

Tunbridge Wells Borough



Tunbridge Wells Borough Council

Economic Development Topic Paper for Pre-Submission Local Plan

March 2021



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1.0 Introduction and Purpose

- 1.1 This Topic Paper explains the background to the proposed approach to the provision of economic development, including provision of employment land and the approach towards town centres and town centre uses as set out within the Local Plan.
- 1.2 Specifically, it sets out how the strategy for the provision of economic development has been developed, taking into account the requirements set out at the national level and consideration of local circumstances and aspirations through engagement with stakeholders and the public. Reference is made to the previous approach adopted by Tunbridge Wells Borough Council (TWBC) and the particular evidence studies commissioned to inform the updated strategy and policies for the new Local Plan in relation to economic development.
- 1.3 For the purposes of the Local Plan and this Topic Paper, employment provision is regarded as all employment generating development within the borough, but with a particular focus on the traditional 'B Class' uses, i.e. B1 – office (now covered by use class E Commercial), B2 - General Industry and B8 – Storage and Distribution. It does however also refer to wider employment generating uses which constitute a large proportion of employment within the borough which fall outside of these traditional use classes but contribute significantly to the local economy.
- 1.4 It also sets out how the strategy for the provision of town centres and town centre uses has been developed, taking into account the requirements set out at the national level and consideration of local circumstances and aspirations through engagement with stakeholders and the public.
- 1.5 Additionally, this paper sets out how the approach to economic development ties in with the wider development strategy set out within the Local Plan, in particular in relation to the balance between the provision of housing and employment growth. Reference is made to the importance of individual sites and locations as well as the approach to development management in realising the economic development strategy proposed in the Local Plan.
- 1.6 This Topic Paper should be read in conjunction with other evidence studies and documentation (e.g. the Economic Needs Study, the Retail, Commercial Leisure and Town Centre Uses Study and other Topic Papers, including the Development Strategy Topic Paper) produced to inform and support the Local Plan. All supporting documents referred to throughout this document can be found under [Supporting Documents](#) on the Council's Local Plan web page.

2.0 National and Local Policy context

National Policy

National Planning Policy Framework

- 2.1 The National Planning Policy Framework (NPPF) sets out in section 6, the approach to building a strong, competitive economy. It encourages planning policies and decisions to help create the conditions in which businesses can invest, expand and adapt and that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 2.2 In particular the NPPF requires at paragraph 81, that planning policies should:
- a. *Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.*
 - b. *Set criteria, or identify strategic sites, for local and inward investment, such as adequate infrastructure, services or housing, or a poor environment; and*
 - c. *Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*
 - d. *Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.*
- 2.3 The NPPF also requires Local Planning Authorities to recognise and address specific locational requirements of different sectors and making provision for different clusters and industries in suitably accessible locations.
- 2.4 Further to this, the NPPF specifically supports the ambition of a prosperous rural economy and seeks that planning policies should enable:
- a. *The sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
 - b. *The development and diversification of agricultural and other land-based rural businesses;*
 - c. *Sustainable rural tourism and leisure developments which respect the character of the countryside; and*

- d. *The retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.*

- 2.5 It is also accepted at paragraph 84, that planning policies should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. However, it is recognised that in these circumstances, it will be important to ensure that development is sensitive to its surroundings and does not have an unacceptable impact on local roads. Additionally, the use of previously developed land and sites that are physically well-related to existing settlements should be encouraged where there are suitable opportunities.
- 2.6 In terms of planning for town centres and town centre uses, the National Planning Policy Framework sets out in section 7, the approach to ensuring the vitality of town centres. It encourages planning policies and decisions to help support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaption.
- 2.7 In particular the NPPF requires at paragraph 85, that planning policies should:
- a. *Define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;*
 - b. *Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;*
 - c. *Retain and enhance existing markets and, where appropriate, re-introduce or create new ones;*
 - d. *Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least 10 years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;*
 - e. *Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that we well connected to the town centre; and*
 - f. *Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.*
- 2.8 The NPPF also requires Local Planning Authorities to apply a sequential test to planning applications for main town centre uses which are neither in an existing

centre nor in accordance with an up-to-date plan. This requires that 'main town centre uses' should be located in town centres, then in edge of centre locations and then only if suitable sites are not available (or expected to become available) should out of centre sites then be considered. Furthermore, it is considered that accessible sites which are well connected to the town centre.

- 2.9 Additionally, guidance is set out in relation to the requirement for an impact assessment if developments coming forward are over a proportionate floorspace threshold, either a locally set threshold or the default threshold set out in the NPPF of 2,500sqm of gross floorspace. The requirements of the impact assessment are detailed at paragraph 89 of the NPPF.
- 2.10 The above requirements set out at the national level in the NPPF have informed the approach taken by Tunbridge Wells Borough Council at the local level to provide for continuing economic development in the borough, including the provision of employment land and planning for and supporting town and other identified centres to meet the needs of the borough over the Local Plan period.

Local Policy

Adopted Planning Policy Framework

Tunbridge Wells Borough Local Plan Adopted 2006

- 2.11 The Tunbridge Wells Borough Local Plan was adopted in 2006 and covers the whole borough.
- 2.12 Section 5 of the Plan deals with 'Town, Neighbourhood and Village Centres (incorporating Retail Development)' and sets out in full the approach towards these centres across the borough.
- 2.13 The uses considered appropriate within the centres are identified and the hierarchy of centres is defined recognising the individual role that each centre provides for the local community that it serves.
- 2.14 The appropriate development management policies are set out, followed by a number of allocations within the defined centres and then specific policies in relation to the designated Primary Shopping Areas within the key centres. The approach to supporting and retaining services and facilities within neighbourhood and village centres is also provided.
- 2.15 Section 7 of the Local Plan sets out the approach to Economic Development provision and details to be taken to the provision of economic development land and growth.
- 2.16 A number of policies set the framework for the consideration of proposals for economic development and specific allocations are made to deliver the floorspace required as set out at the strategic level.

- 2.17 Although the Adopted Local Plan is some years old, some of the policy approach remains valid and many of the policies are 'saved' and used in the determination of planning applications for development management purposes.

The Core Strategy

- 2.18 The Core Strategy was adopted by the Council in 2010 and covers the plan period and strategic approach to meeting development within the borough to 2026.
- 2.19 Core Policy 7 – Employment Provision sets out the Council's approach to the provision of employment and promotes the following strategy:
- Sufficient good quality employment land will be provided for strategic and local requirements;
 - Maintain the overall net amount of employment floorspace across the borough for a range of employment generating uses;
 - The identification and definition of the 'Key Employment Areas' (KEA's) within the borough and the approach to these;
 - Safeguarding for employment use, areas and buildings that are in existing employment use, physically and viably capable of providing employment sites that are well located, modern and attractive to the market;
 - Allocation of new sites to meet the demand if the regional requirement cannot be met by the above approach and should be directed towards expansion of the existing KEAs;
 - Strengthening the rural economy through the re-use of surplus rural buildings;
 - The promotion, development and retention of tourism accommodation and attractions across the borough.
- 2.20 No specific allocations are made within the Core Strategy itself, but rather are made within the Site Allocations Local Plan which allocates site to meet the strategy set out within the Core Strategy as outlined below.
- 2.21 It was the intention that further detail on the KEAs and the uses which would be directed/be acceptable within these defined areas would be set out within a Development Management DPD. However, this was not progressed and therefore the approach to the KEA's has been reviewed within the scope of the new Local Plan.
- 2.22 Core Policy 8 (CP8) sets out the approach to the provision of new retail and leisure provision within the borough over the Plan period. It refers to new retail development being provided in the order of 26,500sqm net of comparison retail floorspace to 2017 as identified within the 2006 Retail Study unless a different need is identified in a future study.

- 2.23 CP8 also refers to how retail proposals will be considered and makes it clear that proposals for main own centre uses on sites not within the defined centres will not be permitted unless they meet specific criteria.
- 2.24 The Hierarchy of Centres is determined and Table 10 provides the definition of retail centres, including the Primary Regional Centre, Town Centres, District Centres, Neighbourhood and Village Centres, as illustrated on the Key Diagram.
- 2.25 No specific allocations are made within the Core Strategy itself, but rather are made within the Site Allocations Local Plan which allocates site to meet the strategy set out within the Core Strategy as set out below. Further detail in relation to the Primary Shopping Areas and the extent of designations etc was to be identified within the Town Centre Area Action Plan, the Allocations DPD and the Development Control Policies DPD.
- 2.26 The Town Centre Area Action Plan and Development Control Policies DPD were not progressed and a number of the policies and issues have been addressed within the Site Allocations Local Plan and the new Local Plan.

The Site Allocations Local Plan 2016

- 2.27 The Site Allocations Local Plan (SALP) sets out the specific sites that the Council believes should be developed in order to meet the levels of growth set out in the Core Strategy. It also defines spatially designations that apply to certain areas of the borough.
- 2.28 In terms of employment, the SALP identifies limited sites for meeting employment needs in accordance with the strategic approach set out within the Core Strategy, i.e. maintaining the overall net amount of employment floorspace across the borough. The allocated sites constitute either a stand-alone employment allocation or as part of mixed-use sites where employment provision forms part of the mix. This is particularly the case for a number of the town centre sites allocated within Royal Tunbridge Wells.
- 2.29 Additionally, the SALP defines, spatially, the 'Key Employment Areas' identified within the Core Strategy.
- 2.30 The SALP sets out the approach to development within the key centres within the borough as defined within the Core Strategy. Table 5 details the requirements per settlement by use and includes the requirements for retail provision which is further set out at paragraphs 2.27 to 2.32.
- 2.31 The majority of the retail and town centre growth is directed towards Royal Tunbridge Wells and the amounts to be achieved are set out within Table 6.
- 2.32 A number of specific sites are allocated within the Royal Tunbridge Wells and Southborough chapter of the SALP which seek to meet the overall need identified. Further allocations are made within the other key centres, including Paddock Wood and Cranbrook.

- 2.33 Additional policies also define spatially the defined Town Centre boundaries, (of which Royal Tunbridge Wells Town Centre is also identified as a Key Employment Area), District, Neighbourhood and Village Centres as well as the Primary Shopping Areas and Primary Shopping Frontages. Reference is made to further details to be provided on the appropriate uses within these areas within the relevant DPD.
- 2.34 No further DPDs were progressed under the Core Strategy framework and so the designations, boundaries and policy approach to these areas have been reviewed and set out within the new Local Plan.

Tunbridge Wells Borough Council's Economic Strategy

Tunbridge Wells Borough Council Economic Development Strategy 2018-2021

- 2.35 The Economic Development Strategy has been adopted by the Council and covers the period from 2018-2021.
- 2.36 The overall goal of the Economic Development Strategy is to '*seek to create the best possible conditions for business investment and sustainable growth in the borough*'.
- 2.37 The strategy sets out the key issues for the borough in economic terms, the borough's strengths and weaknesses, and strategy aims and objectives. Also included is an Action Plan, detailing the project, timescales, delivery partners and measure of success. A number of projects are set out and are grouped into themes: Place Shaping and Promotion; Accessibility and Connectivity; Skills and Employability; Rural Economy; and Supporting Enterprise.
- 2.38 This strategy highlights the lack of sites and premises as a constraint to growth and barrier to inward investment from outside the borough, exacerbated by the permitted Development Rights legislation allowing the conversion of office space to residential. It does however draw on the strengths of the borough and the diverse range of sectors important across the borough.
- 2.39 The Economic Development Strategy and accompanying Action Plan is monitored and reviewed regularly to ensure that it continues to respond to changing circumstances. The Borough Council will be reviewing the Economic Development Strategy in the second half of 2021. The updated Strategy will take account of the impacts of the Covid 19 pandemic where this is possible and build on the Borough's recovery action planning. This review will also feed into the Town Centre Area Plan for Royal Tunbridge Wells.

West Kent Economic Strategy

West Kent Economic Priorities for Growth 2019-2022

- 2.40 Tunbridge Wells Borough Council works closely with its colleagues within West Kent in recognising the role and synergies of the West Kent area and the positive contribution that partnership working can bring to the wider Kent economy.

- 2.41 West Kent comprises the boroughs of Tunbridge Wells and Tonbridge & Malling as well as Sevenoaks district as well as business representatives. These areas share many characteristics, which make for a strong West Kent identity. In particular, the strategy recognises the role of Royal Tunbridge Wells as a regional retail, cultural and commercial centre.
- 2.42 The West Kent Economic Strategy set out a number of objectives as set out below:
- Deliver a dynamic and well- connected economy;
 - Become a key location for business growth where businesses are supported to innovate and thrive; and
 - Ensure our local population has access to high quality jobs and opportunities for skills development.
- 2.43 The strategy identifies the strengths, weaknesses and opportunities within the region and acknowledges the areas potential for growth. Although it also recognises the constraints to growth in the area and identifies actions and priorities for realising the economic potential across the West Kent area.
- 2.44 The Strategy identifies priorities for growth and sets out a 'Priorities for Growth 2019-2022 Action Plan', which sets out Objectives, Actions, Timescales, West Kent Partnership Partners and Success Measures. This includes 'Key Locations for Growth Brought Forward' and refers to the Amelia (Cultural and Learning Hub) and other Royal Tunbridge Wells town centre projects. 'Transport Infrastructure' is also included as an Action and amongst the projects identified is lobbying for the improvement of the A228 Colts Hill and A229, as well as cycling and walking improvements etc.
- 2.45 Additionally, following the Covid 19 pandemic a Recovery Addendum and Action Plan supplementary document has been prepared and agreed.

Royal Tunbridge Wells Together

- 2.46 Royal Tunbridge Wells Together (RTWT) is the Business Improvement District (BID) delivery company for Royal Tunbridge Wells. It is a Community Interest Company created as a town centre partnership by several local businesses and the Borough Council in 2016. The Board consists of key business leaders in the town.
- 2.47 RTWT works collaboratively to make Royal Tunbridge Wells a destination for retail, business, leisure and culture, maintaining a competitive edge over other town centres in the south east and is focused on increasing the vitality of the whole town.
- 2.48 The Vision of the BID is to work hard to deliver:
- a. A well-connected town
 - b. A forward-thinking place to do business
 - c. A stunning, historic leisure destination

d. A clearly defined and unique brand

- 2.49 A five-year Business Plan has been put together by RTWT (2019-2024) which sets out details in terms of the geographical area covered by the BID, the aims, aspirations, BID budget and how it operates. The 'Tunbridge Wells Together' website provides further information and the BID publishes regular newsletters setting out the work of the BID and progress to date. It has also developed the 'TWWorks' website in order to promote existing flexible workspaces in Royal Tunbridge Wells but also to attract inward investment to the town

3.0 Evidence Base Studies

- 3.1 A number of evidence-based studies have been commissioned and carried out to inform the emerging Local Plan, covering a range of issues. Of particular note, in relation to economic development, the Council has commissioned a specific Economic Needs Study, a Royal Tunbridge Wells Town Centre Office Study (and an update), a Retail and Leisure Study (and an update), and a Hotel Capacity Study. The key findings and outcomes of these studies are summarised below with key policy recommendations informing the Local Plan identified.

Sevenoaks and Tunbridge Wells Economic Needs Study: August 2016

- 3.2 The Economic Needs Study (ENS) was produced in 2016, by Turley, in association with Colliers International, on behalf of Sevenoaks District and Tunbridge Wells Borough Council.
- 3.3 The study 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.
- 3.4 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.

Policy Recommendations

- 3.5 A number of policy recommendations and enabling actions are set out within the concluding chapter of the ENS. Broadly these can be summarised as below;
- The ENS provides a strong quantitative and qualitative case for retaining existing employment areas and allocating additional land to accommodate the borough's future employment needs;
 - Potential for the expansion of a number of Key Employment Areas, including at land adjacent to Longfield Road/North Farm, Maidstone Road, Paddock Wood and at Gill's Green;
 - Identification of areas in the borough where new supply would be met with demand include:
 - i. Areas close to main arterial roads where accessibility to the highway network for business operations is quick;

- ii. Areas which are close to public transport nodes or sites which have space for ample car parking;
- iii. Areas which have a critical mass of employment uses and amenities which would be attractive to investors and occupiers.
 - The A21 should continue to be the focus for transport investment and the area considered to have significant growth potential and improve choice of sites available to investors;
 - TWBC should work collaboratively with its neighbours in line with the Duty to Cooperate to ensure effective coordination of cross boundary issues relating to the demand for and supply of employment land;
 - Protection of employment sites – the ENS provides strong justification for the retention and protection of the borough’s supply of employment land and premises and sets out a number of recommendations;
- i. The Council should adopt criteria-based protection policies;
- ii. The Council should consider the use of Article 4 directions to withdraw permitted development rights for light industrial to residential conversions;
- iii. New sites should be allocated in response to evidenced need;
- iv. The Council should maintain a five-year housing land supply to negate the need for residential development on existing and allocated employment sites.

Enabling Actions

- A more detailed review of the office market in Royal Tunbridge Wells including a survey of stock and premises availability relative to demand and needs;
- Ongoing engagement with the borough’s strategic employment/occupiers to understand their land and premises requirements;
- Undertaking a survey of start-up, small and rural businesses to understand their needs and location requirements;
- Continue to support rural based employment development by responding positively to proposals that encourage the re-use of redundant agricultural buildings;
- The use of Council landholdings to attract inward investment and help to facilitate employment development;
- Improvements to digital connectivity to support further growth of the rural economy and homeworking;
- Review of potential business rates (non domestic) revenues that could be realised through the allocation of new employment sites.

- 3.2 The broad policy recommendations of the ENS have been taken forward within the Local Plan in terms of the overall development and employment strategy, the individual site allocations and suite of development management policies (Economic Development Policies) proposed.

Town Centre Office Market Review: Tunbridge Wells 2018

- 3.3 This report was commissioned by TWBC in order to gain an accurate and up to date picture of the Royal Tunbridge Wells town centre office market. This was commissioned in response to both the enabling actions set out in the ENS as well as concerns regarding significant office space losses in the town centre from the Permitted Development Rights (PDR) introduced allowing office premises to convert to residential without the need for planning permission. The study involved a detailed analysis of the offices, current planning position and market demand as at January 2018, focusing on 'principal' office space (defined for the purposes of the study as that being over 5,000sqft or 465sqm) the town centre of Royal Tunbridge Wells.
- 3.4 This assessment determined that there had been substantial losses of B1 office floorspace across the town centre since the PDR had come into force. The most notable result of the conclusion of the Study, was the recommendation that the Council seeks to implement a range of Article 4 Directions to protect existing valued office stock from change of use to residential through Permitted Development rights without the need for assessment through a planning application.
- 3.5 Additionally, the study recommended that in order to address a shortage of available stock, it should consider the allocation/and or development of identified sites within Royal Tunbridge Wells, including: the Civic Centre; Vale Avenue Area of Change; 77 Mount Ephraim; and sites within the North Farm Key Employment Area/A21 Corridor.

The Tunbridge Wells Hotel Capacity Study 2017

- 3.6 The Council commissioned Nexus Planning to undertake a hotel study to assess Tunbridge Wells Borough Council's current supply of hotels and its capacity for new hotel development across the borough. The study considers national and regional trends as well as changes to the supply of hotels in the borough. It carried out an audit of the existing stock of accommodation across the borough, an assessment of tourism growth and visitor numbers, the capacity of existing hotels and accommodation and a gap analysis.
- 3.7 The key findings and recommendations of this study are summarised below;
- Considers that domestic tourism is likely to grow steadily over the next decade.

- Rural parts of the borough have a healthy provision of visitor accommodation stock, however larger budget branded hotel in rural parts of the borough could provide economic support to local businesses and economy (subject to other material considerations and constraints).

3.8 There is a lack of choice and quality of serviced accommodation in the Royal Tunbridge Wells Town Centre. More affordable stock would be desirable as well as provision of luxury five-star hotels offering higher end accommodation which could also tap into the spa market.

3.9 It is considered that this study provides a comprehensive assessment of the capacity of accommodation across the borough and any gaps in provision which could be addressed through the approach taken in the Local Plan.

Retail and Leisure Study

3.10 The Retail and Leisure Study 2017 was produced by Nexus Planning on behalf of the Borough Council. This study concluded by setting out the following recommendations;

Borough-wide recommendations;

- Make provision for the development of up to 9,500sqm (net) of convenience floorspace;
- Make provision for the development of between 21,700sqm (net) and 34,000sqm (net) of comparison goods floorspace over the plan period with new comparison floorspace primarily directed towards Royal Tunbridge Wells;
- Capacity for new convenience retail floorspace in each of Southborough, Cranbrook and across the rest of the borough, but this is not considered of sufficient size to specifically plan for any new convenience retail floorspace and will likely be taken up by minor increases in retail provision across the borough over the plan period.
- There is no specifically identified capacity within the borough for any leisure facilities, such as health and fitness clubs, cinemas or ten-pin bowling lanes;
- There was public demand for a swimming pool, additional cinemas and children's play facilities;
- A locally set threshold of 280sqm (net) for proposals within the catchments of Southborough, Paddock Wood, Cranbrook and Hawkhurst Town Centre were recommended;
- The amalgamation of units should be supported where appropriate, to allow for flexibility and encourage investment in the Borough's centre.

Royal Tunbridge Wells specific recommendations;

- The total provision of retail floorspace proposed through the Site Allocations Local Plan would fall within the identified qualitative capacity and would be suitable for Royal Tunbridge Wells Town Centre, subject to market forces and all other relevant material considerations;
- The current amount of allocated comparison goods floorspace is towards the upper end of the calculated comparison goods capacity, we note that the allocations will be reviewed throughout the plan period in order to suitably account for relevant changes.
- A local impact threshold of 1,000sqm (net) for proposals within the catchments of Royal Tunbridge Wells Town Centre was recommended;
- A quantitative capacity for an allocation for one large (or two small to medium) foodstore(s) within the centre, particularly noting the qualitative lack of convenience provision in the centre given relative draw of out-of-centre facilities.

3.11 The findings of the Retail and Leisure Study 2017 were used to inform the emerging Local Plan; however, it was considered that it needed updating to take account of structural changes to the retail economy and town centres over the recent years and in light of ongoing implications of the Covid 19 pandemic as referred to below, in order to inform the Local Plan.

Retail, Commercial Leisure and Town Centre Uses Study – February 2021

3.12 The 2017 study has recently been updated by the Tunbridge Wells Retail, Commercial Leisure and Town Centre Uses Study 2021. The scope of this study has been widened to include an assessment of Town Centre office provision, by way of an update of the above-mentioned 2018 Town Centre Office Study.

3.13 This updated work takes into account current market trends and the ongoing impact and implications on town centres of the Covid 19 pandemic, accelerating previous retail, leisure and office trends.

3.14 It also considers recent changes introduced by MHCLG in relation to the Commercial Class E replacing the previous town centre uses, such as A1, A2, A3 etc. Reference is also made to the Government's proposed changes to permitted development rights from Class E Commercial to Residential. However, it is noted at that at the time that Nexus drafted the report (and the production of the Local Plan and this topic paper) that the proposed changes are subject to consultation before any decision is made on the approach and whether the Government will bring the changes into legislation.

- 3.15 The study concludes by identifying a number of key priorities for the borough over the plan period and recommends that the following should be planned for or considered within the policy approach advocated within the Local Plan:
- No pressing qualitative need to allocate a site for a further foodstore and do not recommend that the Council specifically plans for the allocation of a site for convenience retail;
 - No qualitative or quantitative capacity for additional comparison goods floorspace to support any allocations;
 - Confirm their previous recommendation for setting a local impact threshold requiring a proportionate Retail Impact Assessment for developments greater than 1,000sqm for proposals within Royal Tunbridge Wells or 280sqm (net) for proposals within the catchments of Southborough, Paddock Wood, Cranbrook and Hawkhurst Town Centres;
 - Flexible working practices and new formats should be encouraged through planning policies supporting the amalgamation or sub-division of existing town centre units and workspace to encourage investment;
 - Where allocations within the town centre are to be carried forward, would suggest a flexible approach to the provision (or re-provision) of retail floorspace, reflecting the fact that changes of use across Class E are no longer defined as development;
 - Consider the use of restrictive conditions for any proposals coming forward for Class E commercial uses which would not accord with the 'town centre first' policies;
 - Consider adopting a policy that would assist in enabling the re-occupation of longstanding vacant units in the Primary Shopping Area no longer fit for purpose, for other uses that would support the vitality and viability of the centre, including such uses as pubs, bars, cinemas and music venues.
 - The consolidation of Royal Tunbridge Wells Town Centre by sensitively reducing the boundary in line with recommendations made;
 - Complementary uses (i.e. those complementary to retail uses) such as office space and residential units to occupy areas closer to the centre that are currently under performing as retail, to aid in increasing footfall and a consistent customer base;
 - The Council should actively encourage residential living above ground floors in the Town Centre, as well as comprehensive redevelopment schemes which may be predominantly residential led;
 - The Council to lead on the production of a Town Centre Area Plan for Royal Tunbridge Wells, building on existing evidence to produce a vision and strategy for the centre to encompass a range of uses including office and employment;

- Policy support for ‘meanwhile’ uses to temporarily occupy vacant units by new business concepts and would assist small and small-medium sized enterprises (SME’s) wanting to invest in Tunbridge Wells;
- Introduction of ‘softer’ initiatives within the Town Centre should be actively advocated for within the Local Plan and any future spatial strategy and could include construction of click and collect ‘hubs’, support for town centre events and commissioning community-led murals and public art, including shutter art and building decorations;
- Promotion of the evening economy, through policy support for flexible or late-night opening hours, although this would only relate to new development proposals;
- Consideration should be given to developing a Business Improvement District in Paddock Wood to support the ambition to expand the position and offer of Paddock Wood town centre;
- A number of recommendations are also made in relation to individual sites which were proposed for allocation within the Draft Local Plan and how these should be taken forward within the revised new Local Plan.

3.16 The above recommendations have been taken into account when formulating the policy approach set out within the Local Plan in relation to economic development and planning for the borough’s town centres.

4.0 Consideration

- 4.1 Drawing on the policy context and evidence studies outlined above, this section considers what provisions should be made for economic development and growth within the emerging Local Plan.
- 4.2 It firstly proposes an overall approach, followed by a review and updating of the early assessment of employment land needs. The most appropriate strategy for addressing such needs is then developed, having due regard to the spatial characteristics of the borough. It then considers opportunities for the identification of employment areas and sites to deliver the strategy.
- 4.3 Following this, it proposes the overall strategy and approach to the planning for the future of the town centres within the borough, followed by consideration of the key centres, sites and policy approach and how this can be taken forward within the Local Plan and other future policy documents.
- 4.4 Finally, the approach towards the formulation of an appropriate suite of development management policies to cover all elements of economic development is set out, including the approach to the provision and control of employment land needs and ensuring the vitality and viability of the borough's centres over the plan period.

Overall approach to employment land provision

- 4.5 In line with the NPPF, the Local Plan should set out to meet the development needs of the borough over the plan period, also having due regard to the situation in adjoining areas.
- 4.6 In terms of meeting employment provisions, the studies referred to in the previous section inform the development of a strategy, which has regard to the relationship with other development needs, in particular housing needs, opportunities and constraints, as well as ensuring that the employment land provides for the current and growing resident population as well as for those who travel to the area for work – the 'Travel to Work Area' (See Appendix 1) which covers parts of West Kent and Sussex. This is all within the context of securing economic growth and a prosperous borough, one of the Council's key corporate priorities and in accordance with the aims of the Economic Development Strategy. Part of the Vision of the Local Plan is to develop the borough's economic strengths and range of accessible job opportunities.

Employment land requirements

- 4.7 The Economic Needs Study 2016 projects employment land floorspace requirements to 2033/2035, for at least 14 hectares (ha) of employment land.

4.8 The Executive Summary of the ENS states the following:

“This suggests an objectively assessed need (OAN) for at least 14ha of employment land over the period to 2033 and 2035, of which 5.9ha should be suitable for office use (B1a/b) and 8.1ha suitable for warehouse uses (B8). The Council may, however, wish to consider planning on the basis of a higher requirement for industrial (B1c/B2) land, recognising that the market has been active in recent years with continued take up of pace.

Colliers consider there to be potential for the expansion of a number of Key Employment Areas, with suitable land adjacent to Longfield Road/North Farm, Maidstone Road (Paddock Wood) and Gill’s Green having the potential to address the identified shortfall while creating a balanced portfolio of employment land.”

- 4.9 However, it is necessary to review these recommendations in relation to the minimum employment land requirements to take account of further site-based evidence work, the evolution of the overall development strategy and the extension of the plan period.
- 4.10 Firstly, it is noted that the start date for the requirements identified in the ENS is 2013. It can be calculated from the above that, based on a pro-rata approach, it is assumed that the need figure would equate to 0.7-0.78 ha/per year (14ha/18-20 years). This can be rolled forward from 2033/2035 to 2038 (the Local Plan end date), with a resultant additional need of 2-4ha (07/0.78x3-5).
- 4.11 This increases the minimum floorspace requirement to 16-19 ha from a base date year of 2013. However, bringing this up to date to the current year (2020) and based on evidence of past take-up rate provided in the ENS, being an average take up of 0.5 ha per year, suggests that some 3 ha have been developed over the period from 2014-2019. This can be seen to approximately balance out the additional need due to the extension of the plan period (i.e. 2-4ha v 3 ha) such that 14ha is an appropriate minimum target for the period 2020-2038.
- 4.12 It is also necessary to consider any projected changes in labour demand and supply. The ENS was produced when the Strategic Housing Market Assessment housing need figure was set at 648 dwellings pa. This is now marginally higher at 678 dwellings pa, based on the standard method housing need figure, and so arguably labour supply will also be slightly higher. In fact, the labour supply-based calculation of employment land need in the ENS was slightly lower, at around 11ha, than the labour demand and the past take-up calculations in the ENS and so this new figure better aligns with local employment needs., potentially with some scope for reducing out-commuting
- 4.13 Furthermore, the recent work carried out to inform the Local Plan estimates the potential increase in labour supply calculated on the minimum housing need of 678 dpa would support provision of between 9,500 -9,900 additional jobs over the plan period 2020-2038. This can be seen to compare with the ENS forecast, based on the previous SHMA figure, allowing for commuting and converting to FTE, of an additional 8,928 FTE jobs for the period to 2035.

- 4.14 Taking the above into account, it would still be appropriate that there should be a minimum of 14ha of employment land identified within the Local Plan to meet needs over the plan period, 2020 – 2038, in line with the emerging overall development strategy.
- 4.15 At the same time, emphasis should be placed on this being a “minimum” though, as the actual provision will need to also factor in:
- provision of a range of types of sites
 - the spatial spread of the main centres of employment
 - the suitability, availability and achievability of sites
 - maintaining a continuity of supply of sites and premises

Proposed strategy in relation to employment land and floorspace

- 4.16 Supporting the needs of the local economy so that it can continue to be competitive, together with creating a range of local job opportunities, is seen as a key issue for the Local Plan. Tunbridge Wells Borough is an attractive location for investors, but the lack of available suitable land and premises has historically hindered future economic growth in the borough and it is considered that opportunities need to be provided in both the urban and rural areas to bring forward economic growth and local employment opportunities.
- 4.17 Economic prosperity is therefore an integral part of the emerging vision for the borough, which seeks to ‘*develop the borough’s economic strengths and range of accessible job opportunities*’.
- 4.18 It is considered that the strategy set out within this Topic Paper and realised through the Local Plan recognises the importance of economic development in balancing the growth of the borough and can be delivered via the promotion of the sites/areas and policies set out within the following sections. This includes the following;
- Promotion, intensification and expansion where appropriate of the defined Key Employment Areas;
 - Allocation of new sites to meet the identified employment needs detailed above in locations that are suitable, available and deliverable;
 - Retention of sites and areas in existing employment use that are well located and attractive to the market;
 - A suite of Development Management policies both promoting and controlling where necessary appropriate employment uses across the borough;
 - A permissive approach to appropriate rural business opportunities building on the rural economy and further encouraging the range of existing and diverse uses;
 - Recognition of tourism as a key sector of the economy of the borough.

4.19 The following sections set out the approach outlined above in further detail.

Key Employment Areas and site allocations

Key Employment Areas

4.20 The identification of Key Employment Areas is a well-established policy approach to support the main centres of economic activity. They were originally defined within the Core Strategy and prior to that as 'Economic Development Areas' as defined within the Local Plan 2006. These are long established existing areas of employment provision within the borough and the ENS considered that they are well located and operating well and should be the areas where future expanded provision should be directed. A number of Key Employment Areas are defined spatially within the emerging Local Plan and are listed below for ease of reference:

- Royal Tunbridge wells Town Centre;
- Royal Tunbridge Wells/North Farm/Longfield Road area;
- Southborough High Brooms Industrial Area;
- Paddock Wood Eldon Way and Land West of Maidstone Road;
- Paddock Wood Transfesa Road East and West;
- Gill's Green Business Park;
- Capel Brook Farm.

4.21 Where allocations are proposed as extensions to the Key Employment Areas (see below), the extent of the KEA will be extended and re-drawn to reflect this. The mix of uses appropriate within these areas will be set out within the relevant policy (Policy ED1) of the Local Plan and defined spatially on the Policies Map. Whilst the proposed policy seeks the encouragement/retention of the more traditional employment uses within these areas, it also recognises that there is a mix of uses which make up these areas and contribute to employment and economic growth. This is particularly the case for the Longfield Road/North Farm and Southborough/High Brooms Key Employment Areas which provide a mix of uses, including retail (mostly bulky goods retailing) and leisure and other complementary uses.

Site allocations

4.22 The following allocations are identified as being suitable, available and achievable to include within the Local Plan to specifically provide for employment floorspace. These broadly reflect the findings of the ENS and the overall strategy for growth and are directed towards sites within or as extensions to the defined Key Employment Areas as referred to above. The role of both Royal Tunbridge Wells and Paddock

Wood Town Centre are also recognised in terms of providing for a range of commercial uses, including office, retail, leisure and other complementary town centre uses. Policies STR/RTW 2 – The Strategy for Royal Tunbridge Wells and STR/SS 2 – The Strategy for Paddock Wood Town Centre detail the policy approach to these areas and are covered in more detail in the following section.

Table 1: Employment land allocations proposed to be identified in the Local Plan

Settlement	Site	(Draft) Policy Number	Net developable area (ha)
Royal Tunbridge Wells	Land adjacent to Longfield Road	AL/RTW 17	13.4
Paddock Wood	Land east of Maidstone Road	STR/SS 1	4.6
Paddock Wood	Land east of Transfesa Road	STR/SS 1	7.3
Gill's Green	Hawkhurst Station Business Park	AL/HA 6	1.2

Royal Tunbridge Wells

- 4.23 An allocation is proposed under Policy AL/RTW 17: Land at Longfield Road, Royal Tunbridge Wells for the creation of a modern business park to provide approximately 80,000sqm (net) of employment floorspace, Class E, B2, and B8. This allocation for a substantial new employment area is considered would bring about significant economic benefits to the borough and the wider local economy of west Kent. The site is located immediately to the east of the Key Employment Area at North Farm/Longfield Road and would act as an extension of the KEA in this location. This area was identified within the ENS as a location for employment growth, which it considered would be attractive to the market and future occupiers. The site does fall within both the Green Belt and the High Weald Area of Outstanding Natural Beauty and therefore is required to meet the exceptional circumstances test as set out by national policy. This is addressed in the Development Strategy Topic Paper.
- 4.24 Taking the above locational context into account, this site has been the subject of robust assessment in relation to its allocation and additionally, in respect of a planning application which has been submitted for the site. In its consideration of the latter, in September 2020, the Council resolved to grant planning permission for the development of up to 74,000 sqm employment floorspace for Use Classes E, B2 and B8, subject to the resolution of outstanding highway and section 106 legal matters. The highways matters have now been resolved, and both highway authorities recommend granting permission.

- 4.25 The important role of Royal Tunbridge Wells Town Centre in providing a range of commercial uses and stimulating employment growth is also recognised, particularly in relation to the office market and the service sector providing a range of employment uses. Additionally, a number of office buildings within Royal Tunbridge Wells Town Centre are subject to Article 4 Directions to seek to protect the existing well located and modern office stock. In recognition of this, the proposed amended defined Town Centre is designated as a KEA as referred to above. Further detail on the approach to Royal Tunbridge Wells town centre is covered within Paragraph 4.51 below.

Paddock Wood/Capel

- 4.26 A number of Key Employment Areas are identified within Paddock Wood and Capel, as set out in the table above. Additionally, the ENS confirms that further development as expansion of the KEAs in Paddock Wood would be appropriate to support expansion in this area and the growing population of the town of Paddock Wood and the wider area.
- 4.27 Further details about the background to emerging Strategic Policy STR/SS 1: The Strategy for Paddock Wood and East Capel, which sets out the strategy for the expanded settlement and in particular in relation to employment growth, are contained in the strategic Sites Topic Paper. The ENS considers that the KEA at Land East of Maidstone Road/Transfesa is a strong employment location supporting a range of industries and that the area could offer scope for future expansion with good access to the existing road network. The Local Plan takes this recommendation forward and includes 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 as extensions of the existing Key Employment Area.
- 4.28 The development at Paddock Wood will be delivered through the production of four framework Masterplan Supplementary Planning Documents for the planned growth including the employment areas.
- 4.29 Further to this, the role of Paddock Wood town centre is also recognised in securing commercial and economic growth to support and complement the significant housing development proposed at the settlement. To ensure the growth of the town centre is planned and delivered holistically, a Town Centre Framework Masterplan SPD will be prepared with input from a range of local stakeholders to secure the economic prosperity of the town. The proposed Policy STR/SS 2 sets out the strategy put forward for Paddock Wood Town Centre.
- 4.30 Further detail on the Local Plan approach to town centres and retailing is covered in the next section.

Rural Areas

- 4.31 The Gill's Green Key Employment Area lies to the north of Hawkhurst on Cranbrook Road and serves this rural part of the borough. This area 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.

- 4.32 This area differs somewhat from the Draft Local Plan which sought to allocate a larger area to the south of the existing KEA; however, following the outcomes of further landscape assessment work, this area has been reduced to the site now proposed in the Local Plan. A further site to the north of the KEA is identified as a safeguarded site for future employment uses and is covered in the section below.

Overview

- 4.33 Taken together, the total potential employment development land in the above proposed allocations is 26.5 ha. While this appears substantially more than the 14ha minimum requirement, it is nonetheless considered appropriate, with particular regard to the following:
- It is made up of just four sites, which is seen as a minimum in terms of offering choice of locations for new development;
 - Over a half of the total developable area is on one site, which together with the existing Longfield Road/North Farm area, will be a strategic employment location well sited in relation to the A21, that will serve a wider, west Kent area;
 - The need for employment land releases as integral elements of the strategic growth of Paddock Wood, as well as to support that at the proposed nearby Tudeley Village;
 - The nature of the sites, with a range of suitable uses, may well not be developed at the densities assumed in the ENS, such that the actual floorspace created would be closer to that assumed in the ENS;
 - The allocation of the site at Gills Green in Hawkhurst will provide expansion space at an existing, successful business area in the east of the borough.
- 4.34 Hence, it is concluded that the proposed site allocations are justified and, in conjunction with policies that provide for the retention and enhancement of existing sites and areas, will support the sustainable growth of the borough as a whole.

Safeguarded and reserved Land

Land at Colebrooke House, Royal Tunbridge Wells

- 4.35 In addition to the above, a further site (Land at Colebrooke House) has been promoted and considered by the Council for inclusion as a site for allocation for employment land. Indeed, this site was included within the Draft Local Plan (2019) as a draft allocation for 10,000sqm of B1, B2, B8 employment land. This site falls within the Green Belt and the High Weald Area of Outstanding Natural Beauty and it was proposed that the site would provide for sensitive development within a parkland setting.

- 4.36 However, following further assessment and review of the development strategy, taking account of updated evidence in relation to Green Belt and landscape considerations as well as the overall strategy for growth, it is considered that this site should not be allocated within this Local Plan. It is not considered that it would demonstrate the exceptional circumstances test, due to the fact that the Local Plan is already seeking to plan positively in employment land terms by providing over the minimum requirement in order to provide a range and choice of sites and premises in line with the recommendations within the ENS.
- 4.37 Rather, it is proposed that the site at Colebrooke House be identified as safeguarded land and be removed from the Green Belt in order to meet future employment land needs in this sustainable location, as a further extension of the Key Employment Area, should future employment provision be required over the longer term. This is seen as consistent with the NPPF insofar as it has regard to the likelihood of land being needed to meet longer term development needs.
- 4.38 Planning permission for the permanent development of this safeguarded land will only be granted in accordance with the NPPF following an update of this Plan which proposes the development. This will be considered through the five-year review of the Local Plan and subject to monitoring of employment floorspace and any additional, unmet employment land needs.

Site at Limes Grove (March's Field), Gill's Green, Hawkhurst

- 4.39 This site is a former woodyard located opposite the existing business Park at Gill's Green. The site is currently undeveloped; however, it is considered that it could contribute towards future employment growth within the rural area, and therefore it is identified as being reserved for employment uses under emerging Policy AL/HA8 for employment uses - Class E, B2 and B8.
- 4.40 It is intended that this site could be released for development for employment purposes 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. If the site is not required in the plan period, it would still be appropriate to safeguard it for employment use in the longer term.

Overall approach to retail, leisure and town centres

- 4.41 In terms of the identified centres within the borough, the NPPF requires that the Local Plan should ensure the continuing vitality and viability of town centres and encourages a policy approach that secures their future growth, management and adaption over the plan period.
- 4.42 In respect of meeting the provision for the future of the centres across the borough, the key study informing the approach is the Retail, Commercial Leisure and Town Centre Uses study 2021 (RCLTCU Study) which updated the previous study carried

out in 2017 and is reviewed within section 3 above. It was considered prudent to carry out an update of the study due to the changes that had already taken place over the preceding years in respect of town centre and retailing and the impacts that this would likely have on the findings, recommendations and policy approach within the 2017 study.

- 4.43 However, it is acknowledged that the new study and, indeed, the Local Plan itself is being prepared during a time of uncertainty due to the ongoing Covid 19 Pandemic which is having a profound effect on the high street and centres nationally and across the borough. Nevertheless, in retailing and town centre terms, many of the current trends were already emerging and it is considered by many commentators that Covid 19 has merely accelerated these trends. It is therefore important to consider them and plan accordingly for the future of the centres across the borough and the updated RCLTCU study takes this into account in its assessment and recommendations.

Retail, leisure and town centre use requirements

- 4.44 To inform the Local Plan approach, the requirements across the borough for retail, leisure and town centre uses have been updated for the plan period to 2038, to take account of changing economic circumstances and future trends and projections. The study has been carried out in accordance with the requirements set out within the NPPF and PPG and follows a standard industry methodology to identify and calculate future requirements (both in quantitative and qualitative terms) for retail and commercial leisure floorspace. The scope of the study was also widened to consider in general terms, other 'town centre' uses, in particular office space, as an update to the previous Town Centre Office Market Review carried out in 2018. The study also considers other compatible uses, namely residential but also cultural, as these are seen as key drivers in the recovery of town centres over the coming year.
- 4.45 In broad terms, as referred to in section 3, it is considered in the study that there is no identified need for any qualitative or quantitative capacity for additional comparison goods floorspace to justify any allocations over the plan period. There is also no specific requirement to allocate any sites for further convenience goods floorspace or other commercial leisure uses.
- 4.46 This is in contrast to the previous 2017 study which sought the provision of both convenience and comparison floorspace over the plan period and appropriate draft allocations were set out within the Regulation 18 Draft Local Plan.
- 4.47 Taking the above into account, the updated evidence base and ongoing uncertainties in relation to retailing, leisure and town centres, a more flexible and adaptable approach which is wholly in accordance with the NPPF, is advocated to be taken in the Local Plan which is set out in more detail below.

Proposed strategy in relation to retail, commercial leisure and town centre uses

- 4.48 It is considered that the strategy set out within this Topic Paper and within the Local Plan supports the future vitality and viability of the identified centres across the borough and can be realised through the following approach as set out in the next section, but broadly encompasses the following:
- Setting out the defined town and rural service centres and identification of neighbourhood Centres and villages settlements;
 - The production of a Town Centre Area Plan for Royal Tunbridge Wells town centre;
 - A Town Centre Masterplan for the settlement of Paddock Wood;
 - A flexible approach to town centre uses and the production of a suite of Development Management Policies to support the vitality and viability of the key centres within the borough
- 4.49 The following section sets the approach outlined above in further detail.

Defined town centres and site allocations

- 4.50 The key centres of the borough are defined within Policy ED8 of the Local Plan which proposes the retail hierarchy across the borough. This is included for ease of reference within Appendix 2 of this Topic Paper. The centres are defined spatially on the Policies Map.

Royal Tunbridge Wells Town Centre

- 4.51 Royal Tunbridge Wells is defined as a Primary Regional Town Centre in the retail hierarchy and is the largest centre in the borough, attracting visitors from the borough and a wider catchment area.
- 4.52 The RCLTCU Study 2021, recommends within the suggested policy approach a number of key priorities as referenced at section 3 of this Topic Paper. These have been arrived at through the statistical analysis, as well as a qualitative analysis, health checks of the key centres and extensive stakeholder engagement. A SWOT analysis was also carried out of Royal Tunbridge Wells town centre considering a range of issues.
- 4.53 Of most significance is the RCLTCU policy recommendation to consider the formulation of a 'Town Centre Area Plan', with a particular focus on how suitably designed, viable and deliverable developments can be carried out across the town centre incorporating a number of key sites.
- 4.54 Taking the above recommendation on board, it is proposed that the Pre-Submission Local Plan (Policy STR/RTW2) sets out the framework for the provision of a Royal Tunbridge Wells Town Centre Area Plan, setting out a strategic vision for the town

centre over the plan period. This includes the provision of a mix of uses to facilitate economic growth within the town centre including residential, particularly to aid in the recovery of the town post Covid 19. It also identifies a number of key sites to realise this vision including the following:

- The Royal Victoria Place Shopping Centre, Calverley Road;
- The existing Civic Complex (including the Town Hall, the Assembly Hall Theatre and Police Station);
- The former cinema site, Mount Pleasant Road;
- Mount Pleasant Avenue Car Park and the Great Hall Car park and surrounds;
- Torrington and Vale Avenue.

4.55 The RCLTCU Study advocates that any Town Centre Area Plan should include an updated survey of town centre uses to take account of any further Covid 19 impacts, lockdowns and recovery. Further wide-reaching public consultation and stakeholder engagement should also be a pivotal element of the work to build on that already carried out as part of the 2021 study.

4.56 With this in mind and Policy STR/RTW2 setting the framework, the Borough Council has set out an ambitious programme and timetable for the production of the Royal Tunbridge Wells Town Centre Area Plan within the updated Local Development Scheme (2021).

4.57 In addition to Policy STR/RTW, two town centre sites are allocated within the Local Plan for mixed town centre uses as set out below. These allocations reflect the current planning permissions which relate to these specific sites.

- Policy AL/RTW1 – Former Cinema Site, Mount Pleasant Road is allocated for mixed use development including approximately 100 residential dwellings and uses falling within Commercial Use Class E, sui generis including a cinema and cafes or drinking establishments. This site is also included within Policy STR/RTW2 due to its significance and prominence within the town centre.
- Policy AL/RTW – Land at the Auction House, Linden Park Road is allocated for a mix of town centre uses and could comprise Class E Commercial, sui generis and residential.

Paddock Wood Town Centre

4.58 Paddock Wood is defined as a Town Centre within the retail hierarchy and performs a local retail and service role to residents of the north and east of the borough and wide rural hinterland beyond the borough boundary.

4.59 Alongside the significant residential growth proposed for the settlement of Paddock Wood and land at east Capel, it is considered important to provide supporting services and facilities to support the growth of the town. As part of a planned approach, Policy STR/SS2 – The Strategy for Paddock Wood Town Centre; is

proposed within the Pre-Submission Local Plan which will set the framework for producing a Paddock Wood Town Centre Framework Masterplan Supplementary Planning Document.

- 4.60 It is intended that the Supplementary Planning Document will set out a vision and framework for guiding future development within the centre to ensure that it supports and compliments the growth within Paddock Wood and the surrounding area.

Other defined and identified centres

- 4.61 Cranbrook and Southborough are also defined as 'Town Centres' within the retail hierarchy as set out within Policy ED8 of the Local Plan and defined spatially on the Policies Map. Hawkhurst is defined as a 'Rural Service Centre'. The strategic Policies for Cranbrook, Southborough and Hawkhurst respectively set out the broad approach to the development within these settlements and refer to retaining an appropriate mix of uses within the defined centres and ensuring the future vitality and viability of these centres.
- 4.62 In terms of site allocations, a specific allocation is made at Southborough at land at Mabledon House, a Grade II Listed Mansion, for the provision of a luxury hotel of up to 200 rooms as well as other leisure uses including a spa and conference facilities. This is in accordance with the recommendations of the Hotel Capacity Study which highlighted a gap in the market for this type of use within the borough. It is considered that this is an appropriate and attractive location for such a use.
- 4.63 Following in the hierarchy, the Local Plan also identifies within Policy ED8, the defined Neighbourhood Centres, which comprise of a cluster of community facilities within the existing urban areas and are also proposed to be designated within the proposed development at Paddock Wood and east Capel as well as at Tudeley Village.
- 4.64 Additionally, the importance of villages and the services and facilities that they provide are recognised and those settlements that have an LBD as defined on the Policies Map are also identified within Policy ED8. The approach to protecting and retaining the services and facilities within the neighbourhood and village centres is provided within Policy ED12 and detailed further in the next section.

Overview

- 4.65 Despite the Local Plan being prepared in a period of significant uncertainty with unprecedented impacts on town centres and the retail economy, the Council has sought to take a proactive and ambitious approach to securing the long-term future of the borough's key centres.
- 4.66 Through the provision of the proposed Royal Tunbridge Wells Town Centre Area Plan and the Paddock Wood Town Centre Masterplan, as well as a flexible approach to future uses, it is considered that the Local Plan makes adequate

provision for meeting the needs of current and future businesses, residents and visitors.

- 4.67 It is considered that the policy approach and specific strategic policies and allocations are justified in supporting the economic prosperity of the borough.

Development Management policies

- 4.68 Although national policy is set out in the NPPF and the relevant PPG, it is also important to set out the local policy approach to development management in line with national policy but reflective of local circumstances and constraints and the evidence base that has been carried out to inform the Local Plan as referred to above.
- 4.69 It is proposed that the Local Plan sets out a suite of development management policies to guide future development in the borough, including those in relation to Economic Development encompassing Employment Provision and supporting town and other defined centres.
- 4.70 A number of policies in relation to Economic Development are set out in Section 6 of the Local Plan and are split into those in relation to Employment provision and those in relation to Town, Rural Service and Neighbourhood Centres and Village settlements.

Employment Provision Development Management Policies

- 4.71 In accordance with the findings and recommendations set out in the ENS, the Local Plan continues to define the Key Employment Areas as referred to in the previous section as it is considered that these are performing well and should be retained as broad employment locations to provide future economic development opportunities over the plan period. Policy ED 1 – Key Employment Areas; defines and sets out the mix of uses that are appropriate within the Key Employment Areas. The KEA's are defined spatially on the Policies Map.
- 4.72 The retention of existing well located, good quality modern business accommodation and employment sites is a strong expectation of the Local Plan, fully in line with the recommendations of the ENS and also the Town Centre Office Market Review. Policy ED 2 – Retention of existing employment uses; details the approach to the retention of such sites and buildings and identifies criteria which should be used when considering the change of use of such buildings and locations.
- 4.73 The NPPF strongly promotes the expansion of electronic communications developments including broadband and is considered essential to delivering the strategy set out within the Local Plan. Supporting future growth and ensuring that the whole borough is well connected is covered by Policy ED 3 – Digital Communication, which details the approach to the improvement of digital communication networks across the borough, including through the provision of mobile data networks, fibre to the premises or other wireless solutions. The policy

approach proposed is ambitious and flexible in terms of adapting as necessary to future technological advances.

- 4.74 The Local Plan also recognises the importance and role of the rural economy and a range of policies are proposed which promote, encourage and support the rural economy and rural diversification. The ENS recommended that the Council should continue to support rural based employment development by responding positively to any proposals coming forward and encouraging the re-use of rural buildings for economic uses. Specifically, Policy ED 4 – the Rural Economy; sets out the Council’s approach to ‘Rural Diversification’ in order to help maintain the viability of rural businesses engaged in sustainable land management and rural diversification schemes.
- 4.75 Policy ED 5 – Conversion of rural buildings outside of the Limits to Built Development; focuses on the Council’s policy towards the conversion of such rural buildings and states that priority will be given to the retention and conversion of existing agricultural or other suitable buildings in the countryside for business, recreation and tourism uses. A range of criteria are set out that will need to be satisfied in considering such proposals.
- 4.76 Again, supporting the rural economy and in line with guidance set out within the NPPF and recommendations in the ENS, the Council recognises that recreational uses make an important contribution to the health and wellbeing of communities and to the rural economy generally. Policy ED 6 – Commercial and private recreation; refers specifically to commercial and private recreation (including equestrian) in the countryside. This policy sets out where such commercial recreational uses in the countryside will be permitted and again sets out a number of criteria which takes into account the constraints within the rural parts of the borough.
- 4.77 Tourism is also recognised as a key economic driver in the borough and important to the local economy as recognised within both the ENS and the Hotel Capacity Study. Therefore, the Local Plan seeks to support the important economic role tourism across the whole borough – in both the rural and urban areas. Policy ED 7 – Tourist Accommodation and Attractions sets out the Council’s approach to the retention of, and the promotion of new, tourist accommodation and attractions. This refers to the Council’s policy of supporting well located and attractive tourist accommodation with a number of criteria set out to resist the loss of such premises.
- 4.78 The policy also supports new visitor accommodation and attractions and the upgrading of facilities to increase the range and quality of provision. Importantly it also allows for the provision of new ‘outdoor accommodation’ where it is appropriately located and would not have any detrimental impacts on designated areas such as the AONB or the openness of the Green Belt.

Town, Rural Service and Neighbourhood Centres and Village Settlements Policies

- 4.79 In line with the requirements of the NPPF and reviewed through the Retail, Commercial Leisure and Town Centre Uses Study, Policy ED8 – Town Rural

Service and Neighbourhood Centres, and Village Settlements Hierarchy defines the hierarchy of centres across the borough which are set out in the previous section above. The extent of the identified centres is defined spatially on the Policies Map. The mix of uses deemed appropriate within the defined Town and Rural Service Centres are set out in Policy ED9 – Defined Town and Rural Service Centres.

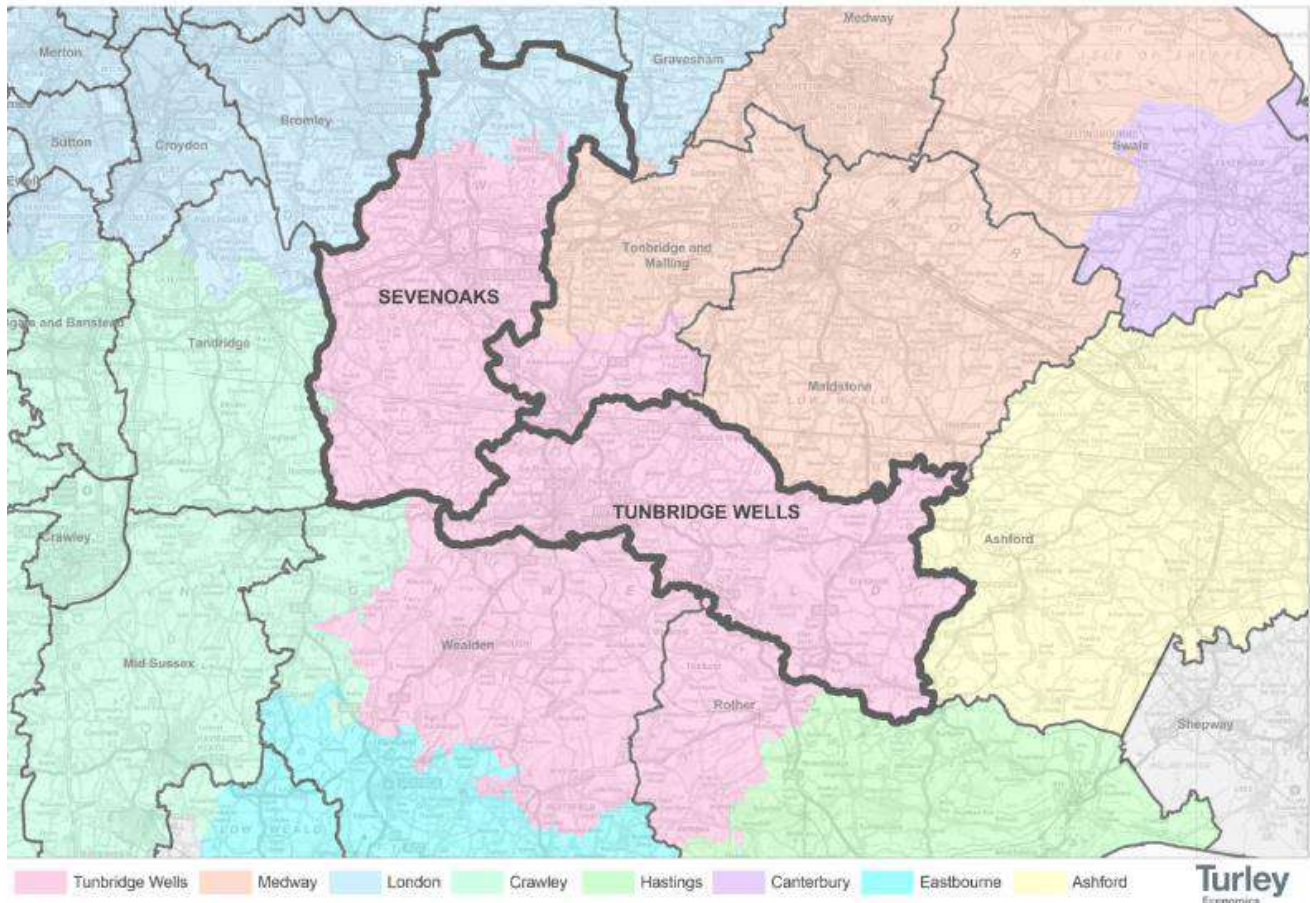
- 4.80 A key requirement of the NPPF is the consideration of the ‘town centres first’ policy and the use of the ‘Sequential Test’ and the ‘Impact Test’ in considering planning applications for main town centre uses. The NPPF sets a national threshold for applying the ‘Impact Test’ although recognises that in certain circumstances a justified local threshold may be applied. The 2017 Retail and Leisure Study recommended a Local Threshold, which was reviewed in the 2021 study and still considered to be relevant and robust. Therefore, Policy ED10 – Sequential Test and Local Impact Test takes forward this local approach based on the national guidelines.
- 4.81 Primary Shopping Areas are areas of core town centre/retail uses and the NPPF requires that Local Authorities designate Primary Shopping Areas and retail frontages within the key town centres within the borough in order to provide some control of the types of uses appropriate within the core town centre. These areas have been reviewed as part of the RCLTCU Study and Policy ED11 – Primary Shopping Areas and Retail Frontages, defines these areas and provides a flexible approach to maintaining the mix of uses appropriate and the vitality and viability of the town centres and the rural service centre.
- 4.82 The role and retention of local facilities and services is recognised through the NPPF, which emphasises the importance of creating healthy, inclusive communities and safeguard such services for future local communities. Therefore, Policy ED12 – Retention of Local Services and Facilities seeks to provide for this aim at the local level through resisting the loss of local facilities or services which serve a local need. The policy sets out a range of criteria which should be considered against applications which would result in the loss of local services and facilities.

5.0 Summary

- 5.1 This Topic Paper sets out the Council's approach towards the provision of Employment Land and Economic Development within the borough over the Local Plan period. It provides helpful background to both national and local policy in relation to employment provision and town centres and retailing, as well as commentary on the previously adopted approach within the borough. It also provides a summary and draws on the key elements of the evidence base which has informed the proposed strategy set out within the Local Plan.
- 5.2 The above is important, as Tunbridge Wells Borough Council has taken a positive and ambitious approach towards the provision of employment land in order to support and encourage economic growth across the borough. This differs from the previous approach set out within the adopted Core Strategy which sought to maintain overall net employment land.
- 5.3 Similarly, in relation to the approach towards the boroughs centres, the strategy set out in the Local Plan is markedly different from that advocated in the previous local policy approach. The strategy to be taken forward is predicated on a flexible and resilient approach to securing the future of the borough's centres as well as the formulation of a vision and pro-active strategy to be taken forward in a Town Centre Area Plan for Royal Tunbridge Wells and a Town Centre Masterplan for Paddock Wood.
- 5.4 The above approach is advocated by National Policy and recommended at the local level through the relevant evidence base studies, building on the attractiveness of the borough to potential investors, recent investment in infrastructure, in particular the A21 and the previous lack of suitable sites, premises and overall vision to realise economic growth.
- 5.5 A number of sites have been allocated specifically for employment and commercial development as detailed in section 4 of this Topic Paper as well as a number of detailed Development Management Policies which will enable economic growth across the borough in both the urban and rural areas. These reflect national policy at the local level, notably the policy recommendations and enabling actions set out within the evidence base studies as referenced at section 3 of this Topic Paper.
- 5.6 The above strategy provides a balanced approach to economic development provision in line with the proposed housing growth, across the borough. It takes into account the economic priorities and drivers for growth, but also has been developed to deliver sensitive and flexible growth aligning with the policy constraints evident across large parts of the borough.

Appendices

Appendix 1: Tunbridge Wells borough travel to work area



Source: ONS, 2015, taken from the Sevenoaks and Tunbridge Wells Economic Needs Study 2016.

Appendix 2: Retail hierarchy

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 John's 10. St Peter's 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*

*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.

**If you require this document in another format,
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