



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

**Main Modifications Consultation
Representation Form**

**Please use a separate form/sheet for each
representation/main modification**

Ref:

(For official use only)

We welcome your comments on the Tunbridge Wells Borough Local Plan Main Modifications Consultation.

The consultation also includes a number of other documents as listed in Box 1 below upon which representations can be made, including an updated Sustainability Appraisal and updated Habitats Regulations Assessment.

Completed forms must be received at our offices by midnight on **Wednesday 30th April 2025**.

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 or print them off and send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

Please refer to the [Guidance Note on Making Representations](#) for further information. The Guidance Note explains the soundness tests and statutory plan making requirements relevant to this consultation.

PART A – CONTACT DETAILS

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)
Title		Mr
First Name		Troy
Last Name		Hayes MRTPI
Job title (where relevant)		Founder & Managing Director

Organisation (where relevant)	Paddock Wood Town Council	Troy Planning + Design
Address Line 1		33 Foley Street
Address Line 2		London
Address Line 3		
Postcode		W1W 7TL
Telephone number		0207 0961 329
Email address (where relevant)		info@troyplanning.com

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

1.	Name of the Document to which this representation relates (please tick):
X	Schedule of Proposed Main Modifications
	Sustainability Appraisal (Part 2)
	Habitats Regulations Assessment (Part 2)
	Schedule of proposed Map Changes (Policies Map/Inset Maps)

2.	To which part of the document listed in Box 1 above does this representation relate to?
If Main Modification (please quote number e.g. MM1)	MM20 and MM21
Chapter and (if applicable) subheading	
Policy/Paragraph number	

3.	Do you consider the Main Modification / document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):
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3.1	Legally Compliant	Yes		No	X
3.2	Sound	Yes		No	X

4. Please give details of why you consider the Main Modification/document not to be legally compliant or sound. Please be as precise as possible and provide evidence to support this.
 Or
 If you wish to support the legal compliance or soundness of a main modification/document, please also use this box to set out your comments.
 The text box will automatically expand if necessary.

Main Modifications MM20 and MM21

The last sentence of Section 4 (Ensuring Comprehensive Development) has been amended as shown in MM20, and it reads as follows: “A Masterplan will be required for the urban expansion of Paddock Wood (including land at east Capel)”. However, the proposed wording conflicts with the wording of Policy STR/SS 1 (The Strategy for Paddock Wood including Land at east Capel), as amended (see MM80), which states that “all development proposals in relation to the Eastern and Western parcels shall be in accordance with an approved masterplan relating to each parcel (or combination of parcels)”.

The result is a policy framework that is not clear on whether a single masterplan would be required for the expansion of Paddock Wood, or several masterplans would be necessary, whether only eastern and western parcels require masterplanning, or what is the requirement for other parcels and the Town Centre.

Furthermore, MM21 refers to the masterplan (singular, not plural, as per MM80) to be approved as a Supplementary Planning Document (SPD). Unfortunately, this is not compatible with the expectations for masterplans in Policy STR/SS 1 (as amended), which does no longer require being approved as SPDs.

MM20 and MM21, when read in conjunction with other policies that relate to the expansion of Paddock Wood (Policy STR/SS 1) result in a confused policy framework and unclear policy requirements for the expansion of the town. We are concerned that this leads to an ineffective policy framework where it relates to masterplanning (an essential element of the strategic expansion of Paddock Wood) and to an unsound policy.

5.	<p>If you do not agree with the proposed Main Modification/document, please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at Section 4 (above) where this relates to legal compliance or soundness.</p> <p>Please be as precise as possible.</p> <p>The text box will automatically expand if necessary.</p>

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

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

7.	Please tick this box if you wish to be kept informed about the Inspector's Report and/or adoption of the Local Plan	X
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Signature		Date	30.04.2025
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Thank you for taking the time to complete this form.

Closing date for responses: midnight on Wednesday 30th April 2025