



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

Representation Form

Please use a separate sheet for each representation

Ref:

(For official use only)

Name of the Local Plan to which this representation relates:	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
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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

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	Councillor	
First Name	Paul	
Last Name	Cooper	
Job title (where relevant)	Deputy Leader of the Council and Cabinet Member for Planning, Infrastructure and Economic Development	
Organisation (where relevant)	Maidstone Borough Council	
Address Line 1	Maidstone House	

Address Line 2	King Street	
Address Line 3	Maidstone	
Address Line 4	Kent	
Postcode	ME15 6JQ	
Telephone number		
Email address (where relevant)		

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	Maidstone Borough Council
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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	Housing Need and Supply 2020-2038	
Policy	Policies STR1 – The Development Strategy; STR/SS1 – The Strategy for Paddock Wood, including land at east Capel; STR/SS3 – The Strategy for Tudeley Village	
Paragraph number or appendix		

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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.2	Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5.	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.	
	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.

The text box will automatically expand if necessary.

Of the proposed changes to the submission plan, the two with the potential to impact Maidstone borough are the removal of Tudeley Village and the reduction in proposed development at Paddock Wood/land east of Capel (PWeC). Both of these proposals contribute to a reduced housing and employment land supply of just 10 years, with the suggestion of a requirement for an immediate review of the plan as a result.

The removal of Tudeley Village in its entirety and the reduction in housing and employment development at PWeC equates to the delivery of approximately 3,100 fewer new homes over the plan period to 2038. It would also result in a reduction in net developable employment land at PWeC from 11.2 hectares to 8.4 hectares – sufficient only to 'meet likely needs over the first ten years post-adoption' (para 4.33 of the TWBC Topic Paper – Addendum, January 2024

https://forms.tunbridgewells.gov.uk/_data/assets/pdf_file/0020/455132/PS_054-Development-Strategy-Topic-Paper-Addendum.pdf).

MBC, through the preparation of its own Local Plan Review, have already sought to accommodate Maidstone borough's significantly increased identified housing and employment needs within the borough boundary and are not at a stage in plan-making to be able to consider accommodating any additional unmet housing or employment needs from neighbouring authorities.

The reasons for the removal of Tudeley Village from the submission plan are understood and appreciated by MBC. Similarly, the reduced development capacity at PWeC due to flood risk is also understood, based on the content of the Inspector's letter. It is commendable that TWBC are seeking to progress the plan in order to ensure the certainty of a plan-led system and the wider benefits that this brings.

However, the Inspector goes on to state that 'the Council will therefore need to give further consideration to how best the Plan can still meet housing needs, having particular regard to the requirements in paragraph 68 of the Framework'.

MBC is concerned that the proposals put forward by TWBC to meet development needs over the next ten years only are not positively prepared as the plan would no longer, as a minimum, seek to meet the identified needs over the plan period to 2038. On this basis, MBC does not consider the TWBC Local Plan to be 'sound'.

MBC raises no concerns or objections on the grounds of legal compliance.

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>
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In order to be found 'sound', the Tunbridge Wells Local Plan needs to be positively prepared in that it must set out how it plans to meet identified needs in full over the plan period. The development expected in the final third of the plan period should not be left to a subsequent – albeit immediate – review of the plan. The risks associated with this approach, e.g. potential timetable slippages or change in political direction may place additional development pressures on TWBC at a later date.

That being said, if the Inspector considers TWBC's approach to be sound in his final report – be that subject to any caveats of immediate plan review or otherwise; MBC would not seek to dispute this conclusion.

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.	If you wish to participate at the examination hearings stage once it resumes, please outline why you consider this to be necessary:
N/A	

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	N/A	
Policy	N/A	
Paragraph number or appendix	N/A	

11.	Please use this box for any comments you wish to make about the Sustainability Appraisal. The text box will automatically expand if necessary	
N/A		

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		Date	3 April 2024
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