



**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 Friday 12 April 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	Mr	
First Name	Peter	
Last Name	Tavner	
Job title (where relevant)	n/a	
Organisation (where relevant)	n/a	
Address Line 1	████████████████████	
Address Line 2	████████████████	

Address Line 3	██████████	
Address Line 4	███	
Postcode	██████	
Telephone number	██████████	
Email address (where relevant)	██████████████████	

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

Name or Organisation	Peter Tavner
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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	No chapter reference in Addendum	
Policy	Land at Mabledon House – Policy AL/SO2	
Paragraph number or appendix	Paragraphs 65-68 of Inspector’s Initial Findings	

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.

The Topic Paper Addendum is silent on Policy AL/SO2. The Inspector, in his response, makes it clear that as it stands currently Policy AL/SO2 is not sound and that changes are required to make it sound. The Council has not addressed the Inspector's comments in the Addendum and as such we must conclude that the policy remains unsound.

The Inspector says in paragraph 67 of his initial findings that:

“Allocating the site for development, but then requiring it to demonstrate very special circumstances [for inappropriate development in the Green Belt] does not represent an effective or justified policy”

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.

6. 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.

The text box will automatically expand if necessary.

The Inspector's Initial Findings in Paragraph 68 gives an indication of what modifications could be made to make the policy sound, as follows:

“The conversion of existing structures and the house could also presumably take place without the construction of new buildings. Another way of making the Plan sound might therefore be to support the principle of the uses proposed but within the exceptions permitted by national planning policy. This would potentially be a different type of development to the one proposed by the site promoters. It is therefore a matter which requires further consideration by the Council on the most appropriate way forward.”

Based on the Inspector's comments, I conclude that the following changes could make the policy sound:

- Conversion of the existing building at Mabledon House only with no new buildings or extensions to Mabledon House
- A smaller hotel with considerably fewer beds than the proposed 200
- Ensuring that the 'footprint' of the new hotel (including patio area, swimming pool, other facilities) does not exceed that of the existing development.

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>
	<p>I originally provided similar comments using the online form but this required comments directly aligned to the Topic Paper Addendum. As the Addendum contains no reference to Policy AL/SO2 it is difficult to provide comments aligned to it. I have therefore provided this submission separate to the online form.</p>

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>
	<p>Click or tap here to enter text.</p>

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		Date	12/04/2024
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