



**Tunbridge Wells  
Borough Local Plan (2020 – 2038)**

**New Evidence Base Documents  
Consultation Representation Form**

**Please use a separate sheet for each  
representation**

Ref:  (For official use only)
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<b>Box 1:</b>	
<b>Name of the Local Plan Evidence Base Document to which this representation relates:</b>	<b>Stage 3 New Evidence Base Documents</b>

Completed forms must be received at our offices by **midnight on Wednesday 23<sup>rd</sup> October 2024.**

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](mailto:LocalPlan@TunbridgeWells.gov.uk) or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

**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)
<b>Title</b>	<b>Messers</b>	<b>Mr</b>
<b>First Name</b>	<b>Nick &amp; Peter</b>	<b>Mike</b>
<b>Last Name</b>	<b>Dunlop</b>	<b>Holmes</b>
<b>Job title (where relevant)</b>		<b>Associate Planner</b>
<b>Organisation (where relevant)</b>	<b>Kent Woodware Ltd</b>	<b>KLW Ltd</b>
<b>Address Line 1</b>	<b>Estate Office</b>	<b>Ridgers Barn</b>
<b>Address Line 2</b>	<b>Unit 16 Station Business Park</b>	<b>Bunny Lane</b>

Address Line 3	Gills Green	Tunbridge Wells
Address Line 4	Hawkhurst	
Postcode	TN18 5BD	TN3 9HA
Telephone number		██████████
Email address (where relevant)		██

**PART B – YOUR REPRESENTATION**  
(Please use a separate sheet for each representation)

Name or Organisation	
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3.	To which part of the document listed in Box 1 above does this representation relate to?	
Chapter and (if applicable) sub heading	Local Plan Examination Note for Inspector in response to Action Points 27 and 29 regarding written statements from KCC Highways on Policy AL/RTW 19 Land to the north of Hawkenbury Recreation Ground, Royal Tunbridge Wells and Policy AL/HA 8 Site at Limes Grove (March's Field), Hawkhurst	
Paragraph number or appendix	Section 3.0 ad Appendix 2	

4.	Do you consider the Evidence Base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):				
4.1	Legally Compliant	Yes		No	
4.2	Sound	Yes		No	X

<b>5.</b>	<p><b>Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible.</b></p> <p><b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b></p> <p><b>The text box will automatically expand if necessary.</b></p>
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As pointed out by the Inspector in his Initial Findings note from November 2022, the Limes Grove site is “directly opposite the existing business park, is within the same ownership and has been identified as suitable for commercial uses by the Council. Rather than deleting the allocation entirely, another way of making the Plan sound might therefore be to identify the site for smaller, less-intensive ancillary uses associated with the business park.”

We would reiterate the point again that the site is available now and it remains the case that the space is required to provide local businesses more space. There remains no justification to restrict when the site comes forward.

These are points acknowledged by the Inspector in his Initial Findings note, which concludes on the soundness of the site that both the use and the timing of its availability “can be rectified by main modifications” to the policy rather than entire deletion.

At paragraphs 7.12 – 7.21 of the Council’s Local Plan Development Strategy Topic Paper Addendum, the main thrust of the concerns regarding the appropriateness of the site to be allocated appear to be those based upon highways matters.

Following publication of the Stage 3 New Evidence Base Documents, ADL Traffic & Highways Engineering Ltd have continued to seek a solution to the concerns raised by Kent County Council (KCC) as the Highway Authority to the inclusion of the policy in the Local Plan.

One such solution could be to provide those vehicles accessing the March’s Field site with a route through the Business Park, which our Client is the owner of, to Cranbrook Road and vice versa. Access to March’s Field and the Business Park could be provided very close to one another. This would remove any additional traffic passing along the full length of Limes Grove and entering or exiting the Limes Grove and Cranbrook Road junction.

This improvement would benefit all users and future users of Slip Mill Road by having a site access in a location where suitable widths, and importantly visibility splays can be achieved.

To date we have not received a response from KCC on the suitability of this as an alternative solution to overcome their concerns. Without this feedback our Client has been reluctant to commit to fully scoping this solution with ADL.

This demonstrates that Policy AL/HA 8 should not be deleted on highway grounds based on potential deliverable improvements to accessibility.

Given the proximity to the existing Hawkhurst Station Business Park, March's Field serves as an ideal location to provide additional employment land within the Borough.

We therefore believe that the loss of the policy would result in the detrimental loss of employment land being delivered within the Borough, which could result in the Plan being found unsound.

**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 5 (above) where this relates to legal compliance or soundness.**

**6. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

**The text box will automatically expand if necessary.**

If the Inspector agrees with the Council on the proposed deletion of Policy AL/HA 8 of the Submission Local Plan, our Client would ask the Inspector to consider the modification to the policy proposed below.

This will allow our Clients to utilise their land in conjunction with the expanding Hawkhurst Station Business Park, supported by the inclusion of additional land to the south of the existing Business Park in proposed Policy AL/HA 7.

We would therefore suggest the following modification to the proposed policy –

“This site, as defined on the Gill's Green Hawkhurst Policies Map, is reserved for the parking of vehicles at the Hawkhurst Station Business Park. Development on the site shall accord with the following requirements:

1. The design sensitive to the adjacent historic farmstead and listed buildings;
2. A landscape and visual impact assessment that informs the extent of the development proposals, to include the;
3. Provision of a landscape management scheme to ensure any impact of development upon the surrounding rural area is minimised in perpetuity, including landscape boundaries of native species;
4. There is no unacceptable impact on air quality, having regard to any mitigation measures provided.”

<b>7.</b>	<p><b>Please use this box for any other comments you wish to make.</b></p> <p><b>The text box will automatically expand if necessary.</b></p>
	N/A

<b>8.</b>	<p><b>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)</b></p>	
	No, I do not wish to participate at the examination hearing session	
	Yes, I wish to participate at the examination hearing session	X

<b>9.</b>	<p><b>If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:</b></p>	
	<p>It is important that we have the opportunity to present directly to the Inspector, to assist with their assessment of the proposed modifications to the Development Strategy for the Local Plan, in particular the proposed deletion of Policy AL/HA 8 relating to Limes Grove (March's Field), Gills Green, Hawkhurst. We participated in the previous hearings and our continued participation is a logical extension to the process.</p>	

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.**

<b>Signature</b>	Mike Holmes on behalf of Messers Nick & Peter Dunlop	<b>Date</b>	23/10/2024
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