



**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)
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<b>Box 1:</b>  <b>Name of the Local Plan Evidence Base Document to which this representation relates:</b>	Policy STR/SS 1  The Strategy for Paddock Wood including Land at east Capel  And Document Reference: TWLP/151
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Completed forms must be received at our offices by **midnight on Wednesday 23<sup>rd</sup> 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](mailto: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)
<b>Title</b>	<b>Mr</b>	
<b>First Name</b>	<b>Andrew</b>	
<b>Last Name</b>	<b>Stanley</b>	
<b>Job title (where relevant)</b>	n/a	
<b>Organisation (where relevant)</b>	n/a	

Address Line 1	██████████	
Address Line 2	██████████	
Address Line 3	Kent	
Address Line 4		
Postcode	██████████	
Telephone number	██████████	
Email address (where relevant)	██████████████████	

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

Name or Organisation	
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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	See box 1	
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	<input type="checkbox"/>	No	<input type="checkbox"/>
4.2	Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

<b>5.</b>	<p><b>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.</b></p> <p><b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b></p> <p><b>The text box will automatically expand if necessary.</b></p>
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**TWBC has failed to properly consider all sites available and particularly sites that do not infringe on the green belt or are not in flood zones.**

**I believe the council has failed to properly apply the sequential and exceptional tests.**

<b>6.</b>	<p><b>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.</b></p> <p><b>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.</b></p> <p><b>The text box will automatically expand if necessary.</b></p>
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The response is flawed for the reasons stated at 5.

The council has never been prepared to look at certain alternative sites or to provide satisfactory explanations on why those sites aren't suitable. At this stage that is unlikely to change.

<p><b>7.</b></p>	<p><b>Please use this box for any other comments you wish to make.</b></p> <p><b>The text box will automatically expand if necessary.</b></p>
	<p>Policy STR/SS 1</p> <p>The Strategy for Paddock Wood including Land at east Capel</p> <p>And Document Reference: TWLP/151</p> <p>I am uncertain whether the release of greenbelt land has been approved but to be clear I am opposed to the development of land which is in a flood zone, on greenbelt and is agricultural land. With flooding certain to increase in the future and reports of disasters elsewhere where flood zone land has been developed (despite mitigation measures) I am surprised at Tunbridge Wells Borough Council's (TWBC) insistence on pursuing an inappropriate plan. Has the council consulted local authorities elsewhere where development has taken place in identified flood zones and particularly where flooding has subsequently taken place post development? It is only a matter of time before the land proposed for development would become flood zone 2 or 3.</p> <p>I have noted the council's modelling proposals for future flood risks (zones 2 and 3) and note no mention of serious flooding that currently takes place north and south of the railway line (land parcels A &amp; B) (flood zone 1); twice in the last 5 years. What risk to the foundations of the railway line?</p> <p>It is apparent that local or wider knowledge counts for nothing with our representatives.</p> <p>With so many other non-greenbelt, non-flooding sites available in the borough, this is negligent on the part of TWBC and a stubborn insistence in pursuit of as much as possible of the original plan. The council is happy to rely on the sequential test for land at parcels A &amp; B despite flooding as described above and falls back on the exception test for other areas. The council "has concluded during the preparation of the Submission Local Plan that it could not meet its development needs entirely from sites that were in Flood Zone 1 due to both wider borough wide sustainability issues (primarily in relation to Green Belt, AONB and highways constraints)" (TWLP/151 para 3.13). The council can only reach that conclusion by failing to properly consider the range of land available within the borough which doesn't fall within flood zones or greenbelt. Throughout this process the council has ignored or avoided a full discussion on more appropriate sites.</p> <p>I tried to contact the Environment Agency with regard to flood risk regarding (in particular) North Western Parcel (A), Western Parcel (B) and Northern Parcel (E) but failed to obtain a response. Has TWBC consulted Kent County Council, Maidstone Borough Council or the body responsible for flooding in the River Medway. The implications for places such as East Peckham and Yalding are significant.</p> <p>I can see nothing in the council's proposals that takes any account of the thoughts of local people as identified in the Capel and Paddock Wood Neighbourhood Plans. That makes that exercise nothing more than a tick box to satisfy legal requirements.</p>

I see terms such as master planning, betterment and flood attenuation which may all have technical meaning but are actually meaningless in reality. Even with this wholly inappropriate development there is such a lack of information and specific detail that the council and developers will have a virtually free hand in how it proceeds once approved.

I note a reference to landscaping to reduce visual impact on the countryside with 3,000/3,500 houses, most on green belt! Is TWBC so out of touch with the people?

S 8 (j) – Can the council explain: “where green belt is to be developed, provide compensatory improvements to the green belt”. What are those improvements?

In conclusion I am dismayed at the council’s response to the Inspector’s previous findings. In my view the council has attempted to place sticking plasters on a bad plan that should have been reviewed by the council’s Planning Officer.

I believe the council, land owners and developers will keep returning until their original targets are achieved.

<b>8.</b>	<b>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)</b>	
	No, I do not wish to participate at the examination hearing session	x
	Yes, I wish to participate at the examination hearing session	

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

**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.**

<b>Signature</b>	AJ Stanley	<b>Date</b>	23/10/2024
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