

**Tonbridge and Malling Borough Council**

**LOCAL DEVELOPMENT FRAMEWORK  
DEVELOPMENT LAND ALLOCATIONS DPD**

**RESPONSE STATEMENT No DLA03**

**Other Employment Issues**

**West of Woodgate Way  
Oast Park, Priory Works, Tonbridge**



# TONBRIDGE AND MALLING LOCAL DEVELOPMENT FRAMEWORK

## Response Statement DLA 03

### Oast Park, Priory Works, Tonbridge

#### 1. Introduction

- 1.1 This Response Statement deals specifically with the representations received from United Utilities which argue that a large part of the land safeguarded to West Of Woodgate Way, Tonbridge for employment purposes under the provisions of Policy E1(k) and allocated in part for employment development under Policy E3(m) should instead be allocated for housing under the provisions of Policy H1.
- 1.2 This Response Statement should be read together with Core Strategy Position and Rebuttal Statements CS08 and Development Land Allocations DPD Position Statement DLA03. Reference should also be made to Chapter 8 of the Inspector's Report<sup>1</sup> into the soundness of the Core Strategy.

#### 2. Context

- 2.1 An Employment Land Review<sup>2</sup> was prepared by independent consultants, Drivers Jonas, following a comprehensive evaluation of all employment land in the Borough. The Review was carried out in full accordance with the published Government advice on the matter<sup>3</sup>. In the light of that review certain employment areas were identified and defined as "Best or Good Urban" sites. These sites were brought forward into the Core Strategy as employment areas to be Safeguarded under Policy CP21.2. The larger more strategic safeguarded sites are specifically identified diagrammatically on the Key Diagram.
- 2.2 Land to the West of Woodgate Way, Tonbridge is so identified on the Key Diagram. It is for the Development Land Allocations DPD, through Policy E1, to identify on the Proposals Map the precise extent of the area to which Policy CP21.2 should apply. For the avoidance of doubt, Map G10 in the Development Land Allocations DPD confirms that the entire area to the West of Woodgate Way, including the objection site, is covered by this safeguarding policy (E1(k)). Open, unused land and buildings within this safeguarded area are allocated for employment development under Policy E3(m).
- 2.3 The issues relating to this site were considered in some detail at the Examination of the Core Strategy and the Inspector's views on the matter are clearly set out in her report (Section 8). Whilst the Core Strategy is not site-specific, the Employment Land Review is specific in identifying the limits of the area. Furthermore, the representations made by United Utilities were quite precise in the areas of land referred to, which are exactly the same as those under consideration for the Development Land Allocations DPD

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<sup>1</sup> RD 5.14 – Core Strategy : Inspector's Report

<sup>2</sup> RD 7.4 - Employment Land Review – July 2005

<sup>3</sup> RD 1.24 – Employment Land Reviews: Guidance Note – December 2004

(indeed, United Utilities representations for both the Core Strategy and the Development Land Allocations DPD are identical).

- 2.4 The Inspector accepted that if the problems of bringing Oast Park back into employment use are genuinely insurmountable, there is a high likelihood that the site will remain vacant and derelict. However, she found little evidence that a comprehensive approach to development, including the upgrading of the access had been actively pursued. The Inspector found that there is a relatively limited supply of suitable land available for employment development in the Tonbridge area. Without more convincing evidence that a comprehensive redevelopment of the site cannot be achieved, she found that the balance of advantage lay with the Core Strategy. She accepted that the situation would have to be monitored and that the status of the site may have to be reviewed if the identified constraints cannot be overcome.
- 2.5 It is the Borough Council's view that this position should be reflected in the Development Land Allocations DPD. It cannot be right that the Core Strategy can be adopted in September 2007 and its provisions immediately overridden a few months later, unless there is some significant change in circumstances.

### **3. Untied Utilities' Representations**

- 3.1 United Utilities propose an alternative pattern of land use in this area as illustrated on the plan (extracted from their representation) that is reproduced under Annex A to Position Statement DLA03. They propose three things:

- That the entire area (ie that to which Policy E1(k) applies) should be covered by a comprehensive policy to achieve gateway status;
- That Policy E3(m) should be subdivided to the north and south of Tudely Lane, as was the case in the Tonbridge and Malling Borough Local Plan.
- That land in United Utilities control should be allocated for housing under Policy H1, and therefore, by implication, should be excluded from the employment policies.

- 3.2 In their Examination Statement they argue that:

- Linking Oast Park (Priory Works) with land to the south of Tudely lane represents an additional burden to developing the site for employment purposes;
- Land at Oast Park is not suitable or attractive for employment development;
- It would be better developed for housing;
- The policy is not reflective of the realities of the market;
- The requirement to bring forward the sites comprehensively could result in the sterilisation of accessible previously developed land;
- The proposed allocation does not represent the most appropriate in all the circumstances, as it is not the result of an exercise that properly weighed up the merits of the site for other competing uses.

#### 4. Borough Council's Response

##### ***Comprehensive Approach***

- 4.1 There is no requirement in the plan for a comprehensive approach to be adopted and the Borough Council does not necessarily advocate such an approach. It is true that the ELR suggests that such an approach may be necessary to overcome the acknowledged constraints over access to the site and this picked up and referred to in para 4.2(1) of the Council's Position Statement CS08 and in the Inspector's Report. However, the fact that Policies E1(k) and E3(m) apply to the sites both north and south of Tudely Lane should not be interpreted as meaning that the sites should necessarily be developed as one, even if this might be the best overall solution.
- 4.2 There are plenty of other locations in the Borough where sites in multiple ownership are covered by a single safeguarding policy (eg Policy E1(l) – Tonbridge Industrial Estate). It simply means that the entire area is safeguarded from alternative forms of development. It does not mean that the only form of development that is acceptable is a redevelopment of the whole area. That would clearly be unrealistic. If the Inspector believes that it would be helpful the Borough Council would have no objection to the vacant land covered by Policy E3(m) being divided into two sites one north and one south of Tudely Lane as follows:

- (m) West of Woodgate Way, Tonbridge (5.22ha)**
- (n) South of Tudely Lane, Tonbridge (2.10ha)<sup>4</sup>**

and then renumber the two sites that follow.

- 4.3 The only reason for a comprehensive approach relates specifically to the issue of improving access. However, it is only because United Utilities allege that it is specifically the constraint on access that has limited the marketability of the site that has led Drivers Jonas to the conclusion that the access needs to be improved. The Inspector has said that she had little evidence before her that a comprehensive approach to development had been actively pursued. Attached at **Annex A** is a letter from the agents acting on behalf of the owners of the land south of Tudely Lane which confirms that they are still open to discussions on a comprehensive solution if only United Utilities were to approach them on the subject. It is clear from this that United Utilities have not made sufficient efforts to resolve the constraints that they say apply to the development of their land. It is also of note that Hadlow Estates have not objected to the Development Land Allocations DPD.
- 4.4 They say that the Council has made no approach to them about a comprehensive development of the area. This is not entirely true in that on every occasion there have been meetings about this site the point has always been made that the best solution would come from a joint approach. This same advice has always been given to the other owners in respect of the land to the south of Tudely Lane. In any case, the Borough Council would not necessarily expect to make such overtures. Certainly Untied Utilities have never come to the Council and asked it to broker negotiations between them and the adjacent landowner. The conclusion is that a comprehensive

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<sup>4</sup> Note: these two sites do not add up to the same figure as in the DPD because the area of the road is no longer included.

development of the entire area is not necessary, but a comprehensive approach to the area would seem to be the most appropriate way forward. This could identify how best to unlock the access constraint.

**Employment Land Supply and Market Demand**

4.5 The Inspector has accepted (para 8.1) that the Employment Land Review “has been prepared generally in accordance with current best practice” and that it is a “robust evidence base to support the approach to the Core Strategy”. She has also accepted (para 8.7) that “the Employment Land Review has identified a relatively limited supply of land for employment development in the Tonbridge area”. Attached at **Annex B** is a report from Drivers Jonas commenting on the current land supply situation and marketing in Tonbridge and rebutting some of the statements made in United Utilities submissions.

4.6 Attached at **Annex C** are the comments of the County Planning Authority on the current planning application for proposals which are identical to those advanced by United Utilities through the LDF process. It should be noted that the County Council’s comments relate to the Kent and Medway Structure Plan (which is not used as a basis for preparing the LDF) and are based on the 2005/06 Commercial Information Audit<sup>5</sup>. Nevertheless, they do give a very clear picture of the overall land supply situation in Tonbridge.

4.7 The County Planning Authority concludes on the issue of employment land supply that:

*“Given the scale and character of employment land supply relative to strategic policy guidance and the need to husband a balanced portfolio of development opportunities in a location subject to high level polices of development restraint, priority should attach to maintaining this site for employment use.*

4.8 The approach of the Employment Land Review is slightly different but is basically aimed at ensuring that there is sufficient amount and choice of land supply to meet forecast requirements and demand. In reality this means achieving no net loss year on year of employment land: ie maintaining an equilibrium. The latest figures available are in the Commercial Information Audit for 2006/07<sup>6</sup>. In effect, this is the first year of monitoring the impact of the LDF since its base date of April 2006. In terms of completions and demolitions in year 1 of the LDF the following is the situation.

	Gains (Completions)	Losses (Demolitions)	Net Change
Borough-wide figures	19.94ha	11.24ha	+8.7ha
Tonbridge only	0.59ha	1.83ha	-1.24ha

As can be seen, whilst the Borough-wide land supply picture is positive, the situation is, already at year 1, negative for Tonbridge.

4.9 These results also have to be seen in the context of the Tonbridge Central Area Action Plan that seeks to upgrade and redevelop certain employment

<sup>5</sup> RD 3.4 – Commercial Information Audit: Monitoring Survey Report 2005/2006

<sup>6</sup> RD 3.5 – Commercial Information Audit: Monitoring Survey Report 2006/2007

sites close to the town centre. Whilst some of these sites might be redeveloped for other higher order employment uses, the business which are displaced will no doubt be looking for alternative accommodation within the town. The Oast Park site is one of the only vacant sites that is available for development in the medium term and should therefore be safeguarded.

- 4.10 Throughout the whole Borough the only vacant sites potentially available for new employment development are those identified under Policy E3. These sites were vacant at the base-date of the plan This information forms the start-point for monitoring and should therefore not be updated in the plan. The current situation at the end of year 1 in respect of each site listed in Policy E3 is set out below.

(a)	North of Gibson Drive, Kings Hill (1.55 ha)	Development Complete
(b)	Off Kings Hill Avenue, Kings Hill (1.34 ha)	Under Construction
(c)	North of Kings Hill Avenue, Kings Hill (1.16 ha)	Outline planning permission - still vacant.
(d)	South of Kings Hill Avenue, Kings Hill (7.41 ha)	Outline planning permission - still vacant.
(e)	East of Tower View, Kings Hill (22.5 ha)	Outline planning permission - still vacant.
(f)	Alexander Grove, Kings Hill (1.4 ha)	Outline planning permission - still vacant.
(g)	Priory Park, Quarry Wood (3.46 ha) <sup>7</sup>	Outline planning permission - still vacant.
(h)	Hermitage Lane (1.55 ha)	LDF draft allocation – vacant <sup>8</sup>
(i)	Former Mill Hall Centre, New Hythe (4.13 ha)	Vacant – possibly reserved for local occupier
(j)	Former Playing Fields, New Hythe (2.16 ha)	Vacant – possibly reserved for local occupier
(k)	North of Vantage Point, Holborough (4.73 ha)	Outline planning permission - still vacant
(l)	Platt Industrial Estate (1.36 ha)	Vacant but subject to Policy M1.3(c)
(m)	West of Woodgate Way, Tonbridge (7.65 ha)	Outline planning permission - still vacant
(n)	Land off Cannon Lane, Tonbridge, (1.41 ha)	Live planning application – still vacant
(o)	Branbridges, East Peckham, (0.76 ha)	Development complete

- 4.11 From the above it can be seen that, other than at Kings Hill, there is very little vacant employment land in the whole Borough that is potentially available for development over the next 14 years. In the case of Tonbridge, the situation is extreme with the Priory Works site being one of only two vacant sites in the Tonbridge area identified in the Development Land Allocations DPD. There is one other site, not in the above list, that lies within the extent of the Tonbridge Central Area Action Plan. This is Policy TCA11(u) which is currently vacant and is allocated for a mixed employment use. The Driver Jonas Report refers to this as the former Colas Site which has now been acquired by Graftongate. This will provide new accommodation to meet immediate market needs over the next year or so, but the Development Land Allocations DPD needs to look ahead at least 10 years, subject to monitoring. A long-term plan cannot be prepared on the basis of current market conditions.

- 4.12 In this respect, time is needed for the full effect of a safeguarding policy to be recognised by the market. At present, the market is still responding to the hope value resulting from United Utilities ambitions reflected both through its representations on the LDF and its current planning application for the residential development of the site. So long as the market considers there to be any prospect of higher value residential development on the site, so the prospects of any form of lower value employment development are undermined. The whole purpose of employing a safeguarding policy is to make it absolutely certain to the landowners and to the development market

<sup>7</sup> See para 5.2 of Position Statement DLA02 – Quarry Wood

<sup>8</sup> See also Position and Response Statements DLA02 – Quarry Wood

that the only prospect of development on such sites is for employment purposes.

- 4.13 The Guidance on Employment Land Reviews<sup>9</sup> (in para 1.1) makes it clear that its purpose is to help authorities assess the suitability of sites for employment, safeguard the best sites in the face of competition from other higher value uses and identify those that are no longer suitable for employment development which can be made available for other uses. The Government's aim is to identify a balanced and robust portfolio of employment sites in the LDF. It makes the point (in para 2.20) that "the value of land for housing development normally exceeds that for employment development", and that "this acts as a major incentive for individual site owners and developers to pursue housing opportunities unless the Development Plan clearly states otherwise." It goes on to say that this imbalance in value also acts as a disincentive to undertake employment development on allocated sites where these suffer from physical or other constraints. This is exactly the situation that exists at the Priory Works site. Unless a firm safeguarding policy is confirmed on this land the owners will no doubt continue to speculate or pursue the prospects of residential development on the site.
- 4.14 The fact that the market may not be responding now to employment development on the site is not a reason for releasing safeguarded land. Neither is the immediate availability of alternative accommodation in the locality (as identified by King Sturge) of any relevance, because the whole idea of safeguarding is to ensure the long-term availability of the site for employment use throughout the plan period. If it is lost to alternative uses now it can not ever be available at a future date to meet the employment needs of the area. In the case of Tonbridge, there is no other land that is so suitably located within the urban area, particularly with regard to accessing the primary road network without going through the town.
- 4.15 If this site is lost to some other use then the Council will inevitably have to review the Green Belt boundary at some time in the future in order to identify an alternative area of land for new employment development at Tonbridge. This exercise was undertaken during the preparation of an earlier Local Plan. The conclusion, which will not have changed, was that in terms of suitably located and accessible land there was no acceptable location for additional employment land on the periphery of Tonbridge having regard to the fact that good access to the A21, without going through the town, was an overriding consideration. It would certainly be an extreme irony, in a Borough as constrained as Tonbridge and Malling, which has sufficient brownfield sites for housing to meet its housing needs up to 2021, if a greenfield site ultimately had to be released for employment to compensate for the loss of an otherwise suitable employment site to housing that was not itself needed (see below).

### ***Housing Land Supply and other uses***

- 4.16 The Housing Land supply picture is set out in Core Strategy Position Statement CS01. In considering the matter the Inspector concluded (in para 3.5) that "the Core Strategy sets out a clear and achievable strategy for meeting and probably exceeding the housing requirements set out in the

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<sup>9</sup> RD 1.24 – Employment Land Reviews : Guidance Note – December 2004

submitted draft RSS with sufficient flexibility to enable unexpected situations to be handled through the monitor and manage stages of the process". Her fundamental conclusion (in para 3.6) was that she found "no justification for a general review of the Green Belt boundaries or a need for greenfield locations to meet general housing requirements". The recommended increase by the RSS EIP Panel<sup>10</sup> of 375 dwellings during the plan period should not alter this conclusion since the revised Housing Trajectory in the Development Land Allocations indicates a surplus of some 1312 dwellings above the submitted RSS requirements<sup>11</sup>.

- 4.17 Whilst the Inspector's conclusions related specifically to the need for greenfield releases, it can reasonably be argued that they are equally applicable to other land that is protected from prejudicial development. The constraints on identifying suitable employment land are very much more onerous than on housing land, particularly with regard to transport. The fact that the Employment Land Review demonstrated that the Council has just enough employment land, provided losses are matched by gains, means that there is no case for considering the alternative use of such land for housing which is in surplus or, for that matter, for any other use. In this respect, uses such as retail, for example, should be located in the town centre, pursuant to Core Policy CP22 and PPS6 rather than on a peripheral site such as Priory Works.
- 4.18 The strong presumption in favour of releasing employment land which is no longer needed which was included in para 42A of PPG3 is longer included in PPS3. PPS3<sup>12</sup> (para 44) now refers to Local Planning Authorities considering a range of incentives or interventions that could help to ensure that previously developed land is developed in line with the (housing) trajectory. These could include (inter alia) considering whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development and this should be done in the context of an Employment Land Review carried out in accordance with the Government Guidance. This is exactly the approach that the Council has adopted and, for the reasons given, it has concluded that it is right that this land should remain allocated and safeguarded for employment purposes.
- 4.19 The Borough Council's view on housing land supply is shared by the County Planning Authority which, in respect of the current planning application has, concluded (**see Annex C**):

*There is a very significant surplus against the requirements of the Kent and Medway Structure Plan Policy H1 to 2016 and the Borough Council in its Position Statement establishes that there is sufficient land to meet RSS requirements to 2018 without reliance on windfalls as required by PPS3. On this basis, there is no imperative to release the application site for housing, especially in view of the starkly contrasting position with the relationship between employment land supply and policy guidance.*

*Figure B1 of the Tonbridge and Malling Position Statement on Housing Land suggests that over 1000 dwellings are to be provided in*

<sup>10</sup> RD 2.4 – South East Plan – Panel's Report August 2007 –page 106

<sup>11</sup> See Annex B to Position Statement CS01

<sup>12</sup> RD 1.14 – PPS3: Housing – November 2006

*Tonbridge town centre between 2008 and 2021..... With such growth taking place in the town centre, and such large losses of employment land, the sustainable balance between employment and housing risk being undermined by further loss of employment land in the town.*

4.20 The County Planning Authority concludes:

*In summary, the County Planning Authority considers that the loss of 5ha of employment land, its impact upon the scale of employment land supply in the Borough and at Tonbridge which is subject to wider policies of development constraint and on the balance between employment and housing land supply and opportunity are pivotal considerations in this case from a strategic planning policy perspective. In the light of these concerns, the County Planning Authority raises a strategic objection to TM/07/2156 as being contrary to policies EP2(a), EP2(c) and EP2(d) of the adopted Kent and Medway Structure Plan 2006.*

These considerations apply equally to the proposal to change the Development Land Allocations DPD.

4.21 The Council does not, in any case, accept that in land use terms the site is ideally suited or located for residential development. United Utilities suggest that it can act as a buffer between the existing housing and the employment uses which remain on the site. All that releasing this site for housing would do is to move the proximity of housing to employment uses but further to the east. It would not act as a buffer. On the contrary, it would move housing closer to an unfettered employment use. Much better would be a modern, planned employment use on the intervening land which, with suitable restrictions (B1) could genuinely act as a buffer between the current unfettered B2 use on the Seimen's site and the existing housing in the Lodge Oak Lane vicinity.

## **5. Conclusions**

5.1 The Oast Park site is a site identified through a comprehensive Employment land Review carried out in accordance with Government advice as one that should be safeguarded. It could not be better located relative to the primary road network, in that heavy goods vehicles do not have to travel through the town. It is well located relative to the town centre and public transport routes. It is one of just a few remaining vacant sites available for employment development in the Tonbridge area. Indeed, it is one of only a handful of such sites in the Borough as a whole, other than at Kings Hill which is not directly comparable. Under the circumstances, it is right that the site should be safeguarded along with the wider area West of Woodgate Way under Policy E1(k).

5.2 Insofar as alternative uses are concerned, there is no overriding need for the site to be allocated for housing, which would not, in any case, be the most suitable use in land use terms. It is not in an appropriate location for retail use having regard to PPS6 and Core Policy CP22.

5.3 There is no need for the site to be developed comprehensively, but a comprehensive approach to the development of the site in association with its neighbour could result in an improved access and consequent improvements

in marketability. There is evidence that insufficient effort has so far been applied to such a joint initiative. The Council is happy for the site north and south of Tudely Lane to be identified separately in Policy E3 if the Inspector considers this to be helpful.

- 5.4 Subject to this possible change, which does not materially affect the content of the plan, the Development Land Allocations DPD is considered to be sound as submitted and no further change should be made to it.



# Annex A



B Gates Esq  
Chief Planner (Policy)  
Tonbridge & Malling Borough Council  
Gibson Building  
Gibson Drive  
Kings Hill, West Malling  
Kent  
ME19 4LZ

19 October 2007

Dear Mr Gates

**RE: BROOK FARM, TONBRIDGE**

I can confirm that this practice represents the Hadlow Estate in relation to its landholding comprising part of the former Brook Farm. The land straddles the Postern Stream - the boundary between the Tunbridge Wells and Tonbridge & Malling administrative areas. The relevant land has gradually been brought forward for employment uses through a series of planning consents within the Tunbridge Wells Borough Council area. Approximately 0.85 acres (with planning permission for an 800m<sup>2</sup> B1 unit) remains undeveloped on the TWBC side of the stream with approximately 4.5 acres (gross) of allocated land remaining undeveloped on the T&MBC side of the stream.

During the mid to late 1990s, discussions with the owners of the former Wallace & Tiernan site (sometimes called Priory Works) took place with a view to exploring the possibilities for joint working regarding land within the T&MBC District. Discussions since that time have largely ceased but Hadlow remains interested in finding a basis for the 2/3 owners to work together. This will require the parties agreeing some form of methodology whereby no one owner can benefit from taking the "Lions Share" of the combined site value and thereby depriving the other contributing parties of a "fair share".

If you would like to discuss this matter further then I would be happy to represent Hadlow at any "All Owners" meeting intended to bring forward the combined sites.

Yours sincerely,



**JOHN TURNER**

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## **Annex B**

**Matter – West of Woodgate Way / 59 / 1**

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### **Examination Statement**

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In response to:  
**United Utilities Plc (Respondent No. 59)**  
**West of Woodgate Way**  
**Oast Park, Priory Works, Tonbridge**

Submitted by:  
**Drivers Jonas**

On behalf of:  
**Tonbridge & Malling Borough Council**

**Tonbridge & Malling Local Development Framework**  
**Development Land Allocations DPD Examination**

**Date: 18 October 2007**



## **1. Introduction**

- 1.1 This statement is prepared by Drivers Jonas on behalf of Tonbridge & Malling Borough Council in response to objections made by United Utilities Plc to the identification of Land West (and North) of Woodgate Way for employment purposes under Policy E1 (k) and E3 (m) of the Submission Draft Development Land Allocations DPD (September 2006).
- 1.2 This response statement considers these objections in the light of the conclusions of the Tonbridge & Malling Employment Land Review (ELR), dated July 2005 and prepared by Drivers Jonas in accordance with good practice guidance. The ELR forms part of the Local development Framework (LDF) evidence base which the Inspector has found to be '*comprehensive, robust and credible*' (paragraph 2.12 of the Report on the Examination into the Core Strategy DPD, 15 August 2007).
- 1.3 Comments in this statement focus on those matters considered to be of particular substance to the issues in hand and include:
- The employment land supply context, with particular focus on the Tonbridge area; and
  - The marketing campaign that was undertaken, as detailed in the Market Assessment of the subject site prepared by King Sturge, as a measure of demand for the property for employment purposes.
- 1.5 Other matters raised by United Utilities, including comprehensive development and the appropriateness for residential development, are mainly dealt with in the Council's Response Statement No. DLA02.
- 1.6 For simplicity, this statement generally follows the format and headings used in the Examination Statement submitted by United Utilities. Where appropriate, paragraph numbers are also identified for clarity. Unless

otherwise stated, paragraph numbers referred to in the text relate to those in the United Utilities Examination Statement of 1 October 2007.

- 1.4 Reference is also made to the Planning Statement by DPP and Market Assessment by King Sturge, prepared in support of a current outline planning application for 191 No. dwellings and a community facility on land at Oast Park (application reference TM/07/02156/OS), and to associated representations to the application submitted by Kent County Council dated 17 August 2007.

## **2. Employment Land Context**

### ***Quantitative Supply***

- 2.1 The table following paragraph 2.2 (and also following paragraph 6.18 of the DPP Planning Application Statement) reproduces information included in Table 10.5 of the ELR. This provides a picture of the quantum of employment land and vacant premises across the Borough as a whole at the time of the study. Also, in interpreting this information, it is important to have regard to qualitative and other issues, such as those set out in paragraphs 10-78 – 10.83 of the ELR which relate to the supply of land for manufacturing.
- 2.2 As an additional point of clarification, the Borough-wide figures reported in the table do not take account of the loss of the approximately 5.6 ha / 28,000 sqm Frantschach employment site to residential in the Medway Gap urban area, which occurred following the publication of the ELR. The implications of the loss of the Frantschach site (which in essence has restricted the quantity and quality of supply in the Medway Gap area but not impacted on other sub-areas in the Borough, including Tonbridge), is addressed in the Employment Land Review Supplemental Statement, produced by Drivers Jonas in September 2005.

- 2.3 In the case in hand, it is important to have regard to the local context, particularly for an area such as Tonbridge where supply is constrained and demand often emanates from local requirements (these issues are discussed further below).
- 2.4 Although the supply of land for office and manufacturing uses appears healthy for the Borough as a whole, this is not evenly distributed. For example, the ELR identifies that over 90% of the Borough’s potential office land supply and 75% of vacant office space is located at King’s Hill.
- 2.5 The following table provides a summary of land supply in the Tonbridge urban area, based on information included in Table 10.c of the ELR. Further explanation is included in the ELR at paragraphs 10.66 to 10.69. These figures exclude any redevelopment potential estimate for the Priory Works site [but includes the adjacent land owned by Hadlow Estates (Local Plan Policy P15/5)]. The following table is reproduced in full at **Appendix 1**.

	<b>Office</b>	<b>Manufacturing</b>	<b>Warehousing</b>
Total (excluding vacant premises and redevelopment opportunities)	436 sqm (0.08 ha)	12,442 sqm (2.95 ha)	2,492 sqm (0.43 ha)

- 2.6 Employment land supply figures produced by Kent County Council (extracted from the 2006 Employment Land Survey and appended to their letter dated 17 August) provide a further picture of the constrained level of employment land supply in the Tonbridge area and support the importance of retaining land at Woodgate Way for future employment development. The redevelopment of Oast Park, Priory Works for housing as proposed would have a significant impact on the overall level of employment land supply in the Tonbridge urban area.

### ***Qualitative Supply***

- 2.7 As noted at paragraph 2.5, the Borough as a whole is able to offer a range of sites potentially capable of meeting a range of occupier needs. This being said, the supply of land in the Tonbridge area for new employment development is significantly restricted in qualitative terms, due largely to the very limited number of alternative sites for new employment development.
- 2.8 Although certain constraints applying to land at Woodgate Way are recognised in the ELR, it is also noted that the site is well located adjacent to the A26 Tonbridge Relief Road and accessible to the town centre. The assertion that the site is not suitable or attractive for employment development is not accepted, albeit that the resolution of current access constraints and adopting a comprehensive approach to development could well enhance the market attractiveness of the site. Additionally, the site generally scores well against environmental sustainability and strategic / economic planning considerations, providing an opportunity to more effectively use a currently underused and largely previously-developed site located in a reasonably prominent position on the edge of the urban area.
- 2.9 Overall, the site is classified as 'Good Urban' in the ELR to be protected for future employment use and makes an important contribution to the restricted level of supply of employment land in Tonbridge. In the absence of this site, the only other alternative vacant sites for new employment development in Tonbridge are land off Cannon Lane (1.41 ha and subject to a current planning application) and the former Colas Site, purchased by developers, Graftongate.

### ***Marketing***

- 2.10 Paragraph 2.5 states that the King Sturge Market Assessment (Appendix VII) identifies a total of 47 vacant industrial / warehouse units on the market,

ranging from 929 sqm to 9,662 sqm and totalling 55,716 sqm. These vacancies relate to the Borough as a whole. Based on the schedules included at Appendix VII, of this total, 13 are within Tonbridge itself, providing a total of approximately 19,600 sqm of vacant space.

- 2.11 This total accords with the general conclusions reached in the ELR in terms a relatively limited number of available vacant premises in Tonbridge. Enquiries of local agents revealed good demand for smaller industrial units in Tonbridge (ELR paragraph 6.114). Demand is also identified for warehouse space, emanating from local occupiers (ELR paragraph 6.125). The enquiries noted by King Sturge in the Enquiry Schedule (Appendix V Market Assessment) in fact reflect this, with a number of enquiries for premises smaller than 1,000 sqm.
- 2.12 Paragraph 2.6 notes that site marketing commenced in June 2006. It is not clear from the Market Assessment what actions this included other than erecting a board and preparing in-house particulars that were '*made public*' (Market Assessment paragraph 4.3).
- 2.13 Paragraph 2.6 goes on to state that no concerns have been raised by officers regarding the comprehensiveness of the marketing campaign. We however have a number of comments on the Marketing Campaign as described in Section 4 of the King Sturge Market Assessment. The re-branding logo, stated to have been used throughout the marketing, was not included on the sales board as shown photographed, so it is not clear whether the board was erected before this re-branding or afterwards. The two-sided colour brochure was not produced until October 2006. The source of the September 2006 enquiry by 3663 noted in the Enquiry Schedule in Appendix V was stated to have been an advert, although the first advert was placed in the Estates Gazette on 28 October 2006. This suggests that the origins of the marketing campaign were fairly low key, using a site board, in-house particulars and no /

limited advertising; a campaign in this manner would be expected to capture largely only local enquiries.

- 2.14 The adverts in the Estates Gazette and Property Week would have captured more regional and national enquiries, and the use of full-page adverts was appropriate to this size of property. Only one advert was placed in the Estates Gazette and two in Property Week, although the second was a quarter page and in May 2007. The Enquiry Schedule includes responses elicited by adverts, of which all but one were represented by other agents. It appears that those agents only responded to adverts, as there are no responses listed in the enquiries schedule that record an agent enquiry after receiving details from a mailshot.
- 2.15 The King Sturge Market Assessment does not give details as to when mailshots were undertaken. It states that '*all companies, irrespective of size, in Tonbridge, Sevenoaks, Tunbridge Wells and Maidstone*' were sent details of the property; this would seem rather inappropriate given the property size stated was 12.3 acres (5 ha) with no flexibility indicated to attract smaller occupiers.
- 2.16 Paragraph 2.7 notes that a key reason why smaller companies have not progressed interests further has been an immediate need for accommodation and an inability to wait for purpose-built premises to be provided. This conclusion suggests that if such premises were available (i.e. provided by a developer), then demand would likely exist for their occupation. The purchase of the former Colas site by developers (now branded Tonbridge Gateway Park) to provide a mix of commercial uses, which could include industrial and warehousing (King Sturge Market Assessment, pp13-14) is further evidence of the likely demand for the provision of such space in Tonbridge.
- 2.17 The results of any more detailed discussions with enquirers are not recorded in the King Sturge Market Assessment. For example, there is no discussion

as to the results of so many enquiries for freehold premises, i.e. it is not clear whether King Sturge and United Utilities discussed speculative development, or a strategy of developing smaller units to be sold off freehold once built.

The viability of such developments is untested within the documents put forward.

- 2.18 Paragraph 2.7 also states that the marketing campaign is on-going, referring to an update letter from King Sturge dated 25 September 2007 (Appendix 1). The King Sturge letter states that since the [18<sup>th</sup> June] report '*we have continued to actively promote the site*' by '*responding to applicants by sending PDFs of the brochure via e-mail and post*'. It is refuted that this is 'actively promoting' the site. Furthermore this is contradicted in the last paragraph which starts '*There have been no new enquiries over the last few months*' so there is no record of the identity of applicants to whom brochures were sent. As there is no record of any enquiries received, comment cannot be made on the quality of, or lack of, enquiries, or reasons therefore.
- 2.19 Paragraph 2.8 notes that the site would be suitable for light industrial and general industrial uses, but that only 3 enquiries were received for such uses (the preceding paragraph highlights that 7 enquires have been received for B1c / B2). Although the ELR concludes at paragraph 5.73 that the site 'could' be comprehensively redeveloped for light industrial and general industrial uses, conclusions do not preclude other types of employment use, including warehousing. Similarly, as noted previously, although adopting a comprehensive approach to redevelopment would be the optimum approach in terms of enhancing the current access and improving the site's market attractiveness, this is not to say that the site could not physically be developed or that a developer or user could not be found in the absence of such an approach. There is an extant planning permission relating to the Priory Works site for a mix of industrial and warehousing development which

is understood can be implemented without a requirement to upgrade the bridge access. Although proximity to residential uses could reduce the market attractiveness of the site to certain occupiers, such as those requiring 24 hour operations, it is not uncommon for housing and industrial / warehousing uses to co-exist in close proximity.

- 2.20 Paragraph 2.9 states that the marketing campaign identified shortcomings in the site. The first named is '*age/poor condition/configuration of existing buildings*'. As King Sturge were not, from the evidence supplied, marketing the site as an existing occupiable prospect, but instead as a design and build opportunity, then the state of existing buildings on site was irrelevant as no potential occupier would have believed those buildings were those for the proposed occupation. This is not a shortcoming for this type of opportunity.
- 2.21 The second identified shortcoming is the '*lack of profile*'. From the enquiry schedule produced by King Sturge giving reasons for non-progression of enquiries, none of the companies listed gave lack of profile as a reason.
- 2.22 The third identified shortcoming is '*restrictions on any operations on site as a result of neighbouring residential uses*'. The adjoining residential use was stated by only two of the enquirers as a reason for not progressing with Oast Park. Whilst it is acknowledged that those two companies identified had specific operations that they considered would be precluded by the nearby residential, this does not restrict 'any operations' on site.
- 2.23 The fourth identified shortcoming is stated as '*existence of a good supply of land and new and good quality second hand premises, which are superior to the site*'. The supply argument is dealt with earlier in this statement.
- 2.24 Based on the evidence put forward in the Examination Statement and supporting Market Assessment, there is no indication of alternative marketing strategies to accommodate smaller plots or premises than simply the entire

site, and no consideration of the use of a joint sole agent from the local market, given King Sturge's base in London.

### **3. Conclusions**

- 3.1 Employment land supply within Tonbridge is relatively limited, as acknowledged by the Inspector in her consideration of the Core Strategy. The loss of the Priory Works site would significantly impact on this existing situation in terms of further restricting the current quantitative and qualitative level of supply in the local area.
- 3.2 A number of points are raised concerning the site marketing campaign as detailed in the King Sturge Market Assessment. In short, based in information supplied in the assessment, the potential demand and suitability of the site for employment purposes may not be fully revealed. For example, it is not clear whether speculative development has been considered, or a strategy of developing smaller units to be sold off freehold. Also, many of the conclusions concerning the short comings of the site identified through the marketing campaign appear not to be justified.
- 3.3 Although certain constraints are identified in the ELR which could restrict the market attractiveness of the site to certain occupiers, the site can play an important and necessary role in the employment hierarchy in meeting future employment requirements and demand within Tonbridge.
- 3.4 In summary, the 'Good Urban' classification of land off Woodgate Way, as defined in the ELR and concluded as a result of a systematic and comprehensive assessment of the site (and of other employment sites across the Borough), remains appropriate today. Together with 'Best Urban' sites, 'Good Urban' sites should be retained as they are considered valuable employment sites / areas to be protected against loss to alternative uses (ELR paragraph 10.87).

## APPENDIX 1

### *Tonbridge Urban Area – Supply Overview [m<sup>2</sup> (Ha)]*

	Office	Manufacturing	Warehousing
<i>Vacant Allocations without planning permission</i>	610 (0.18)	14065 (3.44)	3590 (1.12)
<i>Employment Allocations Proposed Losses</i>	-650 (-0.18)	-2650 (-0.83)	0 (0)
Employment Allocations (Net) (1)	-40 (0)	11415 (2.61)	3590 (1.12)
<i>Commitments Gains</i>	819 (0.14)	2784 (0.57)	2806 (0.18)
<i>Sites Pending a Loss</i>	-343 (-0.06)	-452 (-0.1)	-2599 (-0.74)
Commitments (Net) (2)	476 (0.08)	2332 (0.47)	207 (-0.56)
Vacant Premises	4015	15864	4108
Loss of 'Other Local' Sites (3)	0	-1305 (-0.13)	-1305 (-0.13)
<i>Redevelopment opportunities (Gross) (4)</i>	1560 (0.39)	11990 (2.69)	3500 (0.77)
<i>Redevelopment opportunities (Losses) (5)</i>	-1300 (-0.5)	-2000 (-0.8)	-2000 (-0.79)
Redevelopment opportunities (Net) (6)	260 (-0.11)	9990 (1.89)	1500 (-0.02)
Total	4711	38296	8100
<b>Total (excl. vacant premises and redevelopment opportunities)</b>	<b>436 (0.08)</b>	<b>12442 (2.95)</b>	<b>2492 (0.43)</b>

- (1) Employment Allocations (Net) = [vacant allocated employment land without planning permission – proposed losses (i.e. identified existing employment sites identified for alternative uses in the Local Plan)]
- (2) Commitments (Net) = [(extant planning permissions not started + development under construction) – sites pending a loss (i.e. existing employment sites with planning permission for alternative forms of development)]
- (3) Relates to Land East of Priory Road and West of Strawberry Vale (P5/12n&f)
- (4) Includes redevelopment potential estimate for vacant premises and land off Woodgate Way (2.09 and 1.76 hectares respectively)
- (5) Includes an estimate of existing floorspace that would be lost as a result of redevelopment opportunities
- (6) Redevelopment Opportunities (Net) = [Redev't Opps (Gross) – Redev't Opps (Losses)]

## ANNEX C

Ms Jill Hamilton  
Development Control  
Gibson Building, Gibson Drive  
Kings Hill  
West Malling  
Kent  
ME19 4LZ

### Strategy & Planning Division

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Your ref: TW/07/0534  
Our ref: PP/ST/TM/2/TM/07/2156  
Date: 17/8/07

Dear Ms Hamilton,

### **Planning and Compulsory Purchase Act 2004 Schedule 6 para 16(4) Consultation TM 07/02156/OA Redevelopment at Oast Park, Priory Works, Tudeley Lane, Tonbridge**

The County Planning Authority (CPA) wishes to make the following representations on the above application.

#### The Proposal

The proposal relates to a 5 hectare site at Oast Park, Tudeley Lane Tonbridge and involves the demolition of vacant industrial units and use of vacant industrial land for the development of 191 dwellings, a community facility and associated open space and car parking. 77 of the 191 dwellings proposed (i.e. 40%) would be affordable.

The site is within the built up area of a principal urban area (Tonbridge) as defined by the Structure Plan and is located between a residential area to the west and industrial units and a car dealership to the east. The site is in relatively good proximity to Tonbridge town centre and its associated facilities, including accessibility to Tonbridge station and benefits from good road access to the A26 and nearby A21. The site is allocated in the Tonbridge and Malling Local Plan (Policy P5/9) for employment uses and this allocation is carried forward to the Tonbridge and Malling Development Allocations DPD submission document (Policy E1).

The main strategic planning policy considerations raised by this proposal are:

- 1) Impact of the proposals on the supply of business and industrial land.
- 2) The need for the residential development proposed to meet strategic requirements for housing provision
- 3) Implications for the provision of mixed use environment and efficient use of land
- 4) The approach to housing development at this location given the site's status as previously developed land within a principal urban area.
- 5) The mix of housing and implications for social/community facilities.
- 6) Transport infrastructure.

7) The impact on biodiversity.

Relevant KMSP (adopted 2006) policies are SS1, EP2, HP1, HP2, HP3, HP7, QL5, QL12, IM1, TP3 and EN8.

The impact on the supply of business and industrial land

The site constitutes 5 hectares of allocated employment land including existing industrial floorspace of c.5000 sq m. The KMSP (2006) Policy EP2 establishes a strategic requirement for 284,000sq m of employment floorspace within the B Use Classes to be provided in Tonbridge and Malling Borough 2001-2021. The employment land/floorspace supply at 2006 was as follows:

	B2	B8	A2/B1-B8
Net floorspace completed 2001-2006 (net)	23826	-6858	35774
Net floorspace allocated at 2006	1353	6204	26606
Net floorspace permitted but not completed	2298	-646	93063
Total Land Supply at 2006	27477	-1300	155443
KMSP Policy EP2			284000
Supply in relation to policy			-128557

Source: Kent Employment Land Survey 2006

Employment land supply at 2006 was 155,443 sq. m which is only 54 percent of the KMSP strategic guideline. While the floorspace provided by the existing buildings is only 5029sq m the site is under developed and could accommodate substantially more employment floor space. Illustratively, on the basis of an average of 3,500 sq m per hectare of B class floor space, approximately 18,000sq m could be provided on the site. The loss of this potential capacity would reduce the total land supply to only approximately 48 percent of the strategic guideline.

Furthermore, as the table above shows, land for B2 and B8 uses is a small proportion of the total employment land supply, constituting only c.18 percent of the post 2001 supply with the majority of this accounted for by floorspace already completed. The contribution of the B2/B8 Use Classes to future commitment is even more marginal at less than 8% of an overall supply which is very substantially below the strategic guideline. Land availability in the B2/B8 uses is at a particular premium and has come under sustained pressure from alternative land uses (principally housing) within the higher value housing markets of West and Mid Kent. Whilst the pressures on employment land supply in the Borough as a whole are acute these pressures are writ large in the Tonbridge area in terms of both overall supply and B2/B8 Uses in a Green Belt location where there are marked constraints on augmenting land supply for the major land uses and a consequent need to husband a sustainable balance of land supply opportunities. As at 2006 employment land/floorspace supply in Tonbridge is negative overall and in respect of B2/B8 uses (see table).

## Employment Land Supply in Tonbridge 2006

	B1	B2	B8	Total
Completions (net 2006)	-830	-1044	0	-4008
Net allocations	3700	0	1000	4700
Net committed	-2274	-6255	-5774	-14303
Total land supply for 2006	596	-7299	-4774	-13611

Data from Employment Land Survey 2006 – please see appendix.

KMSP 2006 (Policy EP2) provides for some reduction in the scale of business and industrial land provision in Tonbridge and Malling but this is directly and solely a consequence of parallel proposals to revise the land use mix at the strategic development location of Kings Hill. It does not involve wider acceptance of reductions in employment land supply in the Borough – indeed retention and implementation of the level of commitment and of specific sites suited to employment use is the main thrust of Policy EP2a. Policy EP2 (d) requires that “*existing employment sites that are well located and otherwise well suited to employment use should be retained for this purpose*”. Any review of constrained or poor quality employment land commitments should take place through LDD preparation with a view to their replacement by alternative sites.

The recent Employment Land Review undertaken by your Council identified the site as a good urban site for employment uses and the site has been allocated in the emerging Local Development Framework for employment on this basis. While Oast Park may be outside of the main industrial area of Tonbridge it is well situated, within close proximity to the town centre, easy access to the primary road network and accessible by a choice of transport given its close proximity to local bus services and Tonbridge station. Alternative locations for employment would be difficult to identify without adverse impacts on the constraints affecting Tonbridge notably its location entirely within the Green Belt

The County Planning Authority considers that, given the scale and character of employment land supply relative to strategic policy guidance and the need to husband a balanced portfolio of development opportunities in location subject to high level policies of development restraint, priority should attach to maintaining this site for employment uses.

### Housing Supply

The site is not allocated for residential development in the Tonbridge and Malling adopted Local Plan or in the emerging Local Development Framework. There is a very significant surplus against the requirements in the KMSP Policy HP1 to 2016 and the Borough Council in its position statement for the recent Core Strategy Examination establishes that there is sufficient land to meet RSS requirements to 2018 without reliance on windfalls, as required by PPS3. On this basis there is no imperative to release the application site for housing especially in view of the starkly contrasting position with the relationship between employment land supply and policy guidance.

Structure Plan requirement 2001-2016	6800
Total Completions 2001-06	3015
Residual to 2016	3785
Land supply at 2006	6927
Surplus of land supply to policy	3142
Supply in relation to policy requirement	+83%

Data from Kent Housing Land Supply Survey 2006

South East Plan requirement 2006-2021	6375
Extant sites	4606
Unimplemented housing allocations	1065
Total Land Supply to 2018	5571
Surplus to requirements to 2018	571
Windfalls 2018-2021	610
Total Land Supply to 2021	6181
Difference to RSS requirement	-194

Data from TMBC Core Strategy

Figure B1 of the Tonbridge and Malling Position statement on housing land suggests that over 1000 dwellings are to be provided in Tonbridge town centre between 2008 and 2021 as provided for in the Development Land Allocations DPD. With such growth taking place in the town centre, and such large losses of employment land, the sustainable balance between employment and housing risks being undermined by the further loss of employment land in the town.

#### Mixed use

Policy QL5 encourages large scale developments to include a mix of residential and employment uses taking account of the contribution made by adjacent land uses to the provision of a mix of land uses. The site is surrounded by an existing mix of residential and commercial uses and provision for a mixed use development incorporating a higher density and intensity of employment use might offset some of the concern regarding the loss of employment potential if your Council were minded to support a residential element to development at this location. KMSP Policy EP2 (g) supports the efficient use of land as a result of business and commercial development through redevelopment of low density uses especially where located within a principal urban area. The existing employment use of the site is of low intensity.

#### Development of Previously Developed Land within a Principal Urban Area

The site is located on the outskirts of Tonbridge town centre. Tonbridge is identified as a principal urban area in conjunction with KMSP Policy SS1. The site is previously developed land and as such would figure prominently in application of the sequential approach to development established in Policy HP2 and would contribute to Kent wide and district targets for the use of previously developed land for housing. The great majority of land already identified for housing within the Borough constitutes PDL and overall requirements can be accommodated by PDL sources

other than the site of the current application. The prioritisation of PDL applies to the identification of land for employment as well as housing development requirements (KMSP Policy SS4) and in the context of the prevailing balance of future provision for housing and employment purposes the commitment to employment use at this site should prevail.

#### Mix of Housing and Implications for Social/Community Facilities

The County Planning Authority notes that this proposal provides for 40% of new housing to be affordable. Without prejudice to the policy objections outlined above should permission be granted for housing development at this site the substantial element of affordable housing included is welcomed in the context of Structure Plan Policy HP7.

However, the implications of a development of this scale for the funding and timely provision of necessary social and community facilities to support the development, including educational provision, must also be borne in mind. KMSP Policy QL12 emphasises that residential development should not be permitted until the funding for the community services it requires has been identified and agreed and Policy IM1 provides for local planning authorities to seek contributions from developers to meet the costs of providing infrastructure arising from the needs of the development. I understand that colleagues from KCC's Development Contributions team are in contact with you on this issue.

#### Transport Infrastructure

I am aware that my colleagues from Kent Highways Services have already commented on the application and have raised no objection to the proposed residential development of the site from a highway and access standpoint.

Pursuant to KMSP Policy TP3 if the site were to be permitted it should be demonstrated that the development can be well served by public transport, walking and cycling. The proposals relating to the cycling and pedestrian links and the provision of cycling storage facilities are therefore to be welcomed.

#### Impact on biodiversity

Pursuant to KMSP Policy EN8, the Biodiversity Officer at KCC has raised a number of concerns and considerations in regard to biodiversity if the site is redeveloped. Please see their comments attached at Appendix 2.

Conclusion

In summary the County Planning Authority considers that the loss of 5 ha of employment, its impact upon the scale of employment land supply in the Borough and at Tonbridge which is subject to wider policies of development constraint and on the strategic balance between employment and housing land supply and opportunity are the pivotal considerations in this case from a strategic planning policy perspective. In light of these concerns, the County Planning Authority raises a strategic objection to TM 07/2156 as being contrary to Policies EP2a, EP2 ( c ) and EP2(d) of the Adopted Kent and Medway Structure Plan 2006.

Yours sincerely

A handwritten signature in black ink that reads "Dick Feasey". The signature is written in a cursive style with a large, sweeping flourish at the end.

Dick Feasey  
Planning Policy Manager



**Net committed****Extants**

<b>Site</b>	<b>B1</b>	<b>B2</b>	<b>B8</b>	<b>Total</b>
Former Alsford Site, Medway Wharf Road	1568			1568
Land at Cattle Market, Stafford Road	1370			1370
Former Cannon Lane Depot, Cannon Lane			959	959
Cannon Bridge Industrial Estate		338		338
Priory Works	7574	7574		15148
<b>Totals</b>	<b>10512</b>	<b>7912</b>	<b>959</b>	<b>19383</b>

But should exclude Priory Works on the basis of this permission as permission above includes application site.

Excluding Priory Works gives totals of

	2938	338	959	4235
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**Pending losses**

<b>Site</b>	<b>B1</b>	<b>B2</b>	<b>B8</b>	<b>Total</b>
162 High Street	170			170
Old Cannon Wharf		600		600
12A East Street		110		110
Former Cannon Depot Cannon Lane			1000	1000
1 Bank street	240			240
Cannon Bridge Industrial Estate	330	450		780
10-12 Albert Street		264		264
Deacon House, the Slade	523			523
Land between 20 and 22 Priory Street	100			100
Chatfields Removals, Waterloo Road	100			100
1 Lavender hill	140			140
Former Cannon Depot Cannon Lane			300	300
5 Baltic Road	217			217
Priory Works	3609	5433	5433	14475
<b>Totals</b>	<b>5429</b>	<b>6857</b>	<b>6733</b>	<b>19019</b>

Exclude Priory works	1820	1424	1300	4544
Extants - pending losses	2938	338	959	4235
Excluded figures (highlighted above in red)	5212	6593	6733	18538
<b>Net committed</b>	<b>-2274</b>	<b>-6255</b>	<b>-5774</b>	<b>-14303</b>

**Employment land supply in Tonbridge**

	<b>B1</b>	<b>B2</b>	<b>B8</b>	<b>Total</b>
Completions (net 2006)	-830	-1044	0	-4008
Net allocations	3700	0	1000	4700
Net committed	-2274	-6255	-5774	-14303
Total land supply for 2006	596	-7299	-4774	-13611

