

Supporting Sustainable Economic Growth - Questions 81 - 90

Summary of Regulation 18 consultation responses (March 2026)

Question 81: Do you agree with Policy E1 (Supporting a Prosperous, Inclusive and Sustainable Economic Future)?

Total Number of responses received: 25					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
1	13	1	2	2	6

The majority of respondents that commented on Policy E1 were either developers or agents with the remainder being residents and statutory consultees. Overall, the Policy was supported.

Summary of issues raised

Those respondents that supported Policy E1 indicated that they lived in the borough. Those that commented, indicated:

- support for the approach to protecting and retaining existing employment floorspace, supporting proposals for new good quality and flexible employment floorspace, and other criteria set out under this policy.
- support a policy to protect and retain existing employment floorspace but would like to see much stronger policies against the conversion of employment floorspace to residential accommodation.
- Green Belt protection is essential and that Green belt land should be protected at all costs.
- reference to quality Traditional Design Codes.

The 'neutral' response was in relation to concern about national fiscal policy impacting on the delivery of the Plan's economic aims. In other words, how national budget decisions may undermine or restrict the ability for Plan implementation.

A number of concerns were raised by respondents that did not support the policy, relating to:

- Agree with the focus on green economy, encouraging start-ups and locating employment close to housing.
- Concern that proposed employment locations contradict evidence and policy aims - specific employment site proposals—particularly Little Postern Farm—do not align with Policy E1's own criteria, such as market demand, infrastructure capacity, and proximity to housing.

- The perceived inconsistency in Green Belt approach and employment allocations. More specifically, a view that sites within the Green Belt (e.g., Little Postern Farm) are being allocated for employment despite E1 emphasising sustainable and evidence-based locational choices. Meanwhile, other non-allocated sites closer to existing infrastructure and housing, but also within the Green Belt, have been rejected.
- Suggest figure 11.1 is included as part of theme 2.
- disproportionate investment focus on Tonbridge: concentrating investment in Tonbridge is disproportionate to the current plans for allocation of housing in other areas of the borough. Investment should be made where the additional housing is planned. If Tonbridge want the investment, it should accept the majority of the housing allocation.

Respondents who provided a neutral sentiment response submitted a number of comments which indicate further support for the policy approach. These are summarised as:

- support for the principle of economic growth and a prosperous local economy.
- we welcome the inclusion of the criterion that recognises the vital role of the green economy. This policy could be strengthened by maximising opportunities to enhance green infrastructure and tree-planting on employment sites.
- support draft policy E1 and note that the policy, amongst other matters, seeks to support economic development proposals to improve or upgrade the quality of employment premises / floorspace including through redevelopment, conversion, refurbishment, intensification or reconfiguration. Comment in relation to a site, that its development proposals will assist in meeting this key objective through the redevelopment of a brownfield site which will provide modern employment accommodation and sensitive intensification in the use of the Site with significant new employment opportunities to support economic growth in the Borough.
- supports the principle of promoting a prosperous, inclusive and sustainable local economy in Policy E1. However, the strong focus on the retention and expansion of employment floorspace, alongside detailed requirements relating to market demand, infrastructure capacity and locational criteria, would benefit from greater flexibility to ensure that proposals can respond effectively to changing economic conditions and evolving market demand.
- Within Policy E1, greater flexibility should be afforded to promote and deliver employment uses on appropriate windfall sites, including within mixed use and residential led schemes, where proposals would still contribute positively to local economic objectives.

Summary of feedback from Statutory Consultees

- **Natural England** supports the policy, welcoming the inclusion of criterion 1h that recognises the vital role of the green economy. The Dasgupta Review emphasises the important role that nature recovery plays in underpinning economic and social wellbeing. This policy could be strengthened by maximising opportunities to enhance green infrastructure and tree-planting on employment sites.

Summary of feedback from District / Boroughs

- **Tunbridge Wells Borough Council** supports the approach to protecting and retaining existing employment floorspace, supporting proposals for new good quality and flexible employment floorspace, and other criteria set out under this policy.

Summary of feedback from Parish Councils

- **West Malling Parish Council** noted that West Malling has suffered a significant decline in employment floorspace with a continued trend towards converting smaller office spaces to residential use. This has a detrimental impact on the ability of business startups and small and medium sized enterprises to find suitable and affordable office accommodation without moving away from the town. The Parish Council support a policy to protect and retain existing employment floorspace but would like to see much stronger policies against the conversion of employment floorspace to residential accommodation. This ensures that the parish remains a viable location to both live and work, reducing commuting times and ensuring a viable business community.

Summary of feedback from Other Organisations

- **Royal British Veterans Enterprise** supports the principle of promoting a prosperous, inclusive and sustainable local economy in Policy E1. However, the strong focus on the retention and expansion of employment floorspace, alongside detailed requirements relating to market demand, infrastructure capacity and locational criteria, would benefit from greater flexibility to ensure that proposals can respond effectively to changing economic conditions and evolving market demand.

Within Policy E1, greater flexibility should be afforded to promote and deliver employment uses on appropriate windfall sites, including within mixed use and residential led schemes, where proposals would still contribute positively to local economic objectives.

- **The Corporation of Hadlow College and The Corporation of West Kent and Ashford College** support the approach towards economic growth and development and development at the Site would achieve the Council’s policy aims.

Officer response to the consultation feedback

The Council remains committed to delivering a prosperous, inclusive and sustainable local economy, and the consultation has provided valuable insights into how Policy E1 can be strengthened.

Responses suggested a number of wording changes to Policy E1 to:

- Strengthen E1 on green infrastructure and trees on employment sites.
- Tighten E1 against conversion of employment floorspace to residential.
- Increase flexibility in E1 for windfall, mixed-use and residential-led schemes.

No respondent provided any explicit proposed wording change to the supporting text of Policy E1. However, five areas of supporting-text amendments emerged, all relating to:

- strengthening green-economy narrative;
- explaining flexibility in applying locational/market-demand tests;
- justifying stronger protection of employment floorspace;
- clarifying the relationship between E1 and Green Belt constraints; and
- improving clarity and usability of explanatory text.

Updates to the policy and supporting text will be incorporated into the Regulation 19 Local Plan, ensuring that employment provision is robust, flexible, environmentally responsible and aligned with Borough-wide needs. The update will consider the following:

- Increased protection and retention of employment floorspace relating to the ongoing loss of small and affordable office space to residential uses.
- Enhancing the policy’s commitment to the green economy and climate resilience.
- Need for greater flexibility in applying E1 to respond to market change - greater flexibility, especially for windfall sites and mixed-use or residential-led schemes capable of delivering employment benefits.
- Concerns relating to spatial equity and infrastructure considerations.
- Clarification and accessibility of supporting text relating to Figure 11.1.

Question 82: Do you agree with Policy E2 (Strategic Employment Areas)?

Total Number of responses received: 24					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
1	11	3	3	1	5

The majority of respondents that commented on Policy E2 were either developers or agents with the remainder being residents and statutory consultees. Overall, the Policy was supported.

Summary of issues raised

12 respondents supported the Policy. Comments included:

- explicit support for the general thrust of Policy E2, pointing to the TMBC Economy Study 2025 as the evidence base for identifying Strategic Employment Areas.
- although out of scope under this question, there was also support for meeting identified retail needs and for the approaches set out in Policies E5-E9.
- Reference to Quality Traditional Design Codes.

Of those respondents who provided a neutral sentiment answer, a number of concerns were highlighted by 1 respondent:

- support for Strategic Employment Areas in principle, but concern for impacts on smaller business centres.
- support the designation of Kings Hill Business Park as a Strategic a Strategic Employment Area, but this should not come at the detriment of smaller business centres, such as West Malling. Section 3b should be strengthened accordingly.

Of those respondents that did raise concerns, the following key issues emerged:

- Comments in relation to Kings Hill:
 - this area is currently dominated by large office spaces, yet there is significant potential for repurposing these for alternative employment uses.
 - there has already been substantial loss of protected employment land to housing, including the KCC distribution centre.
 - the Local Plan does not account for this loss; any reduction should be offset by equivalent provision elsewhere.
 - further erosion of employment land at Kings Hill is fundamentally altering the character of the development, moving it far from its original design.
- Policy E2 over-prioritises logistics and industrial uses across the borough:

- the Economic Update recommends logistics growth mainly in the M20/M2/A228 corridor, yet Policy E2 applies logistics policy pressure borough-wide;
- the Plan allocates six times more B2/B8 land than recommended by the evidence.
- object to the use of Green Belt / Grey Belt for employment development. The concept of Grey Belt is misleading, as the sites are effectively still Green Belt.
 - no exceptional circumstances have been demonstrated to justify releasing Green Belt for Policy E2 allocations;
 - if demand for industrial land outside the M20/M2 corridor is weak, Green Belt should not be developed at all.
- concern that the policy enables loss of employment land - allowing employment land to be re-purposed for non-employment uses subject to a 12-month marketing test.
- preference for alternative locations and planning strategies:
 - new industrial development should be located near the A21, where it would better align with transport links and minimise local impacts.
 - growth in Tonbridge would be more sustainable if directed to locations that support cycling routes, existing residential areas, and reduced congestion.

Those respondents who did not provide an answer to the sentiment question, also submitted a number of varied comments:

- support for policy E2 especially flexibility in employment uses – recognising that allowing E(g), B2 and B8 uses provides necessary flexibility but that the policy should avoid prescribing specific use-class splits unless justified by local constraints (e.g., B2 uses near residential areas).
- Requests for greater flexibility to accommodate emerging employment sectors - Policy E2 is too narrow in focusing mainly on traditional employment categories and there is a need to recognise specialist employment-generating uses, including sui generis and enabling rapid economic adaptation to new market conditions.
- support for retaining and accurately reflecting existing employment allocations (Wrotham Heath Industrial Area / Invicta Business Park / Panattoni Park with a request that Policy E2 explicitly include B8 uses where they already exist or are being proposed, to ensure the Local Plan reflects the true operational use of these sites.
- Objections to Green Belt designation and calls for removal of sites from the Green Belt.

- Concern that policy wording may unintentionally limit flexibility - the policy needs to enable non-traditional and emerging uses, not only B2, B8, or E(g).

Summary of feedback from Statutory Consultees

None received.

Summary of feedback from District / Boroughs

- **Tunbridge Wells Borough Council** supports the general thrust of this policy and notes that the TMBC Economy Study 2025 provides the evidence base for identifying the Strategic Employment Areas. TWBC notes the identified retail floorspace need of 18,250 sqm and supports the approach to meeting this need set out in policies E5: Supporting the Vitality of Town, Service and Local Centres, E6: Primary Shopping Areas, E7: Above Ground Floorspace, and E8: Sequential and Local Impact Tests. Note that Policy E8 introduces a locally defined impact threshold of 400 sqm gross for retail and leisure development outside or on the edge of defined centres, based on the outcomes of TMBC's Retail and Town Centres Needs Study.

Summary of feedback from Parish Councils

- **West Malling Parish Council** recorded a neutral response to Question 82. The Parish supports the designation of Kings Hill Business Park as a strategic employment area, but comments that it must not be to the detriment of smaller business centres. Locations such as Kings Hill benefit larger enterprises, but do not cater for the vast majority of small businesses that require smaller, more contained sites. A focus on Strategic Employment Areas, without an acknowledgement of the harm they can cause to neighbouring business centres such as West Malling is damaging. WMPC would welcome section 3b to be strengthened accordingly.

Summary of feedback from Other Organisations

- **Royal British Veterans Enterprise** - Policy E2 is supported in principle, subject to addressing a (likely unintentional) lack of flexibility. While it is sound that the policy seeks to promote employment sites to strengthen the economy, it does not currently enable flexible and rapid responses to changing economic circumstances. Not all employment generating uses fall within traditional categories of B2, B8 and E(g) uses. Some specialist employment generating uses (e.g. sui generis uses) provide significant benefits to the economy. The policy should introduce greater flexibility to meet both traditional and emerging sectors and to ensure that equally acceptable uses that generate significant employment benefits can come forward, to ensure compliance with the NPPF.

Officer response to the consultation feedback

A number of key issues have emerged, demonstrating both broad support for the principle of identifying and protecting Strategic Employment Areas, and also raised concerns about specific wording, supporting text, and the balance of employment uses across the borough.

As part of the preparation for the Regulation 19 consultation document, a review of Policy E2 together with a focussed review of the evidence base will be undertaken. The following will be considered as part of a review:

- greater flexibility in acceptable employment uses;
- alignment with the evidence base for logistics and industrial land;
- strengthen protections for smaller business centres;
- consider matters as relevant to the Green Belt;
- clarify the approach to employment land retention and marketing tests;
- ensure the policy continues to support sustainable, well-located economic growth consistent with the Local Plan strategy.

Question 83 Do you agree with Policy E3 - Other Employment Sites, Premises and Floorspace?

Total Number of responses received: 19					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
1	10	3	2	2	1

The majority of respondents supported Policy E3 with the highest number of responses originating from developers/agents.

Summary of issues raised

Those who supported Policy E3 commented on the Policy's aim to protect existing employment land, offices and commercial floorspace. Specific comments included:

- policy support if road access infrastructure also is improved. Lower Thames Crossing LTC directs traffic towards A2, M2, A229 and M20. Routes 13 and 16 are currently classed as traffic congestion black-spots, A229 improvement scheme is essential before the LTC project commences.
- support for safeguarding employment space.

- concerns about uncontrolled permitted development rights (PDR) - support the call for Article 4 Directions to withdraw PDR in vulnerable areas.
- recognition of changing work patterns and need for small office spaces.
- support for flexibility in employment space.
- reference to Quality Traditional Design Codes.

3 respondents provided a neutral response and generally raised issues, uncertainties, or conditional points. For example:

- uncertainty about economic direction and policy fit - unsure if the approach taken in Policy E3 reflects current or emerging economic trends.

Only 4 respondents did not support Policy E3. Concerns that were raised included:

- Respondents raised concerns that the proposed policy effectively enables the loss of designated employment land to other uses and that rather than facilitating the release of employment sites. The Council should prioritise more efficient and intensive use of existing employment areas. Examples provided include mixed-use development above retail premises and opportunities to redevelop under-utilised areas such as parts of Postern Trading Estate.
- It was suggested that allowing the conversion of employment land after an 18-month marketing period indicates a lack of confidence in the employment land evidence base. Specifically, it was felt that this undermines the justification for allocating 83.2 ha of additional employment land, particularly in the context of proposed releases of Green Belt land.
- A consistency issue was also highlighted: page 270, paragraph 11.43 refers to an 18-month marketing period, while Policy E3 (6a) specifies 12 months. Respondents requested alignment of these requirements.
- A strong concern was expressed about the release of Green Belt land for development. Respondents emphasised the importance of protecting the Green Belt and objected to the concept of Grey Belt, stating that such land should remain protected and should not be treated as brownfield.

The single respondent who did not answer the sentiment question, raised a number of additional points:

- Policy E3 is broadly supported in seeking to safeguard viable employment uses and sites.
- greater flexibility is required to reflect the changing market conditions and future business requirements, particularly on sites where full retention of employment floorspace may not be optimal or realistic for future development.

- there should be flexibility to ensure employment generating uses which that do not fall within traditional categories of B2, B8 and E(g) uses can be promoted and accommodated within TMBC.
- welcome Part 4 of Policy E3 which appropriately recognises the role of partial loss and cross-subsidy in securing long-term viability of employment uses, and this approach should be applied pragmatically to enable high-quality, mixed-use redevelopment that delivers economic benefits alongside other uses.

Summary of feedback from Statutory Consultees

None received.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

- **West Malling Parish Council** supports Policy E3 and notes that West Malling has suffered significantly as a result of the changes to the GPDO and therefore welcomes policies that protect smaller office floorspace in the town. Notes that a reduction in office accommodation does not just affect those businesses, however, and a vibrant healthy retail and entertainment offering in a town relies as much on office worker lunchtime trade as that of residents at other times.

Although the pandemic changed a number of business patterns, there is a significant hidden economy of home-based workers. The demand from them for suitable office accommodation away from the home environment is not well researched but should not be overlooked when setting policies to promote and retain smaller premises.

Summary of feedback from Other Organisations

- **Royal British Veterans Enterprise** - Policy E3 is broadly supported in seeking to safeguard viable employment uses and sites. However, greater flexibility is required to reflect the changing market conditions and future business requirements, particularly on sites where full retention of employment floorspace may not be optimal or realistic for future development. In addition as indicated above there should be flexibility to ensure employment generating uses which that do not fall within traditional categories of B2, B8 and E(g) uses can be promoted and accommodated within TMBC.

RBVE welcomes Part 4 of Policy E3 which appropriately recognises the role of partial loss and cross-subsidy in securing long-term viability of employment

uses, and this approach should be applied pragmatically to enable high-quality, mixed-use redevelopment that delivers economic benefits alongside other uses.

Officer response to the consultation feedback

Based on consultation feedback, a number of changes will be considered for incorporation into the Regulation 19 consultation document:

- strengthening protection of employment floorspace;
- consider the marketing period;
- potentially enhancing references to GDPR impacts;
- considering a broader set of employment-generating uses; and
- improving supporting text on justification, flexibility, and infrastructure requirements.

Question 84 Do you agree with Policy E4 (Employment and Skills)?

Total Number of responses received: 20					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
2	9	4	2	1	2

The majority of respondents that commented on Policy E4 were either developers or agents with the remainder being residents and statutory consultees. Overall the Policy was supported.

Summary of issues raised

Respondents who supported Policy E4 made the following comments:

- strongly agree with the proposal to require Employment and Skills Training Plans for larger developments and employers, but there is a significant skills gap more generally in the economy and policies to assist smaller businesses to access this training for their employees or prospective employees is necessary to enable all businesses to contribute.
- Reference to Traditional Quality Design Codes.

Only 4 respondents provided a neutral response. One comment related to a request to clarify whether the policy wording needs to say ‘should’ versus ‘must’. Another comment related to Green Belt concerns - and opposition to the concept of Grey Belt, despite this issue not being connected to Policy E4’s skills and employment focus.

Respondents that did not support Policy E4 commented that:

- little evidence that the Plan has paid attention to Policy E4. If employment sites are required for housing of 20 units or more then the Plan should be proposing mixed use sites yet in Tonbridge housing is using Green Belt on the edge of the Town and the industrial development is on the other side of the Town as far away from the new housing as possible. This suggests that the housing and employment proposals have not been joined up with the consequential adverse impact on infrastructure.
- this policy could create operational challenges and should be integrated into infrastructure planning.

Respondents who did not state their sentiment commented:

- support the inclusion of a policy on employment and skills within the draft Local Plan. Panattoni, proactively seek to ensure that their developments prioritise training and job opportunities for local people and businesses in communities close to their developments.
- welcome the requirement for any proposals greater than 1,000 sqm to be accompanied by an Employment and Skills Training Plan to demonstrate how the proposal will contribute to employing, educating and training local people.

Summary of feedback from Statutory Consultees

None received.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

- **West Malling Parish Council** strongly supports the with the proposal to require Employment and Skills Training Plans for larger developments and employers, but notes that there is a significant skills gap more generally in the economy and policies to assist smaller businesses to access this training for their employees or prospective employees is necessary to enable all businesses to contribute.

Officer response to the consultation feedback

In order to ensure Policy E4 is clear, robust, and effectively supports the Council's objectives for inclusive, sustainable economic growth, the Policy and supporting text will be reviewed to clarify how skills and training plans will be implemented, and to reflect the skills needs of small and medium enterprises and ensure training opportunities benefit the wider business community. Further, the Policy and supporting text will be reviewed to improve alignment between Policy E4 and other parts of the Local Plan, including spatial strategy considerations and guidance on mixed-use and place-making opportunities, where appropriate.

Question 85 Do you agree with Policy E5 (Supporting the vitality of Town, Service and Local Centres)?

Total Number of responses received: 20					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
2	14	1	0	0	3

There was overwhelming support for Policy E5. The highest number of respondents that commented on the Policy were residents.

Summary of issues raised

Of those respondents who supported Policy E5, support was evident on a number of issues:

- strongly support the policies set out to ensure that retail and entertainment uses are promoted and proposed developments retain those uses.
- it is essential that service and office business accommodation is also protected to maintain a healthy customer base for retail and entertainment businesses during the working day.
- agree with this policy, specifically the aim of “maintaining and enhancing the centres vitality and viability by ... the overall balance, mix and diverse offer of town centres uses”.
- some retail and service space could be lost, e.g. to residential use, under PDR. These changes to a non-Class E use are currently permitted without requiring a planning application and so this Policy would not be applied in these situations. To safe-guard retail/service spaces and the related jobs - advocate that Article 4 Directions (under the GPDO) should be sought to withdraw retail to residential permitted development, for the town centre area. This would enable these policies (E5 and E8) to be applied, helping to prevent a loss of retail floor-space and employment, ensuring the vitality/viability of town centres.
- the aerial photograph of the Angel shopping centre shows poor pedestrian connectivity and junction design that disadvantages pedestrians and cyclists – it is an example of a retail facility but not a good one.
- in many high street settings it will be impossible to contribute to urban greening.
- Promoting Tonbridge vitality - suggest encouraging landlords to use non ground floor space for quality housing through easy planning procedures.
- if a night economy is planned, dropping car parking charges in Tonbridge would encourage footfall and encouraging cafes to open beyond 4pm – reduced rate increases?

- allowing parking (in Tonbridge) along the road on one side in North High Street would help and a better pedestrian crossing arrangements at the roundabout at the station end of the High Street, at the top of Bordyke and a zebra crossing on Bordyke to East Street and pavement on both sides of Bordyke all the way up.
- Green Belt protection is essential. Green belt land should be protected at all costs.
- reference to Quality Traditional Design Codes.

The single respondent who did not answer the sentiment question, commented that it was not clear how these objectives will be met in the face of high business rates/rents in and around Kings Hill.

Those respondents who did not respond to the sentiment question commented:

- support the inclusion of criterion 3e but advise that it should be amended to “including linking to green and blue infrastructure network ...”
- Support for a thriving, walkable town centre
 - concentrating new homes in the town centre directly strengthens local businesses, increasing the number of residents who walk to shops, services and leisure rather than driving in from distant estates.
 - public consultation shows strong support for well-designed mixed-use regeneration, particularly improvements to the riverside and public realm, which is a signal that residents view town-centre development as a benefit, not a threat.
- TMBC must demonstrate commitment to this policy, as recent decisions appear inconsistent with its principles.

Summary of feedback from Statutory Consultees

- **Natural England** supports Policy E5 and supports the inclusion of criterion 3e but advise that it should be amended to “including linking to green and blue infrastructure network ...”

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

- **West Malling Parish Council** supports the approach and welcomes the acknowledgement that West Malling plays a significant role within the Borough as a District Centre. Strongly support the policies set out to ensure that retail and entertainment uses are promoted and proposed developments retain those uses. However, as set out in our responses to Policies E1 and E3, it is essential that service and office business accommodation is also protected to maintain a

healthy customer base for retail and entertainment businesses during the working day.

Officer response to the consultation feedback

Overall, the consultation feedback demonstrates strong recognition of the importance of safeguarding the vitality and viability of town, service and local centres across the borough. Respondents highlighted the need to maintain a diverse mix of uses, protect key commercial functions, and ensure that centres remain accessible, attractive and economically resilient. A review of the policy and supporting text will be needed as part of the drafting of the Regulation 19 consultation document. This is likely to include further consideration of the following:

- reviewing the policy wording to incorporate the suggested amendment relating to green and blue infrastructure networks;
- strengthening supporting text regarding:
 - the importance of safeguarding commercial floorspace,
 - the role of public realm and active travel in centre vitality,
 - the relationship between Policy E5 and other tools (e.g., Article 4 Directions).
- ensuring alignment between Policy E5 and the town centre evidence base to enhance clarity and deliverability.
- continuing to monitor the effects of PDR and local market conditions to inform future iterations of the policy.

Question 86: Do you agree with Policy E6 (Primary Shopping Areas)?

Total Number of responses received: 15					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
1	9	4	0	0	1

There was majority support for Policy E6. Similar to Policy E5, the highest number of respondents that commented on the Policy were residents.

Summary of issues raised

Those that supported Policy E6 commented:

- reference to Quality Traditional Design Codes.

Neutral responses to the question reflect a number of matters:

- Green Belt protection is essential. Green belt land should be protected at all costs.
- uncertainty about the direction or impact of the policy;

No negative comments to Policy E6 were received and no wording amendments were proposed to the Policy or the supporting text. 1 respondent noted that the Policy only seemed to apply to Tonbridge.

Summary of feedback from Statutory Consultees

None received.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

- **West Malling Parish Council** noted that this (policy) only applies to Tonbridge.

Officer response to the consultation feedback

Consultation feedback indicates that Policy E6 continues to provide a robust and appropriate framework for managing Primary Shopping Areas in the borough. Overall, the consultation responses demonstrate broad support for the approach set out in Policy E6, with a significant proportion of respondents marking themselves as *Satisfied* or *Happy*. Very few concerns were raised directly about the policy wording or its objectives. Where comments were made, they were mostly high-level or related to wider planning matters outside the scope of Policy E6. The policy's emphasis on vitality, active frontages, town-centre-first principles, and balanced uses appears to align well with stakeholder expectations.

To improve clarity and transparency, officers will consider a minor addition to the supporting text explaining:

- why only Tonbridge has a defined Primary Shopping Area
- how this aligns with the borough's retail hierarchy and the Retail & Town Centres Needs Study

This would address the observation that the policy "applies only to Tonbridge" and help ensure public understanding.

Question 87: Do you agree with Policy E7 (Above Ground Floorspace)?

Total Number of responses received: 16					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
1	10	4	1	0	0

The majority of respondents (11) supported Policy E7. This support mainly originated from residents.

Summary of issues raised

Whilst the majority of all respondents supported Policy E7 only one who responded provided a comment:

- reference to Quality Traditional Design codes.

‘Neutral’ responses generally indicated conditional support, but felt the policy:

- welcomes the policy to bring upper floors back into use, unable to support the conversion of such spaces to residential usage in West Malling, given the lack of suitable office accommodation for small businesses as set out in our responses to the policies elsewhere.
- concern was also expressed about Green Belt - the importance of protecting Green Belt land, arguing that grey belt should not be used as a concept and that Green Belt protection should be absolute.

Only 1 response was recorded as dissatisfied with Policy E7:

- this policy should apply across the entire borough, not solely Tonbridge.

Those respondents that indicated either no support for the Policy or dissatisfaction did not elaborate on any reasoning.

Summary of feedback from Statutory Consultees

None received.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

- **West Malling Parish Council** welcomes the policy to bring upper floors back into use, but unable to support the conversion of such spaces to residential

usage in West Malling, given the lack of suitable office accommodation for small businesses as set out in our responses to the polices elsewhere.

Officer response to the consultation feedback

In light of the consultation feedback, the following responses and actions will be considered as part of the drafting of the Regulation 19 Consultation document:

- a) review widening the geographic applicability of Policy E7 beyond Tonbridge, potentially applying it to all designated centres;
- b) introduce safeguards to prevent the unnecessary loss of upper-floor employment space, particularly in centres like West Malling;
- c) clarify supporting text to reference design quality requirements, ensuring upper-floor conversions contribute positively to townscape and character;
- d) strengthen explanation of how E7 integrates with policies on employment land, vitality of centres, and the local design code.

Question 88: Do you agree with Policy E8 (Sequential and Local Impact Tests)?

Total Number of responses received: 22					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
3	9	3	1	0	6

The majority of respondents (12) supported Policy E8 (Sequential and Local Impact Tests). Most responses originated from residents.

Summary of issues raised

The majority of those that supported the Policy were residents. Comments included:

- it is essential that existing retail centres be maintained and promoted before any other developments are permitted.
- agree with this policy, in particular the introduction of a sequential test.
- the application of this test is crucial to ensure that our vibrant town centres (inc. Tonbridge) remain the focus for retail and other complementary services; where existing vacant town centre units are utilised, before permitting retail development away from the town centre.
- it is important to resist further out-of town retail developments, as these risk hollowing-out our High Street and increasing congestion, where not near public transport (e.g. Cannon Ln has no bus stop and is further from the train station).
- query whether E8.5 should this also refer to adverse impacts on district and local centres as well as town centre.

- Reference to Quality Traditional Design Codes.

Neutral responses did not directly comment on Policy E8, instead 1 respondent referred to Green Belt protection.

The single objection to the Policy commented on the perceived erosion of employment opportunities in Kings Hill, indicating Kings Hill has already suffered significant loss of employment infrastructure.

Of those responses that neither supported or indicated dissatisfaction with the Policy, a range of comments were submitted:

- the NPPF provides requires planning applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, to be accompanied by an impact assessment if the development is over a proportionate, locally set floorspace threshold. If there is no locally set threshold, the default threshold is 2,500m² of gross floorspace.
- the NPPF provides the ability to provide a locally set threshold although indicates that 2,500 sqm is the level where proposed developments may cause an impact on nearby town centres.
- Part (4) of Policy E8 proposes a locally set threshold for impact assessments of just 400 sqm. Object to this on the basis of the threshold being too low; particularly on sites adjoining the principal town centres such as Tonbridge, which will be more resilient to commercial development in terms of diverting trade and resulting in a significant impact.
- advise that a staggered approach to impact assessments is included in the Policy in line with the role of the town centre. This would be a proportionate response and ensure a positively prepared Policy.
- the Sequential Test applies regardless to the scale of the proposal which provides the necessary opportunity for TMBC to consider the impact of any retail proposals on the vitality and viability of the town centre.

Summary of feedback from Statutory Consultees

None received.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

- **West Malling Parish Council** supports Policy E8 believes that it is essential that existing retail centres be maintained and promoted before any other developments are permitted.

Officer response to the consultation feedback

Overall, consultation responses indicated that whilst there is broad support for protecting the vitality and viability of existing town centres, a number of technical concerns were raised, particularly regarding the appropriateness of the proposed 400 sqm threshold, the clarity of the supporting text, and the balance between national and local policy requirements

Based on the consultation responses, officers will update Policy E8 wording to consider a revised threshold or tiered approach; ensure clear cross-reference to district and local centres where justified and strengthen clarity around the Sequential Test and Impact Assessment requirements.

Officers will also consider the updating of the supporting text (paras 6.23.1–6.23.5) to ensure a clear justification for thresholds; and align terminology and explanations more closely with the NPPF and acknowledge centre hierarchy and proportionality.

In drafting the preferred options Policy E8, officers will ensure compliance with soundness tests and confirm that the revised policy is positively prepared, justified and effective. Any revisions to Policy E8 and the supporting text will be included in the Regulation 19 draft Local Plan, accompanied by updated evidence where relevant.

Question 89: Is anything missing from Economy policies?

Total Number of responses received: 15			
No nothing is missing	Not sure	Yes something is missing	Not stated
3	7	5	0

The majority of respondents commenting on Question 89 were residents. The question produced a mixed response in terms of whether the Chapter was complete or whether there were elements missing.

Summary of issues raised

No additional comments were received from respondents who indicated that nothing was missing from the Economy policies.

Only 1 comment was submitted by a respondent who was not sure whether there was anything missing or not:

- Reflections on the impact of internet retail, and what can be done about business rates.

Of those respondents who indicated issues or gaps in the Economy and Town Centre policies chapter, a number of themes emerged:

- Tonbridge - A lack of planning for Tonbridge itself has been undertaken as it has been incorrectly lumped in with the North of the Borough where the Economic study supports these statements. The introductory statement adds “Tonbridge” although the Economic Update offers no evidence to include Tonbridge in the “strong demand for warehousing and logistics”. In fact, Tonbridge has two logistics companies: S & S and Royal Mail as it has very poor links to the M20. “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”.
- Policies should encourage businesses that contribute to local prosperity without excluding smaller enterprises such as dentists, podiatrists, and other essential services.
- Measures should prevent the removal of employment land to artificially inflate property values. Most of the existing offices in Kings Hill are large, and redevelopment of one or two to many smaller offices would significantly improve the economic infrastructure and encourage long-term prosperity.
- Reference to Quality Traditional Design Codes

Summary of feedback from Statutory Consultees

None received.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

- **West Malling Parish Council** - commented that it was satisfied with the Economy and Town Centre policies.

Officer response to the consultation feedback

Overall, the consultation responses have provided valuable insight into how the Economy Chapter can be made clearer, more accurate, and more supportive of local economic needs.

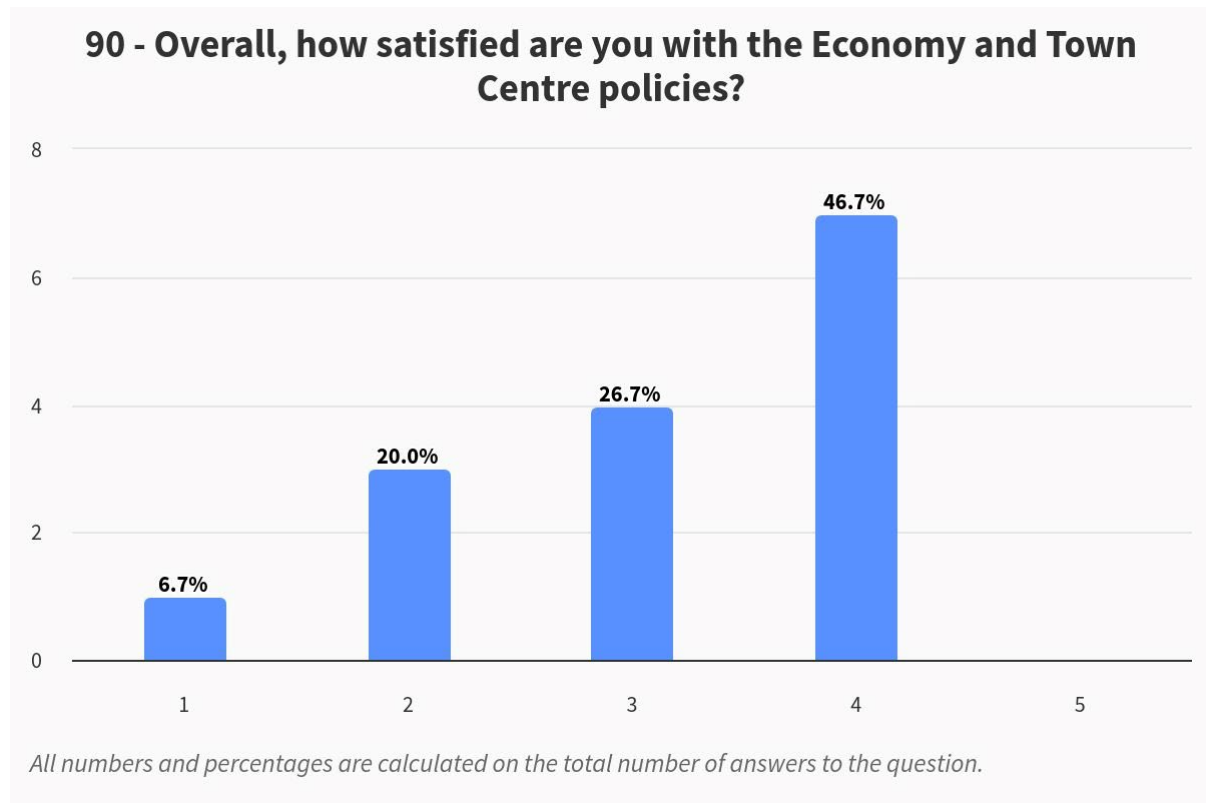
A number of wording amendments proposed through the consultation will be considered as part of the drafting of the Regulation 19 consultation document:

- remove or amend wording that places Tonbridge within areas of “strong demand for warehousing and logistics”
- insert wording that supports small-scale essential businesses

- add wording
 - to prevent redevelopment that removes employment land
 - that encourages subdivision of large office buildings
 - referring to quality traditional design codes and placemaking principles
 - addressing internet retail pressures and business rates

A review of the above proposed changes will ensure that the chapter reflects the evidence base accurately; supports a diverse and resilient economy; recognises the role of small and essential businesses; protects important employment land; responds to contemporary economic challenges; and aligns with placemaking objectives found elsewhere in the Plan.

Question 90: Overall, how satisfied are you with the Economy and Town Centre policies?



Officer response to the consultation feedback

Of the 15 respondents to this specific question, the majority indicated overall satisfaction with the policies. Proposed amendments to individual policies and supporting text have been set out under the question responses (Question 81-Question 89).