town centre and at the local neighbourhood centres as part of the housing delivery of STR/SS 1 would provide some approximately 8.4 hectares of net developable employment land, which would be sufficient to meet likely needs over the first 10 years post-adoption, without recourse to land in higher flood risk areas, which means that some of the previously allocated sites at Keylands Sale Field, Lucks Lane, and Paddock Wood Garden Centre are withdrawn from the strategic allocation STR/SS1.

## Conclusion

11. The Council acknowledges the importance of employment land in the context of strategic development in accordance with the NPPF and that when planning for the largescale expansion of towns that their size and location will need to support a sustainable community, with sufficient access to services and employment opportunities.
12. The Council has undertaken a comprehensive review for site allocation STR/SS 1 Paddock Wood and land at east Capel (PWeC) in the context of a review of the flood modelling, which has resulted in a significant reduction in land associated with housing within Flood Zone 1, and a proportionate reduction in employment land having undertaken a sequential assessment of preferential sites.
13. The amended policy STR/SS 1 for Paddock Wood including land in east Capel would seek to allocate land east of Transfesa Road Key (4.25ha) and already consented scheme at Swatlands Farm (4.27ha), would provide some 8.4 hectares of net developable employment land, which would meet the needs of Paddock Wood for at least the first 10 years of the plan. In addition to the other employment allocations at Longfield Road (AL/RTW 17) for 13.4 hectares and therefore totalling 21.92 ha in the Plan would more than meet the requirement identified in the Economic Needs Study.

## **Inspector’s Question 2: [re. Will there be sufficient sites to meet employment needs?]**

**What are the implications for the provision of employment land? Will the Plan provide sufficient sites to meet needs over the plan period?**

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

#### **Introduction**

14. The Submission Local Plan looks principally at meeting employment land needs across the borough as a whole – as it all falls within the same labour market area (see Employment Land Topic Paper [[CD 3.84](#)]). It does consider the broad distribution of supply but does not seek to specify employment land needs for each settlement. In particular, it identifies the strategic opportunity at Land at Longfield Road, Royal Tunbridge Wells (proposed site allocation Policy AL/RTW 17), adjacent to the A21, which is largely responsible for the overall healthy employment land supply proposed within the SLP.
15. Significant changes as set out in response to Initial Findings and rational behind the proposed response are set out above and in the Councils Development Strategy Topic Paper Addendum [[PS 054](#)] (DSTPA) and the Employment land provision at Paddock Wood Paper [[PS 045](#)] (ELP for Paddock Wood).

#### **Consideration**

16. Proposed changes result in reduction of employment land allocated at Paddock Wood reducing the number of sites available for employment land which are now considered at higher risk of flooding as identified in the Councils revised Flood Modelling and Mapping documents [[PS 042](#), [PS 043](#), [PS 044](#)]
17. The findings of the ENS recommends that a minimum target for new employment land over the plan period (2020 - 2038) should be accommodate at least 14 hectares, with further consideration of the mix and distribution of sites.
18. As a result of the proportionate reduction in the level of employment land necessary to support the housing growth at Paddock Wood was been taken. On the basis of the current allocation of 11.2 hectares of employment land at the settlement of Paddock

Wood, a proportional reduction would see this becoming some 8 hectares of net developable employment land for the settlement.

19. A more comprehensive approach was also considered as set out in the ELP for Paddock Wood, which went through a series of steps to identify the level of employment need based on an overall housing reduction of approximately 1000 dwellings.
20. The ELP for Paddock Wood sets out these steps as –
  - A. Identify additional housing proposed in Paddock Wood,
  - B. Estimate the labour-force and jobs growth associated with future housing,
  - C. Estimate the proportion of likely jobs to be accommodated on employment sites,
  - D. Apply a likely average employment density,
  - E. Identify associated employment land and floorspace needs.
21. Following this process yields a total need from the present day (taken as April 2023) for some 10.65 – 11.7 hectares of net developable employment land, with a likely need around the upper end of this range.
22. Whilst the overall demand identified from the ENS is for 14 hectares across the borough, 13.4 hectares of which would be delivered by AL/RTW 17, it is still necessary that attractive employment sites are still delivered at the main strategic development at Paddock Wood, where major housing growth is envisaged. Therefore, in looking at potential employment land supply as amended in response to the Initial Findings, 8 hectares of land is taken as a baseline requirement, with an additional 3-4 hectares as the more “sustainable” target, that is 11-12 hectares, if suitable sites are available as part of a local plan review.
23. Nevertheless the amended policy STR/SS 1 for Paddock Wood including land in east Capel would seek to allocate land east of Transfesa Road Key (4.25ha) and already consented scheme at Swatlands Farm (4.27ha), would provide some 8.4 hectares of net developable employment land, which would meet the needs of Paddock Wood for at least the first 10 years of the plan. In addition to the other employment allocations at Longfield Road (AL/RTW 17) for 13.4 hectares and therefore totalling 21.92 ha in the Plan would more than meet the requirement identified in the Economic Needs Study over the plan period.