



Tunbridge Wells Borough Council
Planning Policy

By email only: localplan@tunbridgewells.gov.uk

JB/JK/33120
26 February 2024

Dear Sir/Madam

RESPONSE TO PROPOSED CHANGES TO THE TUNBRIDGE WELLS BOROUGH LOCAL PLAN (2020 - 2038) ON BEHALF OF THE LANDOWNER OF LAND EAST OF TRANSFESA

Introduction

This letter of representation has been prepared by DHA Planning on behalf of the majority landowner of the site known as 'Land East of Transfesa' in respect of the current consultation on the Council's Response to Inspector's Initial Findings in respect of the Tunbridge Wells Borough Council Local Plan Examination. The landowner has previously made representations on earlier stages of the new Local Plan and has participated in the Local Plan hearing sessions.

The landowner is promoting a 20 acre parcel of land at Land East of Transfesa, Lucks Lane (part of Call for Sites site 218) that forms part of one of the proposed employment sites as identified in Policy STR/SS1(g), which also confirms that the site will be a Key Employment Area to which Policy ED1 will apply. It forms part of the Northern Parcel as shown on Map 27 of the Tunbridge Wells Submission Local Plan (SLP).

Following the Local Plan examination hearing sessions (March to July 2022) for the SLP, the Inspector wrote to the Borough Council setting out his Initial Findings in November 2022. Having considered the initial findings, the Council is proposing examination of the Local Plan be progressed through a Revised Development Strategy to the SLP. This includes, among other changes, a revision of strategic policy STR/SS1, including a reduction in the amount of residential housing growth along with a reduction of employment provision in and around Paddock Wood. The Council have invited representors to make representation to on the Council's response to the initial findings including the revised development strategy by 26 February 2024.

Revised Employment Land Allocations

The proposed Revised Development Strategy and full response to the Inspector's Findings Letter is set out in the Council's Development Strategy Topic Paper Addendum [PS_054] (the Addendum).

Paragraphs 4.17-4.29 of the Addendum explain that the August 2022 updates to the Planning Practice Guidance (PPG) introduced a requirement to consider climate change impacts as part of the Sequential Test. The Council agreed that further modelling should be carried out in order to assess the impact of this upon the flood extents for the Strategic Sites including the allocations contained in draft policy STR/SS1.

At the time the Submission Local Plan was prepared, the site was in Flood Zone 1 (the southern part) and in Flood Zone 2 (the northern part) with very little in Flood Zone 3.

However, the updated flood risk modelling based on the most recent data and climate change allowances shows that a larger area, essentially the north west part of the site, is expected to be within Flood Zone 3 within the plan period, as shown below.



The southern part of the site, which is currently in Flood Zone 1, is also expected to be within Flood Zone 2 within the plan period.

Paragraphs 4.30-4.35 of the Addendum summarise that the Inspector does not consider the location of new employment uses in areas at higher risk of flooding to be justified. The Council have subsequently reconsidered the location of the proposed employment allocations, taking into account very recent flood risk modelling and applying the sequential test accordingly.

An Assessment is set out in a separate document on 'Employment Land Provision at Paddock Wood' [PS_045] and concludes that the draft allocation for Land east of Transfesa Road should be amended to relate to land not in Flood Zone 3 which would result in a reduced developable area from approximately 4.6 hectares to 4.2 hectares. This is shown at Appendix F of the Summary (Table) of Proposed Modifications to the Development Strategy [PS_063] and in the extract below (the current plan on the left to be replaced with the amended plan on the right).



Overall, the Council clearly consider that the site is still suitable with a strong case for employment growth around Paddock Wood to be accommodated on Flood Zone 2 but not Flood Zone 3, given the lack of available and suitable alternatives within Flood Zone 1. In policy terms this would mean that the site would continue to be included within a Key Employment Area and within the proposed Northern Development Parcel E (i.e. the development boundary of Paddock Wood), which is welcomed by the landowner.

Summary of the Landowner's Representation

Notwithstanding the proposed reduction in developable area to address the Inspector's concerns regarding flood risk, the landowner is **supportive** of retaining Land East of Transfesa within the Key Employment Area and the Limits to Build Development as set out within the proposed change to Policy STR/SS1 and policies map. The approach is justified, effective, and positively prepared and consistent with national policy.

On behalf of the landowner, DHA Planning have contributed to the initial masterplanning work already undertaken by David Lock Associates and have attended the Paddock Wood Strategic Sites Workshops held to date. Whilst a detailed scheme has not been drawn up at this stage, we can confirm that employment development at this site would be designed in accordance with the masterplanning work which has been carried out to date.

The landowner confirms that in relation to the site, it is deliverable over the plan period and therefore represents an excellent opportunity to deliver meaningful new employment in the manner envisaged, including a mix of employment types and sizes for which there is currently the highest level of demand for and to support the balanced economic and employment growth of Paddock Wood.

Closing

I trust the contents of this letter are sufficiently clear, however we would welcome further engagement to discuss these concerns. If you have any queries at all, please do not hesitate to contact Jonathan Buckwell of DHA Planning to discuss further. We look forward to hearing from you.

Yours faithfully,



Jonathan Buckwell
Director - Planning

E: [Redacted]

M: [Redacted]