

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 does this representation relate?

12.0 Conclusions on preferred development strategy option

Which part of the plan does your comment relate?

Policy

Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:

Yes No

Legally Compliant Not Selected Selected

Sound Not Selected Selected

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.

Please see comments below.

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. 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.

Please see comments below.

Please use this box for any other comments you wish to make.

The whole planning strategy adopted by the Council in the Local Plan has, from day one, been flawed.

It is no surprise that the Council has had to row back on the new settlement at Tudely along with the proposed development in the flood plain at Paddock Wood.

This change of strategy will result in a loss of some 3,100 housing units from the Plan. This is disastrous given the acute need for housing in the Borough. The Council are now arguing that the shortfall is not this large. I am sure this will be the subject of rigorous scrutiny at the Examination.

Whatever the final shortfall amounts to this housing needs to be planned for now. It is not good enough for the Council to say that they will plan for 10 years and pledge an early review.

In my experience, these plan reviews never take place within the timescales envisaged. The Council has spent many hundreds of thousands of pounds on survey work and consultants' fees to get to this point. If there is a further delay in providing for this housing the evidence base will need to be updated, which will entail even further costs.

A 10-year Plan is also contrary to advice contained in the NPPF. At paragraph 22 it is stated:

*'Strategic policies should look ahead over a **minimum 15-year period** from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure'*

It always amazes me that the Council who are the regulator in terms of planning law and policy find it so hard to comply with it themselves.

The Examination should be suspended for a period of 6 months whilst the Council undertake a fresh 'Call for Sites Exercise' and come up with a revised strategy to meet the housing need. The Council are bound to argue that this will be too difficult, but this is not meant to be an easy process and difficult decisions need to be made.

It is unlikely that the Plan will be adopted before 2025. As a result, it is imperative that the end date of the Plan is extended to 2040.

Tunbridge Wells is by far the largest settlement in the district with a very diverse range of services and facilities and very good transport links. Development focused on the town would be the most sustainable approach to developing a robust planning strategy. On this point paragraph 7 of the NPPF states:

*'The purpose of the planning system is to contribute to the **achievement of sustainable development**, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner.'*

Development has taken place in Tunbridge Wells, but this is predominantly in the form of expensive flats and accommodation for the elderly. The town desperately needs family housing

to provide some vitality and to support local facilities. On this point, the town centre is in serious decline and an injection of new housing might well create some additional demand. A significant proportion of this housing needs to be affordable.

If this family housing is not provided for through the Plan the town will eventually become a very gentle but sad geriatric ghetto!!

If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?

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