



Tunbridge Wells Borough Council
Planning Policy

By email only: localplan@tunbridgewells.gov.uk

JB/IM/33005
23 October 2024

Dear Sir/Madam

RESPONSE TO PROPOSED CHANGES TO THE TUNBRIDGE WELLS BOROUGH LOCAL PLAN (2020 - 2038) ON BEHALF OF GALLAGHER PROPERTIES LTD

Introduction

This letter of representation has been prepared by DHA Planning on behalf of Gallagher Properties Ltd (Gallagher) in response to the current consultation on the New Evidence Base Documents in respect of the Tunbridge Wells Borough Council Local Plan Examination. Gallagher have previously made representations to the Regulation 18 and 19 versions of the Local Plan and have participated in the Local Plan hearing sessions.

Gallagher is promoting land at Swatlands Farm located at Lucks Lane, Paddock Wood, TN12 6QL, which benefits from an extant outline planning permission (ref. 22/01929/OUT, as varied by 23/01259/FULL) originally granted by the Council in January 2023 for just over 18,000 sqm of new employment floorspace (Class E, B2, and B8 uses). This was in accordance with the Tunbridge Wells Submission Local Plan (SLP) as part of a mix of employment sites to the north and south of Lucks Lane and east of Transfesa Lane in strategic policy STR/SS1 (The Strategy for Paddock Wood and Land at East Capel).

Gallagher remain committed to progressing the development which is evident from the recent submission of details to discharge pre-commencement conditions (refs. 23/00633/SUB and 23/02842/SUB). Further discharge of condition applications as well as application(s) dealing with the reserved matters will come forward in due course.

We have previously responded to the consultation on the council's response to the Inspector's Initial Findings (received November 2022). As part of the Examination process, Stage 3 Local Plan examination hearings sessions were held in June and July 2024 in which DHA have attended the relevant July examination sessions on behalf of Gallagher.

This representation focuses on the proposed draft wording for the post hearing stage 3 revised wording for policy STR/SS 1 – The strategy for Paddock Wood including Land at east Capel.

Revised Wording for Policy STR/SS1

The Council's previous assessment set out in 'Employment Land Provision at Paddock Wood' [PS_045] concluded that Swatlands Farm should be "highlighted as a 'commitment' but not allocated" in recognition of its extant permission. You will recall that Gallagher continue to object to this approach.



Nevertheless, as a commitment, the Council continues to rely on Swatlands Farm as part of its employment strategy to meet about half of the approximate 8ha need of net developable employment land at Paddock Wood over the first 10 years post-adoption.

As we have set out in previous objections, given the importance of the site to the Council's employment land strategy, it is illogical that the site should continue to be excluded from the defined Northern Parcel area. Whilst it is recognised that the site benefits from planning permission, for the reasons set out in previous representations and at the relevant Examination Hearing session, it is important that confusion is avoided and that the Council sets out a clear strategy for the site. This means that the site should be clearly identified both within the Limits to Built Development and allocated for employment uses within the Local Plan.

The current position, whereby the site is expected to deliver a large proportion of Paddock Wood's employment land, but where the site is neither shown within the Limits to Built Development nor clearly allocated for employment development, is not justified.

Requested Changes

We request that various changes are made to policy wording within policy STR/SS 1, as set out below:

Development principles

1. *The development strategy for Paddock Wood and east Capel in conjunction with Policies STR/PW 1 (the Strategy for Paddock Wood (parish) and STR/CA 1 (the Strategy for Capel parish), sets provisional Limits to Built Development for Paddock Wood and east Capel on the Policies Map (Inset Map 4) as a framework for the provision of an extended settlement over the plan period providing for approximately 2450 dwellings and associated infrastructure. This is facilitated through the release of Green Belt land to the west of Paddock Wood, with development to be carried out on each of the development Parcels identified on Map 27 as follows;*
 - A. *North - Western Parcel (edged in green) – approximately 770 dwellings.*
 - B. *South - Western Parcel (edged in dark blue) – approximately 520 dwellings.*
 - C. *South - Eastern Parcel (edged in yellow) – approximately 560 dwellings.*
 - D. *North - Eastern Parcel (edged in light blue) – approximately 600 dwellings.*
 - E. *Northern Parcel (edged in red) - approximately ~~4.25~~ **8.52** hectares of Class E (g), B2 and B8 employment uses.*
 - F. *Town Centre (edged in purple on Map 27 (Master Plan Areas)) which is subject to Policy STR/SS2;*

"Policy STR/SS1(E) - Northern Parcel requirements

Without prejudice to the generality of the requirements of Policy STR/SS 1 above, and other relevant policies in this Plan, the Northern Parcel shall provide the following development:

- (i) a mix of employment uses on sites to the east of Transfesa Road to provide approximately 4.25 hectares of Class E (g), B2 and B8 employment uses;*



(ii) a mix of employment uses on land at Swatlands Farm to provide approximately 4.27 hectares of Class E(g), B2 and B8 employment uses.

The Policies Map should also be amended accordingly to show Swatlands Farm as falling within the Northern Parcel and within the Limits to Built Development.

These changes will enable clarity should a renewed or revised application be necessary in future, as set out in previous representations.

Closing

I trust the contents of this letter are sufficiently clear, however we would welcome further engagement to discuss these concerns. If you have any queries at all, please do not hesitate to contact Jonathan Buckwell of DHA Planning to discuss further. We look forward to hearing from you.

Yours faithfully,

[Redacted signature]

Jonathan Buckwell
Director - Planning

E: [Redacted]
M: [Redacted]