



**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)	MM83
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.	<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><u>Main Modification MM83 – Policy STR/SS 2</u></p> <p>Policy STR/SS 2 has been amended to require residential developments' developer contributions to be used towards the infrastructure having regard to the latest Infrastructure Delivery Plan. However, we consider that 'having regard to' is not a sufficiently robust policy wording and should refer to a complete adherence to the Infrastructure Delivery Plan instead. This would ensure that the policy is effective in securing the relevant IDP contributions.</p> <p>The amended policy text also refers to the support to development proposals that follow the principles set out in the Framework Masterplan. However, in terms of references to the Framework Masterplan (SPD) which is yet to come forward - what happens in the case where development proposals are submitted to the LPA and the Framework Masterplan has not yet been adopted by the LPA? The absence of sufficient masterplan requirements in the policy text leaves the door open to development proposals that would not necessarily have to comply with the future SPD should they be brought forward for planning permission prior to any SPD is adopted. This level of uncertainty and unmeasurable Masterplan Framework leads to the ineffectiveness of this policy.</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>
<p><u>MM83</u></p> <p><u>Policy STR/SS 2</u></p> <ul style="list-style-type: none"> • Policy wording should replace the term ‘having regard to’ with ensuring ‘complete adherence with’ the IDP. • The policy should consider the scenario in which a framework masterplan is not yet made when development proposals and masterplans are submitted for approval. The policy wording should be amended accordingly. <p>We consider that there is a need to refer to the wider development plan including the Paddock Wood Neighbourhood Plan: <i>Proposals for development within the town centre will be supported where they follow the principles set out within this policy <u>and wider development plan, including the Paddock Wood Neighbourhood Plan and forthcoming Framework Masterplan.</u></i></p> <p>This would also suggest that the opening para of the policy also needs amending, as it is the NDP as much (if not more) than the Local Plan policy that sets the basis for the future SPD. I'd suggest that is rephrased along the following lines:</p> <p><i>'Within Paddock Wood Town Centre, as defined on the Policies Map (Inset Map 5), this Local Plan, <u>combined with policies in the Paddock Wood Neighbourhood Plan</u>, shall set out the framework for the provision of a etc etc....'</i></p> <p>This should be explained in the supporting text which is silent on the Neighbourhood Plan, despite it being part of the development plan. Yet it is the only up-to-date and detailed statement of policy there is for the town centre. An additional sentence should be added at the start of para 5.198 which states:</p> <p><i>'The Paddock Wood Neighbourhood Plan was made in October 2023. It establishes a strategy for the town centre supported by a series of policies relating to change and development, accessibility and the public realm. The Neighbourhood Plan was subject to extensive engagement exercises and reflects the community's ambitions for the town centre and the town as a whole'.</i></p> <p>Then the first sentence of 5.198 could stay as is, with the second being amended along the following lines:</p> <p><i>'The Paddock Wood NDP includes a commitment to monitoring, reviewing and updating the Plan. Adoption of the Local Plan may be a trigger for this. Work on the review and</i></p>	

the consultation undertaken as part of this may inform production of Town Centre Masterplan Framework SPD, with the SPD providing more detail on the development of specific sites and associated infrastructure that will deliver the revitalisation of the town centre'.

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.	<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
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Thank you for taking the time to complete this form.

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