



Tuesday 15th October 2024
651/A3/JJA

Planning Policy
Tunbridge Wells Borough Council
Town Hall
Civic Way
Royal Tunbridge Wells
Kent
TN1 1RS

By Email Only

Dear Sirs

**Re: Tunbridge Wells Borough Local Plan - Public Consultation on New Evidence Base Documents
Representations on behalf of Redrow Homes Limited and Persimmon Homes South East
Land North East and South East of Paddock Wood**

I write with reference to the above. As you will be aware, I act for both Redrow Homes Limited and Persimmon Homes South East who have various interests in Tunbridge Wells, including those north east and south east of Paddock Wood as referenced in strategic policy STR/SS 1.

We note the New Evidence Base Documents encompass:

- 1) Gypsy, Traveller, and Travelling Show People
 - PS_093 Tunbridge Wells Gypsy, Traveller, and Travelling Showpeople Accommodation Needs Assessment (GTAA) 2024-2039 Final Report June 2024 (V2)
 - PS_094 Update to Gypsy and Traveller Pitch Supply Statement (September 2024)
- 2) Strategic Allocation – Paddock Wood and Land at East Capel
 - PS_095 Revised Policy Wording for Policy STR/SS 1 – Paddock Wood and Land at East Capel (September 2024)
- 3) Education
 - PS_096 Atkins Realis Mascalls Academy Feasibility Study Review (June 2024)
 - PS_097a Statement of Common Ground between Tunbridge Wells Borough Council and Kent County Council Education (August 2024)
 - PS_097b Appendix 2 Feasibility Study Part 1
 - PS_097c Appendix 2 Feasibility Study Part 2
- 4) Flooding and Flood Risk
 - PS_098 Action Note on Action Point 28 regarding Local Plan Sequential Test regarding Strategic Allocation Policy STR/SS1 Land at Paddock Wood including land at east Capel (September 2024)
- 5) Highways, including Modelling and Mitigation
 - PS_099 Introductory Note to Highway Modelling Reports (September 2024)
 - PS_100 Modal Shift Analysis Technical Note (April 2024)
 - PS_101 A264 Pembury Road corridor – Junction capacity assessment (June 2024)
 - PS_102 Junction Hotspot Comparison (June 2024)
 - PS_103 Strategic Transport Assessment – Modelling Appraisal (April 2024)
 - PS_104 Strategic Transport Assessment Addendum (June 2024)

- 6) Infrastructure
 - PS_105 TWBC Final Infrastructure Delivery Plan (IDP) (August 2024)
- 7) Viability
 - PS_106a Update to Viability Appraisal following completion of the Final IDP Main Report (August 2024)
 - PS_106b Appendix I Addendum Update PWeC Assumptions August 2024
 - PS_106c Appendix II Addendum Update Results Summary August 2024
 - PS_106d Appendix III Addendum Update Appraisal Summaries and ST August 2024
- 8) Housing Needs and Supply
 - PS_107 Action Note for Action Point 30 regarding the Local Plan and Five-Year Housing Land Supply Positions (June 2024)
- 9) Other Allocations
 - PS_108 Action Note on Action Points 27 and 29 regarding written statements from KCC Highways on Policy AL/RTW 19 Land north of Hawkenbury Recreation Ground, Royal Tunbridge Wells and Policy AL/HA 8 Site at Limes Grove, Hawkhurst (September 2024)
- 10) Policy Wording
 - PS_109 Revised Policy Wording and supporting text for Policy STR 1- The Development Strategy (includes commitment to an early review of the Local Plan and text about Tudeley Garden Village) September 2024

Having reviewed these documents, and having regard to our ongoing discussions with the council on the development of the land at PWeC, we would comment as follows:

1 PS_093 and PS_094.

1.1 No comment

2 PS_095.

2.1 The revised policy wording for STR/SS1 is fully supported and aligns with our conversations with the council.

3 PS_096 and PS_097.

3.1 We fully support PS_097 and its associated appendices which reflect the work we have undertaken to demonstrate the ability of Mascalls Academy to accommodate the increasing secondary education needs brought about by the planned growth in PWeC rather than these being provided for on a new site on land west of Paddock Wood. We also have no comments on PS_096 which clearly accepts that based on the information provided in the IDP feasibility study, Mascalls Academy has 'the potential to accommodate a 3FE expansion', and that the matters raised in the report are 'considered to be issues which can be resolved as the scheme progresses through relevant design stages'.

4 PS_098.

4.1 No comment. This document is based upon the flood risk issues associated with the land west of Paddock Wood, not the land to the east.

5 PS_099 – 104.

5.1 PS_099 - No comments as the report acts as a contents page and summary for all the modelling reports.

5.2 PS_100 - This report does not present any new evidence or information but combines all previous modal shift evidence base work. Further context is provided on the justification for applying a 10% reduction in car (driver) trips within the 'Sustainable Transport Zone' (including PWeC development). This is supported given the considerable interventions proposed by the PWeC developments through embedded infrastructure, new and enhanced bus service provision and measures set out in the LCWIP.

5.3 Figure 7 provides an updated and helpful illustration of the corridors where sustainable transport interventions are proposed and how this relates to the zones modelled for modal shift. This serves to reinforce the geographical link between the measures proposed and modal shift that can be achieved.

5.4 PS_101 - The capacity assessment work undertaken by Stantec provides robust and evidenced assumptions to inform its traffic flow scenarios and network modelling. The assessments and conclusions of this work are fully supported in focussing upgrade works on the A264 corridor, as opposed to the Kippings Cross junction.

5.5 It is noted that the schemes presented as mitigation are indicative, and it is apparent at all junction locations that there is land available within the Highway Boundary to deliver these (or an evolution of these schemes), to bring forward the meaningful capacity benefits outlined.

5.6 PS_102 - No comments as this report just sets out the changes in modelling assumptions between the Submitted and Revised Local Plan submissions, principally the removal of Tudeley.

5.7 PS_103 - This is largely a compilation of the previous modelling appraisal work, with the removal of Tudeley, and formed Appendix 1 to TWBC's Matter 3 Issue 2 Hearing Statement. There is nothing new to comment upon.

5.8 PS_104 - This note simply updates modelling outputs to reflect the implementation of the highway's mitigation strategy on the A264 corridor (as opposed to improvements at Kippings Cross). The report therefore supersedes Section 5.11 of the PS_103 report. Which perhaps needs to be made explicit in PS_103 by way of some form of cross referencing.

5.9 More detailed analysis of impacts with regards to the Badsell Roundabout and Colts Hill Bypass are provided, confirming that hotspot criteria are to be met in 2031, due to the addition of Local Plan traffic. The conclusion that the Colts Hill Bypass and Badsell Roundabout scheme would therefore be required by 2031 is acknowledged and noted that this is consistently reflected in the updated wording of policy STR/SS1 (PS_095), the August 2024 IDP (PS_105) and the Addendum Update to Local Plan Viability Assessment. (PS_106 (a-d)).

6 PS_105.

6.1 We note that para 1.4 of PS_105 refers to an appendix 2 - Paddock Wood Specific Delivery Strategy, but no such appendix appears in the document. Even the index does not refer to it. Clarity is required as to whether this document exists and when it will be shared with consultees if it does exist.

6.2 That part of section 3 of PS_105 that addresses transport matters would we believe be improved and assist the reader if it clearly explained what is meant by the 'The Colts Hill Bypass' a simple plan and associated text, cross referencing the works set out in the Update to Viability Appraisal (PS_106a-d) would we believe suffice and make for a much more effective document.

6.3 In addition we note that Table 3 p44 references a pedestrian/cycle route between Paddock Wood and Capel village which given the fact Tudeley has been deleted from the plan is we believe somewhat questionable. It is not a particular desire line and even if intended as more of a leisure route, we would suggest that as we're already providing for pedestrian/cycle route improvements both on and off-site, including works to the former hop-pickers line, we do not believe this requirement to be justified.

6.4 We also note that p51 – para 3 on secondary education still refers to the '*longer term housing developments in Tunbridge Wells Borough, notably at Paddock Wood/Tudeley necessitating a new 6FE Secondary school within the Paddock Wood area*'. This is plainly wrong and conflicts with what is set out on the very next page and required in policy STR/SS1 as now amended by PS_095. It thus needs to be updated.

6.5 Similarly, p68 - 71 on waste water really needs updating as it does not appear to reference the latest discussions there have been between the council and SW about where SW now are in terms of capacity and what is needed to serve the new developments, especially para 3.146 *There will be a need for investment in the Paddock Wood WWTW to deliver increased capacity for the proposed housing growth. Therefore, new development would need to be coordinated with the provision of additional capacity and Southern Water will need clarification on the potential phasing of new development to ensure that this issue is addressed early in the process and to ensure that this investment is delivered alongside the housing growth. As noted above, Southern Water has been engaging with TWBC through the Strategic Sites Working Group and regular liaison and so are kept informed on delivery programmes.*

6.6 As a result of the above the waste water section of table 10 needs to be updated in terms of what it says borough wide and specifically for PWeC.

6.7 Similarly, we note that table 14, in referring to the proposed sports and recreation facilities to be delivered in Paddock wood (p106) advises:

'If an outdoor sports hub is not progressed, a priority pitch for improvement (drainage issues) is Elm Tree playing fields, as well as possible additional pitches (one adult, two junior and two mini soccer pitches) and ancillary facilities (changing rooms); also improvements required at Green Lane recreation ground'

The Elm Tree land is not mentioned in the updated policy STR/SS1 or the VA so we assume this is a mistake and will be deleted in the next iteration of this document.

6.8 In reviewing **appendix 1** of the IDP, we note that P135 refers to a PW infrastructure project that is referenced as: '*LCWIP Phase 2 cycling and pedestrian within existing Paddock Wood town and low traffic neighbourhood network within existing Paddock Wood town*'; and has a cost of £4.05

million set against it. As this does not feature in the VA (PS_106b) we would appreciate clarity as to what this is meant to be for and how it's been taken into account in the VA.

6.9 We also note that certain items identified in PS_106b as attributable to the PWeC development are not in the PW section of appendix 1 of the VA, but rather in the Borough Wide and Cross Boundary costs - which is a tad disingenuous if the PWeC sites are paying for them - see for example:

The closure of Hartlake Road to through traffic near junction with B2017 Tudeley Road - 500k
 Increased capacity at A26 Woodgate Way/ B2017 Tudeley Road roundabout - £1.5mill (63% = 945k)
 Increased capacity at A26/A21/A2014/Pembury Road (Vauxhall Roundabout) - £1mill (63% = 630k)
 Increased capacity at A26 Woodgate Way/ B2017 Tudeley Road roundabout - £2mill (63% = 1.26mill)

6.10 In addition, the reference to Climate Change Adaptation (@ £2,000 per dwelling) does not appear in the IDP, and there is no reference to the cost of providing for the 3 x G&T pitches to the NW, which the VA identifies as costing £270,000. Similarly, the cost of proving for Part M4(2) (£1,411,699), Part M4(3) (£2,867,826) and BNG (£8,641,717) whilst in the VA are not in the IDP and should we believe be included for it to be all encompassing.

6.11 Given the above we are concerned about the level of constancy between the IDP and other documents, especially the VA, and would suggest that the council do a detailed review of both to ensure this matter is addressed prior to main modifications.

7 PS_106 (a-d).

7.1 We note that page 4 of PS_106b, explains that the main additions to the local plan viability assessment of the PWeC sites are:

Revised infrastructure list	Cost	Year needed
Somerhill Roundabout improvements B2017 A26	£1,000,000	2033
Hop Farm Roundabout improvements B2160 A228	£1,149,999	2028
Colts Hill Bypass / Badsell Road Roundabout etc	£10,245,219	2031
A267 / B2169 Birling Road	£500,000	2033
B2017 / Hartlake Road	£500,000	2029
Five Oak Green traffic management B2017	£230,000	2033
Woodgate Corner (A228 / Tonbridge Road / High Street) 63% of cost	£1,260,000	2029
A21 west dumbbell roundabout 63% of cost	£630,000	2029
Halls Hole Road junction 63% of cost	£945,000	2029
Sandhurst Road junction 63% of cost	£945,000	2029
New Health Centre Facility	£1,730,644	2035

7.2 These amount to circa £19,135,862.

7.3 We also note by way of cross referencing to PS_061b that the highway contributions set out in the previous iteration of the Local Plan Viability Assessment of the PWeC sites which no longer appear in the updated Local Plan Viability Assessment are:

Works	Cost
Colts Hill Improvements	-7,250,000
A228 Whetsted Road/A228 Bransbridges Road/B2160 Maidstone Road roundabout	-1,149,999
A228 Maidstone Road / Whetsted Road priority junction	-172,500
A228 Maidstone Road / B2017 Badsell Road (Colts Hill) roundabout	-2,300,000
B2017 Badsell Road / B2160 Maidstone Road signalised junction	-1,149,999
B2160 Maidstone Road / Commercial Road priority junction	-575,000

7.4 The above together with the £3 mill set aside for the health facility as it now has a new cost against it, as above, amount to £15,597,498.

7.5 So, the net additional costs are £3,538,364 - which equates to an additional £1,444 per unit across PWeC - assuming 2,450 dwellings.

7.6 Looking at PS_106c the effects of these additional costs are to increase the deficit / reduce the surplus where there is one. PS_106c is however based upon 2,532 dwellings, which is the upper limit for the PWeC sites suggested in TWBC housing trajectory (PS_107). As policy STR/SS 1 (PS_095) looks to the land at PWeC to deliver 2,450 dwellings (minimum) we would suggest that PS_106c should be calculated on the basis of 2,450 dwellings, not 2,532 which is somewhat aspirational. This would reduce the surplus/ increase the deficit even more, such that we would suggest the apportionment of the A21 works at 63% needs to be fully explained, as whilst we assume this has been calculated on development trip estimates through the junction, it is not clear, and given the growing costs being directed at a reduced number of dwellings being proposed in PWeC the overall project viability is beginning to get tight

7.7 The above is exacerbated by the fact that as per our reps on the council's response to the Inspectors Interim Findings on Feb 2024 the latest Viability Assessment does not, unlike that produced for the Submission Local Plan (CD 3.65) encompass a number of internal routes within the land east of PWeC including:

Internal road off main access	£687,500
Access road off Church Rd	£500,000
Internal road linking the land to the north and the south	£1,800,000

7.8 These works are still fundamental aspects of the proposals for the land east of Paddock Wood which should in our opinion be taken into account when looking at the project's overall viability. Likewise, there are further off-site highway improvements such as the Road Widening Works and Passing Bays proposed along Queen Street and Mascalls Court Road to accommodate the new bus link that have not been factored into the Viability Assessment and could cost circa £750,000.

7.9 All of these costs, together with the increase in many of the other highway works between the two assessments, need to be taken into consideration when assessing the viability of the proposed development east of Paddock Wood.

7.10 As is clear from table 17 of the Strategic Sites Masterplanning and Infrastructure Study (CD 3.66), and table 2 of the latest Local Plan Viability Assessment (PS_106c), changing the assumptions contained in the viability assessment even slightly can impact upon the viability of the

project, such that we would ask that the council undertake further sensitivity testing to address our concerns and strengthen the evidence base.¹

7.11 In the context of the above both Redrow and Persimmon agree that the delivery of the growth around Paddock Wood and east Capel can occur over the plan period provided that the necessary strategic infrastructure is delivered to enable housing and employment to be developed and that appropriate measures are put in place to mitigate any impacts.

7.12 To this end we note that paragraph 2.47 recognises that the IDP is a 'snapshot' in time and that further discussions and liaison will take place with the various infrastructure providers to firm up the requirements, timescales, associated costs, etc and will be updated, if necessary, to ensure it has the most up to date information and requirements in it to support the growth proposed in the Local Plan. All these cost matters will have to be taken into account when assessing viability of the proposals at the time of agreeing any future S106.

8 PS_107.

8.1 We have no comments on the revised calculation of the local housing need or the 5 year housing land supply as set out in PS_107. Nor do we have any comments on the proposed amendments to the SLP as set out in appendix 2 of PS_107.

8.2 We do however note and support the housing trajectory set out in PS_107 for the Persimmon and Redrow sites at PWeC.

9 PS_108.

9.1 No comment.

10 PS_109.

10.1 We note that PS_109 confirms the SLP housing supply is merely for the first 10 years of the plan, and that the proposed changes policy STR1, including the commitment to an early partial review, which we support in the circumstances. That said we remain concerned that the buffer is now very small and that in order to ensure an effective plan that this is fully justified, positively prepared and accords with national policy – eps paras 66 and 74 of the NPPF, TWBC will need to work with those promoting all allocations to ensure their timely delivery and protect the borough from speculative applications.

10.2 We have no comments on the proposed changes to the supporting text to policy STR1.

As per previous representations we would like to highlight Redrow Homes and Persimmon South East's desire to continue to work with Tunbridge Wells Borough Council on the delivery of the proposed strategic allocation at Paddock Wood and to this end would welcome the opportunity to meet with officers to discuss our comments on the new evidence base, especially the IDP (PS_105) and updated VA (PS106_a-d) as soon as is practically possible.

¹ Para 6.94 of CD3.66 also acknowledges that a small change in one assumption can have a relatively large impact on the outcome / result, a point reiterated in para 7.4 of the Strategic Sites Topic Paper (CD 3.67).

In the context of the above you will be aware that the applications for the land east of Paddock Wood have been submitted against the requirements of policies STR/SS1 and STR/PW1 of the Submission Local Plan, together with the aims and aspirations for the site as set out in the Strategic Sites Masterplanning and Infrastructure Study, IDP, VA and TARU², and that said applications have over the past few months been reviewed against the requirements of the councils emerging response to the Inspectors Initial Findings and associated updated evidence base, so as to ensure that they align with the councils revised position and can come forward in a timely way, as part of a comprehensive suite of sites in and around Paddock Wood, to help accommodate the housing needs of the area.

Predicated on the emerging Structure Plan, the strategic scale expansion of PWeC can provide tangible benefits for the local community in terms of improvements to the strategic highway network, as well as local routes, improvements to public transport provision, enhanced pedestrian and cycle links, reduced flood risk, expansion to the local primary and secondary education provision, new sports facilities, new play facilities, new health and medical facilities, a new community hub and new social and leisure facilities. Said development will also provide for much needed family sized housing, and affordable housing, without any adverse environmental or landscape impacts. Indeed, as set out in the Submission Local Plan, the strategic scale expansion of PWeC provides an opportunity to provide for significant landscape and environmental improvements.

We look forward to talking to you further about the above.

Yours sincerely



JUDITH ASHTON

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² Transport Assessment Report Update (March 2021)