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Your ref.
Our ref.
Date 16.10.2019

Dear Planning Policy Team,

Tunbridge Wells Local Plan Regulation 18 Consultation: Response on behalf of Tonbridge and Malling Borough Council (TMBC)

Thank you for the opportunity to comment on the above consultation.

The consultation draft of the emerging Tunbridge Wells Local Plan was considered at an extraordinary meeting of the Council's Planning and Transportation Advisory Board on the 2nd October and again by the Cabinet on the 16th October. Both meetings were characterised by comprehensive debate.

TMBC recognises the challenges facing Tunbridge Wells Borough Council (TWBC) in preparing this Plan as we share many of the same constraints, including significant areas of Green Belt and Areas of Outstanding Natural Beauty in preparing the Tonbridge and Malling Local Plan. The aim of meeting objectively assessed needs for future development within the Borough is one we both share and is welcomed.

However, the proximity of some of the major development proposals to the borough boundary and specifically, the south east of our main settlement of Tonbridge, is a matter of serious concern due to the potential impacts on the local highway network, rail services and other community infrastructure including health care and education, particularly when combined with planned developments in Tonbridge as part of our own Local Plan.

While appreciating that this is an early stage of plan making and the development strategy may be subject to change, in the event that these proposals are brought forward in later versions of the Local Plan, TMBC needs to be assured that it will be a key partner involved with future infrastructure planning and master planning of the allocations that are likely to

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have a significant impact on Tonbridge and surrounding settlements close to the borough boundary. This collaborative approach would have to identify and mitigate any significant adverse impacts on existing infrastructure and services and also those planned as part of TMBC's Local Plan.

It should be recognised that if following this process any of the new infrastructure or mitigations identified to meet the demand arising from any of the new developments is located in Tonbridge and Malling, then developer contributions should be allocated as necessary.

More detailed comments on specific elements of the Local Plan can be found below.

Policy STR/CA1 The Strategy for Capel Parish and Policy AL/CA1 Tudeley Village

Tonbridge and Malling support the proposed approach to meeting the identified needs for future development in Tunbridge Wells within the borough, subject to both authorities proactively working together to ensure all cross-boundary issues are satisfactorily addressed as part of the Local Plan process. This will contribute to the conclusion of the ongoing master planning work and delivery of any identified infrastructure to be phased with the planned development so that any potential impacts are mitigated.

The potential significant impacts of the proposed developments at Tudeley and Capel on the local highway network and on infrastructure and services in nearby Tonbridge are a major concern for TMBC, particularly in the light of the existing infrastructure challenges in Tonbridge and surrounding villages and communities which have been identified by TMBC. TMBC believes that some of these will present delivery challenges for the allocation due to appropriate mitigation measures not being feasible. However, we wish to work collaboratively with TWBC to explore all possibilities and particularly welcome the early identification of a number of junctions requiring mitigation within TMBC.

It is recognised that Policies STR/CA1 and AL/CA1 recognise these issues and require comprehensive master planning and ongoing liaison between Tonbridge and Malling, Tunbridge Wells, Kent County Council and all other relevant stakeholders. This will include land owners, promoters, and infrastructure providers to ensure that the infrastructure accompanying these proposals is properly planned for and delivered at the appropriate time. TMBC requests that they are specifically mentioned in all relevant policies with the emerging Local Plan to ensure that this collaborative approach is enshrined in policy

Both this site and the Paddock Wood sites discussed below require appropriate onsite health service provision to be provided at a primary care level. Given the proximity of these sites to Tonbridge and the proposals for Local Care Hubs that are being progressed by the West Kent CCG, TMBC request that the potential for facilitating Local Care delivery through this strategic site allocation providing land or contribution (our preference is Tonbridge Cottage Hospital) should be explored in detail as part of the next stage of plan development, should this site be taken forward.

Policy AL/CA2 New Secondary School

The response is similar to that in respect of the new settlement at Tudeley above.

As this is the first opportunity to comment on the detailed development strategy set out in the draft Local Plan, TMBC would like to take this opportunity to suggest an alternative

location for the proposed new secondary school at Capel. In the opinion of Tonbridge and Malling, a location at or preferably between the new settlement at Tudeley and the allocations at Paddock Wood would represent a more sustainable solution, being closer to the need generated and the potential for reducing the need to travel to a site on the periphery of Tonbridge, on a constrained site with poor access, adjacent to a town which already has a large number of existing secondary schools and the associated transport issues.

An alternative location for the secondary school would also address a related concern that the proposed developments close to the built confines of Tonbridge would result in the coalescence of the settlements of Tonbridge, Capel, Tudeley, Five Oak Green and Paddock Wood.

The proximity of the proposed school site to the borough boundary and the distance from Tonbridge Station emphasises the importance of implementing sustainable transport improvements in this area to ensure any impacts on the local highway network are minimised. Whilst TMBC welcomes proposals for new bus routes that link Tonbridge/the school/the proposed new settlements/Paddock Wood, it must be recognised that there are significant delivery challenges in ensuring that route is feasible, particularly within the two town centre environments.

Ensuring there is an appropriate access across the railway will be an important consideration for master planning and viability.

TMBC's Local Plan has an employment allocation (LP36 site h), which is an extension of an existing site, immediately adjacent to this proposed allocation. It is essential that existing modelling work carried out to inform this and other local designations with the TMBC Local Plan are considered as part of the infrastructure master planning work that TWBC are proposing to undertake.

Policy STR/PW1 The Strategy for Paddock Wood and PolicyAL/PW1

Although Paddock Wood is further from the borough boundary than the sites at Tudeley and Capel, the size of the allocation here means that the same comments made above are also applicable, particularly for communities in East Peckham.

The aspiration to improve the A228 at Colts Hill is a long held West Kent priority and is supported by TMBC. However, TMBC has significant concerns about the impact of works on the A228 and the potential wider implications need to be thoroughly considered in a holistic fashion, working with KCC Highways, TMBC and Maidstone Borough Council. Following officer discussions, TMBC are requesting that this approach to the A228 corridor is enshrined in the relevant policies.

The implications of this allocation (and the new settlement at Tudeley, which is unlikely to justify the introduction of an additional railway station between Tonbridge and Paddock Wood) on future rail capacity to London will need to be the subject of on-going discussions with Network Rail and the rail service providers and be included in the Infrastructure Delivery Plan. This extends not only to train services but to commuter parking and likely travel habits. The frequency of services at Tonbridge station make this the more likely destination for commuters when compared to Paddock Wood. There is also the need to consider planned development at Marden, Staplehurst and Headcorn that will put additional pressure on the line.

Policy AL/SO3 and Policy AL/SO4 Land at Mabledon and Nightingale and Mabledon House

Although these are smaller proposals that do not require master planning in the way that the larger allocations at Tudeley, Capel and Paddock Wood do, the policy acknowledges that the implementation of the Mabledon House proposal will depend on the agreement of TMBC. It notes that:

“The main house is located within the borough of Tunbridge Wells and the ancillary buildings are located in the borough of Tonbridge & Malling; the Historic Park and Garden is split between the two boroughs. The above policy to be agreed with Tonbridge & Malling Borough Council to encourage a holistic and comprehensive approach to development proposals across the whole of the estate.”

TMBC welcomes the opportunity to discuss the proposed site allocation at Mabledon House with Tunbridge Wells Borough Council within the context of the emerging Local Plan, subject to a better understanding of the scale and form of the development, particularly in respect of that part of the site within Tonbridge and Malling, the very special circumstances for the development within the Metropolitan Green Belt and the impacts on High Weald AONB and its setting.

Policy AL/RTW12 Land Adjacent to Longfield Road, Tunbridge Wells

Tonbridge and Malling welcome the contribution the proposed allocation will make towards meeting the identified needs for employment land in Tunbridge Wells.

However, the concentration of such a significant proportion of the overall need in one location, on the A21 and relatively close to the borough boundary and the Tonbridge Industrial Area raises two concerns regarding the potential impact on the local highway network and competition with businesses in Tonbridge.

Therefore, TMBC would welcome working with the Borough Council, Highways England and Kent Highways to ensure that any potential adverse impacts on the highway network both in the immediate vicinity and more widely can be satisfactorily mitigated. We would also wish to ensure that the planned investments at Longfield Road and at Tonbridge are complementary rather than competitive to ensure that positive economic growth can be delivered either side of the borough boundary.

I hope these constructive comments are beneficial your ongoing process and contribute to the established collaborative working on cross boundary issues that are fundamental to the Duty to Cooperate, which forms a key element of the examination of a Local Plan (as detailed at paragraph 35 of the NPPF).

Yours sincerely,



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