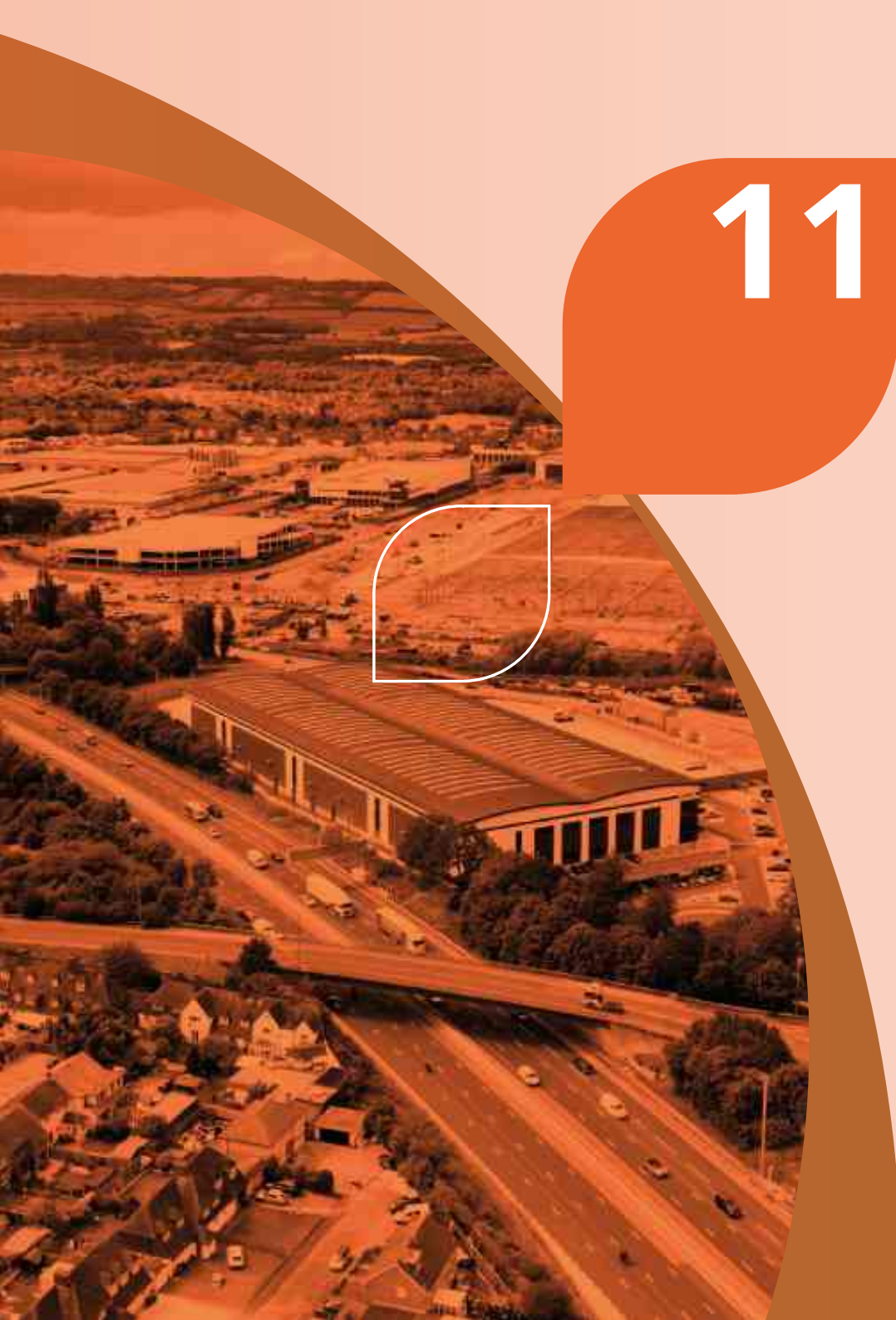


An aerial photograph of a town, likely Tonbridge, showing a large industrial building with a corrugated metal roof, a highway with multiple lanes, and residential areas with houses. The image is overlaid with a large orange shape containing the number 11.

11

ECONOMIC GROWTH AND DEVELOPMENT



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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 and associated Addendum (May 2025 / July 2026), which provides a comprehensive assessment of employment land supply and demand, commercial property market signals, and sector growth opportunities. The study forms part of the Local Plan evidence base.

11.3 National policy places emphasis on enabling economic growth through the planning system and requires 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 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 borough 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 strong strategic links including 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, making effective and optimal use of that 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, the loss of commercial premises through changes of use (including through Permitted Development Rights), the need to retain and intensify existing employment sites 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.

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, while giving significant weight to the economic benefits of development and supporting flexibility to respond to changing business needs.

11.13 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, and by supporting provision that reflects clearly evidenced market demand and modern business requirements.

11.14 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, access to labour supply, and enhances business connectivity.

11.15 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.

11.16 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, as well as supporting low carbon technologies, EV infrastructure and sustainable business operations.

11.17 In addition, the Policy supports initiatives that address local skills shortages and promote inclusive employment opportunities. This includes supporting access to employment, training and career development opportunities for groups that may face barriers to participation in the labour market, helping to ensure that the benefits of economic growth are shared more widely across the borough. By encouraging re-skilling, retraining, and green economy outcomes, the Policy contributes to a more equitable and sustainable future for all residents.

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

- 1 Economic development proposals will be supported, with consideration given to their economic benefits where they contribute towards a prosperous, inclusive and sustainable economic future in the borough in accordance with the presumption in favour of sustainable development and suitably located development. Proposals should positively support business investment, job creation, productivity and innovation, and respond flexibly to the needs of a modern and rapidly changing economy. Developments should also be well-designed, of good quality and suitable for their intended use.
- 2 Proposals for economic development, including industrial, logistics, office, and other employment generating uses, will be supported where they:
 - a Support the retention, intensification, renewal and development of employment land and floorspace including protecting existing employment floorspace;
 - b Do not result in the loss of employment uses unless it can be demonstrated through robust evidence that:
 - i the site is no longer suitable, viable or reasonably capable of being used for employment purposes, taking into account market signals, site characteristics and clearly evidenced in terms of market demand and the need to make effective use of land; or
 - ii the proposal would deliver substantial economic, social or environmental benefits, consistent with the spatial strategy.
 - c Provide a range and choice of, employment sites and premises, at an appropriate scale, type and format, to meet the needs of existing and emerging sectors, including growth sectors such as advanced manufacturing, logistics, digital and low carbon industries;
 - d Enables businesses to start, grow, invest, adapt and innovate that clearly responds to identified market needs and demand;
 - e Support the intensification, redevelopment, renewal, reconfiguration or upgrading of employment sites and premises where this would optimise their use, improve quality and suitability of stock, and support business investment, job creation and productivity;
 - f Be located in suitable and sustainable locations, with particular regard to accessibility by a range of sustainable transport modes, proximity to labour supply and services, and the functional requirements of different employment uses including transport requirements and proximity to strategic routes;

g Supporting development where there is sufficient existing infrastructure capacity, or where infrastructure capacity can be provided, including transport, utilities, digital infrastructure and green infrastructure, with necessary improvements secured in a timely and coordinated manner;

h Support the creation and expansion of startups, small and medium sized enterprises (SME's) and other local businesses by encouraging flexibility, adaptable and innovative workspace provision including shared, co-working and incubator space and creating conditions in which businesses can innovate and grow;

i Contribute to the transition to a low carbon economy and support climate resilience by:

i incorporating high standards of sustainable design, construction and energy efficiency;

ii facilitating sustainable patterns of movement, including public transport, walking and cycling;

iii supporting appropriate provision for ultra-low emission vehicles and digital technologies;

iv supporting sustainable business operations and processes, innovation and technology development, and digital infrastructure improvements including for home working where appropriate; and

v Providing measures such as EV charging points and cycle storage.

j Contribute to the development of a skilled and adaptable workforce, including through local employment opportunities; training, apprenticeships, up-skilling and re-skilling. Proposals should support inclusive access to employment and skills opportunities for all sections of the community, including groups who may experience barriers to accessing the labour market, and contribute to inclusive growth, the expansion of the green economy and addressing identified local skills shortages.



Policy Implementation

11.18 This Policy will be applied to all relevant development proposals, alongside the application of other development management policies.

11.19 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 and, where relevant, justification for any loss of employment uses in accordance with Policy E1 2(b).

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.





Existing 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, adaptable and resilient economy.

11.22 National planning policy 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, the highway network or amenity.

11.24 The Policy also allows for limited ancillary services, such as trade counters, where they support the primary employment function and remain subordinate in scale and function. Proposals for non-employment uses will only be permitted in clearly justified and exceptional circumstances, where robust evidence demonstrates that the proposed use will not undermine the employment role, function or future potential of the site and meets the specific criteria set out in Policy E2.

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 and promoting the effective use of well-located and accessible employment sites capable of supporting a range of business activities.

11.26 The Tonbridge and Malling Economy Study and associated Addendum (2025 & 2026) 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 and a risk of fragmentation or loss of employment capacity.

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 future economic needs.

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





Policy E2: Strategic Employment Areas

- 1 Existing strategic employment sites identified in this policy and on the Policies Map will be retained and safeguarded for employment uses (Use Classes E(g), B2 and B8) in recognition of their importance to the local economy.
- 2 Proposals that support the continued use, redevelopment, renewal or intensification of employment uses on these sites will be supported where they:
 - a Contribute to the effective use of land and result in an improvement in the quantity and quality of employment floorspace and job opportunities;
 - b Will not result in unacceptable impacts on the highway network, and appropriate provision is made for access, servicing and parking;
 - c Will not result in unacceptable adverse impacts on the amenity of surrounding uses or neighbouring properties; and
 - d Maximise the employment potential of the area and are appropriate to the role and function of the employment area and support its continued vitality and attractiveness.
- 3 Ancillary and complementary uses and services, including trade counters, will be supported where they:
 - a Are clearly subordinate in scale and function to the primary employment use and are a de-minimis feature of the employment unit
 - b Support the effective functioning and attractiveness of the employment use, business or area; and
 - c Do not undermine the role, function or integrity of the employment area, or surrounding area, including through unacceptable impacts on amenity, parking or the highway network, that cannot be appropriately mitigated.

Strategic Policy

- 4 Proposals for uses outside Use Classes E(g), B2 and B8 (including sui generis uses) within strategic employment sites will be considered on their merits and will be supported where it can be demonstrated, through proportionate evidence, that there is a clear justification for a departure from this policy and where it can be demonstrated that:
 - a The proposal would not result in the unjustified loss of land or premises that are suitable for, and have reasonable prospect of being used for, employment purposes, having regard to the overall supply, type, quality and distribution of employment land in the area;
 - b The proposal meets an identified need and is in an appropriate location, taking account of sequential and locational considerations and it can be demonstrated that the use cannot be suitably provided elsewhere;
 - c There is no reasonable prospect of the site accommodating a viable employment use, taking into account market signals, site characteristics, viability and demand for its current or last lawful use or for reasonable alternative employment uses or formats; and
 - d The proposed use is compatible with, and would not undermine, the role, function, operation or economic performance of the wider employment area, including through impacts on amenity, servicing and the safe and efficient operation of the highway network, and is suitable in its relationship to other employment uses.
- 5 Where the proposal relates to a loss of an employment use, applicants should provide proportionate and robust evidence to demonstrate compliance with criterion 4. This should demonstrate that there is no longer a demand for the site or premises for employment purposes, and should include:
 - a Evidence from a suitable commercial agent(s) of active and continuous marketing of the site or premises for employment uses over an appropriate period, typically undertaken for a minimum period of 12 months, at a realistic price for sale or letting on the open market, with no reasonable offers being refused, such evidence to be provided at the cost of the applicant; and
 - b Evidence relating to viability, market demand and site constraints, including consideration of alternative employment uses or formats.

Strategic Policy

Policy E2: Strategic Employment Areas continued

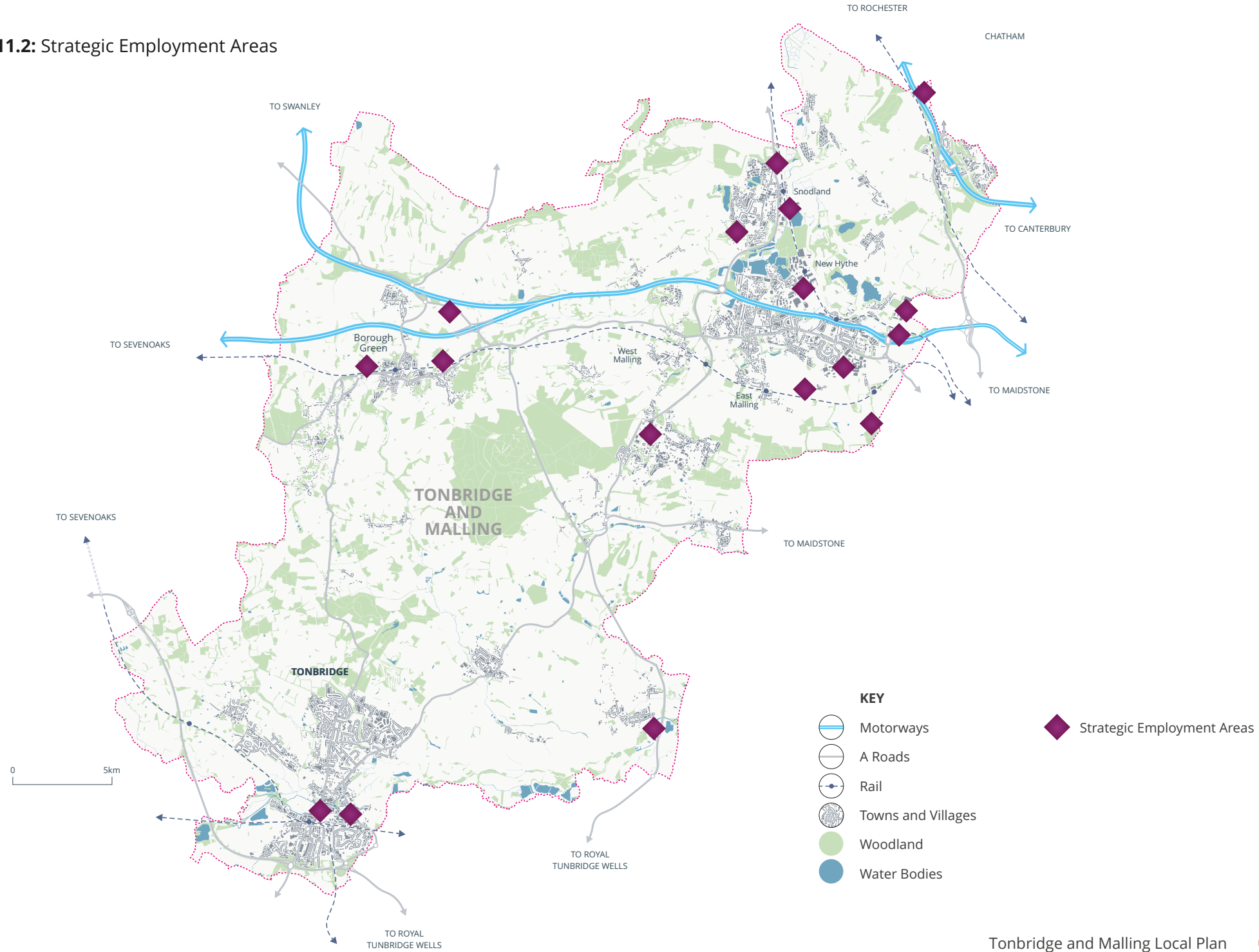
Employment Area	Acceptable Uses
Tonbridge Industrial Area including premises at Cannon Lane, Vale Road, Vale Rise, Morley Road, Sovereign Way and Tannery Road	General Industry - B2
New Hythe Industrial Area including Panattoni Park Aylesford	
Quarry Wood Industrial Area including Britania Business Park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

Ancillary Office - E(g)

Office, Research and Development - E1(g) i) and ii)

Strategic Policy

Figure 11.2: Strategic Employment Areas



Policy Implementation

11.29 Planning applications within Strategic Employment Areas will be assessed against policy E2 and its criteria. Proposals must demonstrate compliance with the use classes B2, B8 and E(g) as set out in the policy and provide proportionate evidence where alternative uses are proposed.

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 4a-d of Policy E2. Proposals that involve a loss of employment use will need to be accompanied by proportionate and robust evidence of active marketing. This may differ on a case-by-case basis, but will typically be over a minimum period of 12 months, unless otherwise agreed with the council.

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 and national policy requirements.

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 modern, high-quality and fit-for-purpose employment space.

11.33 If the council requires 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 through an appropriate mechanism.

Other Employment Sites, Premises and Floorspace



Introduction

11.34 Other existing employment sites are located throughout the borough and provide a diverse range of employment stock, uses and opportunities. These premises are of varying age, quality and price, which contributes to a flexible supply of employment land capable of meeting the needs of different sectors, particularly small and medium-sized enterprises (SMEs). These sites play a vital role in supporting the local economy, providing jobs, and sustaining business activity. They 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, modernisation and intensification where appropriate. This approach supports the growth of local businesses, inward investment and job creation, helping to retain and strengthen the boroughs economic base. Maintaining a balanced distribution of employment opportunities also supports sustainable patterns of growth and reduces the need for out-commuting by residents.

11.36 The demand for offices and other uses under Use Class E(g) is expected to fluctuate over the plan period in response to changing economic and market conditions. The Covid-19 pandemic accelerated trends in home and hybrid working, resulting in reduced demand for some office stock. Changes to the General Permitted Development Order (GPDO) have also enabled the change of employment premises to residential use, which alongside other permitted development, has reduced the availability of premises for start-up, growing and relocating businesses, particularly in locations such as Kings Hill.

11.37 Evidence from the Tonbridge and Malling Economy Study (2025) indicates that there is ongoing demand for employment space across the borough, especially for flexible, modern and well-located premises. Retaining and enhancing existing employment sites is therefore critical to meeting current and future economic needs and ensuring an adequate supply of employment land over the plan period.

11.38 This Policy seeks to ensure that employment land is not lost unnecessarily and that any changes of use are justified by clear economic, social or environmental benefits. It provides a flexible framework that supports investment and adaptation while safeguarding the role of employment sites, and aligns with national planning policy objectives to support economic growth, productivity and a strong, competitive economy.

Policy E3: Other Employment Sites, Premises and Floorspace

- 1 Existing B2, B8 and E(g) employment sites premises and floorspace will be retained for employment use and protected from loss to non-employment uses.
- 2 Development proposals that would result in the loss of employment sites, premises or floorspace to non-employment uses will only be supported where it can be demonstrated through proportionate evidence that:
 - a There is no reasonable prospect of the site or premises being used for employment purposes, including through redevelopment, intensification, modernisation or subdivision having regard to viability, market signals, site characteristics and business needs; or
 - b The proposed alternative use will deliver substantial economic, social or environmental benefits that clearly outweigh the benefits of retaining the site or premises for employment use;
 - c The proposal is compatible with, and would not undermine the role, function and operation of the wider employment area or the operation of neighbouring businesses, and would not result in unacceptable adverse impacts on residential amenity or the effective operation of existing businesses, including in relation to noise, disturbance, servicing, hours of operation, parking and traffic generation; and
 - d The proposal would contribute to sustainable development, including where relevant through economic benefits such as job creation, regeneration, or improvements to the built environment or amenity.
- 3 Development proposals that seek to intensify, upgrade, or modernise existing employment sites will be supported where they:
 - a Respond positively to current and future business needs;
 - b Support job retention and/or creation; and
 - c Make efficient use of land and premises, including maintaining or increasing employment floorspace where appropriate.
- 4 Proposals involving the partial loss of employment floorspace or mixed-use redevelopment will be supported where:
 - a The development would secure the long-term retention or viability of employment use on the site; or
 - b The employment use would be re-provided in a more suitable or efficient form; and
 - c The overall proposal would deliver wider sustainable development benefits without undermining the supply of employment land, including where necessary through cross-subsidy to support continued employment use.
- 5 Development proposals should ensure that changes do not unreasonably prejudice the continued or future use of employment sites, including through the loss of essential supporting infrastructure (such as servicing, access or parking), unless:
 - a It can be demonstrated that the site would remain functional and viable for employment use; or
 - b Any impacts can be appropriately mitigated.

- 6 Development proposals should apply the 'agent of change' principle to ensure that existing employment uses are not subject to unreasonable constraints from new neighbouring uses.
- 7 Where proposals involve the loss of employment use, applicants should provide proportionate and robust evidence to demonstrate compliance with this policy, and which may include:
 - a Evidence of active and continuous marketing of the site or premises for employment uses over an appropriate period, normally for a minimum period of 12 months, at a realistic price, with terms reflecting the lawful use and condition of the site;
 - b Independent written evidence from a suitably qualified commercial agent at the cost of the applicant to support this;
 - c Evidence relating to viability, market demand and site constraints, including consideration of alternative employment uses or formats; and
 - d Confirmation that no reasonable offers have been refused during the marketing period.





Policy Implementation

11.39 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 will be expected to provide clear and proportionate evidence to demonstrate that the site is no longer viable or suitable for continued employment use and that there is no reasonable prospect of its continued use for employment purposes.

11.40 To support decision-making, proposals that involve a loss of employment use will need to be accompanied with evidence of active and genuine marketing of the site or premises for employment use. The appropriate marketing period will be assessed on a case-by-case basis, having regard to the nature of the site and market conditions, but will typically be undertaken for a period of 12 to 18 months. Other evidence will also be required, including a proportionate economic or viability assessment, outlining the implications of the proposed change and how the proposal meets the Policy criteria.

11.41 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, and which make efficient use of land and premises will be supported.

11.42 Where the council requires the review of any submitted marketing, viability or economic information by an independent consultant, the reasonable costs of this review will be met by the applicant.



Employment and Skills



Introduction

11.43 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".

11.44 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.

11.45 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". By supporting an inclusive approach, the borough can help increase skills levels and reduce unemployment through the creation of training and employment opportunities for local people. Access to good-quality employment and skills development can also contribute positively to health and wellbeing outcomes by improving financial security, social inclusion, life chances and overall quality of life. This could include supporting opportunities for groups that may be overrepresented in unemployment or face barriers to accessing the labour market, including young people, some ethnic minority communities, women in ethnic minority communities, and those seeking to return to work. This can help promote more equal access to employment opportunities and improve outcomes for residents across the borough.

11.46 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 must be accompanied by an Employment and Skills Training Plan (ESTP), proportionate to the scale, nature and viability of the development, and demonstrating how opportunities for local employment, skills and training will be delivered.

11.47 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. As a minimum, ESTPs will be expected to identify training and employment opportunities, explain how these will be promoted and accessed locally, and set out how outcomes will be monitored. This approach aligns with national planning guidance and supports the council's objectives for inclusive growth and social mobility.

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 (ESTP) to demonstrate how the proposal will contribute to employing, educating and training opportunities for local people, support inclusive access to employment and skills development, and contribute to wider social, health and wellbeing outcomes. This should cover both the construction and operation phases appropriate to the type of development.
- 2 The scope and content of the ESTP must be proportionate to the scale, viability and nature of the proposal, and agreed with the local planning authority, but in all cases must clearly demonstrate how the development will support local employment, skills and training outcomes.
- 3 As a minimum, and where relevant, the ESTP will need to:
 - a Identify the opportunities for training and apprenticeships that will be made available to local residents during both construction and operational phases (where applicable);
 - b Set out how local residents will be given reasonable priority access to employment opportunities, including through:
 - i Engagement with local job brokerage services;
 - ii Supply chains and sub-contracting, where practicable;
 - c Set out measures to promote access to employment, apprenticeships, work experience, training and recruitment opportunities for groups that may face barriers to entering or progressing within the labour market;
 - d Outline engagement with local education providers, and how the development will support investment in local skills development, where appropriate; and
 - e Include clear and measurable monitoring and reporting mechanisms, to be secured where necessary, including how outcomes will be reviewed and reported to the local planning authority.
- 4 ETSP's will normally be secured by planning condition. Planning obligations will be used where necessary and appropriate to secure specific commitments, including financial, measurable targets or monitoring arrangements.



Policy Implementation

11.48 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.

11.49 The council will work with applicants, developers, contractors and local partners to maximise opportunities for local employment and skills development arising from new development. Employment and Skills Training Plans should reflect local labour market needs and be aligned with existing initiatives and delivery mechanisms where available. The council will therefore 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, including, where appropriate, engagement during both construction and operational phases.

11.50 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, and to support effective and coordinated delivery of employment and skills outcomes.

11.51 ESTPs will normally be secured by planning condition to ensure their submission, approval and implementation. Planning obligations will be used where necessary to secure specific commitments, including financial contributions, measurable targets or monitoring arrangements, and only where they meet the relevant statutory and national policy tests.

Town Centres

Introduction

11.52 This section sets out the strategy for how our town, district and local centres can develop, reinforcing their distinct roles within the defined hierarchy, 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.

11.53 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, increasing the importance of local policy in managing changes to maintain active frontages and the vitality and viability of centres.

11.54 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, support local communities, and provide a balanced mix of uses, as well as ensuring that our centres meet the needs of local residents.

11.55 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), highlighting the need to carefully manage diversification to retain an appropriate balance of uses.

11.56 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, providing essential day-to-day services that support sustainable communities.

11.57 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. This reinforces the need to strengthen the role, resilience and attractiveness of the borough's centres

Town Centre Hierarchy

11.58 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, with development directed to centres in accordance with the sequential approach. 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).

11.59 Figure 11.3 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).

11.60 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, ensuring that development reinforces the role, function and character of each centre.

11.61 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	

11.62 Policy E5 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 planning policy, which highlights the need for diversification whilst maintaining an appropriate balance of uses, and a positive strategy to help centres adapt to rapid changes in the retail and leisure sectors.

11.63 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, ensuring that each centre performs its intended function within the hierarchy.

11.64 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, as well as reinforcing the identity of centres. Meanwhile uses are encouraged where they activate vacant spaces and contribute positively to the area, particularly where they support the transition to longer-term uses.

11.65 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, or clearly justified in line with Policy E5 to ensure no harm to vitality and viability.

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

- 1 The defined hierarchy of centres will be expected to be the focus for main town centre uses. The role and function of each centre will be protected and enhanced, in accordance with its position within the hierarchy.
- 2 Within the defined town, district and local centres, proposals for main town centre uses will be supported where they:
 - a Are located within the defined centre boundary; and
 - b Contribute positively to the vitality and viability of the centre, maintaining a balanced mix and diversity of uses, including for retail, food and drink, financial and professional services, leisure, entertainment and indoor sport and recreation uses, offices, arts and culture, tourism, residential and employment development as well as markets.
- 3 Proposals within defined centres will be supported where they:
 - a Maintain and enhance the vitality and viability of the centre, including contributing to the overall balance, mix and diversity of uses that support local communities;
 - b Provide active frontages at ground floor level ensuring that there is no undue break in active frontages;
 - c Are of a scale and nature appropriate to the size, role, function and character of the centre;
 - d Do not result in unacceptable impacts on amenity, including from noise, odour, disturbance or traffic; and
 - e Deliver high quality design and contribute positively to placemaking and wellbeing, including where appropriate:
 - i Improved accessibility and sustainable travel;
 - ii Enhanced public realm and urban greening;
 - iii Integration with blue and green infrastructure networks; and
 - iv Conservation and enhancement of heritage assets and their setting, and reinforcing the identity of the centre where opportunities allow.
- 4 Within defined local centres, proposals will be supported where they:
 - a Provide direct, accessible and inclusive access to day-to-day services for the local community, supporting walkable neighbourhoods and reducing the need to travel; and
 - b Do not result in the loss of key local facilities, unless it can be demonstrated that:
 - i The facility is no longer viable; or
 - ii Suitable alternative provision is available and accessible by walking, wheeling or public transport.
- 5 For town centre regeneration proposals, these should be supported by relevant impact assessments to ensure that the development will be inclusive.
- 6 Temporary and meanwhile uses will be supported where they:
 - a Contribute to the vitality and attractiveness of the centre;
 - b Maintain active ground floor frontages and retain any existing shopfronts where feasible;

c Provide economic, social and/or environmental benefits, including the re-occupation of vacant units or sites; and

d Act as a precursor to longer-term permanent uses or development where possible.

Such uses should not prejudice the delivery of longer-term permanent development.

7 Proposals that support the evening and night-time economy will be supported within town and district centres where they:

a Contribute to a diverse, inclusive and balanced offer;

b Maintain active frontages where appropriate; and

c Do not give rise to unacceptable impacts on amenity, safety, or daytime footfall and the operation of daytime uses, having regard to the effectiveness of proposed mitigation.

8 Within defined centres, ground floor uses will be expected to support active and vibrant frontages. Proposals involving the loss of main town centre uses at ground floor level will be resisted unless it can be demonstrated that:

a The proposal would not result in harm to the vitality and viability of the centre or undermine its role and function; and

b The site has been actively marketed for an appropriate period without success, or the use is no longer viable; and

c The proposed use would make a positive contribution to the centre, including through active frontage, footfall or complementary activity. Residential uses at ground floor level will be resisted unless clearly justified or where they form part of a comprehensive redevelopment or allocation.

9 Proposals for main town centre uses located outside defined centres must:

a Demonstrate compliance with the sequential test; and

b Where required by national policy or locally set thresholds, be supported by an impact assessment demonstrating that there would be no significant adverse impact on the vitality and viability of existing centres.

Strategic Policy

Policy Implementation

11.66 Policy E5 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. Consistent with the sequential approach set out in national policy, proposals for main town centre uses should seek locations within centres first, followed by edge-of-centre locations and then out-of-centre sites where suitable and available sites cannot be identified in more central locations. The hierarchy is intended to guide appropriate development, not to prioritise investment in one centre over another. Its purpose is to ensure that development supports the vitality and viability of all centres in accordance with their role. The policy also seeks to promote a balanced mix of uses within centres, supporting retail, leisure, cultural, community and service uses that contribute to their vitality, viability and resilience.

11.67 Proposals should contribute positively to the health and function of centres, including through the provision of active frontages and activity that supports footfall throughout the day and evening. While uses that support the evening and night-time economy can make an important contribution to centre vitality, they should not undermine the amenity of nearby residents or the diversity and function of the centre.

11.68 To retain and enhance the vibrancy and vitality of centres, proposals should support a balanced mix of retail, leisure, cultural, and service uses, avoiding over-concentration of any single use that could undermine the diversity and function of the centre. The mix of uses should reflect the scale and character of the centre and avoid undermining the function of surrounding areas. Proposals are encouraged to contribute positively to footfall, active frontages and the overall health of the centre. While sui generis uses such as bars and live music venues can enhance the evening and night-time economy, applicants should demonstrate that such uses will not harm daytime footfall or residential amenity.

11.69 Meanwhile uses are those that reoccupy vacant and underutilised units or sites. These units will be supported in principle to maintain the vitality and viability of centres, particularly where they provide active frontages and contribute economic, social and environmental benefits. They can also help reduce vacancy rates, support local enterprise and test new concepts before longer-term occupation. Where planning permission is required, the council may apply conditions, such as restrictions on opening hours to safeguard the amenity of neighbouring occupiers, and to ensure that such uses do not prejudice the delivery of longer-term development.

Primary Shopping Areas

Introduction

11.70 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 main town centre uses.

11.71 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. This increased flexibility requires careful management to ensure the Primary Shopping Area continues to function as the principal retail focus of the town centre.

11.72 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.

11.73 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, including proposals that would result in an over-concentration of non-retail uses or reduce active frontage.

11.74 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.

11.75 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. The Primary Shopping Area also supports sustainable and inclusive communities by providing convenient access to everyday goods and services, encouraging walking, wheeling and cycling, and reducing the need for longer journeys.

11.76 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.

11.77 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.

11.78 This approach aligns with national planning policy, which emphasises the importance of promoting competitive and vibrant town centres through supporting a diverse range of main town centre uses while maintaining strong retail cores, and supports the council's wider regeneration and place-making objectives for Tonbridge.

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 they:
 - a Contribute positively to the vitality, viability and resilience of the town centre, including through the diversification of uses where this supports the role of the Primary Shopping Area;
 - b Maintain the Primary Shopping Area's role as the principal retail focus of the town centre, whilst allowing for complementary main town centre uses (for non-E class uses) where these will support footfall and do not undermine its predominantly retail function;
 - c Provide, maintain or enhance active ground floor frontages, having regard to the need to support footfall and contributing to the character and function of the town centre and public realm;
 - d Provide a high-quality standard of design including shop front design and public realm (as relevant) and ensure inclusive access for all users; and
 - e Make effective use of vacant or underused units, including through the re-use, adaptation or temporary activation of premises where this would support the vitality and viability of the centre.
- 2 Development proposals will not be supported where they would:
 - a Result in a significant loss of retail function within the Primary Shopping Area;
 - b Lead to an over-concentration of non-retail uses; or
 - c Introduce uses with closed, inactive or poorly activated frontages that would harm the vitality, viability or character of the centre.

Policy Implementation

11.79 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, particularly within the Primary Shopping Area (PSA) where retail uses are expected to remain predominant.

11.80 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, provided that proposals do not undermine the PSA's predominantly retail role or lead to an over-concentration of non-retail uses. Such diversification can contribute to the enhancement of street-level activity and the overall attractiveness of the centre.

11.81 The Policy also recognises the importance of high-quality design, accessibility, and the need to manage change sensitively, including ensuring that new uses provide active and well-designed ground floor frontages that support footfall and reinforce the character of the centre.

Above Ground Floorspace

Introduction

11.82 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.

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

11.84 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 increased the importance of bringing these spaces back into active use.

11.85 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.

11.86 Policy E7 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.

11.87 Where vacant units exist above ground floor commercial premises, these present opportunities to contribute positively to the local economy and community. Encouraging the reuse of aboveground 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.

11.88 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.

11.89 Policy E7 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.

11.90 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 E7: Above Ground Floorspace

- 1 Proposals for the use and redevelopment of upper floors within the defined town centre boundaries are encouraged to support town centre vitality, viability and sustainability. Proposals for upper floor uses, including residential, commercial, co-working spaces, cultural or community uses, will be supported where:
 - a The redevelopment of upper floors does not result in a significant adverse impact that would undermine the continued viable operation of the ground floor use including the loss of ancillary storage space or other beneficial uses;
 - b The proposal optimises the use of upper floors and contributes to a diverse mix of uses within the town centre;
 - c The proposal provides safe and independent access to upper floor(s), without harming the character and appearance of the building or surrounding townscape, or the functioning of the town centre;
 - d The use does not result in unacceptable impacts on the property's existing servicing arrangements, parking or the local highway network;
 - e Adequate provision is made for refuse storage and collection, and cycle storage space, taking into account the constraints of the site;
 - f Residential uses provide a good standard of amenity for future occupants, including appropriate levels of natural light and ventilation; and
 - g Residential uses are not adversely affected by, or place unreasonable constraints on, existing neighbouring uses by reason of noise, disturbance, or air quality impacts.
- 2 Development should not result in the loss of existing residential or employment floorspace, unless:
 - a It can be demonstrated that the existing use is no longer viable; or
 - b The proposal would deliver clear benefits to the vitality and viability of the centre; or
 - c The use is located in the Tonbridge primary shopping area and is for a Class E use.
- 3 Where upper floors are located within conservation areas or involve designated or non-designated heritage assets, proposals must preserve or enhance their significance, in accordance with national policy and policies within this Plan.

Policy Implementation

11.91 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. Proposals should also demonstrate how they respond positively to local character and townscape, having regard to relevant design policies and any adopted local design codes.



Sequential and Local Impact Tests

Introduction

11.92 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.

11.93 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.

11.94 The purpose of Policy E8 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.

11.95 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.

11.96 National planning policy provides the ability to provide a locally defined impact threshold, while indicating that 2,500 sqm is the default level at which proposed developments may cause an impact on nearby town centres. In Tonbridge and Malling this threshold is considered inappropriate. Policy E8 therefore 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 Study indicates that such a threshold would be consistent with the Sunday trading threshold and reflects the nature of stores most likely to divert trade and impact centres. This threshold is applied to retail and leisure uses combined, including combined floorspace across different phases of development.

Policy E8: Sequential and Local Impact Tests

All retail and leisure developments over 400 sqm gross (combined) proposed outside or on the edge of town, district and local retail centres will therefore be required to prepare a proportionate impact assessment. The threshold applies to individual proposals as well as cumulative floorspace across phases or within mixed-use schemes.

11.97 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.

- 1 Proposals for main town centre uses should be located within defined town centres. Where such uses are proposed outside defined town centres, applicants will be required to demonstrate compliance with the sequential approach, including robust justification, that no suitable and available sites exist firstly within town centres and secondly on the edge of town centres.
- 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 by a choice of sustainable transport modes.
- 3 Opportunities to utilise town centre or edge of centre sites should be fully explored, including through an appropriate area of search, before considering sites elsewhere. This should be demonstrated through evidence showing that flexibility has been applied in relation to format, scale and layout, where appropriate.
- 4 Outside the designated Tonbridge primary shopping area and other defined 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 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 would not result in a significant adverse impact on any town centre within the borough or in surrounding areas, either on its own or cumulatively.

Policy Implementation

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

11.99 Policy E8 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.

11.100 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.

11.101 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.

11.102 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.

11.103 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.