Tunbridge Wells Local Plan Regulation 18 Response

In respect of Paddock Wood Garden Centre, Maidstone Road, TN12 6QJ
On behalf of Inter-Leisure Ltd

November 2019
DHA/13976
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1 Local Plan Representation

1.1 Introduction

1.1.1 This representation has been prepared on behalf of Inter-Leisure Ltd in response to the Tunbridge Wells Borough Council ('TWBC') Draft Local Plan Consultation, which runs until an extended deadline of 15th November 2019.

1.1.2 Our client controls Paddock Wood Garden Centre, Maidstone Road (herein ‘the Garden Centre’ or ‘the Site’) and it is their intention to promote it for allocation in the finalised draft of the Local Plan.

1.1.3 The site was not put forward as part of the Call for Sites process, however it is available and adjoins the proposed extension to Paddock Wood (Policy AL/PW1). It therefore represents a logical location to extend the allocation boundary and contribute toward meeting identified development needs. In particular, the associated additional retail needs that will arise from the increased population.

1.1.4 This representation therefore comments on the content of the draft plan, outlines why the site represents a suitable location for growth and how development could be delivered on site.

1.2 The Tunbridge Wells Draft Local Plan

Overview

1.2.1 The TWBC Draft Local Plan (herein referred to as ‘the plan’) sets out the spatial vision, strategic objectives, and overarching development strategy for the borough. It details overarching place shaping policies for each parish and settlement, as well as site specific allocations to deliver the strategy and detailed policies to be applied to all new development.

1.2.2 The plan will set the agenda for development across the borough to 2036 and replace the current Development Plan, which comprises the Local Plan 2006 (saved policies), the Core Strategy 2010, and the Site Allocations Local Plan 2016.

1.2.3 This representation comments on the following elements of the plan:

- Development Strategy and Strategic Policies; and
- Place Shaping Policies for Paddock Wood;

Development Strategy and Strategic Policies

1.2.4 The purpose of the Development Strategy is to outline how much development will be provided to meet the needs of the borough and where such development will be located.

1.2.5 In terms of economic and retail development, the National Planning Policy Framework ('NPPF') states that planning policies should help create the conditions in which businesses can invest expand and adapt. Moreover, planning policies
should set out a clear economic vision and strategy that plans positively, and proactively encourages sustainable economic growth.

1.2.6 The Sevenoaks and Tunbridge Wells Economic Needs Study (‘ENS’) was produced in 2016 to inform the plan and make recommendations for the future provision of employment land (use classes B1, B2, and B8). It recommended that the Council should plan positively to facilitate economic growth by allocating news sites, and identified a need of circa 14 hectares of new employment land to support new opportunities alongside the provision of new housing. Specifically it recommends the extension of existing employment areas, including those around Maidstone Road in Paddock Wood.

1.2.7 Moreover, the retail and leisure needs of the borough have been determined through the Retail and Leisure Study (2017), which identified a need for between 21,700 and 34,000 square metres of additional comparison floorspace and between 7,500 and 9,500 square metres of additional convenience floorspace.

1.2.8 The strategy for meeting identified development needs is consolidated by Policy STR1, which sets out the quantum of development that will be allocated within or around settlements to meet the identified needs over the plan period.

1.2.9 In this respect, the strategy seeks to expand Paddock Wood - following garden settlement principles - to deliver housing and employment growth, new and expanded education facilities and provide strategic flood risk solutions.

1.2.10 A new garden village at Tudeley is also proposed, which would deliver circa 2,500 - 2800 new houses (1,900 homes within the plan period) as well as a package of infrastructure measures. The remaining growth would be dispersed proportionately to settlements in the borough.

1.2.11 We support the overall principle of the strategy and consider that Paddock Wood represents a sustainable location to deliver housing and other development needs, through a comprehensive master-planned approach.

1.2.12 Nonetheless, given Paddock Wood Garden Centre’s geographical location to the proposed allocation boundaries, to exclude it from the masterplan area would have a negative impact upon the long term viability of the site. Instead, it should be included within the Paddock Wood site allocation, identified for intensified or new employment/retail provision.

**Place Shaping Policies**

1.2.13 The place shaping policies establish the spatial priorities for different areas in the borough, organised according to non-parish and parish areas. For each area, there is an overarching policy that development should adhere to and details are provided for individual allocated sites that will deliver the quantum of development proposed. The site specific allocations provide both strategic and development management guidance.

1.2.14 In respect of Paddock Wood, policy STR/PW1 states that provision will be made for circa 4,000 new homes, considerable employment provision and associated uses. This vision shall be developed using a comprehensive master-planned approach.
1.2.15 The site is broken down into 12 development zones, which each have different constraints and opportunities – as identified in Table 4 of the plan.

1.2.16 The Garden Centre is situated between Zone 3 (AL/PW3) and Zone 5 (AL/PWS) (see figure 1 below). For context, Zone 3 is identified for residential use and flood compensation, with additional scope for a neighbourhood centre, mixed uses and/or a primary school. Zone 5 is identified for economic development.

*Figure 1: Location of Paddock Wood Garden Centre in relation to Paddock Wood allocations*

1.2.17 Our clients land was not put forward for as part of the Call for Sites process, so we can only assume that it has been excluded from the allocation area due to uncertainty regarding its availability for development, rather than its lack of suitability for inclusion in the plan. Indeed, should the site remain excluded, there would be an underutilised parcel of previously developed land adjoined by comprehensive redevelopment. It is our view that the land could be put to better
use in meeting identified needs, specifically commercial and/or retail needs to serve a growing population.

1.2.18 Taking the above into account, whilst we do not object to the overall thrust of the place making policies for Paddock Wood, we can now confirm availability of the land and respectfully request that the Council amend the allocation boundary so our clients land is included.

1.2.19 In order to confirm availability, the subsequent sections of this representation provides an overview of the site opportunities and constraints and illustrates how development could be accommodated.

1.3 Site Context

1.3.1 The site is an established and operational retail Garden Centre located on the northern periphery of Paddock Wood (see figure 2).

![Figure 2: Location of Paddock Wood Garden Centre (not to scale)](image-url)
1.3.2 It consists of a mix of hardstanding, permanent buildings, glass houses and temporary structures. It constitutes previously developed land but is situated outside of the Tunbridge Wells 'limits to built development' (‘LBD’).

1.3.3 The site falls within the administrative area of TWBC, albeit close to the borough boundary with Maidstone Borough Council, which is demarked by Wagon Lane.

1.3.4 The built up area of Paddock Wood is located approximately 400m to the south of the site, whilst the town centre is situated approximately 1km in the same direction. Immediately north of the site is a commercial plant hire yard, whilst adjacent to the southern boundary is a residential caravan park.

1.3.5 The closest railway station is Paddock Wood (1km) to the south.

1.3.6 Paddock Wood is a sustainable location and offers a good range of services and facilities, including convenience and comparison shopping, job opportunities and public transport links.

**Planning History**

1.3.7 The site has been subject to a significant degree of planning history. Those considered the most relevant to the suitability of the site for future redevelopment are listed in table 1 below.

<table>
<thead>
<tr>
<th>Reference</th>
<th>Description</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>75/00306</td>
<td>Use of existing site as a garden/small buildings display centre, extension of centre to provide additional display area and car parking provision</td>
<td>Refused Permission</td>
</tr>
<tr>
<td>78/01318</td>
<td>New store office and portaloo, sale of garden buildings and leisure products. Internal and reorganisation of car parking and landscaping</td>
<td>Approved</td>
</tr>
<tr>
<td>83/00005</td>
<td>Swimming pool for display purposes</td>
<td>Refused – PP required</td>
</tr>
<tr>
<td>84/00480</td>
<td>Use of land as temporary site for camping equipment, portakabin for rent, sales.</td>
<td>Approved (Restricted Seasonal use and personal to Mr G Carmichael)</td>
</tr>
<tr>
<td>85/0315</td>
<td>Alterations to front of shop</td>
<td>Approved</td>
</tr>
<tr>
<td>86/0236</td>
<td>Continuance of use without complying with condition 2 of TW/84/0480 (use limited to individual person)</td>
<td>Approved</td>
</tr>
<tr>
<td>86/0972</td>
<td>Re-site plant house and change of use to coffee shop.</td>
<td>Approved – but restricted to 30 Nov 1991. Conditions to restrict use as ancillary and for in store consumption.</td>
</tr>
<tr>
<td>86/01597</td>
<td>Change of use to pet centre</td>
<td>Decision Unavailable online</td>
</tr>
<tr>
<td>88/00666</td>
<td>Replacement single storey building for garden centre sales. Additional car parking and open sales area.</td>
<td>Approved (conditional)</td>
</tr>
</tbody>
</table>
### Table 1: Planning History for Paddock Wood Garden Centre

<table>
<thead>
<tr>
<th>Reference</th>
<th>Description</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>89/00942</td>
<td>Temporary stationing of mobile home for office use.</td>
<td>Approved</td>
</tr>
<tr>
<td>90/01014</td>
<td>Temporary stationing of mobile home for office use</td>
<td>Refused</td>
</tr>
<tr>
<td>91/00158</td>
<td>Extensions to Garden and Leisure Centre and car park</td>
<td>Refused</td>
</tr>
<tr>
<td>92/00689</td>
<td>Retrospective - Enclosure of covered patio as extension to coffee shop</td>
<td>Approved</td>
</tr>
<tr>
<td>92/00689</td>
<td>Approval of revised landscape proposals; (ii) Retrospective - use of existing polythene tunnels for display of garden furniture; (iii) Approval of revised parking proposals.</td>
<td>Refused</td>
</tr>
<tr>
<td>93/00617</td>
<td>Extension to existing garden centre building and retention of conservatory display</td>
<td>Refused</td>
</tr>
<tr>
<td>94/00262</td>
<td>Retrospective - change of use from garden centre to display and sale of conservatories, sheds, garages and other small buildings</td>
<td>Refused (Appeal Allowed)</td>
</tr>
<tr>
<td>96/00643</td>
<td>Erection of a horticultural plant shade for plant protection</td>
<td>Approved</td>
</tr>
<tr>
<td>96/01739</td>
<td>Retention of six containers in a fenced and landscaped position</td>
<td>Approved</td>
</tr>
<tr>
<td>05/01021</td>
<td>Horticultural plant shade for the protection of small and vulnerable plants.</td>
<td>Approved Extended 2010 10/01185/FUL</td>
</tr>
<tr>
<td>16/07659</td>
<td>Operation of hand car wash and siting of wooden storage shed</td>
<td>Approved</td>
</tr>
</tbody>
</table>

### Site Opportunities and Constraints

1.3.8 According to the Council’s adopted proposals map, the site is free from any restrictive planning designation. However, it is situated outside of the current limits to built development where policies of countryside restraint apply.

1.3.9 Nevertheless, there are no nearby listed buildings that would impact upon development proposals, the closest being the Grade II listed Beltring House - located circa 450m to the north.

1.3.10 The site is located in Flood zone 3 but with the benefit of flood defences.

1.3.11 Furthermore, the land adjoins areas of land that are allocated for residential and economic development in the TWBC draft Local Plan. Therefore, an opportunity exists to make efficient use of the site in meeting development needs in the forthcoming plan period.

1.4 Illustrative Proposals for Paddock Wood Garden Centre

1.4.1 Policy AL/PW1 of the plan allocates land at Capel and Paddock Wood for the following:

1) The provision of circa 4,000 new homes and a three pitch gypsy traveller site on this land and in Paddock Wood Town Centre;
2) Additional employment provision;

3) New Schools;

4) New Medical Centre;

5) The provision of open space, youth and children’s play and sports facilities as well as recreational facilities semi-natural green space, allotments and publicly accessible open space.

1.4.2 It is the Council's intention to deliver the development through a comprehensive master-planned approach, and the land has been broken down into a number of zones to assist with this process. In this respect, the Garden Centre is located between Zone 3 - which is marked for mostly residential use - and Zone 5, which is identified for economic development.

1.4.3 We have included an illustrative masterplan with this representation (Appendix 1) to show how the site could be developed to provide additional retail provision to support the new housing and employment uses proposed. An extract is provided below for ease of reference.

1.4.4 The proposals highlight the potential to provide additional comparison or convenience retail development (circa 1,895 sqm) by making efficient use of the extensive and underutilised parking areas.
1.4.5 Notwithstanding the proposals for retail led redevelopment, the site could be made available for alternative employment generating uses should there be a greater unmet need.

1.5 Conclusion

1.5.1 This representation has been prepared on behalf of Inter-Leisure Ltd in response to the Tunbridge Wells Borough Council Draft Local Plan Consultation.

1.5.2 Our client controls Paddock Wood Garden Centre, which is a well-established and operational garden centre on the northern periphery of Paddock Wood. The site was not put forward as part of the Call for Sites process, however it is available for redevelopment and represents a logical location to extend the land allocated for the Paddock Wood expansion.

1.5.3 The purpose of this representation has been to provide comment on the Council’s proposed development strategy and specific proposals for allocated sites within the plan.

1.5.4 In this respect, we support the overall principle of the strategy and consider that Paddock Wood represents a sustainable location to deliver housing and other development needs. However, we consider that Paddock Wood Garden Centre should be included within the allocation boundary.

1.5.5 To illustrate how additional retail floorspace could be accommodated, we have included an illustrative masterplan, albeit the site could equally be redeveloped for alternative commercial uses and Inter-Leisure Ltd are flexible in this respect.

1.5.6 I trust the contents of this representation are clear and I hope the comments are useful in guiding the forthcoming stage of the plan making process.
Feasibility Document
Paddock Wood Garden Centre,
Maidstone Road, Kent

October 2019
SITE ANALYSIS
Site and Surroundings
SITE ANALYSIS
Site Photographs

Images Obtained Via Google Maps
Schedule of Accommodation

**Existing**

- **Garden Centre**
  - GEA: circa 1695 sqm
- **Retail Unit**
  - GEA: circa 72 sqm

**TOTAL GIA:** 1767 sqm
Proposed Site Layout Plan
1:1000 @ A3

Schedule of Accommodation

Existing (Retained)
Garden Centre
GEA: circa 1695 sqm

Retail Unit
GEA: circa 72 sqm

Proposed
Commercial Unit 1
GEA: circa 1895 sqm

TOTAL GIA: 3662 sqm

No Parking Zone

Maidstone Road

WAGON LANE

Letting

Maidstone House, Eclipse Park, Sittingbourne Road
Maidstone, Kent ME14 3EN

Eclipse House, Eclipse Park, Sittingbourne Road
Maidstone, Kent ME14 3EN

1:1000

Metres (1:1000)

Site Area: 1.54 Ha

Application Boundary
Approximate Location of Existing Trees
Approximate Location of Existing Tree Group/Hedgerow

0 10 20 30 40 50

Grass

Poly Tunnels/Greenhouse

Commercial Buildings

Arable Land

Residential Dwelling

Garden Centre

Service Area

Outdoor Retail Area

Parking Area 1

Commercial Unit 1

Parking Area 2

Service Area

Parking Area 3

Jackswood Cottage

Jackswood House

Existing Site

Access

Poly Tunnels/Greenhouse

Garden Centre

Residential Dwelling

Outdoor Retail Area

Parking Area 1

Service Area

Parking Area 2

Commercial Unit 1