

Public Consultation on Tunbridge Wells Borough Council's Local Plan: New Evidence Base Documents – summary and response table for comments outside the scope of the consultation

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Document(s) commented on	Proposed Modifications	Comment Summary	TWBC Response	Hearing Session Participation (and reason for participation)
NEBD1-1	Mr Nicholas Prideaux				Supporting docs re site 237 ref AL/RTW24		<p>Legally non-compliant and unsound</p> <p>The documents relating to Cadogan Fields does not account for:</p> <ul style="list-style-type: none"> Right of access by neighbouring houses accrued and exercised over many years Flooding drainage problems at entrance and adjacent to changing rooms/pavilion Impact and disturbance to a green space in an over developed area 	Site reference 237 refers to the site at Cadogan Fields in Royal Tunbridge Wells. This site was allocated under Policy reference AL/RTW 24 in the Regulation 18 Draft version of the Local Plan but was subsequently deleted from the Regulation 19 and Submission Version of the Local Plan. It is not therefore an allocation within the Plan and not part of this consultation.	No, I do not wish to participate at the examination hearing session.
NEBD16-4		Tunbridge Wells Green Party	John Hurst		PS_109	Better locations for the approx 250 dwellings in the three high-quality Green Belt sites at AL/RTW 16, 14 and 5 should be sought during the planned early review of the approved Local Plan, using the new Government's guidelines on the use of Green Belt land.	<p>Legally compliant but unsound</p> <p>TW Green Party welcomes the reduction in loss of Green Belt through dropping Tudeley and Paddock Wood's worst flood zones, but maintains AL/RTW 5, AL/RTW 14 and AL/RTW 16 are not justified for the reasons noted in our Stage 2 Hearing Statement (Matter 3, Issue 1).</p> <p>The Local Plan will not be sound if these developments are included, as they are not justified or positively prepared in respect of sustainable development.</p>	The Councils approach to the strategy for development is set out within CD 3.126 Development Strategy Topic Paper and PS_054 Development Strategy Topic Paper Addendum . Allocations AL/RTW 5 – Land at Caenwood Farm, Royal Tunbridge Wells, AL/RTW 14 – Land at Tunbridge Wells Garden Centre, Royal Tunbridge Wells and AL/RTW 16 – Land at Spratsbrook Farm, Royal Tunbridge Wells all include land within the designated Green Belt on the edge of Royal Tunbridge Wells. The rationale for their allocation is set out within Hearing Statements TWLP/037 and TWLP/063 were discussed in detail at the Stage 2 Hearing sessions on the 17 June and 12 July 2022.	No, I do not wish to participate at the examination hearing session.
NEBD21-4	Mrs Nichola Watters	Wealden District Council			AL/RTW 16 - Land to the west of Eridge Road at Spratsbrook Farm	None <i>[TWBC: see the next column – Comment Summary]</i>	<p>Legally compliant and sound</p> <p><i>[TWBC: applied for the overall Policy STR 1 – Development Strategy (PS_109) as specified in the representation form.</i></p> <p><i>Comments related to AL/RTW 16 are then listed here for clarity.]</i></p> <p><u>Comments with regard to Policy AL/RTW 16 as part of the Policy STR 1 – the Development Strategy</u></p>	This is noted.	No, I do not wish to participate at the examination hearing session.

Public Consultation on Tunbridge Wells Borough Council’s Local Plan: New Evidence Base Documents – summary and response table for comments outside the scope of the consultation

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Document(s) commented on	Proposed Modifications	Comment Summary	TWBC Response	Hearing Session Participation (and reason for participation)
							A site allocation at the border of Tunbridge Wells Borough and Wealden District, known as Land to the west of Eridge Road at Spratsbrook Farm (Policy AL/RTW 16), is set for 120 dwellings with delivery expected in 2028/29 and 2029/30. The Council is satisfied that the policy addresses impacts on adjacent land within Wealden District, particularly through criterion 10, which requires consideration of these impacts.		
NEBD44-1	Ronald Davies	WBD Planning Ltd			AL/RTW 14		Legally compliant and sound AL/RTW 14 - Land at Tunbridge Wells Garden Centre, Eridge Road <i>[TWBC: Known as High Rocks Lane in the Site Appraisal submitted along the representation]</i> <ul style="list-style-type: none">Planning Consultant submission – WBD PlanningRD is aware that consultation for AL/RTW 14 (Garden Centre) has closed. He has been involved for a few weeks in land adjacent to draft allocation AL/RTW 14, promoting it on behalf of the owner, Running Rail Ltd.RD wanted to ‘let the council know’ that this land, to the east of AL/RTW14 is being promoted for development and, in his opinion, could be sensibly added to AL/RTW14.There is a preliminary design document submitted with the comment. This shows the area that the agent believes is suitable for development. The site is in the Green Belt with policy and protected area designations.The agent suggests that part of the site is suitable for residential development and potentially a care home or sheltered housing.	This comment is noted. It is not appropriate at this stage in Plan preparation to consider further sites and the Council would therefore encourage the site promoter to submit the site through the ‘Call for Sites’ process which will take place as part of the Local Plan Review process. Alternatively, the site promoter may decide to promote the site through the Development Management process.	No, I do not wish to participate at the examination hearing session.
NEBD45-4	Mr Jonathan Easteal				All consultation documents		Legal compliance and soundness not stated Documents submitted by the council too opaque, not designed for the average	TWBC accepts that some of the documents, particularly those that relate to highways modelling and mitigation are by their very nature, complex, technical documents. The	Not stated

Public Consultation on Tunbridge Wells Borough Council’s Local Plan: New Evidence Base Documents – summary and response table for comments outside the scope of the consultation

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Document(s) commented on	Proposed Modifications	Comment Summary	TWBC Response	Hearing Session Participation (and reason for participation)
							residents to understand, limiting the accessibility, not in the interest of them.	<p>Council has tried to assist on this point by preparing an Introductory Note (document PS-099) for the highways documents, which explains the purpose of the different highways reports produced.</p> <p>In conducting the public consultant, full contact details for the Policy Team were given so that people could contact the Planning Policy Team if they required assistance with the documents or understanding them.</p> <p>The Council also conducted accessibility checks of documents and advised on the website that paper copies of the documents could be made available upon request.</p>	
NEBD46-5	Sue Lovell	Stop Overdevelopment of Paddock Wood			All consultation documents		<p>Legal compliance and soundness not stated</p> <p>Acknowledge that the below is not a formal response to the consultation but aims to highlight the difficulties residents faced in contributing to the process.</p> <ul style="list-style-type: none">Concerns about the 20 updated documents for consultation that are difficult to understand due to technical language, making it hard for residents of Paddock Wood to grasp the key issues and their impacts.Highlight the lack of plain English versions of the documents and the absence of face-to-face meetings, which would help residents understand the proposals better.Believe the consultation process is too complex for the average person, leading to a lack of transparency and a feeling of powerlessness among residents. Feel that this approach does not give residents a real voice and increases despondency, making it seem like a “done deal.”	<p>TWBC accepts that some of the documents, particularly those that relate to highways modelling and mitigation are by their very nature, complex, technical documents. The Council has tried to assist on this point by preparing an Introductory Note (document PS-099) for the highways documents, which explains the purpose of the different highways reports produced.</p> <p>In conducting the public consultant, full contact details for the Policy Team were given so that people could contact the Planning Policy Team if they required assistance with the documents or understanding them.</p> <p>The Council also conducted accessibility checks of documents and advised on the website that paper copies of the documents could be made available upon request.</p> <p>The consultation has been a non-statutory consultation conducted at the request of the Inspector. The Inspector will have full regard to all</p>	<p>Yes, I wish to participate at the examination hearing session. - not stated why</p>

Public Consultation on Tunbridge Wells Borough Council's Local Plan: New Evidence Base Documents – summary and response table for comments outside the scope of the consultation

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Document(s) commented on	Proposed Modifications	Comment Summary	TWBC Response	Hearing Session Participation (and reason for participation)
							<ul style="list-style-type: none"> Question whether the public's views will truly be heard or if the consultation is merely a formality. Note that despite promises of improvements, no infrastructure enhancements have been delivered from the existing developments. Concerns have been raised about the lack of clarity in the proposals, particularly regarding infrastructure improvements and costs. Details on secondary school and healthcare provisions are also insufficient. Additionally, there are issues with how TWBC conducted the flood assessment, especially the 'sequential test' for site allocation. Overall, the documents are criticised for being heavy on jargon and lacking substantial, clear details. 	<p>consultation responses received in determining the next steps for the examination.</p> <p>As part of the Local Plan process, Tunbridge Wells Borough Council has carried out extensive engagement and liaison with infrastructure providers in order to inform the Local Plan and the strategy and policies contained within it. This work is set out clearly within Policy STR5 – Infrastructure and Connectivity and is set out in detail in the Infrastructure Delivery Plan - (August 2024) which supports the Local Plan.</p> <p>This has been evidenced in the many Statements of Common Ground (SoCGs) completed by the Council with infrastructure providers, which has included with the Kent County Council on education matters (Core Document 3.132c(v) superseded by PS 012) and most recently PS 097. The Council will continue to work with and engage with KCC (and others) on infrastructure matters. It has also included engagement with the health care provider.</p>	
NEBD48-1	Rex Wakeling. D.C.M.				All consultation documents		<p>Legal compliance and soundness not stated</p> <p>Acknowledge that the below is not a formal response to the consultation but aims to highlight the difficulties residents faced in contributing to the process.</p> <ul style="list-style-type: none"> Concerns about the 20 updated documents for consultation that are difficult to understand due to technical language, making it hard for residents of Paddock Wood to grasp the key issues and their impacts. 	<p>TWBC accepts that some of the documents, particularly those that relate to highways modelling and mitigation are by their very nature, complex, technical documents. The Council has tried to assist on this point by preparing an Introductory Note (document PS-099) for the highways documents, which explains the purpose of the different highways reports produced.</p> <p>In conducting the public consultant, full contact details for the Policy Team were given so that people could contact the Planning Policy</p>	Not stated.

Public Consultation on Tunbridge Wells Borough Council’s Local Plan: New Evidence Base Documents – summary and response table for comments outside the scope of the consultation

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Document(s) commented on	Proposed Modifications	Comment Summary	TWBC Response	Hearing Session Participation (and reason for participation)
							<ul style="list-style-type: none">Highlight the lack of plain English versions of the documents and the absence of face-to-face meetings, which would help residents understand the proposals better.Believe the consultation process is too complex for the average person, leading to a lack of transparency and a feeling of powerlessness among residents. Feel that this approach does not give residents a real voice and increases despondency, making it seem like a “done deal.”Question whether the public’s views will truly be heard or if the consultation is merely a formality.Note that despite promises of improvements, no infrastructure enhancements have been delivered from the existing developments.	<p>Team if they required assistance with the documents or understanding them.</p> <p>The Council also conducted accessibility checks of documents and advised on the website that paper copies of the documents could be made available upon request.</p> <p>The consultation has been a non-statutory consultation conducted at the request of the Inspector. The Inspector will have full regard to all consultation responses received in determining the next steps for the examination.</p> <p>As part of the Local Plan process, Tunbridge Wells Borough Council has carried out extensive engagement and liaison with infrastructure providers in order to inform the Local Plan and the strategy and policies contained within it. This work is set out clearly within Policy STR5 – Infrastructure and Connectivity and is set out in detail in the Infrastructure Delivery Plan - (August 2024) which supports the Local Plan.</p> <p>This has been evidenced in the many Statements of Common Ground (SoCGs) completed by the Council with infrastructure providers, which has included with the Kent County Council on education matters (Core Document 3.132c(v) superseded by PS_012) and most recently PS_097. The Council will continue to work with and engage with KCC (and others) on infrastructure matters.</p>	