



Lucid Planning Ltd
11 Pinewood Road, Hordle. SO41 OGN
E: [REDACTED]
T: [REDACTED]

Our Reference: 1199P/JP

Planning Policy
Tunbridge Wells Borough Council
Town Hall
Civic Way
Royal Tunbridge Wells
Kent
TN1 1RS

22 October 2024

BY EMAIL ONLY

Dear Sirs

**Tunbridge Wells Borough Local Plan - Public Consultation on Stage 3 New Evidence Base Documents
Representations on behalf of Crest Nicholson, Land North West of Paddock Wood**

I write on behalf of Crest Nicholson, who has an interest in the land to the north west of Paddock Wood that forms a significant part of the housing allocation STR/SS1: The Strategy for Paddock Wood, including land east of Capel.

PS_095 Revised Policy Wording for Policy STR/SS 1 – Paddock Wood and Land at East Capel (September 2024)

This revised policy wording is as agreed by Crest, Redrow and Persimmon; therefore it is supported by Crest.



PS_096 Atkins Realis Mascalls Academy Feasibility Study Review (June 2024)
•PS_097a Statement of Common Ground between Tunbridge Wells Borough Council and Kent County Council Education (August 2024)
PS_097b Appendix 2 Feasibility Study Part 1
PS_097c Appendix 2 Feasibility Study Part 2

Crest supports these documents as it reflects and supports the work undertaken by the developers and demonstrates that Mascalls has the potential to accommodate a 3FE expansion and support the revised policy wording that reflects this.

PS_105 TWBC Final Infrastructure Delivery Plan (IDP) (August 2024)

Paragraph 1.4 of PS_105 refers to “*Appendix 2 - Paddock Wood Specific Delivery Strategy*”, but no such appendix appears in the document. Appendix 2 is actually “*Existing open space by parish*”. We suspect this error is just a remnant from previous version of the document and therefore needs to be corrected. If it is not, then the PW developers need clarity on this matter and whether this document exists and when it will be shared with consultees if it does.

Crest is pleased to see, at paragraph 3.20, reference to the Colts Hill roundabout scheme changes and that the secured funds from the developments at Church Farm, Mascalls Farm and Mascalls Court Farm will be utilised to fund part of the revised roundabout.

We also note that on page 51, in the 3rd paragraph under “Secondary Schools (non-selective)” the text still refers to the “...*longer term housing developments in Tunbridge Wells Borough, notably at Paddock Wood/Tudeley necessitating a new 6FE Secondary school within the Paddock Wood area*”. This has been superseded by the work undertaken and presented in PS_096 and conflicts with what is set out on the next page and required in policy STR/SS1, as amended by PS_095. It thus needs to be updated.

In regard to sport and recreation provision, matters have moved on following the feasibility study work undertaken to consider the expansion of Mascalls Academy which also provides for some significant sports provision, as set out in PS_096. Table 14 on page 106 should therefore be updated. Further reference to Elm Tree playing fields should be deleted to be consistent with revised policy STR/SS1.

On Page 137 of the IDP under Paddock Wood and East Capel, Transport (walking and cycling) there is reference to ‘*LCWIP Phase 2 cycling and pedestrian within existing Paddock Wood town and low traffic neighbourhood network within existing Paddock Wood town*’ with a cost of £4.05 million set against it. This is not in the PS_106a and therefore should be deleted or explained how it has been taken accounted for in the Viability Appraisal.



PS_106a Update to Viability Appraisal following completion of the Final IDP Main Report (August 2024)

PS_106b Appendix I Addendum Update PWeC Assumptions August 2024

PS_106c Appendix II Addendum Update Results Summary August 2024

PS_106d Appendix III Addendum Update Appraisal Summaries and ST August 2024

Note: the revised VA Addendum only revisits updated infrastructure information, as shown here in Table 1B of the VA Addendum:

Revised infrastructure list		Year needed
Somerhill Roundabout improvements B2017 A26	£1,000,000	2033
Hop Farm Roundabout improvements B2160 A228	£1,149,999	2028
Colts Hill Bypass / Badsell Road Roundabout etc	£10,245,219	2031
A267 / B2169 Birling Road	£500,000	2033
B2017 / Hartlake Road	£500,000	2029
Five Oak Green traffic management B2017	£230,000	2033
Woodgate Corner (A228 / Tonbridge Road / High Street) = 63% of cost	£1,260,000	2029
A21 west dumbbell roundabout = 63% of cost	£630,000	2029
Halls Hole Road junction = 63% of cost	£945,000	2029
Sandhurst Road junction = 63% of cost	£945,000	2029
New Health Centre Facility	£1,730,644	2035

**Information provided by TWBC.*

These costs total c.£19,135,862.

By cross referencing to PS_061b that the highway contributions set out in the previous iteration of the Local Plan Viability Assessment of the PWeC sites which no longer appear in the updated Local Plan Viability Assessment are:

Works	Cost
Colts Hill Improvements	-7,250,000
A228 Whetsted Road/A228 Bransbridges Road/B2160 Maidstone Road roundabout	-1,149,999
A228 Maidstone Road / Whetsted Road priority junction	-172,500
A228 Maidstone Road / B2017 Badsell Road (Colts Hill) roundabout	-2,300,000
B2017 Badsell Road / B2160 Maidstone Road signalised junction	-1,149,999
B2160 Maidstone Road / Commercial Road priority junction	-575,000

The above together with the £3mn set aside for the health facility as it now has a new cost against it, as above, amount to £15,597,498.

So, the net additional costs are £3,538,364 - which equates to an additional £1,444 per unit across PWeC - assuming 2,450 dwellings.



PS_106c is however based upon 2,532 dwellings, which is the upper limit for the PWeC sites suggested in TWBC housing trajectory (PS_107). However, as amended Policy STR/SS 1 (PS_095) now looks to the land at PWeC to deliver approximately 2,450 dwellings, we would suggest that PS_106c should be calculated on the basis of 2,450 dwellings. This would reduce the surplus/ increase the deficit even more.

Paragraph 3.1.6 of the PS_106a, the VA Addendum states that the benchmark land value is £250,000 per ha. In the previous SOCG (September 2021) at paragraph 2.10, it is recognised that the nature of viability assessments for the local plan process are necessarily high level and that the range of assumptions could change over time, but it should be noted that Crest Nicholson has not agreed to that benchmark land value.

Crest does, however, agree that the delivery of the growth around Paddock Wood and east Capel can occur over the plan period provided that the necessary strategic infrastructure is delivered to enable housing and employment to be developed and that appropriate measures are put in place to mitigate any impacts.

Paragraph 2.47 recognises that the IDP is a 'snapshot' in time and that further discussions and liaison will take place with the various infrastructure providers to firm up the requirements, timescales, associated costs, etc and will be updated if necessary, to ensure it has the most up to date information and requirements in it to support the growth proposed in the Local Plan. All these costs matters will have to be taken into account along with benchmark land values when assessing viability of the proposals at the time of the application/agreeing the s106.

Several items identified in PS_106b as attributable to the PWeC development are not in the PW section of appendix 1 of the VA, but rather in the Borough Wide and Cross Boundary costs. This needs to be clearer if the PWeC sites are paying for them:

- The closure of Hartlake Road to through traffic near junction with B2017 Tudeley Road - 500k
- Increased capacity at A26 Woodgate Way/ B2017 Tudeley Road roundabout - £1.5mill (63% = 945k)
- Increased capacity at A26/A21/A2014/Pembury Road (Vauxhall Roundabout) - £1mill (63% = 630k)
- Increased capacity at A26 Woodgate Way/ B2017 Tudeley Road roundabout - £2mill (63% = 1.26mill)

There are also a number of discrepancies between the IDP and VA which need to be resolved:

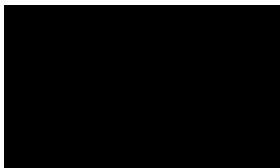
- Climate Change Adaptation (@ £2,000 per dwelling, Table 1A of VA Addendum) does not appear in the IDP
- 3 Pitch Gypsy & Traveller Site (£270,000, Table 1A of VA Addendum) does not appear in the IDP
- Similarly, the cost of proving for Part M4(2) (£1,411,699), Part M4(3) (£2,867,826) and BNG (£8,641,717) whilst in the VA are not in the IDP and should be for consistency.



It is suggested that TWBC review these documents to ensure consistency and transparency prior to main modifications.

We look forward to talking to you further about the above.

Yours sincerely



Jane Piper
Director

Cc Hannah Short, Crest Nicholson
Rob Bias, Crest Nicholson