

Respondent ID	Agent ID	Document Part Name	Comment (plain text)	TMBC Response
42333569	0	5.4.1 - 5.4.18	Plan should consider the "future of work". Many future jobs will not require employment space as they did pre Covid. The world of work has changed . So the loss of offices is not a bad thing as many office workers WFH and most firms now only need smaller offices. With regard to viticulture, I have the following observation. At one time land just North of Eccles village was allocated for an international station on the Channel Rail Link. This proposal was never realised. The land allocated to the station and its car park is classified as ALC grade 2. That land is now Chapel Down's Kits Coty vineyard producing wines with an international reputation that sell at up to £100 per bottle. The arrival of viticulture in the borough has occurred since the publication of the current adopted Plan. The Council needs to have a clear policy in future for dealing with land that could potentially be of significant value to wine producers.	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
25315361	0	5.4.1 - 5.4.18	It seems inconsistent to give priority to land that is classified ALC 1 but not to recognise land that might have a unique terroir for viticulture. The rarity and economic potential of such land is far in excess of grade 1 agricultural land and should be	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
42520801	0	5.4.1 - 5.4.18	Reducing farming land to create additional housing will not solve the problem. Land that is actively used for growth should be left for that purpose. Removing farmland will reduce jobs in the local areas.	Comment noted.
42442561	0	5.4.1 - 5.4.18	Development of the golf course will reduce local employment	Comment noted.
42590561	0	5.4.1 - 5.4.18	If there is a high loss of industrial stock, why allow such a high windfall allowance in the proposed local plan? Para. 5.4.15	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
25361537	0	5.4.1 - 5.4.18	Here it is stated that 'There is currently strong demand for new industrial and warehouse premises in the borough, reflecting the structural change in consumer spending on-line in recent years, and the strategic position of the north-east of the borough especially to the M2 and M20 motorways, which provide access to the channel ports'. Due to their scale and design, such buildings can be particularly harmful when located in the setting of the AONB (or within it). Due to the juxtaposition of the motorways and the AONB boundary, care will be required to ensure any such provision is sensitively High land values are a fact of life in London commuter belt areas. There is no point trying to fight this. It has advantages as stated in higher spending power supporting local businesses. More can be done on this by creating more free or free to start (first 30mins) parking to encourage people to shop locally. Hopefully Rishi will Incentivise business investment in the UK with his tax break for investors and Kent will get its fair share. Invest in making our local towns and villages please places to visit again free parking helps. Be picky about the company's allowed. Insist that large retail developments like the new Aldi in Kings Hill have solar panels on their roofs. Get existing industrial areas to install solar. These sites are already pretty ugly, but let's make them add back to the local area by	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The Council is drafting a Landscape Sensitivity Assessment to support the new Local Plan.
42646849	0	5.4.1 - 5.4.18	There is a contradiction through this consultation. The section above notes the loss of commercial space with conversion to residential uses, especially in Tonbridge and Kings Hill, however these are areas where it is strongly proposing more residential growth. Maybe the drive for residential land use should be tempered and the focus in these areas be better balanced towards high quality commercial development.	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42330433	0	5.4.1 - 5.4.18		Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42798817	0	5.4.1 - 5.4.18	We should be ambitious with our economic development aims which seek to address the climate change agenda by enabling, stimulating, supporting and funding localised renewable energy production schemes.	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42806945	0	5.4.1 - 5.4.18	This area may 'underperform' in relation to other places similarly place with regard to the M25 but it may be a better place	Comment noted.
42821729	0	5.4.1 - 5.4.18	low carbon growth is a consideration Key Development Issues Q.20	Comment noted.
43412865	0	5.4.1 - 5.4.18	* There is a shortage of employment land because you keep allowing houses on those sites 2 There is no investment in any infrastructure, that is needed first * So long as farms do not diversify into built development	Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.

		Key Development Issues	
43417889	0 5.4.1 - 5.4.18	<p>Q.20</p> <p>* There is a shortage of employment land because you keep allowing houses on those sites</p> <p>2 There is no investment in any infrastructure, that is needed first</p> <p>* So long as farms do not diversify into built development</p>	Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.
43548193	38432225 5.4.1 - 5.4.18	<p>Q.20. Do you agree with the key economic development issues identified above? Yes/No Please explain</p> <p>No comment.</p> <p>1.2.37 The Regulation 18 document identifies the following as the key economic issues:</p> <ul style="list-style-type: none"> <li>• High land values and a shortage of employment land and premises for established and growing businesses as well as those looking to locate in the borough.</li> </ul> <p>This is considered to be the key issue and the one which the Plan must address to realise a sustainable economic development strategy that meets the Borough's employment needs.</p> <ul style="list-style-type: none"> <li>• Lack of investment in strategic infrastructure and congestion on local transport networks.</li> </ul> <p>Whilst this is considered an important issue, it is not considered to be one which is unique to the Borough or which is currently placing it at a competitive disadvantage. In fact, as the EDNS identifies, the Borough's transport links are a key driver in the high levels of demand for employment space. The Plan should therefore address this issue, but prioritise the delivery of suitable employment land (where transport impacts are not severe in line with the NPPF tests).</p> <p>1.2.38 Although only an interim document awaiting more detailed assessment, the EDNS provides an extremely useful evidence base for development of the Plan and a sustainable economic development strategy for the Borough. This confirms that:</p> <ul style="list-style-type: none"> <li>• The strategic transport network plays a key role in shaping commercial property (Paragraph 2.25)</li> <li>• Whilst employment space has increased across Kent in the period 2000 to 2021, Tonbridge &amp; Malling has seen a 6.1% decrease, which has been driven by a loss of industrial space (-9.5%) (paragraph 4.3). Industrial stock has decreased 6.5% in the last 5 years, whilst in the same period, Sevenoaks and Tunbridge Wells (in the same West Kent FEMA) have experienced rises.</li> <li>• These losses are set against continued high levels of demand for industrial space and low vacancy rates (Paragraph 4.45).</li> <li>• Based on current figures, the Borough has only 0.55 years' of industrial supply</li> </ul> <p>1.2. It is therefore clear that there is an acute and pressing need for the Plan to help deliver a step-change in the supply and delivery of industrial employment space to address the evidenced losses, meet the high levels of demand and support the Borough's wider housing growth.</p> <p>1.3. The EDNS identifies three options for setting targets for employment site provision in the Plan, with Option 1 (labour demand) considered to offer the best balance at a level of c. 258,000sqm employment floorspace, over 200,000sqm of which is industrial space.</p>	Comment noted.
43676929	43676897 5.4.1 - 5.4.18	<p>1.4. A higher option set by labour demand adjusted to account for the required 839 dpa housing land supply has been</p>	Comment noted. These matters will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The council is currently working with consultants on an update to the Part 1 EDNS this will look at further employment scenarios and will also include an economic strategy. This will be reflected further within the Regulation 18b document. The council is also producing a new SHLAA/HELAA which will look at housing and other economic uses.

1.3.63 Mostly yes.

1.3.64 The Regulation 18 document identifies the following as the key economic issues:

- High land values and a shortage of employment land and premises for established and growing businesses as well as those looking to locate in the borough.
- This is considered to be the key issue and the one which the Plan must address to realise a sustainable economic development strategy that meets the Borough's employment needs.
- Lack of investment in strategic infrastructure and congestion on local transport networks.

1.3.65 Although only an interim document awaiting more detailed assessment, the Economic Development Needs Study provides an extremely useful evidence base for development of the Plan and a sustainable economic development strategy for the Borough. This confirms that:

- The strategic transport network plays a key role in shaping commercial property (Paragraph 2.25)
- Whilst employment space has increased across Kent in the period 2000 to 2021, Tonbridge & Malling has seen a 6.1% decrease, which has been driven by a loss of industrial space (-9.5%) (paragraph 4.3). Industrial stock has decreased 6.5% in the last 5 years, whilst in the same period, Sevenoaks and Tunbridge Wells (in the same West Kent FEMA) have experienced rises.
- These losses are set against continued high levels of demand for industrial space and low vacancy rates (Paragraph 4.45).

1.3.66 Based on current figures, the Borough has only 0.55 years' of industrial supply

1.3.67 It is therefore clear that there is an acute and pressing need for the Plan to help deliver a step-change in the supply and delivery of industrial employment space to address the evidenced losses, meet the high levels of demand and support the Borough's wider housing growth.

1.3.68 The EDNS identifies three options for setting targets for employment site provision in the Plan, with Option 1 (labour demand) considered to offer the best balance at a level of c. 258,000sqm employment floorspace, over 200,000sqm of which is industrial space.

1.3.69 A higher option set by labour demand adjusted to account for the required 839 dpa housing land supply has been discounted. Whilst the rejection of this option in itself isn't objected to, it is considered that in moving forward with the EDNS, further iterations will need to be assessed to properly test the assertion that option 1 offers the best balance. This is particularly so given the scale of losses experienced over the previous Plan period and the need to ensure the delivery of

Comment noted. These matters will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The council is currently working with consultants on an update to the Part 1 EDNS this will look at further employment scenarios and will also include an economic strategy. This will be reflected further within the Regulation 18b document. The council is also producing a new SHLAA/HELAA which will look at housing and other economic uses.

St Clere is an important rural employer in its own right, as well as successfully supporting a number of external businesses. As part of the management of the Estate, St Clere employs 10 local people directly and dozens of contractors, whilst its commercial floorspace supports over 50 employees. This includes indirect white collar employment or film production: high value employment which would not normally be associated with rural areas.

4.2 St Clere is looking to enhance and grow its employment offering. This will involve the development of commercial floorspace to support the expansion of existing businesses, invite new business to the Estate, and to invest in infrastructure to assist in the modernisation and diversification of the Estate.

4.3 The Consultation Document suggests support for these goals; it sets out the need to attract and retain staff in land-based and agricultural business, provide affordable housing for these St Clere Estate employees and build new facilities to diversify rural businesses (Consultation Document paragraph 5.4.14). In particular, we welcome the following at paragraph 5.4.15:

4.4 The provision of new built facilities to support business diversification remains important to ensure that the sector is competitive.

4.5 St Clere is in favour of this argument, and believes that it is in a key position to contribute towards these goals of diversifying and bolstering the rural economy through the provision of employment space and rural housing. However, it is felt that non-land-based rural economic activity is not given sufficient attention in the Consultation Document.

Diversification will be essential to the future needs of the St Clere Estate and a positive and pro-active policy is essential to provide some confidence. Paragraph 5.4.14 is helpful in providing a direction of travel, it does not go far enough:

4.6 Tonbridge and Malling has a strong land based and rural economy with very well established and diversifying agricultural businesses that produce, meat, fruit, grain and salad crops. The borough is home to both the National Institute of Agricultural Botany (NIAB) East Malling Research Station, the UK's largest horticultural research and development organisation, as well as Hadlow College which specialises in land-based education. Recent growth has been seen amongst viticulture businesses which are producing sparkling wine and gin in addition to beer and cider.

4.7 The drift of the draft Plan is to restrict diversification to traditional agricultural activities: this is not diversification but a change in agricultural strategy. This brings substantial risk and needs to be balanced with other forms of diversification such as non-agricultural workspace, visitor accommodation and - in addition staff housing - small scale housing opportunities to provide capital for investment.

Comment noted. These matters will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The council is currently working with consultants on an update to the Part 1 EDNS this will look at further employment scenarios and will also include an economic strategy. This will include considerations in relation to the rural economy and will be reflected further within the Regulation 18b document.

role in sustaining the Kent economy as a whole, but is constrained and underperforming compared to other areas – not least due to a shortage of available land for development / growth (paragraph 5.4.6).

2.2 This lack of employment land has consequences: it increases out commuting from the Borough to London and elsewhere, reduces local economic expenditure / output and suppresses opportunities for local employment / job creation.

2.3 The Consultation identifies a continuing reduction in ‘industrial stock’ – a significant decrease of 20% since 2010/11 (paragraph 5.4.12). Whilst supply has declined, there is strong demand for new industrial premises in the Borough (paragraph 5.4.15).

2.4 This clear imbalance of demand for employment against supply must be addressed by the emerging Local Plan. To not do so would fail to create the conditions in which businesses can invest, expand and adapt, continuing to suppress economic demand to the detriment of local business needs and wider economic opportunity, contrary to the National Planning Policy Framework (2021) (“the Framework”).

2.5 The EDNS highlights this challenge. On its ‘labour demand scenario’ approach it identifies a very significant shortfall of 147,550 sq m of industrial and distribution floorspace across the plan period 2021-40. This shortfall equates to 18.2% of existing industrial stock.

2.6 However this ‘labour demand scenario’ approach is simply a historic snapshot of previous performance, which factors in periods of uncertainty (including Brexit and Covid 19 pandemic) and the constraining undersupply of land. To progress with the ‘labour demand scenario’ as the basis for plan-making, as currently indicated in the EDNS, would continue to impede economic growth, compounding periods unprecedented turbulence into the future.

2.7 Instead the Council should plan to meet economic growth through the EDNS’s ‘labour supply scenario’. This would provide employment opportunities for local communities in nearby locations, reducing the need for out-commuting and travel, as well as maximising local prosperity. Any approach other than a ‘labour supply scenario’ would not effectively support local employment needs and continue to suppress the wider opportunity for growth and productivity.

2.8 As to where the required employment growth should be located, the EDNS (paragraph 4.43) identifies the north eastern part of the Borough around the Medway Gap to be the most significant – the area that is attracting strongest levels of market demand. The EDNS explains (paragraph 2.23) that:

“Aylesford represents the largest and most significant industrial location in Tonbridge and Malling, attracting the strongest levels of market demand. The town and its industrial areas lie directly on the M20 and tend typically to compete with the

Business Sites. Many local farm buildings are being repurposed for business use. This often involves large vehicles using unsuitable country lanes to access the sites, causing damage to the roads, manhole covers and footpaths. When granting permission for change of use there appears to be no consideration given to transportation routes and the detrimental impact on villages such as ours.

Comment noted. These matters will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The council is currently working with consultants on an update to the Part 1 EDNS this will look at further employment scenarios and will also include an economic strategy. This will be reflected further within the Regulation 18b document. If required, the council will allocate the most appropriate and sustainable sites for new employment uses.

Noted.

Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.

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