



HOUSE OF COMMONS

29 October 2019

LONDON SW1A 0AA

Local Plan
Planning Policy, Planning Services
Tunbridge Wells Borough Council
Town Hall, Civic Way
Royal Tunbridge Wells
Kent, TN1 1RD

Dear Sir/Madam,

Please accept this letter as my official response to the Tunbridge Wells Borough Council (TWBC) Draft Local Plan, Regulation 18 consultation, which is currently in progress. Though I do not represent any part of the borough of Tunbridge Wells in Parliament, I am taking the time to respond to the consultation as some of the proposals will have a direct impact on residents in Tonbridge, Golden Green, East Peckham and surrounding communities.

I appreciate this is highly unusual but it is clear from the draft proposals, as they stand, that the impact of development at many of the largest sites will not be on Tunbridge Wells borough, but Tonbridge and Malling. Mass development planned at Paddock Wood, Tudeley and on the very outskirts of Tonbridge will fundamentally change the lives of residents in these areas.

In responding to the consultation, I am drawn to the National Planning Policy Framework (NPPF) which sets the parameters of good planning. Specifically, Paragraph 16c which states that plans should:

“be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees”.

Though I accept that we are at a very early stage of the plan making process, and the current timetable has an additional consultation to come before it is examined by the Planning Inspectorate, I am concerned at the short lead time between publication of the Draft Local Plan at the end of July 2019, and the current consultation. While residents in Tunbridge Wells may have been consulted ahead of this time, this privilege did not extend to those in Tonbridge and surrounding villages. Consequently, in advance of the next consultation in 2020 I would urge TWBC to ensure greater engagement with those communities outside of its borough boundary, whom would be significantly disrupted by the proposals.

I would wish to start with a positive comment on the Draft Local Plan in that TWBC seeks to meet its objectively assessed housing need. Representing areas of both Tonbridge and Malling Borough Council (TMBC) and Sevenoaks District Council, I am well aware of the pressures on authorities with significant amount of Greenbelt and Areas of Outstanding Natural Beauty. Yet it is clear from both their own local plans that there is no available room to take any additional surplus from Tunbridge Wells. Therefore it is right that the objectively assessed housing need should be met in full.

Member of Parliament for Tonbridge and Malling

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This response will focus entirely on the impact on those communities I represent in Tonbridge and Malling. It would not be appropriate for me to pass comment on issues which do not affect residents here. While I appreciate there are significant concerns within the borough on the use of greenbelt, protection of ancient woodland, and other material planning considerations I do not feel it is the purpose of my response to comment on them. As Member of Parliament for Tonbridge and Malling my responsibility is exclusively to residents here and the impact of the Plan on them; this is my priority. I will, however, copy this letter to the Members of Parliament covering Tunbridge Wells Borough, The Rt Hon Greg Clark MP (Member of Parliament for Tunbridge Wells) and Helen Grant MP (Member of Parliament for Maidstone and the Weald), so they are aware of my concerns on the impact in Tonbridge and Malling of the proposals in this document.

I shall also limit my comments to those issues which I feel are crucial in respect of the Regulation 18 consultation. I note from the planned timetable that we should expect the Pre-Submission Local Plan to come out to consultation under Regulation 19 between August and September 2020 and it is during this period that I shall comment on the impact of the proposals, and whether the failure to address cross boundary issues would contravene any of the policies identified in the NPPF.

Yet many parts of the plan as it stands gives me great concern about the impact the proposals will have. I shall address these in turn.

AL/SO 3 and AL/SO 4 – Land at Mabledon and Nightingale, and Land at Mabledon House

I feel that this should be the first site that I comment on, as the boundary of development is right up to, and including, land in Tonbridge and Malling. There are a handful of dwellings south of the A21 which fall in Tonbridge and Malling and residents there are understandably concerned about the impact of this allocation.

It is good that TWBC recognise the cross-boundary issues and accept that they will need agreement with TMBC as the local planning authority here to ensure that this site goes ahead. You will have noted from TMBC's robust response to this consultation that they have their concerns about this allocation, specifically with the outbuildings falling over the borough boundary. I would like to re-emphasise this point and make clear that no development should proceed without TMBC being fully on board with its proposals.

I am particularly intrigued by requirement 8c in the draft allocation at AL/SO 3 on this site because it states that 'Community Facilities' should be provided on site. I would be extremely keen to learn what facilities TWBC thinks would be appropriate here? As the site falls closer to the town of Tonbridge than the town of Tunbridge Wells I am extremely keen that any facilities compliment those that are already available in Tonbridge for local residents.

AL/CA 2 – Land to east of Tonbridge/west of site for Tudeley Village

Following the allocation at Mabledon, this is the next proposal that is closest to the borough boundary, and would have the biggest impact on residents in Tonbridge – by sheer virtue of the fact that the allocation is on the very outskirts of Tonbridge.

South Tonbridge has one of the highest concentrations of secondary schools for a town of its size in the whole country. This, along with the nature of our education system, puts immense

pressure on the local road, bus, and rail network as travel to school plans are increasingly difficult to manage. Pupils often have to travel long distances to schools and it is right that Kent County Council (KCC) have strategic oversight of this. However, as we have seen recently with school expansion in Maidstone, even the slightest increase in a school's yearly roll, or a small change to its catchment area can disrupt local bus services and bring gridlock to the area.

My concern is that a secondary school off Woodgate Way in Tonbridge would make peak time traffic movements in Tonbridge unsustainable. The site is not within easy walking distance of Tonbridge Station nor on the busiest bus routes in the town. Indeed, as things stand it is only services such as the 205 from Kings Hill which pass this location and this has only started this year. There is no doubt that this allocation would bring chaos to the already finely balanced public transport network in Tonbridge.

It is noticeable from the extremely detailed 544 page Draft Local Plan that there is absolutely no mention of the impact of this secondary school on Tonbridge. This gives me significant cause for concern and is a glaring omission from the Draft Local Plan. Ahead of Regulation 19 consultation it is urgent that the impact on Tonbridge is fully understood.

However, at Pages 163-164 we have the smallest of details available about the characteristics of the site itself. As I said at the start of this letter I am focusing this response on the impact on Tonbridge and Malling so won't comment on specific details within allocated sites. However, it is concerning that a high pressure gas pipe, presumably to serve residents in Tonbridge, runs from south to north through this allocated site and I would appreciate further detail on where this gas pipe services, and the impact that development of a secondary school above it would have on residents should it be deemed acceptable here, of which I have my doubts.

Finally, I wish to add my support to the comments of TMBC on this allocation, which they strongly object to. They are right to say that a development the size of which is proposed at Tudeley, as I will comment on shortly, is of a suitable size to encompass on site provision of a secondary school. The large employment site allocation on the neighbouring land in the TMBC Draft Local Plan, which is currently awaiting examination from the Planning Inspectorate, also needs to be considered. This site sits on the edge of Tonbridge's industrial heartland and, as a town steeped in history with close ties to the printing industry, any threat to this should be fully demonstrated.

In summary, a new secondary school on this site would have such adverse impacts on the town of Tonbridge that I strongly doubt whether it would be feasible to deliver.

AL/RTW 12 – Land Adjacent to Longfield Road, Tunbridge Wells

I also wanted to touch on Policy AL/RTW 12 in the TWBC Draft Local Plan in light of my previous comments about industry in Tonbridge. I note that the Sevenoaks and Tunbridge Wells Economic Needs Study, produced in 2016, is used as the document to inform the decision on where to allocate sites in the Draft Local Plan. I'm aware this looks at land around the A21 as a significant opportunity for further employment growth potential. However, there are two issues with this that bring me to have concerns about this allocation.

First, since 2016 there have been two important developments which might overstate this need. The first is the completion of the A21 dual carriageway between Tonbridge and Pembury. This is something I strongly welcomed – and even opened at its completion – but

we must recognise that there are some design issues which need to be resolved. At the time of writing we do not have confirmation from Highways England that any identified works will be funded following the completion of the Road Safety Audit Stage 4 that is currently being undertaken. In the event that we are unsuccessful in getting any road improvements delivered, then I have concerns about development which would increase the volume of traffic using this road at peak times. Employment sites with an additional 80,000sqm floorspace across B1, B2 and B8 uses would generate huge traffic movements during the rush hour and the impact on the A21 both here, and further north towards Morleys Roundabout, gives me cause for concern.

Second, we have had the publication and submission to the Inspectorate of the TMBC Local Plan and its plans for employment land allocations in Tonbridge. Though TMBC have had to take some difficult decisions about the sites which it selected for development, they have sought to keep Tonbridge's industrial heart in the Cannon Lane and Vale Road area by rejecting the opportunity to replace employment land here with residential units.

I am concerned that this allocation, and the sheer size of it, does not account for the development which TMBC plans to bring forward for employment land too. As TMBC are further advanced with their Local Plan it is incumbent upon TWBC to address the issues which are raised in it, rather than vice versa. I am afraid I need more reassurance about this impact and wish for a better assessment when it gets to Regulation 19 stage.

STR/PW 1 and AL/PW 1 – The Strategy for Paddock Wood

The Draft Local Plan proposes approximately 4,000 additional homes on land at Capel and Paddock Wood. This gives me huge concern, specifically for the impact on those neighbouring communities.

Over the past few years I, along with East Peckham Parish Council and many patients and local residents, fought hard to save the East Peckham Doctors Surgery. We managed to in the short term, before it shut last year and residents were forced to travel to Paddock Wood to access Woodlands Health Centre as their local GP instead. This was a shame but it was felt that £250,000 was needed to bring the existing surgery up to scratch, a figure which Woodlands did not dispute when I quoted this to them in a letter dated 31 January 2018 about the closure.

On Page 170 of the Draft Local Plan, I note that it is referenced that Paddock Wood has its own doctors surgery. This is seen as one of the justifications for such large scale development here. However, in order for the existing surgery to cope with the demand from 4,000 additional homes in the town alone it will need to expand, and repurchasing a branch in East Peckham would be the best way to achieve this. It would enable the village to keep its facilities for the local population and ensure that Woodlands Health Centre can adequately deal with the greater number of patients visiting it from Paddock Wood. Meanwhile, East Peckham gets its branch surgery back and reduces the need to travel into Paddock Wood. I hope this is an issue which TWBC will pursue alongside West Kent Clinical Commissioning Group (WKCCG) to ensure that a significant increase in the population of Paddock Wood will not impact on the ability of East Peckham residents to see a doctor.

Furthermore, an additional impact of the Paddock Wood development which gives me great concern is capacity on the Southeastern mainline. We are already seeing significant development in the adopted Maidstone Borough Council (MBC) Local Plan in Marden, Staplehurst and Headcorn, the next stations down the line. The justification used by MBC to

designate each of these areas as Rural Service Centres was that they had a railway station. Indeed, as some of these developments have been brought forward and built out they have already gone above the indicative figures in the MBC Local Plan. For example at Marden, Land South of The Parsonage on Goudhurst Road has an allocation for 50 dwellings, yet planning permission was granted for 65 dwellings in 2017. This represents an uplift of almost an additional third of the site allocation.

Consequently, we must accept that there will be significant additional demand on the rail network from Maidstone borough, and I am hugely concerned that, coupled with the volume of development proposed at Paddock Wood, it will result in overcrowding from these stations on the Southeastern mainline. At present, Tonbridge is the last realistic stop where passengers heading to London can expect a seat, and on the way back commuters are almost always standing from London Bridge. With further stops at Orpington and Chelsfield planned by the Department for Transport in the Invitation to Tender for a future Southeastern franchise, this line will only get busier.

I am hugely concerned that the only perceived impact on the rail network identified in the Draft Local Plan is the need for improved vehicle and cycle parking at Paddock Wood station. While this may be needed, it will do absolutely nothing to mitigate the impact of the development on commuters from Tonbridge and only seek to encourage more people to use the Southeastern mainline. I am extremely disappointed that there is no assessment of this and would urge TWBC to include this as part of their Regulation 19 consultation.

STR/CA 1 – The Strategy for Capel Parish and AL/CA1 – Tudeley Village

Finally, I wanted to comment on the allocation for the strategic site at Tudeley which has probably attracted the most publicity in the run up to this consultation. It has certainly galvanised the interest of residents in Tonbridge and Golden Green since the proposals were published a few short weeks ago and from the allocation it is obvious to see why.

The boundaries of both Tonbridge and Golden Green are very clear and self-defined. On the south east of Tonbridge, Woodgate Way forms a natural buffer between the town and the countryside, and in the most part acts as the borough boundary as well. In Golden Green, the River Medway acts as a natural boundary between it and Tudeley. The result is that development here cannot be considered to be congruous with either settlement. The lack of acceptance that development at Tudeley would provide north-south traffic movements between it, Golden Green, Hadlow and East Peckham is striking of the need for additional work.

As I mentioned in my response to STR/PW 1 and AL/PW 1, the impact on the rail network is one of significant concern for any development on or near the Southeastern mainline. In the most likely event that a railway station is not built at Tudeley, residents will use Tonbridge station as their closest and I have significant concerns about the travel connections between Tudeley and Tonbridge.

First, considering the most sustainable form of transport, there are no cycle paths between the development and even if one was constructed along the B2017, there are many questions about the route it should take in Tonbridge. For a number of years I have been campaigning alongside Kent County Councillors, Richard Long and Michael Payne, as well as Tonbridge Bicycle Users Group to connect Tonbridge Station with the A21 Non-Motorised User Route and we have found agreeing an acceptable route with all parties extremely

difficult. There are no indications that this would be any easier from Tudeley. Consequently, we cannot rely on the bicycle as being a primary and suitable mode of transport for residents in Tudeley.

Furthermore, parking capacity at Tonbridge station is already both limited, and expensive. Access to the car parks can be tricky, especially on the way in from the B2017, with cars having to go through Sovereign Way and Avenue du Puy to get there. This area is also frequently congested at peak times with existing business access, and possible improvements to the road network are limited. Consequently, development of this scale at Tudeley would have an unacceptably high impact on the centre of Tonbridge, and one which I highly doubt can be appropriately mitigated.

It is essential that TWBC looks at the impact of development on key junctions in Tonbridge if its proposals are to be progressed any further. If this does happen, it is down to TWBC to suggest ways that these will be improved which will not have an adverse impact on the quality of life of residents in Tonbridge, will come with the agreement of KCC and TMBC and, crucially, will not be funded by them either.

Turning to Golden Green, it is not possible to adequately assess the impact of development near the village without referencing the terrible flood events which have caused so much trouble for people here in recent decades. Like Tonbridge, in 2013/14 the flooding event hit Golden Green hard and the suitability of the land in the immediate area for further development is questionable. At the time of writing, the River Medway Flood Relief Act 1976 has yet to be amended and consequently we must assess these proposals on the basis that improvements to flood defences at the Leigh Flood Storage Area don't happen as quickly as we would like, although I am confident that they will be delivered. In light of any additional flood defences in the Golden Green area, I have my concerns that the increase in development will increase the flood risk and would request that TWBC engages closely with the Environment Agency to produce accurate models for the Regulation 19 consultation under all eventualities. Of course, these models should extend to Tonbridge as well.

Finally, I wish to cover the health provision needed to make this development acceptable. I am hugely concerned that these have not been identified and cannot find any reference in the Local Plan to the number of GPs needed to serve this development, and where they will be located. My concern is based on my experience representing Leybourne Chase. While TWBC may not be aware, this development of 733 dwellings came with provision for a GP surgery. However, now 5 years on from the first occupation, there isn't a GP on site, with discussions now taking place about changing the use of the building through the planning process.

Like in Leybourne Chase, neighbouring practices are full and in Tonbridge WKCCG has to allocate surgeries to new residents because of their closed lists. Therefore GP facilities are needed on site, but only if agreement can be found with a GP provider to take on ownership of the building. If this doesn't happen, development should not be permitted here as it would put an additional burden on the three Tonbridge GP practices.

In addition, shortly following the conclusion of this consultation we eagerly await the results of WKCCG's study into the need for hubs across West Kent. In Tonbridge Cottage Hospital we have the ideal site for one of these to serve residents across Tonbridge and the borough of Tunbridge Wells and I am concerned that the vague nature of the policy in the current Draft Local Plan leaves open the possibility for a hub to be located at Tudeley. This would no

doubt be used as a reason to make any development acceptable, but would also undermine the viability of Tonbridge Cottage Hospital. Therefore, I urge TWBC to do much more work on the health impacts of these proposals on a strategic level ahead of the next consultation.

In summary, based off the available evidence it is clear that the development proposals at Tudeley would fundamentally change the character and nature of Tonbridge and Golden Green. I am hugely concerned that many of the key issues have not been adequately assessed so far and urge TWBC to complete this work so we know what the impact is on communities across the borough boundary. Without this being done, the Draft Local Plan cannot be considered sound, and I would not be surprised at all if it demonstrated that there was an unacceptable impact on towns and villages in Tonbridge and Malling as a result of these proposals.

I appreciate this is a long response but hope you understand the severe impact which some of the allocations in the TWBC Draft Local Plan will have on Tonbridge and Malling. I look forward to you addressing these issues ahead of the Regulation 19 consultation next summer.

Best wishes,

Tom Tugendhat

TOM TUGENDHAT

CC:

The Rt Hon Greg Clark MP, Member of Parliament for Tunbridge Wells
Helen Grant MP, Member of Parliament for Maidstone and the Weald