



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

**Representation Form**

**Please use a separate sheet for each representation**

Ref:  (For official use only)
-------------------------------------

<b>Name of the Local Plan to which this representation relates:</b>	<b>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</b>
---	--

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](mailto: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)
<b>Title</b>	<b>Ms</b>	
<b>First Name</b>	<b>Margaret</b>	
<b>Last Name</b>	<b>Borland</b>	
<b>Job title (where relevant)</b>		
<b>Organisation (where relevant)</b>		
<b>Address Line 1</b>	██████████	
<b>Address Line 2</b>	██████████	

<b>Address Line 3</b>	██████████	
<b>Address Line 4</b>	██████████	
<b>Postcode</b>	██████	
<b>Telephone number</b>		
<b>Email address (where relevant)</b>	████████████████████	

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

<b>Name or Organisation</b>	Margaret Borland
-----------------------------	------------------

<b>3.</b>	<b>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?</b>		
<b>Chapter and (if applicable) sub heading</b>	2. Green Belt		
<b>Policy</b>			
<b>Paragraph number or appendix</b>	2.12		

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

<b>5.</b>	<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> <p>The text box will automatically expand if necessary.</p>
N/A	

N/A	<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>
N/A	

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>
----	---

- 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>
N/A	

### Sustainability Appraisal

10.	<p>To which part of the Sustainability Appraisal does this representation relate?</p>	
Chapter and (if applicable) sub heading	<p>Chapter 4 – 4.2 Green Belt Studies</p>	

<b>Policy</b>	N/A
<b>Paragraph number or appendix</b>	<b>Table 6 – Reasonable alternative sites in Southborough</b>

<b>11.</b>	<p><b>Please use this box for any comments you wish to make about the Sustainability Appraisal.</b></p> <p><b>The text box will automatically expand if necessary</b></p>
<p>This comment is purely to request a factual correction to PS_037 Sustainability Appraisal Addendum for site 445 (Mabledon and Nightingale) and does not require any changes to policy.</p> <p>Table 6 states that the Gren Belt harm classification has been revised from Very High at Stage 2 to High at Stage 3. However, PS-35 Green Belt Stage 3 Addendum report is clear that the vast majority of the site (RA/SO 1B – 142.60ha) continues to be classified as <u>Very High</u> and only a very small portion (RA/SO 1A – 4.72ha) has been revised from Very High to High at Stage 3, as part of the assessment of “reasonable alternatives”. While this has no impact on the current proposed Development Strategy it may have ramifications for future plan reviews where additional housing development sites are sought. Please could a minor modification be made to Table 6 to confirm that the score revision from Very High to High has been made for a small part of the site only.</p> <p>I also note that Paragraph 2.12. of PS_054 Development Strategy Topic Paper Addendum suggests that sites in both AONB and Green Belt are <u>not</u> included in the list of “reasonable alternatives” and therefore question why this large site, which I believe is wholly within the AONB (See 3.96d LVIA Section 6.5 – Southborough sites) has been included in the Stage 3 review.</p>	

<b>Signature</b>	Margaret Borland	<b>Date</b>	26/02/24
------------------	------------------	-------------	----------

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

<b>Name or Organisation</b>	Margaret Borland
-----------------------------	------------------

<b>3.</b>	<b>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?</b>		
<b>Chapter and (if applicable) sub heading</b>	3.0 Review of the proposal for a new garden village at Tudeley		
<b>Policy</b>			
<b>Paragraph number or appendix</b>	3.14-3.37		

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

<b>5.</b>	<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> <p>The text box will automatically expand if necessary.</p>
N/A	

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>
N/A	

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><b>Issue Area A: Location and Accessibility</b></p> <p>I support the removal of Tudeley Village from the Local Plan. I consider that the RAG ratings given in PS-039 RAG Assessment – Access and Movement do not adequately reflect the practical limitations of the proposal and therefore RAG ratings are generally too optimistic that the issues identified by the inspector can be overcome and should not be used in future Plan reviews. My concerns are set out below.</p> <p>a) Potential for walking and cycling links (para 3.14- 3.17)</p> <ul style="list-style-type: none"> <li>- I am pleased that the Council have now accepted the point made at the Hearings in 2021 that <b>walking</b> to Tonbridge would be impractical, with a focus now on “walking routes primarily within the new community”. Unfortunately no assessment is made of this location constraint.</li> <li>- The cycle link being on proposer’s controlled land was only applicable to a small Part of the link to destinations within Tonbridge urban area – The High Street, the Railway Stations and the popular selective schools, state grammar and independent. It appears that the majority of the route is either a PROW or urban streets and busy A-roads where there are currently no dedicated cycleways.</li> <li>- While a 15minute cycle ride to work in Tonbridge is feasible, commuters making onward journeys by train for work in London or even Royal Tunbridge Wells, would have found commuting in wet weather cycling clothes both uncomfortable and unpopular with fellow travellers.</li> <li>- The lack of any proposed cycle access to the Royal Tunbridge Wells (RTW) Key Employment Areas and Retail/Leisure sites would also have been detrimental to the sustainability of the site, no active travel options available for those wishing to work or spend leisure time in RTW.</li> </ul>	

	<p>b) Rail and bus infrastructure (para 3.18 – 3.20)</p> <ul style="list-style-type: none"> <li>- Network Rail have clear parameters for volume of passengers required for a new railway station plus over recent years have been actively seeking to reduce stops at existing stations with a low volume of passengers in order to deliver a faster, more reliable service to the high-volume stations. The severe impact on the sustainability of Tudeley Village due to the lack of a railway station was always going to be an issue.</li> <li>- It is unclear whether the costings for upgrading the 205 bus service included extending the service into the late evening to meet the needs of commuters and of residents who wished to go to the theatre or for dinner in Tonbridge or London.</li> <li>- There were no proposals for direct bus services from Tudeley to Tunbridge Wells or to the Tunbridge Wells Hospital on the outskirts of Pembury.</li> </ul> <p>d) Congestion in Tonbridge Town Centre (para 3.31-3.33) and e) Modal shift (para 3.34 -3.37)</p> <ul style="list-style-type: none"> <li>- In the light of the above comments, I question the validity of the assertion in para 3.32 that that Tudeley Village would be “expected to facilitate a reduction in the need to travel by private car”, as Tudeley Village would have had minimal sustainable transport options and be in a location that could not be made sustainable (see comments above)</li> <li>- Even if the projected modal shift were achieved, when coupled with the proposed scale of growth, it is surely more likely that extensive private car usage would inevitably exacerbate the existing congestion in Tonbridge Town Centre.</li> </ul>

<b>8.</b>	<b>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?</b>
-----------	---

- No**, I do not wish to participate at the examination hearings
- Yes**, I wish to participate at the examination hearings

<b>9.</b>	<b>If you wish to participate at the examination hearings stage once it resumes, please outline why you consider this to be necessary:</b>
N/A	

**Sustainability Appraisal**

<b>10.</b>	<b>To which part of the Sustainability Appraisal does this representation relate?</b>
------------	---



<b>Chapter and (if applicable) sub heading</b>	<b>N/A</b>
<b>Policy</b>	
<b>Paragraph number or appendix</b>	

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

<b>Signature</b>	Margaret Borland	<b>Date</b>	26/02/24
------------------	------------------	-------------	----------

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

<b>Name or Organisation</b>	Margaret Borland
-----------------------------	------------------

<b>3.</b>	<b>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?</b>	
<b>Chapter and (if applicable) sub heading</b>	11.0 Housing need and supply	
<b>Policy</b>		
<b>Paragraph number or appendix</b>	11.21 Table 3	

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

<b>5.</b>	<p><b>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.</b></p> <p><b>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.</b></p> <p><b>The text box will automatically expand if necessary.</b></p>
<p>I support the reductions in Housing need 2020-2038 set out in Table 3, recognising thrt currently the Council have little option other than to follow the Government's Standard Methodology for these calculations</p>	

<b>6.</b>	<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>
N/A	

<b>7.</b>	<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	

<b>8.</b>	<p>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?</p>
-----------	---

- No**, I do not wish to participate at the examination hearings
- Yes**, I wish to participate at the examination hearings

<b>9.</b>	<p>If you wish to participate at the examination hearings stage once it resumes, please outline why you consider this to be necessary:</p>
N/A	

### Sustainability Appraisal

<b>10.</b>	<p>To which part of the Sustainability Appraisal does this representation relate?</p>
Chapter and (if applicable) sub heading	N/A

<b>Policy</b>	
<b>Paragraph number or appendix</b>	

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

<b>Signature</b>	Margaret Borland	<b>Date</b>	26/02/24
------------------	------------------	-------------	----------

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

<b>Name or Organisation</b>	Margaret Borland
-----------------------------	------------------

<b>3.</b>	<b>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?</b>
<b>Chapter and (if applicable) sub heading</b>	12.0 Conclusions on preferred development strategy option
<b>Policy</b>	Amendments to Policies STR/SS1 and STR/SS3
<b>Paragraph number or appendix</b>	12.1- 12.7

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

<b>5.</b>	<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> <p>The text box will automatically expand if necessary.</p>
<p>I support the Council’s preferred Development Strategy, as outlined in Chapter 12 of the report in particular</p> <ul style="list-style-type: none"> <li>- the reduction in the overall level of housing in Paddock Wood and East Capel to avoid building homes within higher flood zones (STR/SS1).</li> <li>- the removal of the Tudeley Village development (STR/SS3). My support is based primarily on the level of harm to the Green Belt that this would have caused coupled with the poor sustainability of the proposed new settlement.</li> <li>- pursuing the Local Plan on the basis that it is only meeting housing needs for the next 10 years and will need to be subject to an early review.</li> </ul>	

<b>6.</b>	<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>
N/A	

<b>7.</b>	<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	

<b>8.</b>	<p>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?</p>
-----------	---

- No**, I do not wish to participate at the examination hearings
- Yes**, I wish to participate at the examination hearings

<b>9.</b>	<p>If you wish to participate at the examination hearings stage once it resumes, please outline why you consider this to be necessary:</p>
N/A	

**Sustainability Appraisal**

<b>10.</b>	<p>To which part of the Sustainability Appraisal does this representation relate?</p>
------------	---

<b>Chapter and (if applicable) sub heading</b>	<b>N/A</b>
<b>Policy</b>	
<b>Paragraph number or appendix</b>	

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

<b>Signature</b>	Margaret Borland	<b>Date</b>	26/02/24
------------------	------------------	-------------	----------

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

<b>Name or Organisation</b>	Margaret Borland
-----------------------------	------------------

<b>3.</b>	<b>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?</b>	
<b>Chapter and (if applicable) sub heading</b>	14.0 Commitment to early review	
<b>Policy</b>		
<b>Paragraph number or appendix</b>		

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

<b>5.</b>	<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> <p>The text box will automatically expand if necessary.</p>				
<p>I support the commitment to an early review of the Plan and the outline scope of the review suggested in this chapter (i.e not solely focussing on meeting housing need)</p>					



N/A	<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>
N/A	

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>
----	---

- 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>
N/A	

### Sustainability Appraisal

10.	To which part of the Sustainability Appraisal does this representation relate?	
Chapter and (if applicable) sub heading	N/A	

<b>Policy</b>	
<b>Paragraph number or appendix</b>	

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

<b>Signature</b>	Margaret Borland	<b>Date</b>	26/02/24
------------------	------------------	-------------	----------