



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

**New Evidence Base Documents
Consultation Representation Form**

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

Ref: (For official use only)

Box 1: Name of the Local Plan Evidence Base Document to which this representation relates:	Revised Development Strategy and Policy Wording, and new and updated evidence on Gypsy, Traveller and Travelling Showpeople
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Completed forms must be received at our offices by **midnight on Wednesday 23rd October 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

PART A – CONTACT DETAILS

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	Mrs	
First Name	Nichola	
Last Name	Watters	
Job title (where relevant)	Head of Planning Policy, Economy and Climate Change	
Organisation (where relevant)	Wealden District Council	
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Postcode	BN27 2AX	
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Email address (where relevant)	████████████████████████████████████████	

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

Name or Organisation	Wealden District Council
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3.	To which part of the document listed in Box 1 above does this representation relate to?	
Chapter and (if applicable) sub heading	Updated evidence base documents and policy changes to Policy STR 1 – The Development Strategy	
Paragraph number or appendix		

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):				
4.1	Legally Compliant	Yes	X	No	
4.2	Sound	Yes	X	No	

5.	<p>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.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The text box will automatically expand if necessary.</p>
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With respect to legal compliance and specifically duty to cooperate matters, Wealden District Council (WDC) and Tunbridge Wells Borough Council (TWBC) have a current signed a Statement of Common Ground (SoCG), as previously set out in WDCs representation on the Pre-Submission Local Plan dated 3 June 2021. The SoCG was agreed by Wealden District Council’s Portfolio Holder for Planning and Development on 12 March 2021. On this basis, WDC considered that the Regulation 19 Tunbridge Wells Borough Pre-Submission Local Plan did not raise any cross-boundary strategic issues that had not previously been addressed and considered in the evidence base and policies proposed.

It is noted that the evidence base for the Plan has now been updated following the hearing sessions undertaken during the Examination in Public (EiP). This has resulted in revisions to the development strategy and particularly Policy STR 1 – The Development Strategy; and an updated evidence base, which includes a new Gypsy, Traveller, and Travelling Showpeople Accommodation Needs Assessment (GTAA) dated June 2024 (Version 2).

In terms of the development strategy, it is noted that the Plan makes significant revisions to the growth strategy previously identified in the Pre-Submission Local Plan dated 3 June 2021, namely by removing the Tudeley Village allocation and reducing growth at Paddock Wood. The result is that the Plan no longer meets the 15-year growth needs of the district in full, but instead meets housing needs over the initial 10-year plan period only. The need for revising this strategy is noted and follows the Planning Inspector’s Initial Findings on the Plan published in November 2022. WDC accepts the need to adapt the Plan in these circumstances, subject to the matters set out below.

In terms of changes to the development strategy and the impacts on Wealden District, it is noted that one site allocation sits at the administrative border of Tunbridge Wells Borough and Wealden District at Policy AL/RTW 16 (named as Land to the west of Eridge Road at Spratsbrook Farm). This allocation continues for 120 dwellings as per Appendix 1 of the Updated Local Plan Trajectory 2024, with delivery anticipated in 2028/29 and 2029/30. The Council remains satisfied that the policy addresses the impacts on the adjacent land within the WDC area, particularly at criterion 10 of the policy that states that any development coming forward will need to consider any impacts on the adjacent land within WDC area.

There is also a second site within the TWBC Draft Local Plan that sits in close proximity to the Wealden District administrative boundary at Policy AL/RTW 19 (named as Land to the north of Hawkenbury Recreation Ground), which is allocated for a new and enhanced sport and recreation provision as part of a new stadia sports hub, to include standing/seating for supporters up to a maximum capacity for 3,000 spectators. It is noted that

several changes have been put forward by TWBC as main modifications to this policy, following advice from Kent County Council and these are supported by WDC. The Council would wish, if a planning application was to come forward for such a development, to be consulted on the development given its proximity to WDC and for East Sussex County Council (ESCC) to be involved in the process as the neighbouring Local Highway Authority. It is considered by WDC that there may be some merit in having similar criteria added to this policy as described in response to Policy AL/RTW 16 (i.e. criterion 10), or at least to consider this for the supporting text to the policy.

In more strategic terms, when considering the revised development strategy and proposed policy wording for Policy STR 1 – The Development Strategy, the Council welcomes the commitment to an early partial review of the Plan, as set out in revised Policy STR1 (The Development Strategy) and supporting text. The Council specifically notes the supporting text that identifies a commitment to an early review within six months of the adoption of the current Local Plan, and submission of an updated Plan no more than 30 months later. WDC looks forward to engaging with TWBC on those matters and particularly considering how this need is met within the Borough. WDC also urges early engagement on any Green Belt Review required for the new Local Plan, and potential changes and needs arising as a result of the revised National Planning Policy Framework (NPPF) due to be published later this year/early next.

The Council also note the addition of Part (1) to Policy STR1 – The Development Strategy stating that ‘the early review shall be conducted with the objective of securing sustainable development to: (1) meeting the Council’s unmet objectively assessed housing need for the period post adoption of the Local Plan to the end of the plan period (2038), including unmet housing needs for Gypsy and Traveller and Travelling Show People...’ The latter is particularly relevant, given that the Council’s previous position in response to the Regulation 19 Pre-Submission Plan stated, ‘it should be noted that both authorities are intending to meet their own economic development needs, retail needs and gypsy and traveller accommodation needs through their respective Local Plans.’

It remains the case that there has been no specific request from TWBC to WDC to meet the unmet needs for Gypsy, Traveller and Travelling Showpeople, albeit that there was a request to WDC in late 2020 to meet the unmet housing needs of TWBC at that stage. At this stage, and for the avoidance of doubt, WDC are not currently in position to consider any request from TWBC if it was forthcoming on this issue due to the need for further work on our own evidence base in relation to need and a consideration of our own ability to meet our needs.

However, it is noted that that GTAA dated June 2024 identifies an outstanding need for up to 29 pitches (ethnic need) in the Borough, dependent upon the definition of need utilised within the Plan, and also noting that this need now extends beyond the plan period (with assessment based on 2024-2039, rather than the Plan period up to 2038). When taking account of this outstanding need against anticipated supply, as set out in the 5 Year Gypsy and Traveller Supply Statement 2024, it is evident that there is an anticipated unmet need at the end of the Plan period. The level of this need is dependent upon the definition and assessment period utilised, varying between a shortfall of 14 pitches to only a single pitch. It is also reliant on the Inspectors consideration of Local Plan Policy H9 – Gypsies and Travellers as well as the proposed sites/pitches in the Submission Local Plan.

Notwithstanding this, the Plan in its entirety results in unmet needs at the end of the Plan period, hence the commitment to an early review of the Plan as set out in the revised

development strategy. It is also noted that paragraph 21 of the Gypsy and Traveller Supply Statement 2024 states that ‘the Council is committed to an early review of the Local Plan post adoption, and as part of the early review will seek additional sites and/or additional capacity at existing sites in order to ensure that the full needs of Gypsies and Traveller within the borough are met in full to the end of the plan period’. On this basis, the Council again welcomes the early review of the Plan to address development needs within the Borough, including those for Gypsies, Travellers and Travelling Showpeople.

It is noted that other evidence base documents have been updated as a result of modified policy wording of the development strategy of the Plan. These relate to assessment of flood risk in relation to one allocation, viability matters, as well as highways, education and infrastructure matters. WDC welcomes the review of these matters to ensure a sound and compliant Plan is proposed.

WDC is committed to engaging constructively on the consideration and production of any review and further technical work, such as infrastructure provision and highways, with both Kent County Council (KCC) and East Sussex County Council (ESCC). We also look forward to the opportunity of working closely on the development of an updated SoCG, which will provide further detail on the strategic planning matters of importance to both authorities in support of the next stages of the review of the Local Plan as well as the development of the new Wealden Local Plan as it continues through the process towards submission for Examination.

Overall, it is considered that the new evidence base documents do not raise any new cross-boundary strategic issues for WDC, subject to the early review mechanism for the Local Plan and modifications as set out and discussed above. The Council is therefore satisfied that the legal requirements of the duty to cooperate continue to have been met with respect to WDC and looks forward to further discussions on these issues as the early review of the Plan takes place.

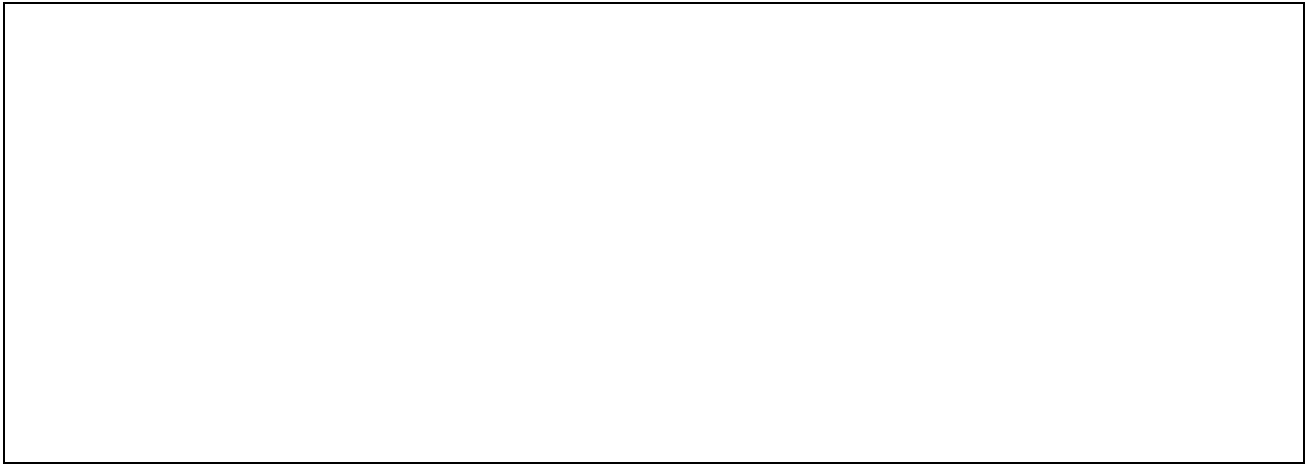
	<p>Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness.</p> <p>6. You will need to say why this modification will make the 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.</p> <p>The text box will automatically expand if necessary.</p>
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None. See comments above.

7.	Please use this box for any other comments you wish to make. The text box will automatically expand if necessary.
	Not applicable. All comments as set out above.

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	X
	Yes, I wish to participate at the examination hearing session	

9.	If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:
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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 hearing session.

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	21.10.2024
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