

1) Please confirm the evidence base document this comment relates to.

PS_107 Action Note for Action Point 30 regarding the Local Plan and Five-Year Housing Land Supply Positions (June 2024)

To which part of the document listed in the question 1 above does this representation relate to?

2) Chapter and (if applicable) sub heading:

All

3) Paragraph number or appendix:

Tables in Appendix 1

4) Do you consider the evidence base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):

Yes No

Legally Compliant Selected Not Selected

Sound Not Selected Selected

6) Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified in question 5 above where this relates to legal compliance or soundness. You will need to say why this modification will make the Local Plan 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.

Please see our comments to

[PS_109 Revised Policy Wording and supporting text for Policy STR 1 – The Development Strategy \(September 2024\).pdf](#)

, following.

7) Please use this box for any other comments you wish to make. The text box will automatically expand if necessary.

Tunbridge Wells Green Party welcomes the reduction of the “buffer” number of houses from the original 1,050 to approx 200-300; this is also in line with our proposal in our Stage 2 Hearing Statement.

https://tunbridgewells.gov.uk/__data/assets/pdf_file/0009/421668/REP-1225605-001-Tunbridge-Wells-Green-Party-Hearing-Statement-Matter-3-Issue-1.pdf

Regarding the table in Appendix 1 of this document, are the dates shown for the various housing developments firm? A surprising number of developments are shown timed for after 2030.

8) If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)

No, I do not wish to participate at the examination hearing session

1) Please confirm the evidence base document this comment relates to.

PS_095 Revised Policy Wording for Policy STR/SS 1 – Paddock Wood and Land at East Capel (September 2024)

To which part of the document listed in the question 1 above does this representation relate to?

2) Chapter and (if applicable) sub heading:

All

3) Paragraph number or appendix:

15, 16 and following

4) Do you consider the evidence base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):

Yes No

Legally Compliant Selected Not Selected

Sound Not Selected Selected

5) Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments. The text box will automatically expand if necessary.

Please see our comments to

[PS_109 Revised Policy Wording and supporting text for Policy STR 1 – The Development Strategy \(September 2024\).pdf](#)

, following.

6) Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified in question 5 above where this relates to legal compliance or soundness. You will need to say why this modification will make the Local Plan 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.

Please see our comments to

[PS_109 Revised Policy Wording and supporting text for Policy STR 1 – The Development Strategy \(September 2024\).pdf](#)

, following.

7) Please use this box for any other comments you wish to make. The text box will automatically expand if necessary.

Tunbridge Wells Green Party welcomes the approx 1,000 reduction in the number of dwellings to be loaded on to Paddock Wood; the elimination of the use of Flood Zones 2 & 3 is in line with our proposal made in our 19 March 2022 Hearing Statement for the Stage 2 Hearings.

https://tunbridgewells.gov.uk/__data/assets/pdf_file/0009/421668/REP-1225605-001-Tunbridge-Wells-Green-Party-Hearing-Statement-Matter-3-Issue-1.pdf

Our detailed comments are as follows:

P7 para 15: the health provision should be defined now, and included in a revised document

P8 para 16: the health provision has not been included in these lists; given the state of current health provision in Paddock Wood, it should be included in the Short Term commitments, and sized to support at least 2,500 dwellings.

P9 onwards: it would help clarity and openness if the now-excluded Zone 2 and 3 areas could be included in the diagrams, eg in a different background shading.

P11 (vi) please show the size and location of the Wetland Park

P13 (iv) please show the size and location of the flood water attenuation area

8) If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)

No, I do not wish to participate at the examination hearing session

1) Please confirm the evidence base document this comment relates to.

PS_098 Action Note on Action Point 28 regarding Local Plan Sequential Test regarding Strategic Allocation Policy STR/SS1 Land at Paddock Wood including land at east Capel (September 2024)

To which part of the document listed in the question 1 above does this representation relate to?

2) Chapter and (if applicable) sub heading:

All

3) Paragraph number or appendix:

Pages 11, 12 onwards, and 17

4) Do you consider the evidence base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):

Yes No

Legally Compliant Selected Not Selected

Sound Not Selected Selected

5) Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments. The text box will automatically expand if necessary.

Please see our comments to

[PS_109 Revised Policy Wording and supporting text for Policy STR 1 – The Development Strategy \(September 2024\).pdf](#)

, following.

6) Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified in question 5 above where this relates to legal compliance or soundness. You will need to say why this modification will make the Local Plan 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.

Please see our comments to

[PS_109 Revised Policy Wording and supporting text for Policy STR 1 – The Development Strategy \(September 2024\).pdf](#)

, following.

7) Please use this box for any other comments you wish to make. The text box will automatically expand if necessary.

Tunbridge Wells Green Party welcomes the approx 1,000 reduction in the number of dwellings to be loaded on to Paddock Wood; the elimination of the use of Flood Zones 2 & 3 is in line with our proposal made in our 19 March 2022 Hearing Statement for the Stage 2 Hearings.

https://tunbridgewells.gov.uk/__data/assets/pdf_file/0009/421668/REP-1225605-001-Tunbridge-Wells-Green-Party-Hearing-Statement-Matter-3-Issue-1.pdf

Our detailed comments are as follows:

P11: it is good that there is acknowledgement of a change in Strategy, and not just in wording (as the title of PS_095 implies)

P12 onwards: we are very glad that more extensive modelling, including the effects of climate change, has been carried out, but it would be good for clarity and transparency if:

1. It is stated what the “+37%” case means in actual climate change terms, eg what global temperature rise does it correspond to?
2. It is shown in diagrams where the Zone 2 & 3 Flood Zones now no longer planned for dwellings are located

P17 para 4.5: we believe that the Council should be firmer than “discouraging” developments in areas of known risk of flooding, and should “not allow” them.

See also Appendix 4’s criteria, and ensure consistency of application, and document wording.

8) If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)

No, I do not wish to participate at the examination hearing session

1) Please confirm the evidence base document this comment relates to.

PS_109 Revised Policy Wording and supporting text for Policy STR 1- The Development Strategy (includes commitment to an early review of the Local Plan and text about Tudeley Garden Village) September 2024

To which part of the document listed in the question 1 above does this representation relate to?

2) Chapter and (if applicable) sub heading:

All

3) Paragraph number or appendix:

All

4) Do you consider the evidence base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):

Yes No

Legally Compliant Selected Not Selected

Sound Not Selected Selected

5) Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments. The text box will automatically expand if necessary.

Tunbridge Wells Green Party welcomes the reduction in Green Belt take due to the dropping of the Tudeley proposal, and of Paddock Wood's worst flood zones, but maintains that the Green Belt takes at AL/RTW 16 (Ramslye Field), AL/RTW 14 (Wyevale Garden Centre) and AL/RTW 5 (Caenwood Farm) are not justified, for the reasons noted in our Stage 2 Hearing Statement.

https://tunbridgewells.gov.uk/__data/assets/pdf_file/0009/421668/REP-1225605-001-Tunbridge-Wells-Green-Party-Hearing-Statement-Matter-3-Issue-1.pdf

If it includes these three developments, the Tunbridge Wells Local Plan will not be Sound, due to their selection not being Justified, or the Plan having been Positively Prepared in the area of sustainable development.

Better locations for the approx 250 dwellings 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.

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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.

8) If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)

No, I do not wish to participate at the examination hearing session