

Tunbridge Wells Borough



Tunbridge Wells Borough Council

## Employment land provision at Paddock Wood

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October 2023



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## 1.0 Introduction

- 1.1 This report reviews both the need for and provision of employment land (that is essentially for uses typically located on “industrial estates” or “business parks”<sup>1</sup>) at Paddock Wood as part of a revised development strategy for the town that limits housing growth to land in the lowest flood zone (Flood Zone 1).
- 1.2 The report is structured as follows:
- a) This paper firstly summarises the current proposals within the Submission Local Plan.
  - b) The Inspector’s concerns are briefly set out.
  - c) The background evidence supporting the current proposed allocations is reviewed, with reference to where there is updated evidence.
  - d) Having introduced proposals for reduced housing growth around the town, it provides an assessment of the quantitative need for additional employment land and floorspace.
  - e) Consideration is given to potential site opportunities, including whether the scale and location of employment allocations put forward in the Submission Local Plan are appropriate in the light of the Inspector’s initial findings.
  - f) Conclusions on the potential approaches to meeting the needs for employment space to serve the expanded town.

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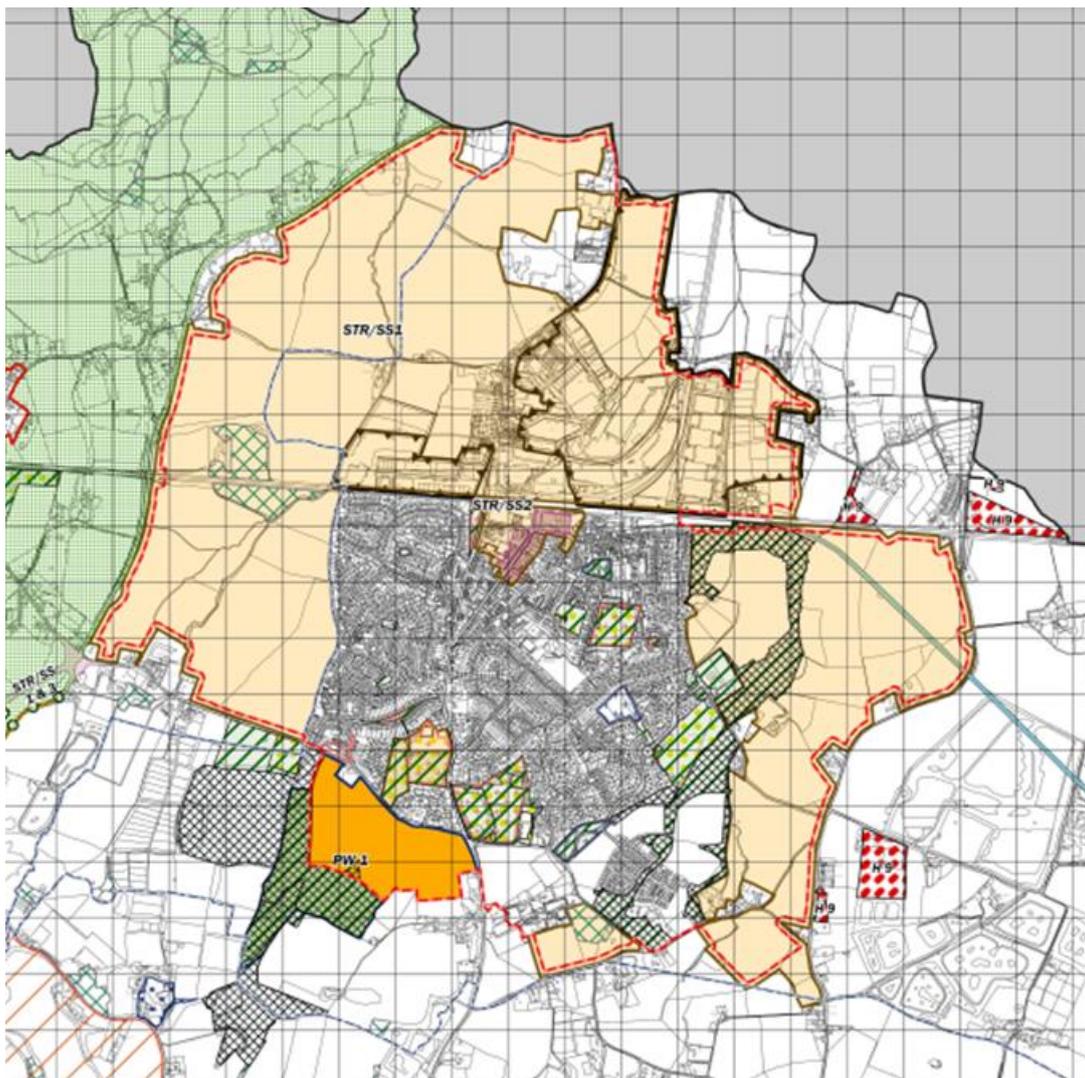
<sup>1</sup> These are traditional ‘B Class’ uses, i.e. former B1 – office (now covered by use class E Commercial), B2 - General Industry and B8 – Storage and Distribution, as well as similar “sui generis” uses.

## 2.0 Paddock Wood - Local Plan employment land provisions

2.1 The two principal existing employment areas of the Submission Local Plan in Paddock Wood, including proposed extensions of them, are identified in Policy ED1 of the [Submission Local Plan](#) as 'Key Employment Areas' (KEAs), being listed as:

- *Eldon Way and West of Maidstone Road*
- *Transfesa Road East and West*

2.2 They are identified on the Paddock Wood Inset Map, as reproduced below, by the thick, black-lined polygons with internal triangles:



2.3 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, as well as land for around 3,490-3,590 dwellings.

2.4 Policy STR/SS1 part 2(g) provides for:

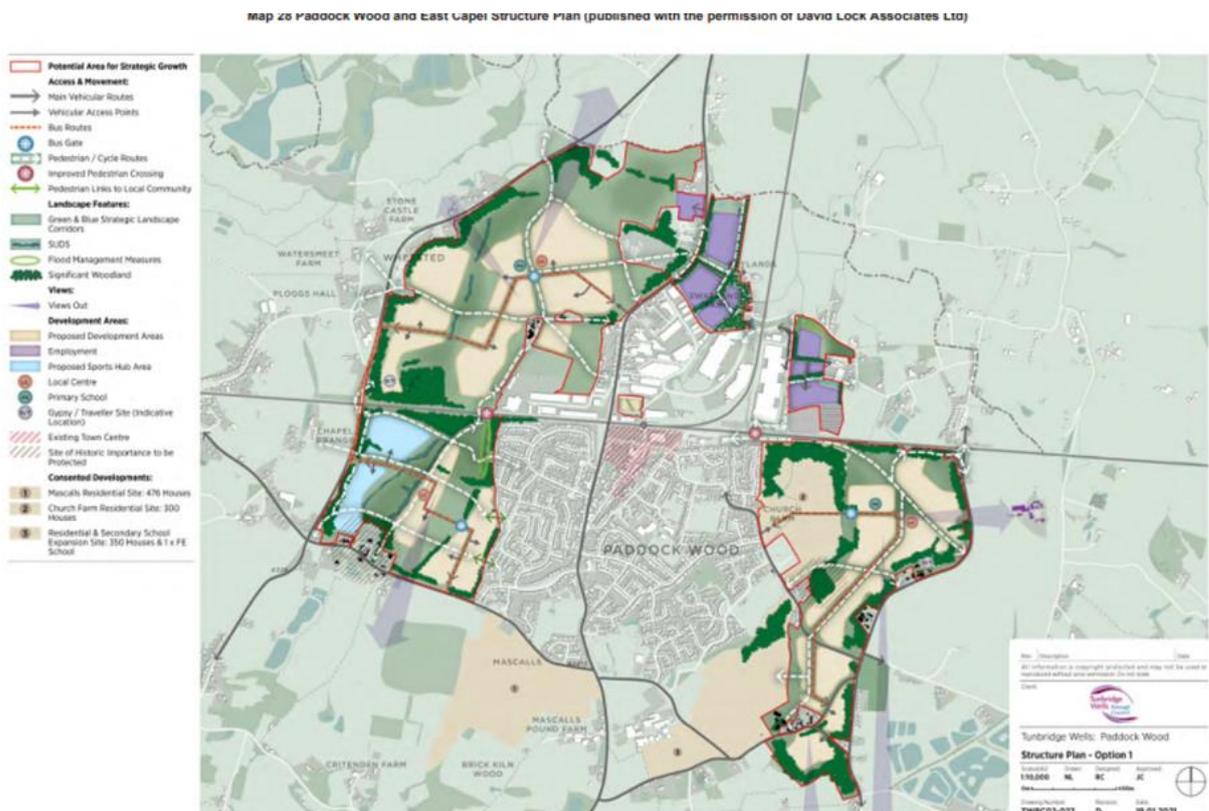
g. significant new land for a mix of employment uses on sites to the north and south of Lucks Lane, and to the east of Transfesa Road. These are Key Employment Areas and regard should be had to Policy ED 1. The new employment areas should include walkable links from the new neighbourhoods;

2.5 The supporting text (at Table 5) to Policy STR1 identifies the two employment allocations, both to the north of the town, as:

*Land east of Maidstone Road - 6.6 ha*

*Land east of Transfesa Road - 4.6 ha*

2.6 The allocated employment areas themselves are shown (by purple shading) on Map 28 - Paddock Wood and East Capel Structure Plan, as reproduced below:



2.7 The Local Plan's supporting text, at para. 5.187, explains the allocations as follows:

*An enhanced employment area within Paddock Wood will be provided, through the provision of additional high quality employment premises to the north of the established industrial area at Transfesa Way. A mix of employment types and sizes will be promoted to support the balanced economic and employment growth of Paddock Wood. This will help further establish this area as a key business location for the borough. It is expected that some of this additional employment provision will free up some existing employment units adjacent to the railway on the edge of the town centre from businesses that might relocate. This will provide an opportunity for key sites adjacent to the town centre to be delivered for a residential-led, mixed use scheme. Whilst it is not anticipated that the industrial units at Eldon Way, to the north west of the town centre, adjacent to the railway line, will become available over the plan period, if suitable alternative employment premises are identified, residential uses would be supported in principle in this location subject to other policies in the Plan.*

2.8 In addition, the Submission Local Plan contains a separate ‘Strategy for Paddock Wood Town Centre’ – Policy STR/SS 2. This 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 – sic] future vitality and viability”*

2.9 There is also provision within Policy STR/SS 1, part 2b for three neighbourhood centres, providing about 2,000sqm of commercial floorspace (Class E) in total.

## 3.0 Inspector's concerns

3.1 The Inspector's primary concern in relation to the employment allocations is with them being in higher flood risk zones. Along with the residential and community proposals, he does not consider the location of new employment uses in areas at higher risk of flooding as justified. (ID-012. para. 52)

3.2 The Inspector also notes that:

*"...land proposed for development in the northern parcel is almost entirely within Flood Zones 2 and 3. 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?"* (ID-012. para. 49), and

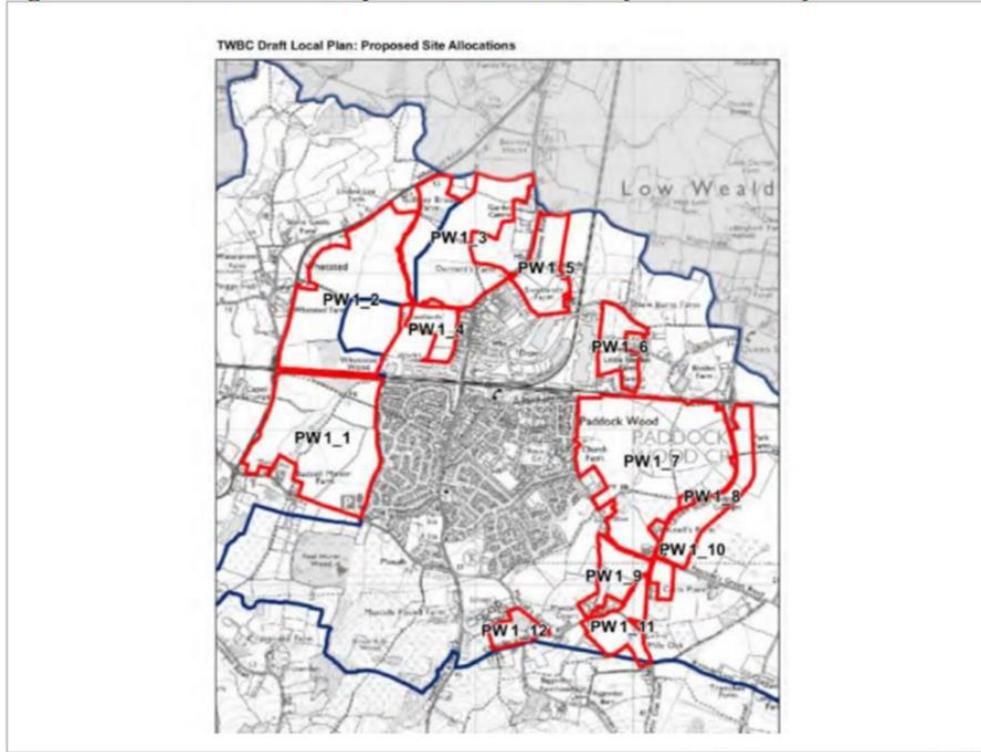
*"Framework paragraph 162 is clear that development should not be allocated if there are reasonably available sites appropriate for the proposed uses in areas with a lower risk of flooding."*

3.3 To address the latter points, it appears necessary to review and, where necessary, provide further evidence to demonstrate that the scale of employment land provisions is appropriate for the amount of housing growth and that local job growth will be achieved in line with planned housing growth to ensure a balanced and sustainable settlement. This will provide a basis for considering potential sites in line with the 'sequential test' and, if necessary, the 'exception test' in relation to development in flood risk areas, as well as against wider planning issues "in the round".

## 4.0 Background to Local Plan employment land provisions

- 4.1 The background to the scale and distribution of employment land allocations in the Submission Local Plan is contained in the Economic Development Topic Paper (CD3.84). This drew on the Economic Needs Study (ENS) prepared by Turley Economics (CD3.25) as well as other evidence base documents and statistical evidence in relation to economic development and commercial floorspace.
- 4.2 In terms of the overall quantum of employment land to be allocated in the borough, the Economic Development Topic Paper concludes, at paragraph 4.14, that the Local Plan should provide for a minimum of 14 hectares of employment land to meet needs over the plan period, 2020 – 2038. It emphasises that this is a “*minimum*”, as the actual provision will need to offer a range of types of sites, a distribution relating to the main centres and housing growth, suitability, availability, and achievability of sites, and maintaining a continuity of supply.
- 4.3 While the total area of Local Plan employment allocations is well over the minimum, it is recognised that the majority of the provision is at one site: ‘Land adjacent to Longfield Road’, Royal Tunbridge Wells, being 13.4 hectares. The allocation (Policy AL/RTW 17), which now has planning permission, lies close to the A21, and is seen as a strategic provision for the entire borough, which is likely to help meet employment needs extending beyond the current Local Plan period.
- 4.4 At Paddock Wood, the ENS recommended the expansion of the Key Employment Area at Maidstone Road, Paddock Wood, noting that it is a strong employment location, supporting a range of industries and that the area offered scope for future expansion with good access to the existing road network. Having assessed available sites, the Draft Local Plan took this recommendation forward, with proposed allocations both to the south and north of Lucks Lane (PW1\_5), and to the east of Transfesa Road (PW1\_6) (at Figure 6), as shown below:

**Figure 6: Draft Local Plan – Proposed Site Allocations (Paddock Wood)**



Source: SQW extract from TWBC Draft Local Plan (Regulation 18)

4.5 The Paddock Wood Economic Opportunities Report, December 2020 (SQW) (CD3.66 Appendix 1) gave further consideration to the potentials of the two draft employment allocations: land north and to the east of the Transfesa Road Key Employment Area (KEA), at Table 6.2. (These locations relate to the above plan.)

Allocation	Allocation area	Assumed developable area	Approximate proposed floorspace (GEA)	Potential employment – Class B1c/B2	Potential employment – Class B8
PW 1_5	15.02ha	7.26ha	72,600	1621	985
PW 1_6	11.1ha	4.57ha	45,700	1020	620
TOTAL	33.63ha	11.83ha	118,300	2641	1605

4.6 The report states that:

- (i) employment areas (locations and sizes) were provided by DLA, based on its masterplanning;
- (ii) employment densities are from HCA guidance, consistent with those considered in the Economic Needs Study (2016);
- (iii) references to previous land use classes (B1 / B2 / B8) are still applied as categories for differentiating between employment typologies;
- (iv) development capacity estimates are not based on any site-specific studies of physical site capacity, and given that there are significant site constraints – not

least flood risk and highways access – these estimates are potentially at the upper end of potential capacity;

(v) job estimates do not capture potential leakage, displacement, or multiplier effects, but are headline estimates for comparative purposes only.

- 4.7 Taken together, it advises that the allocated expansion of the KEA would likely result in c1,600 - 2,600 additional jobs, which can be seen in the context of an estimated total of 5,000 employees in Paddock Wood in all sectors at present (para. 6.31, SQW report) and could effectively double the c1,750 jobs currently in the wholesale sector if all sites were delivered for B8 type land use.
- 4.8 SQW understood that land to the east of the existing KEA (PW 1\_6) has significant potential for distribution / wholesale type development, while land to the north (PW 1\_5) is being considered for a potential range of industrial unit types and sizes resulting in figures between the two employment capacity extremes identified.
- 4.9 While SQW express concern that, whilst an important sector of the economy, typically, B8-type land uses support lower employment density and lower paid, lower skilled, employment. Accordingly, it recommends seeking to diversify the additional employment stock to provide spaces that will attract productive, higher-output sectors. It nonetheless sees extensions to the existing KEA would also be suited to distribution (B8) space needs, as well as to manufacturing.

## 5.0 Further consideration of employment land needs

- 5.1 The broad scale of employment land needs at Paddock Wood is reassessed in the light of an anticipated reduction in the scale of housing growth, ahead of looking further at the potential supply of sites.
- 5.2 Masterplanning work undertaken by DLA is suggesting that, in order to contain new strategic housing growth within land identified (now and in the future) as being in Flood Zone 1, this is likely to reduce the scale of growth from some 3,450 dwellings<sup>2</sup> to approximately 2,532 dwellings, that is a little over 70% of the previously proposed amount.

### Approaches to estimating employment land needs

- 5.3 A simple approach is to reduce the employment land proposed in the Local Plan proportionally to that for housing.
- 5.4 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.
- 5.5 A more demographically-led approach, typical of estimating employment land needs for larger geographies, is to calculate employment land needs based on the likely increase in the local labour-force arising from housing growth. The steps are:
- 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.
- 5.6 These steps are followed through in **Appendix 1** to this report.
- 5.7 It can be seen that this yields a total need from the present day (i.e., 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.
- 5.8 The second approach to estimating employment land requirement produces a higher figure, in part because it relates not only to the proposed strategic sites' housing growth, but also to the significant number of dwellings that are committed through planning permissions, but not yet built. Also, it provides for virtually all the employment needs from new residents to be met in the town itself – which is justified in terms of seeking a highly “self-contained” town, at least as a starting point, as opposed to taking a more strategic approach to need and supply.

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<sup>2</sup> This excludes land forming a later phase of the Church Farm development for some 60 further dwellings, which was included in the overall strategic site allocation.

### Conclusions on employment land needs

- 5.9 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 Kingstanding Way, 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.
- 5.10 Nevertheless, this should not unduly detract from providing suitable and attractive employment sites at Paddock Wood, where major housing growth is envisaged. Therefore, in looking at potential employment land supply below, **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**.

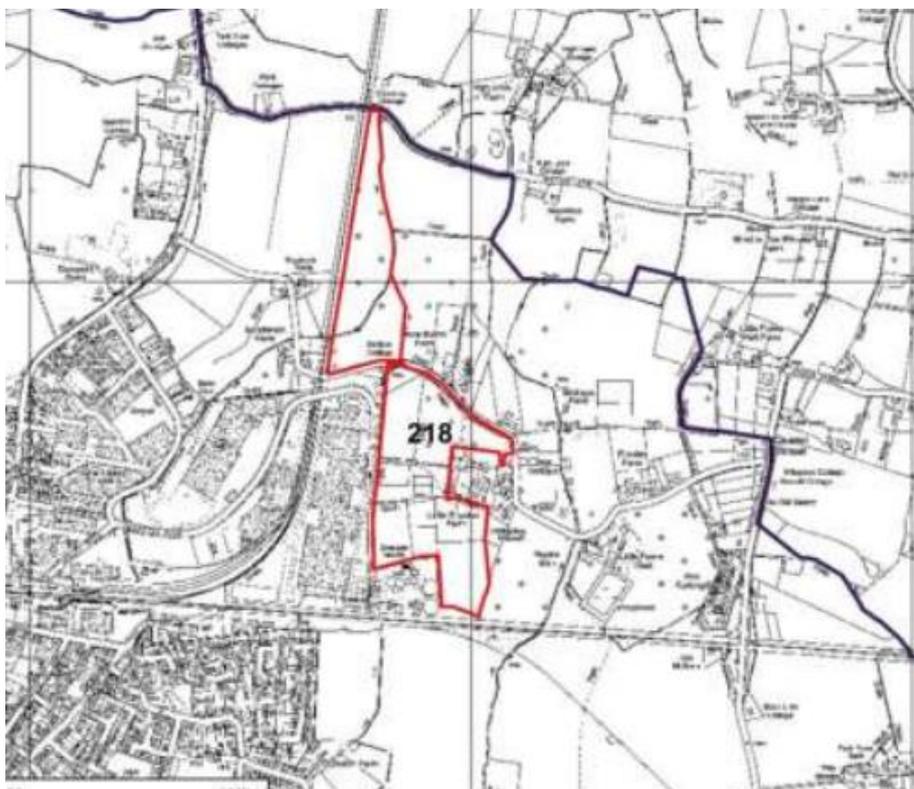
## 6.0 Employment site opportunities

6.1. In identifying available and suitable sites for employment use, landowners and developers were invited to put forward sites for consideration as part of the Strategic Housing and Employment Land Assessment (SHELAA). The SHELAA assessment sheets for sites at Paddock Wood are contained in the SHELAA, January 2021 [[CD 3.771](#)] and the SHELAA Addendum, October 2021 [[CD 3.131](#)].

6.2. The following employment sites were submitted and assessed as part of the Council's SHELAA.

### SHELAA Site Ref: 218: Land at Little Rhoden Farm, Lucks Lane, Paddock Wood

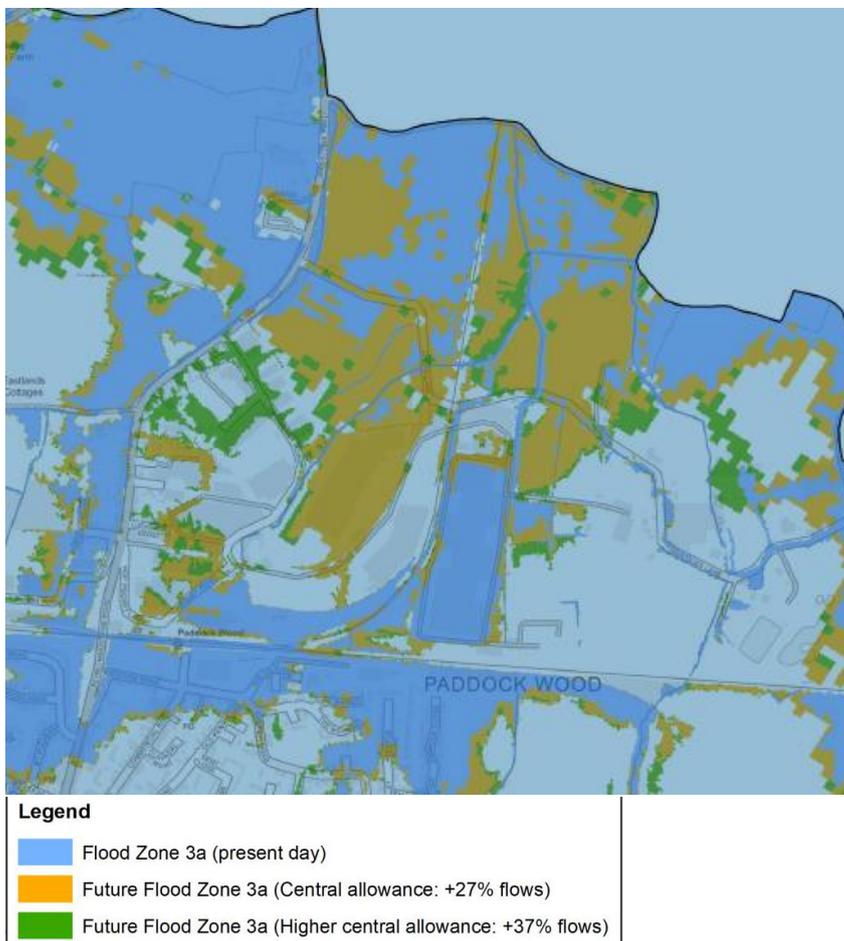
6.3. This includes a southern section immediately east of the Transfesa Road KEA and a separate parcel on the north side of Lucks Lane, alongside the railway forming its western edge. The total area is 15.8 hectares, with about 50% to the south of Lucks Lane.



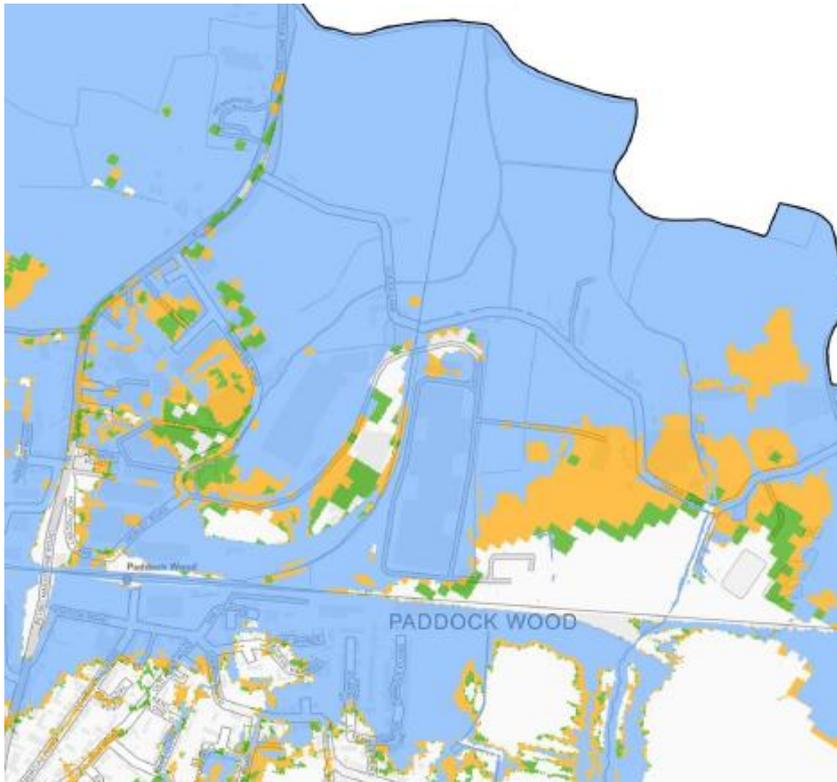
6.4. The 'Reasons' box within the SHELAA states: *The southern parcel would form a logical extension of the existing economic area. The northern parcel would not but may be suitable for mitigation as part of a larger allocation. This site would form a suitable allocation in conjunction with other site submissions for the strategic expansion of the settlement.*

6.5. Accordingly, this southern parcel, with direct access off Transfesa Road is proposed for employment uses in the Submission Local Plan as part of the 'strategic sites' allocation.

- 6.6. At the time the Submission Local Plan was prepared, the land south of Lucks Lane was in Flood Zone 1 (the southern part) and in Flood Zone 2 (the northern part) but with very little in Flood Zone 3.
- 6.7. However, further assessments by consultants JBA, which presents updated flood risk modelling based on the most recent data and climate change allowances, shows more areas in higher flood zones, as shown below:



- 6.8. It can be seen that, apart from a small area in the central-western part of the site, none of the land is currently in Flood Zone 3 (FZ3), but that a larger area, essentially the north-west part of the site, is expected to be within FZ3 within the plan period. This overlays two of the employment areas identified in the DLA masterplan, as reproduced on page 2 above.
- 6.9. Also, the southern part of the site, which is currently in Flood Zone 1 (FZ1), is expected to be within FZ2 within the plan period, as shown on the further JBA report extract below. In effect, only the land immediately east of the existing Wastewater treatment Works is forecast to remain in FZ1.
- 6.10. The implications of the updated flood risk information are set out at the end of this section addressing the sequential and exception tests as they affect all the relevant sites.



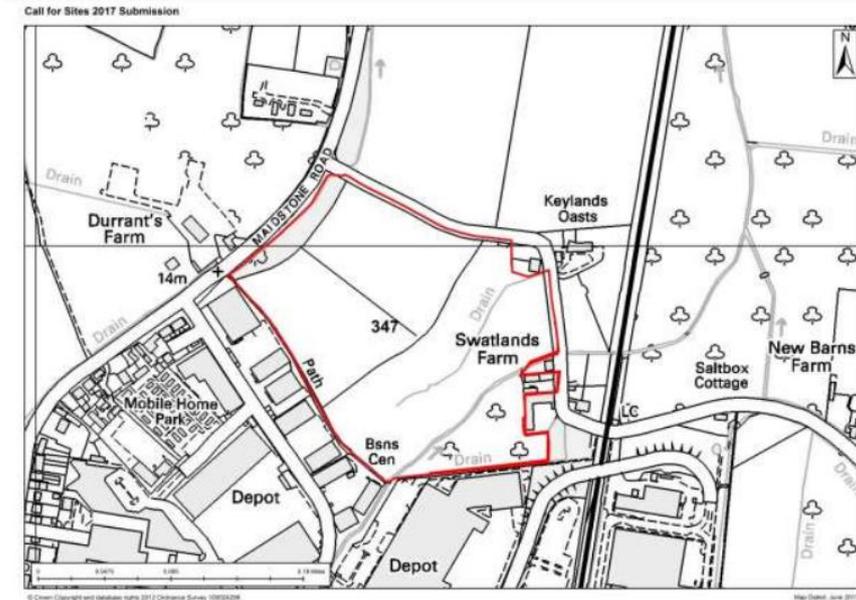
**Legend**

- Flood Zone 2 (present day)
- Future Flood Zone 2 (Central allowance: +27% flows)
- Future Flood Zone 2 (Higher central allowance: +37% flows)

- 6.11. The SHELAA site was submitted as a single entity, but it is now in two ownerships, the original owners still controlling the majority of the site – to the south and west - while the second ownership is of the north-east section, extending to Lucks Lane. They have an existing, large warehouse unit on their land, with planning permission for a further one.
- 6.12. Dialogue with both landowners has confirmed their interest in pursuing additional employment space within their land holdings.
- 6.13. The combined potential developable areas, excluding land in FZ3, but including land which will be in FZ2 within the plan period is capable of yielding some 4.2 hectares of developable employment land, with allowance for buffer areas, especially to Lucks Lane.

SHELAA Site Ref: 347: Swatlands Farm, Lucks Lane, Paddock Wood

- 6.14. This site of 8.56 hectares, is located immediately adjoining the northern edge of the existing KEA, fronting Maidstone Road to the west, with Lucks Lane forming the northern and eastern boundaries, as shown on the SHELAA map below.



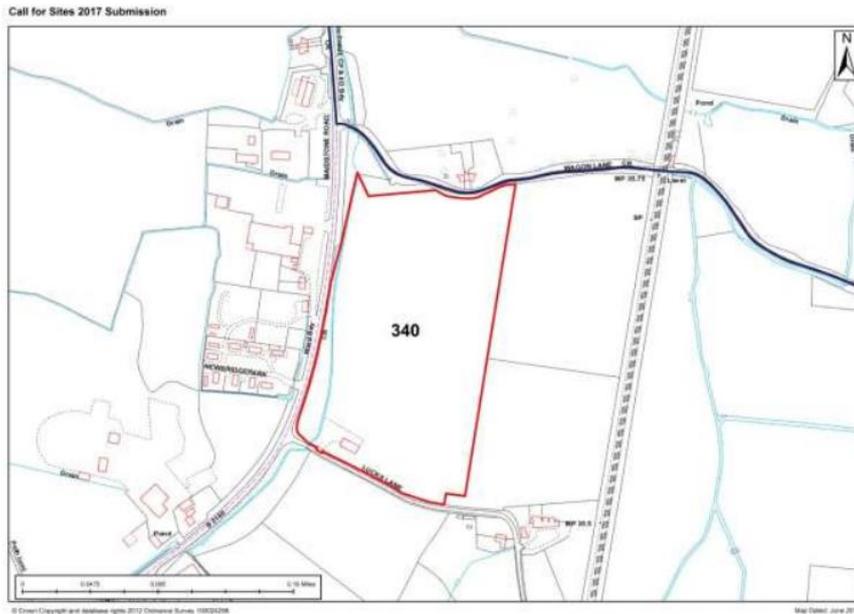
- 6.15. Outline Planning Permission was granted on a somewhat smaller field area, of 8.22-hectares, for the 'Creation of industrial estate to include employment floor space for Class E, B2, and B8 uses and associated internal access roads, landscaping, parking, and other associated works' on 12 January 2023 (ref. 22/01929/OUT).
- 6.16. In total, 18,150 sqm of employment floorspace (GIA) is proposed. The indicative plans (see below) show approximately 15,028sqm for Class for B2 light/general industrial / B8 storage and distribution floorspace and the remaining 3,122 sqm is for Class E office floorspace (ancillary to the main industrial uses proposed).



- 6.17. The proposal is progressing, with a submission of details application recently received - 23/00633/SUB Partial Submission of Details in relation to Condition 21 - (Archaeological Field Evaluation Works) of 22/01929/OUT.
- 6.18. While the application site covers 8.22 hectares, this includes substantial buffer areas, such that the floorspace is 18,150 sqm of employment floorspace (GIA). Excluding the stream-side woodland planting and greenspace on either side of and through the site, the actual net developable area is only some 4.27 hectares.
- 6.19. In terms of flood risk, the site is now expected to be wholly within FZ3 by the end of the plan period; also, the planning permission has appropriate drainage conditions attached to the permission, as agreed with the Lead Local Flood Authority requiring tanks to hold run-off from the buildings that are isolated from surface water infiltration, (although this was imposed at a time when all of the site was identified on Environment Agency mapping as within FZ2).

SHELAA Site Ref: 340: Keylands Sale Field, Lucks Lane, Paddock Wood

- 6.20. This is an agricultural field, amounting to 6.23 hectares fronting Maidstone Road on its western side to the north of Lucks Lane towards the borough boundary.



6.21. The SHELAA states that it is considered 'suitable' for the following reasons:

*This site is considered suitable for economic uses. It provides good access and visibility from Maidstone Road, and Lucks Lane, and when considered alongside SHEELA Site 347 provides a natural extension to the existing economic area to the north of Paddock Wood. In conjunction with other sites, it is considered suitable for allocation and is likely to be sustainable in this context.*

6.22. The proposed allocation to the east of Maidstone Road, as shown on the Submission Local Plan Map 28 - Paddock Wood and East Capel Structure Plan, reproduced in paragraph 2.6 above, corresponds closely with this SHELAA site area.

6.23. While the site area is some 6 hectares, the developable area shown on the Structure Plan prepared by consultants, DLA, as part of its Strategic Sites Masterplanning and Infrastructure Study [\[CD 3.66\]](#) is only 3.18 hectares. This recognises that, while most of the site was identified at the time as being within FZ2, the northern strip and the south-eastern corner then in FZ3 are utilised as green buffer areas.

6.24. The level of flood risk has changed notably according to the most recent JBA study. As shown below, the main central core of the site is now identified as falling in FZ3 within the plan period at both the central and higher climate change allowances.

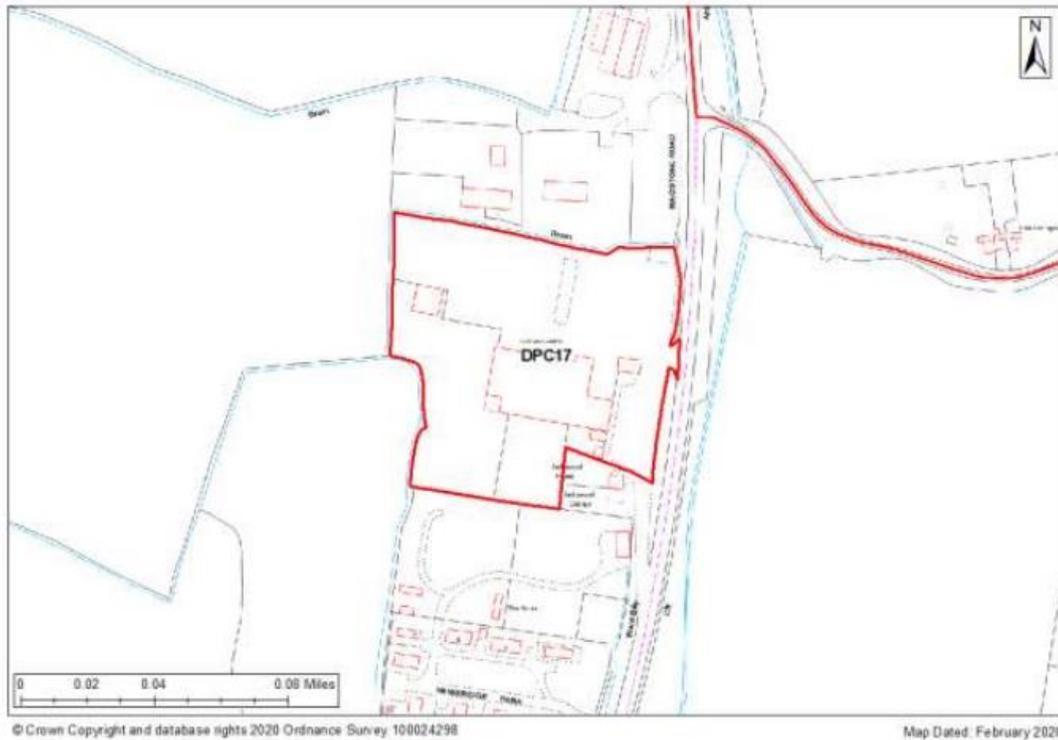


Legend	
<span style="color: lightblue;">■</span>	Flood Zone 3a (present day)
<span style="color: orange;">■</span>	Future Flood Zone 3a (Central allowance: +27% flows)
<span style="color: green;">■</span>	Future Flood Zone 3a (Higher central allowance: +37% flows)

6.25. In terms of capacity, if the site were justified under the sequential test, applying a plot ratio of 50% to the area not currently in FZ3, (and therefore likely to represent a relatively lower hazard), then it would yield a gross floorspace of approximately 15,900sqm (taking account of land take for ancillary development such as parking, site access, SUDS and landscape buffers).

Site Reference DPC17: Paddock Wood Garden Centre (West of Maidstone Road)

6.26. This is an existing garden centre, of 1.46 hectares, with direct access, and visibility, from the Maidstone Road.

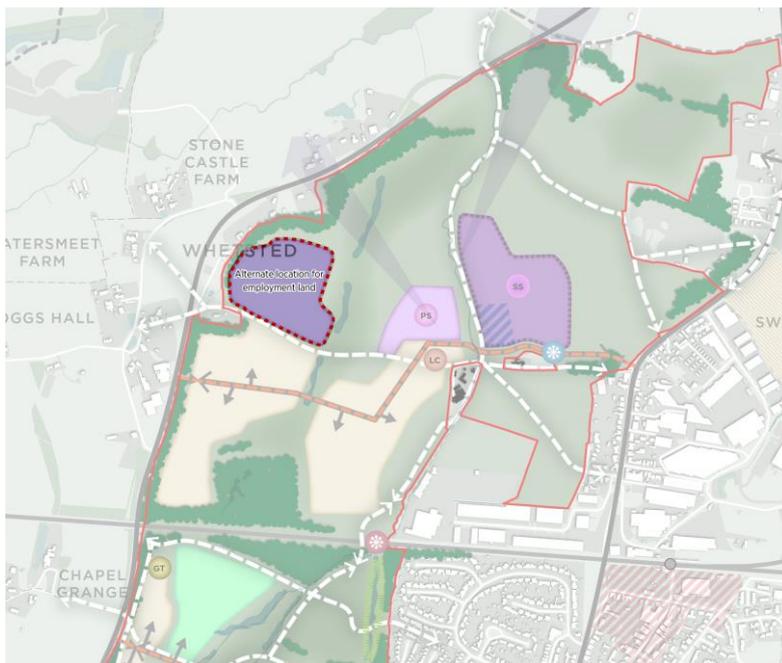


- 6.27. In terms of suitability, while the SHELAA references its location in higher flood zones, it notes that the site is 'previously developed land', containing commercial uses, which would be suitable to continue and make more efficient use of the site where the opportunity arises. The site is referred to in terms of *"in conjunction with other sites will form a sustainable allocation to strategically extend the existing settlement in Paddock Wood."*
- 6.28. While the DLA Structure Plan shows the land as an employment site, it is not included in the list of employment sites at Table 5 of the SLP. While this may be due to its existing "employment use", the prospect of it coming forward is uncertain. As can be seen on the map at paragraph 6.24 above, the whole of the site lies within FZ3 at the current time. The flood risk can be assumed to increase over the period of the Local Plan.
- 6.29. Therefore, there would be real concerns regarding its intensification, notwithstanding it is a brownfield site. Its allocation would only be justified if there is a clear need and no other suitable land at a lower flood risk available.

#### Other potential sites

- 6.30. While the above sites represent all of those put forward specifically for employment development as part of the Local Plan, it follows from the flood risk modelling that potential land within Flood Zone 1 (FZ1) should be re-considered. In essence, this means looking at land that is currently being promoted for residential use in the revised proposals for Paddock Wood including land in east Capel.

- 6.31. Land to the east of the town is discounted because of road access, whereas land close to the A228 on the western side of the town can provide ready access to the main road network. This implies land either close to the junction of the A228 junction with Badsell Road on the south-west edge of the town or close to the new junction to the A228 that is proposed to serve new housing to the north-west of the town.
- 6.32. The disposition of the developable land in the south-west sector does not lend itself to large footprint buildings. Also, Badsell Road itself has limited capacity. Therefore, further assessment is given of land on the edge of the proposed urban expansion to the north-west of the town, as shown on the plan below:



- 6.33. This amounts to some 5 hectares, with some 4 hectares net developable, and could be contained on the north side of the local distributor land serving the new residential area, including the land safeguarded for future new secondary school provision and primary school. It would benefit from the proposed collector road link through to Maidstone Road.
- 6.34. Further consideration is given to this prospect in the following section.
- 6.35. No other land outside the strategic site area has been identified as potentially suitable for employment purposes.
- 6.36. It is noted that the relocation of an employment use on a site occupied by Barth Haas, just north of the railway, is muted in the Submission Local Plan, following a SHELAA assessment that identified it as having potential for residential redevelopment. However, given the need to retain employment sites and having regard to flood risk modelling, it is not considered appropriate to promote it through the Local Plan at this time.

## 7.0 Assessment of potential employment sites, including the application of the sequential and exception tests

- 7.1. For ease of reference, the table below presents the above-mentioned potential employment sites.
- 7.2. Site areas relate to net developable, or usable, areas in hectares (ha). Hence, it excludes land that would not normally form part of a development, such as existing woodland, ponds, stream courses to be retained, or areas of structural planting as part of a strategic framework for development.

Site	Area (ha)	Floorspace (sqm)
Swatlands Farm	4.27	18,150
Keylands Farm	3.2	13,270
Land east of Transfesa Way – south/west section	3.1	15,500
Land east of Transfesa Way – north-east section	1.1	5,500
Garden Centre site	1.46	7,300
Land on edge of NW housing site	4.0	20,000
<b>Total</b>	<b>17.13</b>	<b>79,720</b>

- 7.3. It can be seen that, if all these sites were suitable and available, there would be more than enough land to meet the target provision of some 11-12 hectares.
- 7.4. A summary of the sites' suitability, availability/achievability is presented below. In terms of suitability, the flood zoning is drawn out, while other factors include the relationship to the Key Employment Area (KEA), as advocated in the Economic Needs Study, accessibility to main roads and the railway station, and impacts on landscape, and neighbouring amenities.
- 7.5. The status of a site, in terms of any planning permissions, as well as developer interest are taken as proxies for deliverability (availability and achievability).

Site	Status/Deliverability	Flood Zone (2038)	Suitability in other respects
Swatlands Farm	Planning permission (22/01929/OUT)	FZ3	Adjoins KEA; main road access; on bus route; set behind roadside tree belt
Keylands Farm	SLP allocation; actively promoted	FZ3	Similar to above but would extend development more into countryside.
Land east of Transfesa Way – south/west section	SLP allocation actively promoted	FZ2	Adjoins KEA; level ground, well-suited to large units; set against existing B8 complex; some distance from bus route, but footpath links into town.
Land east of Transfesa Way – north-east section	Part SLP allocation, part pp, actively promoted	FZ2	Adjoins KEA; would infill and extend existing mix of B8

			units; needs buffer to Lucks Lane to preserve amenities.
Garden Centre site	Promoted at time of SHELAA	FZ3	Open and exposed site; somewhat removed from KEA, but on main road; countryside fringe setting.
Land on edge of NW housing site adjacent to A228	Being promoted for housing	FZ1	Would be a wholly new employment location; likely visual impact from large B8 units, so better for Class E, although most demand in the town is for Class B8 space, hence, likely issues of hours of operation and traffic.

- 7.6. With the Swatlands Farm site having planning permission, which is being actively progressed, it is taken as a commitment. At least one additional location is needed to even meet the “base need” of some 8 hectares.

Application of the sequential and exception tests

- 7.7. For alternative sites being considered in plan-making, the flood risk sequential approach is applied to help to ensure that development is steered to the lowest risk areas, where it is compatible with sustainable development objectives to do so. The NPPF states (at paragraph 162) that *“Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.”*
- 7.8. The PPG on Flood Risk and Climate Change elaborates on this policy, advising that *avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features.* It also clarifies that *even where a flood risk assessment shows the development can be made safe throughout its lifetime without increasing risk elsewhere, the sequential test still needs to be satisfied,* and that the test applies to both current and future medium and high flood risk areas.
- 7.9. The only site identified above in the low-risk Flood Zone (FZ1) is that which may be situated as part of, or adjoining, the strategic site parcel to the north-west of the town adjacent to the A228. This is therefore sequentially preferable to the sites in the medium risk zone (FZ2), namely those east of Transfesa Road, which are themselves sequentially preferable to those in FZ3 (i.e., Keylands Farm and the Garden Centre site, to the east and west of Maidstone Road respectively).
- 7.10. Therefore, the FZ1 land should be allocated in the revised Local Plan, unless it is concluded that it is not “reasonably available” and/or is not “appropriate for the proposed development”. As noted in the above table, there are question-marks in respect of both considerations – the land is in the control of a housebuilder which is promoting the site for residential purposes. Also, and critically, while the site could

potentially accommodate Class E (office and light manufacturing) which is, by definition, not expected to be detrimental to the amenities of proposed adjacent housing, it would be far less suitable for large-format warehouse units (B8 use), by virtue of their massing, high proportion of HGV traffic movements and preferred hours of operation.

- 7.11. Given that the local industrial structure indicates that most of the demand for employment floorspace is likely to be for Class B8 units, which is also confirmed by the independent economic studies by Turleys and SQW as referred to above, there is considerable doubt that the site would meet the likely employment space demands of the area.
- 7.12. Therefore, it is concluded that the combination of uncertain availability and its unsuitability for the anticipated purposes, makes this site inappropriate.
- 7.13. The next most suitable sites are those in FZ2, to the east of Transfesa Road. These are, or will be, in a medium risk category. Together, they would provide developable areas of some 4.2 hectares.
- 7.14. The combination of the approved Swatlands Farm site and the southern/western section and the north-eastern sections (reflecting the two ownerships) to the East of Transfesa Way would provide some 8.5 hectares of net developable employment land, which would meet the baseline target of some 8 hectares.
- 7.15. As this 8.5 hectares falls somewhat below the higher target of 11-12 hectares, consideration is given to the other sites in Flood Zone 3. However, given their high flood risk, and the contribution that the strategic site at Kingstanding Way (proposed site allocation Policy AL/RTW 17, which already benefits from permission as referred to above) on the edge of Tunbridge Wells, which amounts to some 13.4 hectares, will make to overall supply – in an accessible location – then it is considered that these sites are not regarded as justified having regard to the sequential test.
- 7.16. In making the above judgements, it is also noted that an early review of the Local Plan is proposed, which will enable the longer-term need for employment land provision to be re-assessed for both the settlement of Paddock Wood and the borough as a whole.

## Conclusions

- 8.1 For the reasons set out above, it is concluded that the Local Plan employment allocations for Paddock Wood including land in east Capel set out in the Submission Local Plan, be amended as follows:
- Draft allocations of land east and west of Maidstone Road be withdrawn,
  - The draft allocations for Land east of Transfesa Road be amended as set out, to relate to land not in Flood Zone 3,
  - The approved site at Swatlands Farm be highlighted as a 'commitment' but not allocated.
- 8.2 In terms of policy presentation, the Inspector pointed out that there is no policy link currently within the SLP between housing and employment release. In response, the policy itself - STR/SS1 - does refer to all land use elements, thereby enabling the local planning authority to seek such linkage. However, given the progress on bringing forward development at Swatlands Farm, as well as the landowners' promotion of the other sites, such a requirement regarding respective phasing with housing seems unnecessary.
- 8.3 The above revised employment allocations would mean that the proposed expanded Key Employment Area would be drawn back to exclude Keylands Farm, but would include Swatlands Farm and revised land to the east of Transfesa Road.

## APPENDIX 1 – Demographically-led employment land needs calculation

### A. Housing growth at Paddock Wood

1. The most recent housing land supply statement, for 1 April 2023 ([see the Five-year housing supply statement](#)), shows that there are outstanding planning permissions in Paddock Wood for a total of 763 dwellings.
2. The previously proposed housing strategic site allocations have been reviewed and further masterplanning work carried out, resulting in a scale of housing growth to avoid housing in higher flood zones (and to take account of more recent flood modelling) and to accommodate additional school capacity in the town. The revised masterplan now envisages some 2,374 – 2,532 dwellings, fairly evenly distributed to the east and west of the town, giving a mid-point of some 2,453 dwellings.
3. Hence, if it is assumed that employment land is required to meet the needs of the workforce from both the allocated and committed dwellings, the current dwelling stock would increase some 3,216 dwellings (763 dwellings + 2,453 dwellings).

### B. Labour force growth

4. The labour force is taken to be those residents who are economically active (EA). It is expressed as a percentage of people aged 16-64.
5. An estimate of workforce growth for the borough as a whole is contained in the '[Review of Housing Needs](#)' report by Icení for the Council [[CD 3.75](#)]. Table 8.4 presents an estimate of the workforce increase and the number of jobs supported by demographic projections based on building 678 dwellings per annum (dpa) over the period 2020-2037<sup>3</sup>. Taking the figures from this table, a simple calculation of the relationship between housing growth and workforce is:

Annual homes	17 years of homes	Total EA pop	Ratio of EA pop to homes
678	11,526	9,502	0.828

6. This means that for every 1,000 homes built in the borough over the plan period, there is expected to be an additional 828 economically active residents. While this ratio may appear low, it should be appreciated that the population projections show greatest growth in the number of people of retirement age.
7. Applying this ratio to the above housing growth at Paddock Wood (c3,216 dwellings), would result in some 2,663 additional residents in the workforce.
8. Of course, caution should be exercised when looking at the precise figures due to the number of assumptions being made, especially in relation to smaller areas.

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<sup>3</sup> It is appreciated that the most recent local housing need, for 2023-2033 is 667 dpa, but this is marginal and unlikely to have a material impact on the relationship between EA population and housing supply.

9. Allowance for unemployment can be factored in at this stage, but most recent monthly claimant counts for the Wards of Paddock Wood East and West are essentially equivalent to full employment, so this is not considered necessary.
10. Consideration should also be given to commuting patterns. While up-to-date commuting data is not yet available, previous studies have shown a close balance between in- and out-commuting. Furthermore, the revised strategy for Paddock Wood looks to promote a more self-contained approach, to reduce the need to travel. Therefore, for the purposes of estimating land needs, it is based on the local workforce growth.

C. Jobs to be accommodated on employment sites

11. The [Sevenoaks and Tunbridge Wells Economic Needs Study \(CD3.25\)](#) estimates that approximately half (49%) of additional jobs will be in activities requiring employment space<sup>4</sup>, based on assigning jobs to land use categories, identifying those likely to require office, industrial or warehouse space.
12. Taking this borough-wide study, a broad estimate would be that 49% of the 2,663 total jobs, that is circa 1,300 jobs, would be in office, industrial and warehousing sectors.
13. The 2021 Census provides an industrial sector breakdown for Paddock Wood Middle Super Output Area, which is used to check the borough-wide, and earlier figures. Of note, there is a high proportion, some 18.6%, of jobs in 'wholesale', which together with 8.3% in manufacturing jobs, 7.4% in transport and storage and 4.6% in motor trades, totals 39% of local employment.<sup>5</sup> Office-based employment (in 'Information and communications', 'financial and insurance', 'professional, scientific and technical', 'administrative and support services' and 'real estate') total some 19.6%.
14. It does not follow that all jobs in these sectors are based on employment sites, with a proportion being primarily away from the base. This includes postal workers, who also fall within the categorisation. Office sectors will include jobs in town centre locations and, increasingly, from home.
15. Overall, while Paddock Wood has a somewhat greater proportion of industrial and warehousing and office jobs than the borough average, the proportion of total employment to be accommodated on employment sites appears likely to be notably less. This is important to take account of, as floorspace and, hence, requirements are derived from job densities. There is no definitive process for estimating this, but if 80% of the proportion of all the above sectors were on employment sites (i.e., 80% of c50%), it would equate to some 1,065 jobs (2,663 resident workforce x 40%).

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<sup>4</sup> See paragraph 8.43, Economic Needs Study (CD 3.25)

<sup>5</sup> Construction employment is not included, although part of the 'Industrial broad category, in the ENS, presumably as employment is mostly site-based.

#### D. Employment density

16. It is normal practice to convert job numbers to floorspace requirements based on research on employment densities. The most common research is the Homes and Communities Agency 'Employment Density Guide 3rd edition', Nov. 2015.
17. This research highlights that job densities vary greatly by sector. Those for mixed B-class space and (B8 class) warehousing, taken from the HCA guide, are reviewed below, together with a "blended" density range, reflecting the town's industrial structure.

Source	Land use	Job density	Floorspace (sqm)	Notes
HCA, 3 <sup>rd</sup> edition	Mixed B (maker space)	15-40 sqm	16,000 – 42,600	15-40 sqm x 1,065 jobs
HCA, 3 <sup>rd</sup> edition	Class B8 (Final Mile' - Regional Distrib. Centre	70-77 sqm	74,600 – 82,000	70-77 sqm x 1,065 jobs
TWBC	"Blended" density <sup>6</sup>	50 -55 sqm	53,250 – 58,575	50-55 sqm x 1,065 jobs

#### E. Land and floorspace needs

18. To estimate land requirements, it is necessary to apply a plot density, or "plot ratio", being the ratio between total floorspace and site area.
19. The Economic Needs Study [[CD3.25](#) - paragraph 8.64] applied the following plot ratio assumptions:
  - A plot ratio of 1.5 is applied for new build B1a/b office premises, reflecting likely multi-storey development.
  - A plot ratio of 0.4 is applied for new build B1c, B2 and B8 industrial and warehouse premises.
  - A plot ratio of 1 is applied to extensions on the basis that site infrastructure will already be in place, but will vary greatly from site to site.
20. There is clearly a much higher plot ratio for offices and lower, similar ones for industrial and warehousing premises. In the context of the industrial structure of Paddock Wood, as reviewed above, the proportion of employment in offices within business areas is very much secondary to that in industrial and warehousing uses. Therefore, a prudent overall average plot density of 0.5 is assumed. It is noted that this ratio is also that used by DLA in its masterplanning work.
21. This calculation (53,250 – 58,575sqm x 0.5ha) produces **an employment land requirement of some 10.65 – 11.7 hectares.**
22. This figure may be seen as the starting point for identifying land needs as, from a practical perspective, further considerations that influence the need for further employment land can include:

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<sup>6</sup> The commercial property market for PW, as set out in the ENS and by SQW, is essentially a "blended mix" of class B/E uses, with a relatively high proportion (60%) of B8 accommodation together with a combination of light industry (15%) and general industry (15%), with some (10%) offices.

- the capacity of the existing stock to absorb more jobs (i.e., be used more efficiently),
- the potential for extensions to existing premises to provide additional space,
- the prospect of existing stock to become obsolete and “lost” to other uses, such as housing, generating a need for replacement space,
- the need for some choice and flexibility in supply to meet a range of needs,
- future changes to the industrial structure and working patterns.

23. As can be seen, several of these factors pull in opposite directions and not readily balanced. Nevertheless, it is helpful to the understanding of land needs and suggests that the supply of new land/premises should be closer to the upper end of the range than the lower.