



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

Representation Form

Please use a separate sheet for each representation

<p>Ref:</p> <p>(For official use only)</p>

<p>Name of the Local Plan to which this representation relates:</p>	<p>Proposed Changes to the Tunbridge Wells Borough Local Plan (2020 - 2038): Response to Examination Inspector’s Initial Findings, Received November 2022 and Supporting Documents, including Sustainability Appraisal</p>
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Completed forms must be received at our offices by midnight Monday 26 February 2024

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

<p>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.</p> <p>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.</p>
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	1. Personal Details	2. Agent Details (if applicable)
Title		Miss
First Name		Jessica
Last Name		Ferguson
Job title (where relevant)		Associate Planner
Organisation (where relevant)		MRPP
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PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	Tesco Stores Limited
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3.	To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum?	
Chapter and (if applicable) sub heading	13	
Policy	H6 'Housing for Older People and People with Disabilities'	
Paragraph number or appendix	13.7 – 13.13	

4.	Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it: (please tick as appropriate)				
4.1	Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.2	Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5.	<p>Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 - 2038) (as set out in the Development Strategy Topic Paper Addendum) are not legally compliant or are unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set out in the Development Strategy Topic Paper Addendum) please also use this box to set out your comments.</p>
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	The text box will automatically expand if necessary.
<p>Additional clarification is needed in relation to Policy H6 to align with the requests raised by the Inspector at paragraph 92 of his Initial Findings (November 2022).</p>	

6.	<p>Please set out what modification(s) you consider necessary to the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) Incorporating the Proposed Changes set out in the Development Strategy Topic Paper Addendum, legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this modification will make the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> <p>The text box will automatically expand if necessary.</p>
<p>The Council have, within their Development Strategy Topic Paper Addendum (January 2024), confirmed in relation to Policy H6 ‘Housing for Older People and People with Disabilities’, that there is no definitive methodology for assessing the need for older person housing. It is thus identified that on alternative methodology approaches the need comprises either 342 units (utilising Kent County Council’s forecasts), 431 units (utilising the Strategic Housing for Older People Analysis Tool based on ONS population projections) or 776 units (based upon a market view of a rate of 45 per 1,000 people aged 75+).</p> <p>The Inspector, at paragraph 92 of his Initial Findings, confirms that the Plan needs to be modified to clearly set out the gross need for extra care housing based on the first two methodology approaches listed above i.e. a range between 342 and 431 units. It is therefore necessary for Policy H6 to be amended to include reference to these identified needs.</p> <p>At paragraph 92 the Inspector also identifies that the Plan should make it clear as to how these needs will be met by listing the relevant sites that will meet this identified need. The Council at paragraph 13.11 of the Topic Paper Addendum provide a list of sites with outstanding planning permissions along with specific site allocation policies for extra care housing. This list however</p>	

excludes the provision of extra care previously associated with Tudeley Village following the decision to remove Tudeley Village from the Plan. In response to the Inspector's Initial Findings it will also therefore be necessary to include within Policy H6 this list of sites to indicate how the identified need will be met.

Bearing in mind the Council have determined to remove Tudeley Village from the Plan it is even more imperative that sites are allocated for extra care housing. The deletion of Tudeley Village removes the provision for at least one sheltered and one extra care scheme that formed part of the policy requirement.

With the above in mind, we write to reiterate the suitability of our client's site at Woodsgate Corner to be allocated for extra care accommodation. The proposed allocation's scale of development (80 units of extra care or up to 120 units of residential care home) can readily be accommodated within the available site. There are no constraints of significance. The site is generally level and has a good access arrangement and it is thus suitable to deliver such extra care provision.

In light of the Council's decision to remove Tudeley Village from the Plan all sites to be allocated are essential in terms of ensuring that the Council can meet the identified need. The Woodsgate Corner allocation will therefore provide valuable unit numbers contributing towards the Council meeting the identified need.

Additional text is therefore needed in relation to Policy H6 in order to make the plan sound i.e. that it is positively prepared (seeking to meet the area's objectively assessed needs) and effective (deliverable over the plan period) as follows:

The following sites will provide housing for older persons to meet the requirement for extra care housing within the ranges set out below.

Prevalence rate	Gross Extra Care Need 2038
<i>KCC Model</i>	<i>342</i>
<i>25/1000 (SHOP@)</i>	<i>431</i>

Site	Status	Units
<i>Arriva Bus Depot, RTW</i>	<i>Planning permission; (Allocation AL/RTW 4) Under construction and nearing completion</i>	<i>89 units</i>
<i>St Michaels Burrswood, RTW</i>	<i>Planning permission (pp for certificate of lawful development)</i>	<i>72 units</i>
<i>Former Cinema site, RTW</i>	<i>Planning permission (pp) (Allocation AL/RTW 1)</i>	<i>166 units</i>
<i>Woodsgate Corner, Pembury</i>	<i>Allocation (AL/PW 6*)</i>	<i>80 units</i>
<i>Paddock Wood – Strategic Allocation (including East parcel)</i>	<i>Allocation (STR/SS 1)</i>	<i>c125 units</i>

<i>Paddock Wood – East parcel</i>	<i>Planning application pending consideration (70 bed care home or 60 extra care units)</i>	<i>60-70 units (form part of the above c125 units)</i>
Total		c532 units

** The policy also allows for an alternative residential care scheme of c100 units)*

To summarise therefore, it has been demonstrated that given the removal of Tudeley Village it is necessary to ensure all sites proposed to be allocated are allocated within the Plan in order that the identified need for housing for older people can be met. To address the comments made by the Inspector in his Initial Findings it is necessary for this need to be quantified within Policy H6 and also that a list of those permissions and allocations, including the Woodsgate Corner allocation, is included within the Policy to demonstrate how this need will be met.

7.	<p>Please use this box for any other comments you wish to make.</p> <p>The text box will automatically expand if necessary.</p>
	N/A

8.	<p>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?</p>
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No, I do not wish to participate at the examination hearings

Yes, I wish to participate at the examination hearings

9.	<p>If you wish to participate at the examination hearings stage once it resumes, please outline why you consider this to be necessary:</p>
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Participation at the Examination would only be necessary if clarification is required regarding the suitability of the Woodsgate Corner site for allocation or in terms of the additions required to Policy H6.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings stage once it resumes.

Sustainability Appraisal

10.	To which part of the Sustainability Appraisal does this representation relate?	
Chapter and (if applicable) sub heading		
Policy		
Paragraph number or appendix		

11.	<p>Please use this box for any comments you wish to make about the Sustainability Appraisal.</p> <p>The text box will automatically expand if necessary</p>	
<p>Click or tap here to enter text.</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, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.

Signature	MRPP	Date	23/02/2024
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