



Tuesday 22nd April 2025
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 Main Modifications 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 (MM81).

Having reviewed the Schedule of proposed Main Modifications (March 2025 v0.7), the Schedule of Policy and Inset Maps Changes (March 2025), the Sustainability Appraisal Addendum (March 2025) Habitat Regulations Assessment (HRA) (March 2025), the Supplementary Statement (Trajectory) (December 2024), the Updated Infrastructure Delivery Plan (IDP) (March 2025), and the Schedule of proposed Additional Modifications (March 25), and having regard to our ongoing discussions with the council on the development of the land at PWec, we would comment as follows:

Schedule of proposed Main Modifications

We support MM16 on policy STR 1 (The Development Strategy), which we believe reflects decisions had during the last round of examination hearings. Likewise, we support MM81 on Policy STR/SS 1 (The Strategy for Paddock Wood, including land at east Capel), which we also believe reflects discussions had during the last round of examination hearings.

Our only concern with the Schedule of proposed Main Modifications, is with MM21 which appears to contradict MM20. We understood that it had been agreed there was no need for an SPD when it came to the masterplanning of PW. As such MM21 needs to be amended accordingly.

Schedule of Policy and Inset Maps-Changes

No comment

Sustainability Appraisal Addendum

No comment

Habitat Regulations Assessment

No comment

Supplementary Statement (Trajectory)

We continue to support the proposed housing trajectory which sees the land to the east of PW delivering in the 25/26 (Persimmon) and 26/27 (Redrow), with Persimmon delivering 230 dwellings and Redrow 220 and in the 5-year period from April 25.

Updated Infrastructure Delivery Plan

We note that para 1.4 of the Updated Infrastructure Delivery Plan still refers to an appendix 2 'PW Specific Delivery Strategy', yet no such document is appended or listed in the list of appendices. As per previous comments on this matter the council really need to rectify this as its confusing and unhelpful to all parties.

In section 3 – Theme 1 – Transport (p19) it is still not clear what 'The Colts Hill Bypass' actually means. We have said it before but perhaps the IDP rather than relying on cross referencing to the Paddock Wood Infrastructure Framework 2024 needs to include a plan of what is meant by the Colts Hill Bypass, so people do not have to go on a paper chase, and we also know what TWBC are actually looking to us to deliver.

On Education we are not convinced the section on secondary provision on p48 is correct in its reference to 6FE.

Turning to Appendix 1 and the Infrastructure Delivery Schedule, the following costs are new:

P122 - £1,139,400 – '*Travel Planning across the borough including Strategic Sites*' - developer funded – we assume this will be share across all 2,460 dwellings proposed in PWeC but would seek clarity.

P123 - £1,725,000 – '*Paddock Wood bus service (5 years) subsidy*' - developer funded/ commercial services – again we assume this will be shared across all 2,460 dwellings proposed in PWeC but would seek clarity.

P123 - £373,749 – '*Upgrade Hop Pickers Line for cycling and walking*' - Developer funding (CIL/s106), DfT cycling & walking funding – we assume this is to be shared across the 1200 dwellings proposed to the east of Paddock Wood but would seek clarity.

Having cross referenced the Updated Infrastructure Delivery Plan with the Addendum Update to Local Plan Viability Assessment (Appendix I: Paddock Wood & East Capel Assumptions) (August 2024), we note that the VA also includes £500k for A267 / B2169 Birling Road and a further £500k for B2017 / Hartlake Road which does not appear in the IDP. We would ask that TWBC clarify if this is still required and update either the IDP or VA accordingly.

In addition, appendix 1 of the IDP includes certain figures in the borough wide section and the Paddock Wood specific section. We assume this is just for clarity and there is no double counting but would seek TWBC clarity on this point. These are:

£1,139,400 for Travel Planning across the borough including Strategic Sites on p122 and on p136.

£1,725,000 for Paddock Wood bus service (5 years) subsidy on p123 and on p134

£373,749 for Upgrade Hop Pickers Line for cycling and walking on p123 and on p133.

And finally, some of the Paddock Wood costs in the VA are in the Tunbridge Wells section of the IDP (p127) not Paddock Wood. These are:

£945,000 - Halls Hole Road/ A264 Pembury Road/ Blackhurst Lane junction improvement (roundabout scheme)

£945,000 - Signalisation of junctions at Sandhurst Road/A264 Pembury Road

£630,000 - A21 west dumbbell roundabout
£1,260,000 - Woodgate Corner A228/Tonbridge Road/High Street

In order to ensure clarity when cross referencing documents it would be helpful if the figures were moved to the Paddock Wood section of the IDP.

Schedule of proposed Additional Modifications

No comment

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.

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 Draft 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 TARU¹, 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 as set out in the Main Modifications 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 Structure Plan for Paddock Wood,, 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.

Yours sincerely



JUDITH ASHTON
Judith Ashton Associates

C.c.	Josephine Baker	Redrow Homes Limited
	Kerri Ann Bland	Persimmon Homes South East

¹ Transport Assessment Report Update (March 2021)