

11

ECONOMIC GROWTH AND DEVELOPMENT



Introduction	254
.....	
Supporting a Prosperous, Inclusive and Sustainable Economic Future	256
.....	
Strategic Employment Areas	262
.....	
Other Employment Sites, Premises and Floorspace	268
.....	
Employment and Skills	272
.....	
Town Centres	274
.....	
Primary Shopping Areas	278
.....	
Above Ground Floorspace	280
.....	
Sequential and Local Impact Tests	282
.....	

11

ECONOMIC GROWTH AND DEVELOPMENT

Introduction

11.1 This chapter sets out the strategy for supporting economic development and employment growth in Tonbridge and Malling over the Local Plan period to 2042.

11.2 The policies within this chapter are informed by the [Tonbridge and Malling Economy Study \(May 2025\)](#), which provides a comprehensive assessment of employment land supply and demand, commercial property market signals, and sector growth opportunities. The Study updates the 2022 Economic Development Needs Study and forms part of the Local Plan evidence base.

11.3 The December 2024 update to the [National Planning Policy Framework](#) (NPPF) places renewed emphasis on enabling economic growth through the planning system. Paragraphs 86 and 87 require local planning authorities to identify suitable locations for modern economy sectors and to recognise the specific locational requirements of different industries.

11.4 Tonbridge and Malling is located within the West Kent Functional Economic Market Area (FEMA), with strong economic ties to Tunbridge Wells and Sevenoaks, while the north-east of the borough in particular has strong linkages with Maidstone. Tonbridge and Malling's economy is underpinned by a strong and diverse employment base, with particular strengths in professional services, administrative and support services, and logistics. The borough has a notably higher concentration of financial services relative to the national average, and its strategic location along the M20 corridor supports a thriving logistics and distribution sector, including major warehousing hubs at Aylesford and New Hythe. The borough also benefits from a strong education sector and a growing presence in specialised construction and life sciences, particularly at East Malling Research Station. These strengths mean that Tonbridge and Malling is well-placed to support the Government's modern economy agenda and to attract further investment in high-value, knowledge-based and infrastructure-linked industries.

11.5 Tonbridge and Malling's commercial property market is currently characterised by a strong industrial base and a more subdued office sector. The borough has one of the largest stocks of employment space in West Kent, with industrial uses accounting for over 80% of total floorspace. Key industrial locations such as Aylesford, New Hythe, and Tonbridge continue to attract strong demand, particularly for warehousing and logistics, supported by easy access to the M20 corridor. Despite a long-term decline in overall employment floorspace, driven largely by industrial losses, net absorption in the industrial sector has remained positive, and rents have steadily increased, indicating a resilient and competitive market. There is potential for this to be enhanced in the future with the completion of the Lower Thames crossing.

11.6 In contrast, the office market has been more affected by structural changes post-Covid, with limited new development, rising vacancy rates, and a shift in demand toward smaller, high-quality, flexible spaces. Kings Hill remains the borough's primary office location, though speculative development is currently unviable. Overall, while the office sector faces challenges, the industrial market remains buoyant and is expected to underpin future employment growth.





Supporting a Prosperous, Inclusive and Sustainable Economic Future

11.7 The Local Plan supports sustainable economic growth that meets the needs of local businesses, residents and future generations. This includes ensuring a sufficient supply of employment land, supporting town centre vitality, enabling rural enterprise, and responding to the challenges and opportunities presented by technological change, climate adaptation, and the transition to a low-carbon economy.

11.8 The council's policy approach is guided by the [Tonbridge and Malling Economic Development Strategy](#) (2023-2027) which sets out the council's vision for the economy to: *"Maximise the unique strengths of the local area to help create a resilient, dynamic and inclusive economy that fosters sustainable growth."*

11.9 Figure 11.1 sets out the strategic objectives from the Strategy. These objectives underpin the policies and proposals set out in this Chapter, which aim to deliver a strong, adaptable, and inclusive economy.

Figure 11.1: Strategic objectives from the Economy Strategy

THEME 1:		Promoting the borough Raising the profile of Tonbridge and Malling as a desirable place to live, work, invest, and visit.
THEME 2:		Supporting local business Enabling business growth through targeted support, advice, and access to funding.
THEME 3:		Land and premises (and supporting infrastructure) Ensuring the availability of suitable employment land and flexible workspaces to meet evolving business needs.
THEME 4:		A greener more productive economy Encouraging sustainable practices and green innovation to support the borough's climate goals.
THEME 5:		A thriving rural economy Supporting rural diversification and infrastructure to maintain vibrant countryside communities.
THEME 6:		An inclusive economy Promoting access to employment, skills development, and digital inclusion for all residents.
THEME 7:		Vibrant town centres Enhancing the vitality and resilience of town and local centres through regeneration and placemaking.



11.10 Tonbridge and Malling's strengths identified within the Strategy include its proximity to London and international gateways, high quality of life, a strong business community, low unemployment, and high levels of household income relative to other areas of Kent. Meanwhile, existing challenges include identifying new employment sites to meet future needs, decarbonising the economy, past losses of commercial premises through changes of use including through Permitted Development Rights (PDR) and recruitment difficulties in some sectors including land based and care roles.

11.11 Policy E1 supports the delivery of the council's economic development aspirations and compliments other initiatives and work undertaken by the council and its partners to support the local economy. This includes providing business support and advice, assisting businesses to access funding and finance, attracting and promoting inward investment, effective partnership working to secure key infrastructure including the completion of full fibre and 5G networks, ensuring our town centres and visitor offer remain competitive, and to support existing businesses to become net zero.

Policy E1: Supporting a Prosperous, Inclusive and Sustainable Economic Future

- 1 Economic development proposals will be supported where they contribute towards the delivery of a prosperous, inclusive and sustainable economic future in the borough. This will be achieved through the following:
 - a Protecting and retaining existing employment floorspace and supporting proposals for new employment floorspace that is well-designed, of good quality and is flexible in terms of operation and use;
 - b Supporting proposals for different employment premises at a range of scales that meet business needs within the industrial, logistics and offices sectors, that clearly evidence relevant market demand;
 - c Supporting proposals that seek to improve or upgrade the quality of employment premises / floorspace including through redevelopment, conversion, refurbishment, intensification or reconfiguration, which will lead to an improvement of employment provision, an increase in job growth and / or will assist to meet the needs of modern-day businesses and market demands;
 - d Locating employment floorspace near to labour supply and in appropriate locations as relevant to the nature of the business including transport requirements and proximity to strategic routes;
 - e Support proposals that will deliver the necessary infrastructure in a timely manner or where there is currently or will be sufficient capacity to support the proposal;
 - f Supporting business startups and small and medium sized enterprises (SME's) by creating conditions in which businesses can innovate and grow;
 - g Ensuring that proposals deliver environmental and climate change policy requirements to assist in decarbonising the economy including adaptation of existing businesses. This includes delivering sustainably constructed business premises and delivering energy efficient buildings, sustainable business operations and processes, sustainable travel infrastructure opportunities and improvements, innovation and technology development, digital infrastructure improvements to facilitate home working as appropriate, EV charging points and cycle storage; and
 - h Supporting proposals that will contribute to addressing local skill shortages, support local employment, re-skilling and retraining and those that enable green economy outcomes.

Reasoned Justification



11.12 The borough's economic landscape is evolving and Policy E1 is designed to ensure that economic development within the borough is future-proofed, inclusive, and environmentally sustainable.



11.13 The Policy supports the retention and enhancement of employment floorspace to safeguard existing jobs and accommodate future growth. It recognises the need for flexibility in employment premises to meet the operational requirements of modern businesses, including SMEs and startups, which are vital to innovation and economic resilience.

11.14 Evidence from employment land reviews and market assessments highlights a need for better quality and more adaptable industrial, logistics, and office space. The Policy responds to this by encouraging redevelopment, refurbishment, and intensification of older or underutilised sites, particularly those that are vacant or of poor quality.

11.15 Locational criteria are embedded in the policy to ensure employment uses are situated where they can thrive, close to labour supply, transport infrastructure, and strategic routes. This supports sustainable commuting patterns and enhances business connectivity.

11.16 Infrastructure provision is a critical enabler of economic growth. The Policy ensures that development proposals are supported by adequate infrastructure capacity or deliver necessary improvements, aligning with wider spatial and transport strategies.

11.17 In line with national and local climate objectives, the Policy promotes low-carbon economic development. This includes energy-efficient buildings, sustainable travel options, and digital infrastructure to support remote working and reduce carbon emissions.

11.18 In addition, the Policy supports initiatives that address local skills shortages and promote inclusive employment opportunities. By encouraging re-skilling, retraining, and green economy outcomes, the Policy contributes to a more equitable and sustainable future for all residents.

Policy Implementation

11.19 This Policy will be applied to all relevant development proposals, alongside the application of other development management policies. Proposals should demonstrate how they contribute to the borough's economic objectives, including job creation, modernisation of employment space, and environmental sustainability. Applications should be accompanied by evidence of market demand, employment impact, and infrastructure capacity.

11.20 Where there is a requirement to secure site-specific infrastructure to mitigate proposals, the council will consider the use of either planning obligations or planning conditions to secure this.



Strategic Employment Areas



Introduction

11.21 Strategic Employment Areas (SEAs) are essential to the borough's economic vitality, providing a range of industrial, logistics, and office-based employment opportunities. These areas support a significant proportion of local jobs and are critical to maintaining a diverse and resilient economy.

11.22 The NPPF emphasises the importance of building a strong and competitive economy and requires planning policies to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. Policy E2 responds to this by identifying and safeguarding a network of key employment locations across the borough.

11.23 These areas are protected for uses within Use Classes E(g), B2, and B8, which reflect the operational needs of modern businesses. The policy supports the expansion, intensification, and adaptation of employment space in these locations, provided proposals enhance employment provision, are compatible with surrounding uses, and do not result in unacceptable impacts on infrastructure or amenity.

11.24 The Policy also allows for limited ancillary services, such as trade counters, where they support the primary employment function. Proposals for non-employment uses will only be permitted in exceptional circumstances, where robust evidence demonstrates that the proposed use will not undermine the employment role of the site and meets specific criteria.



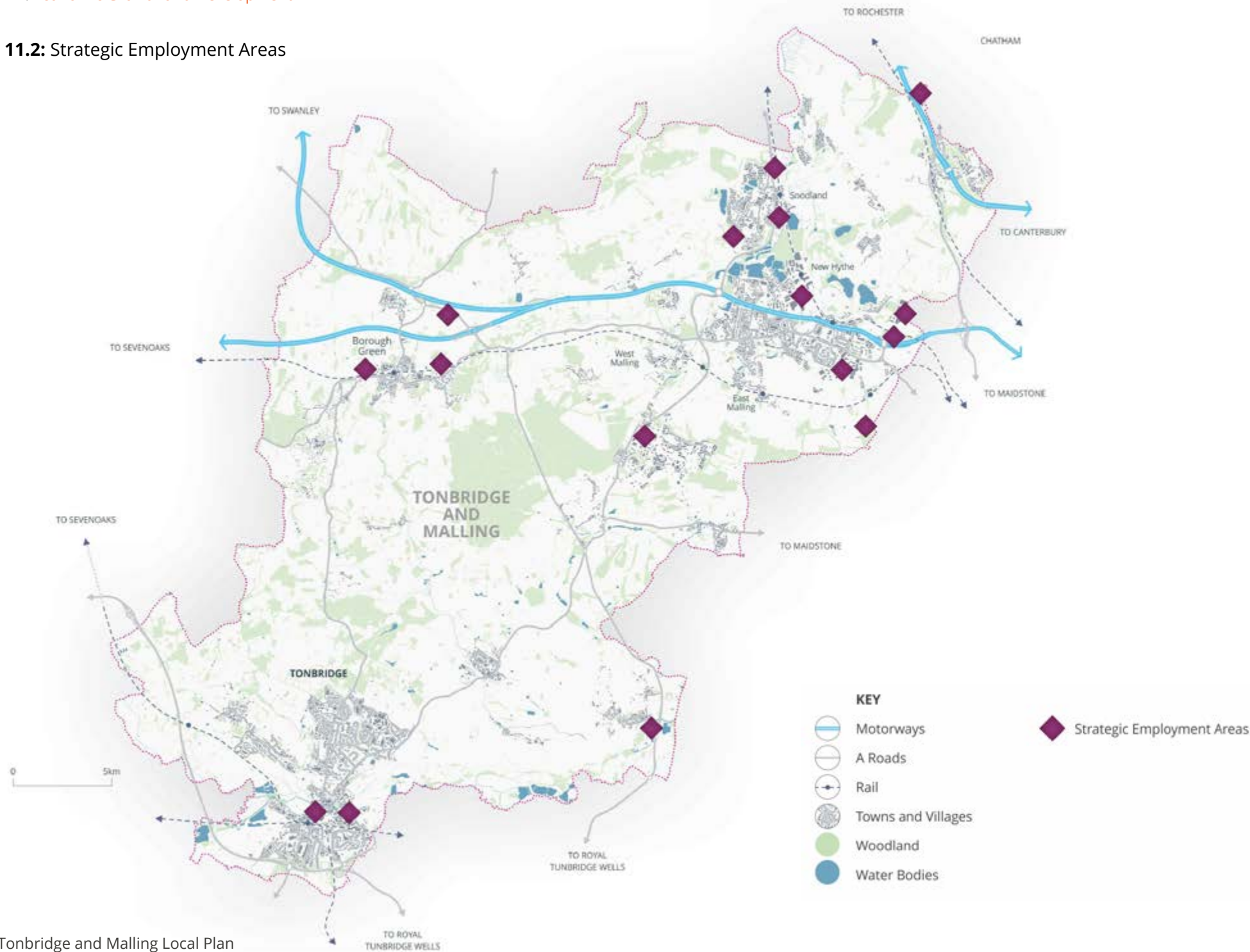


Policy E2: Strategic Employment Areas

- 1 The following strategic employment sites, premises and floorspace will be retained and safeguarded for employment purposes.
- 2 New employment space or the expansion or adaptation of employment space in these locations will generally be supported where uses are for E(g), B2 and B8, as identified in the table and where the proposal:
 - a Will lead to an improvement in the quantity and quality of employment floorspace and related jobs;
 - b Will not result in unacceptable impacts on the road network, providing sufficient parking for the use proposed;
 - c Will not affect the amenity of neighbouring properties;
 - d Complements the employment area and maximises the employment potential of the area. Ancillary services such as trade counters will be supported but only where they are a subsidiary and de-minimis feature of the employment unit, support the primary business function of the unit and where they do not adversely affect the business function of the employment area or surrounding area, including unacceptable parking or highways impacts that cannot be appropriately mitigated.
- 3 Development for non-B2, B8 and E(g) uses in these locations including sui generis uses will only be permitted where there is a clear and evidenced justification for a departure from this policy and where the following criteria can be demonstrated:
 - a There will be no adverse impact on the employment land supply (amount, type, quality and use) and jobs;
 - b It can be demonstrated that there is a need for the type of employment use proposed to be located within the strategic employment site and that the use cannot be suitably provided elsewhere;
 - c That the current employment use is no longer viable for its current or last lawful use;
 - d That the proposed use will not inhibit the ability to provide equivalent employment on the site in the future; and
 - e That the alternative employment use supports the integrity and function of the employment site and is suitable when considering its relationship to other employment uses.
- 4 Ancillary services such as trade counters will be supported but only where they are a subsidiary feature of the employment unit, support the primary business function of the unit and where they do not adversely affect the business function of the employment area or surrounding area, including by giving rise to unacceptable parking or highways impacts that cannot be appropriately mitigated.
- 5 Where the proposal relates to a non-employment use, due to there being no longer a demand for the site or premises or feature(s) associated with the employment use, then this should be demonstrated through:
 - a A minimum prior 12-month marketing exercise, where the site or premises have been genuinely offered for sale or letting on the open market at a realistic price and no reasonable offers have been refused.
 - b Written evidence from a suitable commercial agent(s) will be required to support this.

Employment Area	Acceptable Uses
Tonbridge Industrial Area including premises at Cannon Lane, Vale Road, Vale Rise, Morley Road, Sovereign Way and Tannery Road (47.2 ha)	General Industry - B2
New Hythe Industrial Area including Panattoni Park Aylesford (126 ha)	
Quarry Wood Industrial Area including Britania Business Park and Priory Park, Aylesford (37.6 ha)	
North Snodland Industrial Area including Vantage Point and Arc Logistics Park (8.5 ha)	
East Snodland Industrial Area including Mid Kent Business Park and Smurfit Kappa (26 ha)	
South Snodland Industrial Area, including premises at Hays Road (17.5 ha)	
Forstal Road Industrial Area, Aylesford (part within Tonbridge and Malling), including premises at the Deacon Trading Estate, Cottage Industrial Estate and Beddow Way (19.1 ha)	Storage and Distribution - B8
Industrial Area North of M20 Jn6, including premises at Coldharbour Lane and Frank Sando Way (11.7 ha)	
Innovation Park Medway, Rochester (part within Tonbridge and Malling), including premises at Laker Road (8.6 ha)	Ancillary Office - E(g)
Wrotham Heath Industrial Area including Invicta Business Park and Panattoni Park Sevenoaks (4.3 ha)	
East Peckham Industrial Area including premises at Branbridges Industrial Estate, Archers Park, Adams Wharf and Arnold Business Park (10.4 ha)	
Borough Green Industrial Area, including premises at Cricketts Farm Business Park and H+H Celcon (13 ha)	
Platt Industrial Estate, St Mary's Platt (6.6 ha)	
Tonbridge Town Centre (24.7 ha)	Office, Research and Development - E1(g) i) and ii)
Kings Hill Business Park including premises at Kings Hill Avenue, Gibson Drive, Alexander Grove and Jubilee Way (51 ha)	
Hermitage Court, Hermitage Lane, Maidstone (5.5 ha)	

Figure 11.2: Strategic Employment Areas



Reasoned Justification

11.25 National planning policy requires local planning authorities to plan proactively to meet the development needs of business and support an economy fit for the 21st century. Policy E2 aligns with this by safeguarding a portfolio of well-located, accessible, and high-quality employment sites that are capable of supporting a range of business activities.

11.26 The Tonbridge and Malling Economy Study (2025) provides the evidence base for identifying these Strategic Employment Areas and highlights the importance of protecting employment land from competing uses, particularly in areas of high demand or where there is limited supply.

11.27 By clearly defining acceptable uses and setting out criteria for assessing alternative proposals, Policy E2 provides clarity and certainty for developers, businesses, and communities. It ensures that employment land is used efficiently and remains available to meet current and future economic needs.

11.28 The policy also supports the modernisation of employment space to meet changing business needs, contributing to productivity growth and economic resilience. It ensures that any departure from employment use is justified, does not harm the overall employment function of the area, and supports the long-term economic strategy of the borough.

Policy Implementation

11.29 Planning applications within Strategic Employment Areas will be assessed against the policy's criteria. Proposals must demonstrate compliance with the use classes B2, B8 and E(g) as stated and provide robust evidence where alternative uses are proposed, in line with paragraph 86 e) of the NPPF, which supports flexible approaches to planning for employment land.

11.30 Any planning application that proposes the loss of employment uses within designated Strategic Employment Areas must be sufficiently justified and must meet criteria 3a-e.

11.31 Proposals for 'main town centre uses', including offices, must also comply with Policy E8 (Sequential and Local Impact Tests), ensuring consistency across the Local Plan.

11.32 The council will work with landowners, developers, and business support organisations to promote investment in Strategic Employment Areas and to facilitate the delivery of high-quality employment space.

11.33 If the council require the review of any submitted marketing and viability information by an independent consultant, it is expected that the applicant will cover the cost of this.

Other Employment Sites, Premises and Floorspace



Introduction

11.34 Other existing employment sites are located throughout the borough and offer a wide variety of employment stock, uses and opportunities. These premises are of varying age, quality and price, which helps to support a wide variety of businesses, especially small and medium-sized enterprises (SMEs). These premises play a vital role in supporting the local economy, providing jobs, and sustaining business activity. These sites include uses within the B2, B8 and E(g) use classes, which encompass offices, research and development, light industry, general industrial, and storage and distribution.

11.35 It is important to protect these employment sites from loss to non-employment uses and to encourage investment in their reconfiguration and intensification. This will also help the borough to support the growth of local businesses, inward investment, and related jobs. Retaining and strengthening the local business base will help to provide balanced growth, through providing more local job opportunities for residents that will help minimise out-commuting from the borough.

11.36 The demand for offices and other uses under Use Class E(g) is likely to fluctuate over the plan period in response to changing economic and market conditions. The Covid-19 pandemic, and the related growth

in home and hybrid working have resulted in reduced demand for office stock. Changes to the [General Permitted Development Rights Order](#) (GPDO) have enabled the change of use of Use Class E(g) stock, including offices, to residential use. This, in addition to other permitted losses of office stock, particularly at Kings Hill, has reduced the availability of premises for growing and new businesses.

11.37 Policy E3 seeks to safeguard these existing employment locations from being lost to non-employment uses unless specific criteria are met. The Policy recognises that while some sites may no longer be suitable for continued employment use, any proposed change must be carefully

assessed to ensure it does not undermine the wider employment function of the area or negatively impact neighbouring uses and residential amenity.

11.38 The Policy supports proposals that demonstrate clear economic benefits, such as job creation or retention, and improvements to the local environment or amenity. It also encourages the intensification, redevelopment, or upgrading of existing employment premises where this aligns with modern business needs and contributes positively to the borough's employment offer.

Policy E3: Other Employment Sites, Premises and Floorspace

- 1 Existing B2, B8 and E(g) employment sites premises and floorspace which are not situated within sites identified in policy E2 will be protected against loss to non-employment uses.
- 2 Proposals that will result in the loss of employment use will only be permitted where:
 - a The current employment use is no longer viable for its current or last lawful use;
 - b The proposed use will not have an unacceptable adverse impact on the function or operation of the employment site, neighbouring businesses/uses or unduly affect neighbouring residential amenity due to transport movements, car parking, noise, or hours of operation;
 - c The proposal would result in economic benefits including job provision; and
 - d The current use of the site is not appropriate to be continued, and development of the site would result in an improvement to the built environment or the amenity of the area.
- 3 Proposals for intensification, redevelopment or upgrading of existing facilities will be supported where they respond to modern day business needs, support job retention and creation, as well as maintain or exceed the extent of employment floorspace.
- 4 Where the partial loss of employment use is proposed then applications will only be supported where the partial loss will contribute to the continuation of the existing employment use (should the existing use require less floorspace) and it can be demonstrated that the existing use would otherwise be unviable but can be retained by cross-subsidy.
- 5 Proposals that would result in the loss of features associated with an employment use, that are likely to undermine a site's viability, such as but not limited to car parking, will be refused planning permission unless the impact can be sufficiently mitigated and there are clearly justified circumstances for such a proposal to proceed.
- 6 Where the proposal relates to a non-employment use, due to there being no longer a demand for the site or premises or feature(s) associated with the employment use, then this should be demonstrated through:
 - a A minimum prior 12-month marketing exercise, where the site or premises have been genuinely offered for sale or letting on the open market at a realistic price and no reasonable offers have been refused.
 - b Written evidence from a suitable commercial agent(s) will be required to support this.



Reasoned Justification

11.39 The protection of employment land is essential to maintaining a balanced and resilient local economy. Employment sites provide a range of job opportunities and support business growth, innovation, and inward investment. The loss of such sites to non-employment uses can undermine economic sustainability and reduce the availability of land for future business needs.

11.40 Evidence from the Tonbridge and Malling Economy Study (2025) indicates that there is ongoing demand for employment space across the borough, particularly for flexible and modern premises. Retaining and enhancing existing employment sites is therefore critical to meeting current and future economic needs.

11.41 This Policy ensures that employment land is not lost unnecessarily and that any changes are justified by clear economic or environmental benefits. It also supports the borough's strategic objectives for economic development and aligns with national planning policy on supporting business growth and productivity.

Policy Implementation

11.42 The aim of this Policy is to ensure that existing employment sites across the borough are retained and enhanced in line with the Local Plan's economic objectives and the criteria set out within the Policy. Applicants seeking to redevelop or change the use of employment land must provide clear and robust evidence that the site is no longer viable or suitable for continued economic use.

11.43 To support decision-making, proposals should be accompanied by a marketing assessment demonstrating sustained efforts to let or sell the site for employment use for a prior 18-month period. Other evidence will also be required to be submitted in an economic impact assessment proportionate to the application outlining the implications of the proposed change and how the application meets the Policy criteria.

11.44 The council will encourage investment in the reconfiguration, intensification, and modernisation of employment premises to meet evolving business needs, particularly for small and medium-sized enterprises (SMEs). Proposals that support the delivery of flexible, affordable, and sustainable employment space will be supported.

11.45 If the council require the review of any submitted marketing and viability information by an independent consultant, it is expected that the applicant will cover the cost of this.



Employment and Skills



Introduction

11.46 Tonbridge and Malling is changing and growing as more people choose to live and work in the borough. As part of West Kent, the borough plays a strong role in contributing towards the West Kent economy. The council's Economic Development Strategy identifies that "gross value added (GVA) per head is £36,690 compared to £27,907 across Kent as a whole. However, when compared to other locations equidistant to London, such as Guildford, it is clear that there is room for improvement" (ED Strategy, page 3).

11.47 Supporting the prosperity of local residents through the availability of training opportunities to equip them with high-level skills, as well as employment opportunities, is vital to supporting the economic vitality of the borough and inward investment. The relationship between GVA and skills is an important one given that improved skills contribute to productivity, which in turn increases GVA.

11.48 It is important that the borough offers the right skills profile to cater for the needs of current and future employers, and to overcome any skills gaps. The council's Economic Development Strategy seeks to "ensure that everyone sees the benefit of improvements in our economy, and that no-one is left behind" (ED Strategy, page 5). By supporting an inclusive approach, we can help to increase skills levels and reduce unemployment through creating training and job opportunities for local people. This could include focusing on groups overrepresented in unemployment including young people, ethnic minority groups, and women in ethnic minority groups. This could enhance equal access to employment and income equality to all local residents.

11.49 To help achieve this aspiration, planning applications for 1,000 sqm of commercial or community floorspace (net) or applications for residential development of 20 units or more should be accompanied by an Employment and Skills Training Plan (ESTP).

Policy E4: Employment and Skills

- 1** Proposals for 1,000 sqm of commercial or community use floorspace or for residential developments of 20 units or more will be required to submit an Employment and Skills Training Plan to demonstrate how the proposal will contribute to employing, educating and training local people. The Employment and Skills Training Plan will need to consider both the construction and operation phase of the development (as appropriate).
- 2** The Employment and Skills Training Plan will need to at a minimum:
 - a** Set out training to be provided to local people;
 - b** Set out how jobs will be promoted to the community;
 - c** Set out how local people will be prioritised for new opportunities, including those relating to sub-contractors;
 - d** Set out how local education will be invested in; and
 - e** Set out how the above will be monitored.

Reasoned Justification

11.50 Tonbridge and Malling has a diverse economy, however, there are pockets of skill shortages and economic inactivity, particularly among young people and those seeking to re-enter the workforce. Requiring ESTPs for certain developments ensures that the benefits of growth are shared more equitably. These plans will help address local skills gaps, support apprenticeships and training schemes, and foster stronger links between developers, employers, and education providers. This approach aligns with national planning guidance and supports the council's objectives for inclusive growth and social mobility.

Policy Implementation

11.51 The Government defines major development as 10 or more residential units or more than 1,000sqm of commercial floorspace. It is considered that the development of 10 residential units is relatively small with regards to this issue and therefore requiring employment and skills plans from these developments could prove over burdensome. The council therefore require a more appropriate threshold for residential development in implementing this policy of 20 or more units.

11.52 The council will provide guidance on the preparation of ESTPs, including model clauses and best practice examples. Developers will be expected to engage with local job centres, training providers, and schools/colleges to deliver the commitments set out in an agreed ESTP.

11.53 The council will also explore opportunities to align ESTPs with other local initiatives and through liaising with relevant partners, to maximise impact and avoid duplication.

11.54 ESTPs will be secured via a S106 legal agreement.



Town Centres



Introduction

11.55 This section sets out the strategy for how our town, district and local centres can develop, as well as where new town centre uses should be brought forward. Recent events and trends have changed the role of town centres nationally, including the rise of internet shopping, driven by the Covid-19 pandemic and the forced temporary closure of non-essential stores.

11.56 There has also been the relaxation of planning regulations for town centre uses, which has allowed for certain town centre uses to interchange without planning permission, including the introduction of residential uses.

11.57 High streets are the beating hearts of our towns and villages, and maintaining and enhancing the vibrancy and vitality of our centres will be important to ensure that they continue to play a positive and important role in our local economy as well as ensuring that our centres meet the needs of local residents.

11.58 Tonbridge is the largest and dominant centre in the borough, it benefits from a collection of unique assets including close proximity to the River Medway and Tonbridge Castle, as well as Tonbridge Racecourse Sportsground and Park. As the only town in the borough, it provides the most varied range of facilities and is the only centre with a truly borough-wide catchment area. There are ongoing shifts in demand and expectations for town centres, with a shift towards the town centre being a location for non-retail uses which in Tonbridge increased from 42% in 2003 to 47% in 2025 ([Retail and Town Centres Needs Study 2025, paragraph 5.50](#)).

11.59 There are a number of other centres in the borough of varying sizes that have a more limited and proportionate comparison goods offer, to that provided by Tonbridge. These centres play an important role in the provision of convenience goods and access to services, especially so for more rural settlements.

11.60 The borough does not have any significant urban or edge of centre sites with a substantial sub-regional catchment, in contrast to neighbouring Tunbridge Wells, Maidstone, and Bluewater which draw consumers and spending away from the borough.

Town Centre Hierarchy

11.61 The NPPF confirms that local planning policies should define a network and hierarchy of town centres to promote their long-term vitality and viability. Designated centres remain the expected focus for retail, leisure and other main town centre uses. This is defined in the NPPF as 'Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

11.62 Figure 11.3 overleaf sets out the retail hierarchy for Tonbridge and Malling borough, this identifies town, district and local centres, which is informed by analysis provided in the Retail and Town Centres Needs Study (2025), in terms of the number and mix of outlets available, as well as turnover and market share.

- Town centre: The retail study identified Tonbridge to be at the top of the hierarchy given its number of outlets (172) and mix of facilities.
- District centres: These centres are smaller (with between 22 to 86 outlets). District centres have a more limited range and choice of comparison goods shopping.
- Local centres: Local centres include a range of small shops of a local nature, serving a small catchment (with between 6-15 outlets).

11.63 Policy E5 sets out the approach to supporting the borough’s hierarchy of centres and includes criteria against which town centre proposals will be assessed.

11.64 Town Centre is defined in the NPPF at Annex 2:

“Area defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.”

Figure 11.3: Retail Hierarchy for Tonbridge and Malling Borough

Centre Name	Type
Tonbridge	Town Centre
Borough Green	
Kings Hill	
Martin Square and London Road, Larkfield	District Centre
Snodland	
West Malling	
Martin Hardie Way, Tonbridge	Local Centre
York Parade, Tonbridge	
Twisden Road, East Malling	
Woodlands Parade, Ditton	
Little Market Row, Leybourne	
Hadlow	
Hildenborough	

Policy E5: Supporting the Vitality of Town, Service and Local Centres

- 1 The hierarchy of centres will be expected to be the focus for main town centre uses and the role and function of the centres will be protected and enhanced.
- 2 Within the defined centres, proposals will be supported where they are located within the town centre boundary and contribute to the vitality and viability of the town centre including for retail, food and drink, financial and professional services, leisure, entertainment, indoor sport and recreation, offices, arts, culture and tourism, residential and employment development as well as markets.
- 3 Proposals within town centre boundaries will be supported where:
 - a They are located within the defined town centre boundaries;
 - b They provide an active frontage, ensuring that there is no break in active frontages;
 - c The proposal maintains and enhances the centres vitality and viability by contributing to the overall balance, mix and diverse offer of town centre uses to support the local communities;
 - d The proposal is of an appropriate scale commensurate to the size, function and character of the centre and does not result in amenity issues, such as noise and odour; and
 - e The proposal positively contributes to wellbeing and placemaking including the identity of the centre as opportunities allow. Providing an improved service and experience, improved accessibility and sustainable travel facilities, enhanced public realm, urban greening including linking to blue and green infrastructure, as well as enhancing heritage assets and their setting.
- 4 Within defined local centres proposals will be supported where they provide a direct service to the general public and the use would not result in the loss of local accessible (by walking or wheeling) shopping facilities. For town centre regeneration proposals, these should be supported by relevant impact assessments to ensure that the development will be inclusive.
- 5 Meanwhile uses will be supported in town centres where they enhance the character and vitality of the area, maintain active ground floor frontages and retain any existing shopfronts. Meanwhile uses should be precursors to permanent uses or development, that secure the reoccupation of a vacant site or premises, and which contribute economic, social and/or environmental benefits to the centre.
- 6 Proposals relating to the night-time economy in Tonbridge town centre and district centres will be supported where they do not affect day-time footfall, have an active frontage and will not result in any negative environmental or amenity effects with appropriate mitigation in place.
- 7 Within the defined centres a change of use at ground floor level to a non-main town centre use will not be permitted, unless the site is allocated to deliver residential development. This includes the change of use of existing ground floor premises to residential.

Reasoned Justification

11.65 Policy E6 supports the vitality and viability of Tonbridge's town, district, and local centres by directing appropriate development to these locations in line with the town centre hierarchy. This reflects national policy (NPPF), which highlights the need for diversification and a positive strategy to help centres adapt to rapid changes in the retail and leisure sectors.

11.66 The borough benefits from a well-established network of centres that serve their communities. Maintaining this hierarchy in the Local Plan is essential to ensure sustainable shopping patterns, direct main town centre uses to accessible locations and define a clear role and strategy for our centres.

11.67 The Policy promotes a balanced mix of uses, active frontages, and development that is appropriate in scale and character. It supports placemaking, improved accessibility, and enhancements to the public realm and green infrastructure. Meanwhile uses are encouraged where they activate vacant spaces and contribute positively to the area.

11.68 Night-time economy proposals will be supported where they complement daytime activity and avoid negative impacts. To protect the function of centres, changes of use at ground floor level to non-town centre or residential uses are restricted unless allocated for housing.

Policy Implementation

11.69 Policy E6 ensures that proposals for main town centre uses align with the defined hierarchy of centres. Development must be of a scale appropriate to the role and function of the centre in which it is located. For example, major retail proposals will not normally be supported in local centres, while most new retail floorspace is expected to be accommodated within existing town and district centres and strategic sites. The hierarchy is intended to guide appropriate development, not to prioritise investment in one centre over another.

11.70 To retain and enhance the vibrancy and vitality of centres, proposals must support a balanced mix of retail, leisure, cultural, and service uses. These should reflect the scale and character of the centre and avoid undermining the function of surrounding areas. Proposals should also avoid over-concentration of any single use. For instance, while sui generis uses such as bars and live music venues can enhance the evening and night-time economy, applicants must demonstrate that such uses will not harm daytime footfall or residential amenity.

11.71 Meanwhile uses are those that reoccupy vacant and underutilised. These units will be supported in principle to maintain the vitality and viability of centres. Where planning permission is required, the council may apply conditions, such as restrictions on opening hours to safeguard the amenity of neighbouring occupiers.

Primary Shopping Areas

Introduction

11.72 The NPPF continues to indicate that the first preference for retail and other town centre uses should be Primary Shopping Areas (PSA) for retail uses and the town centre boundary for other town centre uses.

11.73 Primary Shopping Areas (PSAs) represent the vibrant heart of a town centre, where retail activity is most concentrated and footfall is highest. These areas typically include the core frontages where a high proportion of shops, services, and food and drink uses are located, forming the commercial backbone of a town. The ability to focus new retail uses within the PSA, rather than the wider town centre area, has however become more difficult with the introduction of the new Class E, which allows free movement to and from retail use and other town centre uses.

11.74 The need for separate town centre and primary shopping area boundaries has been considered in preparing the Local Plan. It is considered that a PSA is only appropriate for Tonbridge town centre which has significant leisure assets but not for the district and local centres. This is considered sufficient for sequential test purposes.

11.75 As Tonbridge continues to evolve, the PSA will remain central to efforts to enhance the town centre experience, attract investment, and ensure that the town remains a thriving and inclusive place for all. Where planning permission is required, it will help to resist inappropriate changes of use that could undermine the retail function of the town centre.

Policy E6: Primary Shopping Areas

- 1** To ensure that Tonbridge continues to meet the shopping needs of the community, proposals for development within the primary shopping area, as defined on the Policies Map, will be supported and encouraged where:
 - a** They improve the quality and mix of uses within Class E to enhance the role of the town centre and their vitality, viability and street-level vibrancy;
 - b** They provide a complimentary town centre function (for non-E class uses);
 - c** They seek to retain and enhance the active frontage at ground floor level contributing to the character and function of the town centre and public realm; and
 - d** They provide a high-quality shop front design and ensure accessibility for all users.
- 2** Uses within the Primary Shopping Area that are considered to detract from the overall shopping function, including those with closed or inactive frontages will not be supported.

Reasoned Justification

11.76 Tonbridge town centre is a key focus for retail, commercial, and community activity within the borough. The designation of a Primary Shopping Area (PSA) provides a clear spatial framework for managing development and investment in the town centre, ensuring that the most active and accessible frontages are protected and enhanced.

11.77 The PSA encompasses the core retail streets, including the High Street and key adjoining frontages, where footfall is highest and where the concentration of shops and services is most significant. This area plays a vital role in supporting the town's economic health, providing essential services, and contributing to the town's identity and sense of place.

11.78 Designating the PSA helps guide planning decisions, manage change, and focus investment in the most active parts of the town centre. It supports the delivery of a vibrant, accessible, and sustainable place that meets the needs of residents, businesses, and visitors alike.

11.79 Town centre boundaries have also been defined for Tonbridge and other identified centres in the hierarchy. These reflect the extent of commercial, leisure and community uses that are currently available. It is acknowledged that the Tonbridge town centre boundary may change in the Regulation 19 Local Plan, to reflect the outcome of ongoing masterplanning work for the regeneration of sites [East of High Street](#).

11.80 This approach aligns with national planning policy, which emphasises the importance of promoting competitive and vibrant town centres and supports the council's wider regeneration and place-making objectives for Tonbridge.

Policy Implementation

11.81 The introduction of Use Class E has increased flexibility for town centre uses, allowing a range of commercial, business, and service activities to operate without the need for planning permission. While this flexibility is welcomed, it also presents challenges in maintaining a strong retail presence and ensuring that ground floor uses contribute positively to the vibrancy and attractiveness of the town centre.

11.82 This Policy seeks to strike a balance between enabling adaptability and protecting the core retail function of the PSA. It supports a mix of Class E uses that generate footfall and maintain active frontages, while allowing for appropriate diversification where it enhances the overall vitality of the area.

11.83 The Policy also recognises the importance of high-quality design, accessibility, and the need to manage change sensitively.

Above Ground Floorspace



Introduction

11.84 Upper floors in town centres represent a valuable and often underused resource. In Tonbridge and Malling, many buildings within the borough's centres, particularly in Tonbridge and West Malling, feature upper storeys that have the potential to contribute more actively to the vitality, viability, and sustainability of these areas.

11.85 Historically, upper floors have been used for a mix of purposes, including residential accommodation, offices, and storage. However, changing retail patterns and the need to make more efficient use of urban land have highlighted the importance of bringing these spaces back into active use.

11.86 Encouraging the reuse and sensitive adaptation of upper floors can support a more diverse and resilient town centre economy. It can also contribute to housing delivery, provide opportunities for small businesses and co-working spaces, and enhance the overall character and safety of town centres by increasing activity and natural surveillance.

11.87 This Policy sets out the council's approach to managing development proposals involving upper floors, ensuring that they are well-integrated, accessible, and contribute positively to the function and appearance of defined centres.

Policy E7: Above Ground Floorspace

- 1** Proposals for upper floor uses within the defined town centre boundaries that contribute to the centre's vitality, viability and sustainability, including residential uses, commercial uses, co-working spaces, cultural uses or community facilities will be supported where:
 - a** The redevelopment of upper floors does not result in the loss of ancillary storage space or other beneficial uses to the extent that it would make a ground floor unit unviable;
 - b** The redevelopment would not result in the loss of residential or employment floorspace, unless the use is located in the primary shopping area and is for a Class E use;
 - c** The proposal makes efficient use of space and contributes to the overall mix of uses;
 - d** The proposal provides a separate and adequate access to the upper floor(s) ensuring that any new entrance or use does not affect the character and appearance of the building, the public realm, or the functionality or character of the town centre;
 - e** The use does not affect or adversely exacerbate the properties existing servicing arrangements, parking or result in adverse traffic impacts;
 - f** The upper floors have sufficient refuse storage and collection space and cycle storage space, where this is possible.
- 2** Where upper floors are located within conservation areas or involve heritage assets, proposals must preserve or enhance the significance of those assets and comply with relevant heritage policies.

Reasoned Justification

11.88 Town centres are diverse, combining both commercial and residential functions and upper floors within town centres represent a significant opportunity to support sustainable development, enhance town centre vitality, and make more efficient use of existing buildings.

11.89 Where vacant units exist above ground floor commercial premises, these present an ideal opportunity to contribute positively to the local economy and community. Encouraging the reuse of above-ground floorspace aligns with national planning policy objectives to promote mixed-use development, increase housing supply in accessible locations, and support the diversification of town centres.

11.90 Residential uses on upper floors can help increase footfall, improve natural surveillance, and support evening and weekend activity, while office, co-working, and community uses can contribute to daytime vibrancy and employment opportunities.

11.91 This policy supports the sensitive conversion and reuse of upper floors for appropriate uses, including those within Use Class E and residential accommodation, provided they do not compromise the function of ground floor commercial premises. It also promotes good design, accessibility, and integration with the surrounding built environment, particularly in conservation areas and heritage settings.

11.92 By enabling a broader mix of uses above ground level, the policy contributes to the council's wider objectives for regeneration, housing delivery, and town centre resilience, while helping to reduce vacancy rates and support the long-term sustainability of town centres across the borough.

Policy Implementation

11.93 Planning applications involving the change of use, conversion, or redevelopment of upper floors within town centres will be assessed against this policy. Proposals should demonstrate how they contribute to the vitality of the centre, maintain or enhance the function of ground floor uses, and provide safe, accessible, and high-quality accommodation or workspace.



Sequential and Local Impact Tests

Introduction

11.94 Town centres play a vital role in the economic, social, and cultural life of the borough. To maintain their vitality and viability, it is essential that new development is directed to the most sustainable and appropriate locations. National planning policy promotes a 'town centre first' approach, requiring that proposals for main town centre uses are located within defined centres wherever possible.

11.95 This Policy sets out the local application of the sequential and impact tests for proposals involving retail, leisure, and other town centre uses. It ensures that development outside of defined centres is only permitted where no suitable sites are available within or on the edge of centres, and where it can be demonstrated that there will be no significant adverse impact on existing centres. The Policy also introduces a locally defined impact threshold to reflect the scale and character of the borough's centres and to provide a proportionate level of scrutiny for developments likely to affect them.

Policy E8: Sequential and Local Impact Tests

- 1** In accordance with the NPPF, main town centre uses should be located in the defined town centres. Where main town centre uses are proposed elsewhere then the sequential approach will be applied where applicants must be able to demonstrate, with a robust justification, that sites firstly within town centres and then secondly on the edge of town centres are not available.
- 2** Where the sequential approach is met, then main town centre uses will need to be located in accessible and sustainable locations which are well connected to the nearest town centre.
- 3** Opportunities to utilise town centre or edge of centre sites should be fully explored, including a satisfactory area of search, before considering sites elsewhere. This will need to be demonstrated including considering flexibility on issues such as format and scale.
- 4** Outside designated Tonbridge primary shopping area and other town centre boundaries, applications for retail and leisure uses, or retail and leisure uses combined, will be required to submit an impact assessment where the development is for 400sqm or more (gross external area) of retail or leisure floorspace. This includes combined floorspace across different phases of development and mixed-use developments.
- 5** The impact assessment should be proportionate to the size of the development being proposed and must sufficiently demonstrate that the proposal will not have an adverse effect on any town centre within the borough or in surrounding areas, either on its own or cumulatively.

Reasoned Justification

11.96 The purpose of Policy E9 is to support the long-term health and sustainability of the borough's town, district, and local centres by ensuring that new development is appropriately located and does not undermine the role of existing centres. The Policy reflects national planning policy, which promotes a 'town centre first' approach to the location of retail, leisure, and other main town centre uses.

11.97 The sequential test is a key tool in directing development to the most sustainable locations. It ensures that proposals for main town centre uses are only permitted in edge-of-centre or out-of-centre locations where no suitable sites are available within defined centres. This approach helps to consolidate investment in existing centres, supports their regeneration, and reduces the need to travel by car.

11.98 The Policy also introduces a locally defined impact threshold of 400 sqm gross for retail and leisure development outside or on the edge of defined centres. This lower threshold, recommended by the Retail and Town Centres Needs Study, reflects the scale and character of the borough's centres and the potential for even modest developments to divert trade and impact centre vitality. The threshold applies to individual proposals as well as cumulative floorspace across phases or within mixed-use schemes.

11.99 By requiring proportionate impact assessments and applying planning conditions where necessary, the policy provides a robust framework for assessing the potential effects of development on town centres. This ensures that growth is managed in a way that supports the borough's spatial strategy and protects the role of its centres as accessible, vibrant, and inclusive places.

Policy Implementation

11.100 This Policy will be applied to all applications for town centre uses which are proposed on sites situated outside of defined centre boundaries.

11.101 Policy E9 will ensure that proposals for main town centre uses are directed to the most appropriate locations in line with the sequential and impact tests. Applicants will be required to demonstrate compliance with the sequential test by providing evidence that no suitable sites are available within or on the edge of defined centres, including consideration of site flexibility in terms of format and scale.

11.102 In rural areas, the sequential test will be applied proportionately. While the NPPF excludes small-scale rural offices and other small-scale rural development from

the sequential test, it does not define “small-scale” in terms of floorspace. Therefore, the council will consider such applications on a case-by-case basis. In line with the locally defined impact threshold, proposals below 400 sqm gross floorspace will generally be considered small-scale for the purposes of the sequential test.

11.103 For proposals outside defined centres, the council will require impact assessments for retail and leisure developments exceeding 400 sqm gross floorspace, including cumulative floorspace across phases or within mixed-use schemes. For other town centre uses, the threshold for impact assessments will be 2,500 sqm gross. These assessments must be proportionate to the scale of development and should be agreed with planning officers during the pre-application process. As a minimum, assessments must address:

- The impact on existing, committed, and planned public and private investment in centres within the proposal’s catchment area.
- The impact on the vitality and viability of defined centres, including consumer choice and trade in the town centre and wider retail catchment.

11.104 Planning conditions and legal agreements may be used to manage the mix of uses and prevent future changes that could undermine town centres. This is particularly relevant in light of the introduction of Use Class E, which allows retail uses to occupy non-retail premises without requiring planning permission. Where planning consent is required and there is potential for retail use to impact the health of Tonbridge or other centres, the council may apply conditions to restrict the use accordingly.

11.105 Planning conditions and legal agreements may be used to manage the mix of uses and prevent future changes that could undermine town centres. The council will also monitor the effectiveness of the policy through planning application data, retail health checks, and town centre performance indicators, and will review thresholds and criteria as necessary in response to changing market conditions and national policy updates.