

Date: 29 April 2025
Our ref: 506412
Your ref: -



Carlos Hone
Head of Planning
Tunbridge Wells Borough Council

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

By email only, no hard copy to follow

T 0300 060 3900

Dear Carlos Hone

Public Consultation on the proposed Main Modifications to the Tunbridge Wells Pre-Submission Local Plan under Section 20(7c) of the Planning and Compulsory Purchase Act 2004 and Part 6 (Section 20) of the Town and Country Planning (Local Planning) (England) Regulations 2012

Thank you for your consultation on the above dated 17 March 2025 which was received by Natural England on t

Natural England welcomes the opportunity to provide advice on the proposed amendments and are pleased to append them to this letter. We have focussed our advice on areas of the natural environment within our remit. Having reviewed the updated Sustainability Appraisal, Habitats Regulations Assessment and the Schedule of proposed Map Changes (Policies Map/Inset Maps), we have no comments to make on these.

We hope the comments are helpful and if you have any queries, please do not hesitate to contact me by email to sean.hanna@naturalengland.org.uk or by telephone on 0208 0266 064.

Yours sincerely

Sean Hanna
Senior Officer
Sussex and Kent Area Team



**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	Not applicable
First Name	Sean	
Last Name	Hanna	
Job title (where relevant)	Senior Officer	
Organisation (where relevant)	Natural England	
Address Line 1	International House	

Address Line 2	Dover Place	
Address Line 3	Ashford	
Postcode	TN23 1HU	
Telephone number	██████████	
Email address (where relevant)	██	

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):
	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)	MM62
Chapter and (if applicable) subheading	
Policy/Paragraph number	Policy AL/RTW 16 Land to the west of Eridge Road at Spratsbrook Farm

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):				
3.1	Legally Compliant	Yes	X	No	
3.2	Sound	Yes	X	No	

4.	<p>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.</p> <p>Or</p> <p>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.</p> <p>The text box will automatically expand if necessary.</p>
<p>Natural England welcome the inclusion within Criterion 7 of the need to consider the Council's AONB Setting Report and the Landscape and Visual Impact Assessment. This should help ensure that a high quality design which respects the High Weald National Landscape is achieved</p>	

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>
Not applicable	

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>
Not applicable	

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)	MM81
Chapter and (if applicable) subheading	
Policy/Paragraph number	Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

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):				
3.1	Legally Compliant	Yes	X	No	
3.2	Sound	Yes	X	No	

4.	<p>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.</p> <p>Or</p> <p>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.</p> <p>The text box will automatically expand if necessary.</p>
<p>Natural England welcome the wording within Policy STR/SS1 including:</p> <ul style="list-style-type: none"> • The need for the development to be landscape led (3(c)) • The need for landscape and visual impacts to the High Weald National Landscape to be avoided or fully mitigated (3(j)) • The need for the development to be informed by landscape and visual and biodiversity assessments (5) • The need for a green and blue infrastructure strategy to be provided as part of the masterplanning 	

Providing the consideration of impacts, and need to avoid or fully mitigate these, in relation to the High Weald National Landscape and biodiversity assets are included both for the development and the associated infrastructure upgrades (include to the highway network), Natural England feel the policy is sound.

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>
Not applicable	

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>
Not applicable	

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)	MM161
Chapter and (if applicable) subheading	
Policy/Paragraph number	Policy AL/PE 4B Land at Downingbury Farm (east), Maidstone Road

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):				
3.1	Legally Compliant	Yes	X	No	
3.2	Sound	Yes	X	No	

4.	<p>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.</p> <p>Or</p> <p>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.</p> <p>The text box will automatically expand if necessary.</p>
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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)	MM173
Chapter and (if applicable) subheading	
Policy/Paragraph number	Policy AL/SA 2 Sharps Hill Farm, Queen Street

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):				
3.1	Legally Compliant	Yes	X	No	
3.2	Sound	Yes	X	No	

4.	<p>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.</p> <p>Or</p> <p>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.</p> <p>The text box will automatically expand if necessary.</p>
<p>Natural England welcome the inclusion of the need for the landscape and visual assessment to 'take full account of the National Landscape location...' as part of the proposed modifications.</p>	

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>
Not applicable	

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>
Not applicable	

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)	MM176
Chapter and (if applicable) subheading	
Policy/Paragraph number	Policy AL/SP 2 land at and adjacent to Rusthall Recreation Ground, Southwood Road

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):				
3.1	Legally Compliant	Yes	X	No	
3.2	Sound	Yes	X	No	

4.	<p>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.</p> <p>Or</p> <p>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.</p> <p>The text box will automatically expand if necessary.</p>
<p>Natural England support the additional criterion to be added requiring that ‘Proposals for the site shall be informed by a landscape and visual impact assessment, that takes full account of the National Landscape location’</p>	

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>
Not applicable	

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>
Not applicable	

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	✓
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Signature		Date	29 April 2024
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Thank you for taking the time to complete this form.

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