



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

**Main Modifications Consultation  
Representation Form**

**Please use a separate form/sheet for each  
representation/main modification**

Ref:

(For official  
use only)

We welcome your comments on the Tunbridge Wells Borough Local Plan Main Modifications Consultation.

The consultation also includes a number of other documents as listed in Box 1 below upon which representations can be made, including an updated Sustainability Appraisal and updated Habitats Regulations Assessment.

Completed forms must be received at our offices by midnight on **Wednesday 30<sup>th</sup> April 2025**.

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 print them off and send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

Please refer to the [Guidance Note on Making Representations](#) for further information. The Guidance Note explains the soundness tests and statutory plan making requirements relevant to this consultation.

**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)
Title	Mr	
First Name	James	
Last Name	WHITEHORN	
Job title (where relevant)		

<b>Organisation (where relevant)</b>		
<b>Address Line 1</b>		
<b>Address Line 2</b>		
<b>Address Line 3</b>		
<b>Postcode</b>		
<b>Telephone number</b>		
<b>Email address (where relevant)</b>		

## **PART B – YOUR REPRESENTATION**

**(Please use a separate form/sheet for each representation)**

<b>1.</b>	<b>Name of the Document to which this representation relates (please tick):</b>
X	Schedule of Proposed Main Modifications
	Sustainability Appraisal (Part 2)
	Habitats Regulations Assessment (Part 2)
	Schedule of proposed Map Changes (Policies Map/Inset Maps)

<b>2.</b>	<b>To which part of the document listed in Box 1 above does this representation relate to?</b>
<b>If Main Modification (please quote number e.g. MM1)</b>	MM 16
<b>Chapter and (if applicable) subheading</b>	
<b>Policy/Paragraph number</b>	STR 1

<b>3.</b>	<b>Do you consider the Main Modification / document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):</b>
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3.1	Legally Compliant	Yes		No	
3.2	Sound	Yes		No	X

<b>4.</b>	<p><b>Please give details of why you consider the Main Modification/document not to be legally compliant or sound. Please be as precise as possible and provide evidence to support this.</b></p> <p><b>Or</b></p> <p><b>If you wish to support the legal compliance or soundness of a main modification/document, please also use this box to set out your comments.</b></p> <p><b>The text box will automatically expand if necessary.</b></p>
<p>The aspiration to build at least 12,204 dwellings in the Borough over the plan period remains unrealistic and excessive. It was calculated using the NPPF Standard Method for working out national housing demand and then disaggregated to local level by a mathematical formula rather than in accordance with the actual local need for housing. This was derived from the 2014-based projections for T.Wells borough but it didn't match the much lower 2021 census results which recorded only 1,059 extra households over the last decade.</p> <p>I have made this point in earlier phases of the LP consultation but have seen no evidence that it has been properly considered and the proposed dpa targets have barely been adjusted.</p> <p>The consequence is that MM16/s7 still claims that exceptional circumstances exist for some reductions in the Green Belt land around RTW &amp; Pembury but that an effective long-term Green Belt is maintained. In my opinion there would not be an effective long-term Green Belt around Pembury if houses were built on sites AL/PE 1, 2 &amp; 3.</p>	

5.	<p><b>If you do not agree with the proposed Main Modification/document, 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 4 (above) where this relates to legal compliance or soundness.</b></p> <p><b>Please be as precise as possible.</b></p> <p><b>The text box will automatically expand if necessary.</b></p>
	<p>The assessed total housing need for the borough needs to be reduced substantially. This would enable many of the housing proposals on Green Belt land notably those at Pembury to be deleted from the plan.</p>

6.	<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>

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification.

7.	Please tick this box if you wish to be kept informed about the Inspector's Report and/or adoption of the Local Plan	
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Signature		Date	25th April 2025
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Thank you for taking the time to complete this form.

**Closing date for responses: midnight on Wednesday 30th April 2025**