

30 April 2025

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BY EMAIL: localplan@tunbridgewells.gov.uk

Planning Policy
Planning Services
Tunbridge Wells Borough Council
Royal Tunbridge Wells
Kent
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Dear Sir/ Madam

**TUNBRIDGE WELLS LOCAL PLAN (2020-2038): MAIN MODIFICATIONS CONSULTATION
REPRESENTATIONS ON BEHALF OF CREST NICHOLSON**

We write on behalf of Crest Nicholson ('Crest') to submit representations to the Schedule of Proposed Main Modifications for Consultation (March 2025: v0.7).

Crest controls Land North West of Paddock Wood, 'Parcel A' of Policy STR/SS 1: The Strategy for Paddock Wood including Land at east Capel which forms one of six parcels that seek to deliver strategic, transformational growth at Paddock Wood.

Crest welcomes the progress made on the new Local Plan, its vision for Paddock Wood and the extensive work undertaken to support it, and will continue to work with officers on the proposals for, and delivery of, much-needed new homes and other facilities/ infrastructure on Land North West of Paddock Wood.

Crest makes no objection to the Proposed Main Modifications but to assist the Inspector in concluding the Examination process, provides the following comments:

Policy STR 1: The Development Strategy (MM16)

TWBC's Local Plan has passed through numerous stages of consultation and examination. With the adopted Local Plan now almost 15 years old and nearing the end of its Plan period (2026), it is imperative that a new local plan is put in place without further delay.

National policy and guidance have changed over the course of the Local Plan examination with the version proceeding reflecting a 'point in time'. It is therefore welcome that the Main Modifications clearly signal the need for an 'early review', the timeframes for this and that visibility will be provided through an updated Local Development Scheme.

Aside from the introduction of the early review, the other modifications to Policy STR 1 can be classed as refinements which, inter alia, make the Policy clearer, consistent with other modifications and bring terminology up to date (for example referring to National Landscape rather than AONB), and are supported.

Paddock Wood continues to be identified for transformational change for which it is ideally suited and will allow a range of infrastructure, social, economic and environmental improvements and benefits to be realised in a sustainable manner.

Acknowledgement that flood risk solutions exist for Paddock Wood continues to be included (point 3). It is important that this is site-specific to ensure optimum flood solutions are brought forward in line with Policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel and EN25: Flood Risk.

Section 4: Development Strategy (MM17)

The inclusion of lower and upper levels of housing from the various parishes/ settlements in revised Table 4 is helpful in predicting likely numbers and for monitoring. However, given the reduction in the number of homes the Plan seeks to deliver over the course of the Examination, the upper-level ought not be considered a 'ceiling' or limit if it can be demonstrated that more homes can be satisfactorily delivered.

Policy STR/SS 1 for Paddock Wood/ east Capel takes a mid-point in the range and describes this as 'approximate' thus this flexibility is embedded within the specific Policy and TWBC should be encouraging developments to meet this as a minimum.

Policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel

The Main Modifications set out this Policy afresh at **MM80**. Whilst several changes have been made, these, in general, provide refinements rather than fundamental changes to the Policy provisions. Specific comments on the Proposed Modifications are as follows:

Supplementary Planning Document

A change that reflects discussions at Examination is the removal of the requirement for a Supplementary Planning Document ('SPD') and focus, instead, on masterplans which will provide a more effective, efficient and responsive means of assessing the proposals for the strategic sites. This change is reflected in **MM20**. However, **MM21** contradicts this and continues to refer to a SPD. For consistency across the final version of the Plan, the third paragraph to Policy STR 4 (page 51) requires further amendment to remove reference to a SPD.

Flood Risk

A new point has been included as follows (**MM80**):

7. All residential development shall be within Flood Zone 1, and planning applications shall be supported with an up to date site specific Flood Risk Assessment in accordance with Policy EN 25.

This was discussed at the Examination. It is important that a site-specific approach is taken to assessing flood risk, strategies for addressing and any mitigation.

In line with the Planning Practice Guidance ('PPG'), this ought to take account of all available flood risk information including the Environment Agency Flood Maps, Strategic Flood Risk Assessment and any site-specific modelling (Paragraph: 080 Reference ID: 7-080-20220825). This will ensure that the risks from flooding to a site are well understood and the optimum flood risk solutions are developed.

Secondary School

Point 15(c) is clear that the policy preference for additional secondary school provision at Paddock Wood is the expansion of Mascalls Academy which Crest supports and will continue to liaise with TWBC on deliverability and timings. Crest's emerging proposals for the North West Parcel (A) safeguard land in the event that Mascalls expansion is not forthcoming in line with the revised Policy.

Additional clarity has been provided at point (v) of Policy STR/SS 1(A) to confirm that the safeguarded school land can be considered for alternative development if it is not required for a secondary school. Whilst Crest continues to safeguard the land at present, this additional clarity is welcome in the event that this land is not required in the future for that purpose.

Wetland Park

Crest's emerging proposals for North West Paddock Wood include a significant, publicly accessible greenspace in the northern part of the Site. Point (vi) of Policy STR/SS 1(A) is prescriptive on the form of this greenspace defining it as a 'wetland' to deliver flood water attenuation' with 'boardwalks'. The original, larger allocation of homes in the North West Parcel (A) relied upon this for flood attenuation. However, based on the revised strategy this area is not required for attenuation to the same extent.

It remains Crest's intention to deliver a significant resource in this location that includes biodiversity enhancements with full public access. This may include an element of land lowering to provide wet areas for the benefit of biodiversity and amenity/ interest. However, its previous description as 'wetland' is too prescriptive as is the specific inclusion of boardwalks which may not align with the emerging vision for a more naturalist space. Refinement of the wording as follows is requested:

(vi) Parkland within and to the north of the North West Parcel that provides habitat enhancements and publicly accessible open space, allowing for informal recreation via a network of footpaths.

Infrastructure

Crest welcomes removal of the 'Supporting Infrastructure' table from the previous iteration of Policy STR/SS 1. Infrastructure requirements evolve and are more appropriately located in an Infrastructure Delivery Plan ('IDP') that can be more readily updated.

Updated Local Plan Housing Trajectory

Crest's North West Parcel (A) is projected to start delivering new homes ion 2027/28 in the Updated Local Plan Housing Trajectory (December 2024). Crest confirms that this remains as per its intended programme.

We trust this is in order and look forward to confirmation of receipt. Should you require further information or have any queries, please do not hesitate to contact me.

Yours faithfully



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STANTEC UK LIMITED

cc: Barnaby Orr – Crest Nicholson