



**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) |

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| 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) | MM79 |
| 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): |
|-----------|---|

| | | | | | |
|-----|-------------------|-----|--|----|---|
| | | | | | |
| 3.1 | Legally Compliant | Yes | | No | X |
| 3.2 | Sound | Yes | | No | X |

| | |
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| 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> |
|----|--|

Main Modification MM79 – Section 5: Strategic Sites

After Paragraph 5.165 the Main Mods propose two new paragraphs regarding wastewater treatment infrastructure in Paddock Wood. It states that in some cases an odour assessment may be required. We consider this should be changed from ‘may’ to ‘will’ be required. Furthermore, this is the opportunity for TWBC to explain the need for more Waste Water Treatment capacity and facilities at Paddock Wood and how it intends for this need to be addressed to enable the delivery of the housing at Paddock Wood. PWTC expects for the policy framework to include requirements for early engagement with PWTC in the masterplanning phase of any expansion of Paddock Wood and the Town Centre. This engagement should aim for the LPA, developers and stakeholders to understand the capacity of the drainage system from the local community and identify opportunities for improvements, where necessary.

The proposed Main Mods in Paragraph 5.192 are of great concern to the Town Council and should be to the local community given the proposal to bypass the public engagement process to prepare a Framework Masterplan Supplementary Planning Documents (SPDs) for each parcel or combination of parcels. TWBC has stated throughout the Examination that it would prepare SPDs for the Masterplans at Paddock Wood and at this final stage of the Examination this commitment is withdrawn to now state that *“all developments will require a masterplan relating to each parcel (or combination of parcels)” ... “The masterplans should be prepared with relevant stakeholders and submitted with planning applications”*. There is nothing included in this Main Mod that commits TWBC or applicants to working with the Town Council or local community in preparing the masterplans which would have been more certain through an SPD. It simply states that the masterplans should be prepared with relevant stakeholders then submitted as part of a planning application. The Town Council should be identified as a stakeholder, and it should state that public consultation is required. Given that a key focus of this Examination has been on how to ensure the development at Paddock Wood is coordinated and not delivered as ‘piecemeal’ development this proposed Main Mod appears to move TWBC closer to a piecemeal approach whereby key pieces of infrastructure that require joint funding (by multiple developers) could easily be in

jeopardy whereby TWBC is determining applications in isolation to the wider Paddock Wood requirements identified in the Local Plan and IDP.

This is in stark contrast to the Tunbridge Wells Town Centre DPD which requires the full DPD consultation process and scrutiny of an Inspector despite it delivering nowhere near the housing development planned for Paddock Wood.

5.

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.

Please be as precise as possible.

The text box will automatically expand if necessary.

| | |
|----|---|
| 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.

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| 7. | <p>Please tick this box if you wish to be kept informed about the Inspector's Report and/or adoption of the Local Plan</p> | X |
|----|--|---|

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|------------------|---|--|-------------|------------|
| Signature |  | | Date | 30.04.2025 |
|------------------|---|--|-------------|------------|

Thank you for taking the time to complete this form.

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