



**Tunbridge Wells  
Borough Local Plan (2020 – 2038)**

**Representation Form**

**Please use a separate sheet for each representation**

Ref:  (For official use only)
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<b>Name of the Local Plan to which this representation relates:</b>	<b>Proposed Changes to the Tunbridge Wells Borough Local Plan (2020 - 2038): Response to Examination Inspector's Initial Findings, Received November 2022 and Supporting Documents, including Sustainability Appraisal</b>
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Completed forms must be received at our offices by **midnight Monday 26 February 2024**

We encourage you to respond online using the consultation portal. Please note you do not have to sign in to respond via the portal: <https://consult.tunbridgewells.gov.uk/kse/>

Alternatively, you may email or scan forms to: [LocalPlan@TunbridgeWells.gov.uk](mailto:LocalPlan@TunbridgeWells.gov.uk) or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

Please note that representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential. Please also note that all comments received will be available for the public to view and cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2018.

	1. Personal Details	2. Agent Details (if applicable)
<b>Title</b>	Messrs	Mr
<b>First Name</b>	Nick & Peter	Mike
<b>Last Name</b>	Dunlop	Holmes
<b>Job title (where relevant)</b>		Associate Planner
<b>Organisation (where relevant)</b>	Kent Woodware Ltd	KLW Ltd
<b>Address Line 1</b>	Estate Office	Ridgers Barn

<b>Address Line 2</b>	Unit 16 Station Business Park	Bunny Lane
<b>Address Line 3</b>	Gills Green	Tunbridge Wells
<b>Address Line 4</b>	Hawkhurst	
<b>Postcode</b>	TN18 5BD	TN3 9HA
<b>Telephone number</b>		██████████
<b>Email address (where relevant)</b>		████████████████████

**PART B – YOUR REPRESENTATION**  
(Please use a separate sheet for each representation)

<b>Name or Organisation</b>	
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<b>3.</b>	<b>To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum?</b>
<b>Chapter and (if applicable) sub heading</b>	Chapter 7 – sub heading ‘Limes Grove’, and Chapter 15
<b>Policy</b>	AL/HA 8
<b>Paragraph number or appendix</b>	Paragraph numbers 7.12 – 7.21 and 15.1, and appendix G

<b>4.</b>	<b>Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:</b> (please tick as appropriate)				
<b>4.1</b>	<b>Legally Compliant</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<b>4.2</b>	<b>Sound</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input checked="" type="checkbox"/>

<b>5.</b>	<p>Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 - 2038) (as set out in the Development Strategy Topic Paper Addendum) are not legally compliant or are unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set out in the Development Strategy Topic Paper Addendum) please also use this box to set out your comments.</p>
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**The text box will automatically expand if necessary.**

Policy AL/HA 8 of the Submission Local Plan reserved the Limes Grove (March's Field) site for "employment uses (E/B2/B8), to be released for development if monitoring indicates that other employment allocations have not come forward, or there is evidence that further employment provision is required in the eastern part of the borough, or potentially at the five-year review of the Local Plan."

Development on the site was required to accord with a number of criteria. These comprised the following:

1. The design sensitive to the adjacent historic farmstead and listed buildings;
2. A landscape and visual impact assessment that informs the height and massing of development proposals, to include the height and colour of roofs, and reflects the elevated rural location of the site that can be viewed from parts of the surrounding areas;
3. Provision of a landscape management scheme to ensure any impact of development upon the surrounding rural area is minimised in perpetuity, including landscape boundaries of native species;
4. There is no unacceptable impact on air quality, having regard to any mitigation measures provided;
5. The design and layout is to be informed by a comprehensive energy and climate change strategy;
6. Contributions are to be provided to mitigate the impact of the development, in accordance with Policy STR/HA 1."

As pointed out by the Inspector in his Initial Findings note from November 2022, the Limes Grove site is "directly opposite the existing business park, is within the same ownership and has been identified as suitable for commercial uses by the Council. Rather than deleting the allocation entirely, another way of making the Plan sound might therefore be to identify the site for smaller, less-intensive ancillary uses associated with the business park."

We would reiterate the point again that the site is available now and it remains the case that the space is required to provide local businesses more space. There remains no justification to restrict when the site comes forward.

These are points acknowledged by the Inspector in his Initial Findings note, which concludes on the soundness of the site that both the use and the timing of its availability "can be rectified by main modifications" to the policy rather than entire deletion.

At paragraphs 7.12 – 7.21 of the Council's Local Plan Development Strategy Topic Paper Addendum, the main thrust of the concerns regarding the appropriateness of the site to be allocated appear to be those based upon highways matters.

In response to this, the landowners have retained the of ADL Traffic & Highways Engineering Limited, who have produced the Transport Note attached to this representation.

The Transport Note is based upon previous discussions with Kent County Council (KCC) as the Highway Authority, an assessment of the existing highway extents and accident analysis of the local highway network.

Based upon current guidance, the Transport Note clearly demonstrates that the existing highway extent can provide a 1.5m wide footway between the site and the business park to the south and the nearby bus stops, in addition to a 5.5m wide carriageway. This width of carriageway allows for two goods vehicles passing simultaneously.

The Transport Note also demonstrates that it would be possible to achieve a 2.4m x 43m visibility splay from the indicative access onto Limes Grove, where it is anticipated that vehicle speeds would be no more than 30mph, and that rigid vehicles up to 7.5 tonnes could travel along Limes Grove, with minor junction improvements at the Limes Grove and Cranbrook Road (A229) junction.

In terms of potential traffic generation, for an employment use for the site, TRICS database output shows that the site at Limes Grove could generate up to 15 and 12 vehicular trips during typical AM and PM peak hours, respectively. This is not a significant increase and would be imperceptible (i.e., one new trip every 4 minutes) when compared with the recently surveyed two-way vehicle movements on the Cranbrook Road during AM and PM network peak hours.

It should be noted that, during a typical working day, but outside of peak hours (between 09:00 – 17:00), the site would generate an average of up to 10 two-way vehicle trips per hour, which again is not a significant number.

In conclusion, ADL have demonstrated that minor off-site highways improvements can be made to Limes Grove and its junction with Cranbrook Road to provide continuous pedestrian access from the existing bus stops on Cranbrook Road and the site access and to accommodate two-way vehicle movements associated with employment uses safely.

There are no existing safety concerns, based on accident analysis, on Limes Grove and the surrounding network and the site would not generate a significant number of vehicle trips to intensify or adversely impact highway safety.

This demonstrates that Policy AL/HA 8 should not be deleted on highway grounds based on deliverable improvements to both pedestrian and vehicle accessibility, existing road safety, and insignificant increase in vehicular traffic associated with the allocation.

In terms of the use of the site, the criteria set out in the original wording of the proposed policy, as set out above, would clearly mitigate against any potential impacts that the development would have on the local area. The use of the site for a future commercial purpose would therefore be wholly acceptable.

Given the proximity to the existing Hawkhurst Station Business Park, the site serves as an ideal location to provide additional employment land within the Borough, particularly

given it has now been demonstrated that the site would not result in an impact to highway safety on the local highway network.

We therefore believe that the loss of the policy would result in the detrimental loss of employment land being delivered within the Borough, which could result in the Plan being found unsound.

**Please set out what modification(s) you consider necessary to the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) Incorporating the Proposed Changes set out in the Development Strategy Topic Paper Addendum, legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness.**

**6. You will need to say why this modification will make the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

**The text box will automatically expand if necessary.**

If the Inspector agrees with the Council on the proposed deletion of Policy AL/HA 8 of the Submission Local Plan, the landowners would ask the Inspector to consider the modification to the policy proposed below.

This will allow the landowners to utilise their land in conjunction with the expanding Hawkhurst Station Business Park, supported by the inclusion of additional land to the south of the existing Business Park in proposed Policy AL/HA 7.

We would therefore suggest the following modification to the proposed policy –

“This site, as defined on the Gill's Green Hawkhurst Policies Map, is reserved for the parking of vehicles at the Hawkhurst Station Business Park. Development on the site shall accord with the following requirements:

1. The design sensitive to the adjacent historic farmstead and listed buildings;
2. A landscape and visual impact assessment that informs the extent of the development proposals, to include the;
3. Provision of a landscape management scheme to ensure any impact of development upon the surrounding rural area is minimised in perpetuity, including landscape boundaries of native species;
4. There is no unacceptable impact on air quality, having regard to any mitigation measures provided.”

<b>7.</b>	<p><b>Please use this box for any other comments you wish to make.</b></p> <p><b>The text box will automatically expand if necessary.</b></p>
	N/A

<b>8.</b>	<p><b>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?</b></p>
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**No**, I do not wish to participate at the examination hearings

**Yes**, I wish to participate at the examination hearings

<b>9.</b>	<p><b>If you wish to participate at the examination hearings stage once it resumes, please outline why you consider this to be necessary:</b></p>
	<p>It is important that we have the opportunity to present directly to the Inspector, to assist with their assessment of the proposed modifications to the Development Strategy for the Local Plan, in particular the proposed deletion of Policy AL/HA 8 relating to Limes Grove (March's Field), Gills Green, Hawkhurst. We participated in the previous hearings and our continued participation is a logical extension to the process</p>

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings stage once it resumes.

**Sustainability Appraisal**

<b>10.</b>	<b>To which part of the Sustainability Appraisal does this representation relate?</b>	
<b>Chapter and (if applicable) sub heading</b>	N/A	
<b>Policy</b>	N/A	
<b>Paragraph number or appendix</b>	N/A	

<b>11.</b>	<b>Please use this box for any comments you wish to make about the Sustainability Appraisal.</b>	
	<b>The text box will automatically expand if necessary</b>	
N/A		

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.**

<b>Signature</b>		<b>Date</b>	23/02/2024
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