

From: [REDACTED]
To: [Local Plan \(TWBC\)](#)
Subject: Re: Tunbridge Wells Borough Council's Local Plan: Public Consultation on the proposed Main Modifications
Date: 30 April 2025 16:48:06

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Dear Planning Policy Team,

Thanks for the email and opportunity to review and comment on your Tunbridge Wells Local Plan Main Modifications Consultation.

From a water supply perspective, we would like to emphasise the need for any properties to be as water efficient as possible, particularly with regards to new affordable homes and customers that may need support in keeping their water bills as low as possible. As set out in our recently published Water Resources Management Plan (WRMP), here: <https://www.southeastwater.co.uk/about/our-plans/future-water/>, our aim of reducing household consumption to reach our per capita consumption ambition of 110 litres per person per day by 2050 requires the use of new approaches and technology, including smart metering. The savings are stretching and will be challenging to deliver especially given the impacts that affluence, temperature and rainfall have on our regional water use. South East Water strongly supports any commitment to sustainable design of new residential and commercial development. As the South East is an area of serious water stress, it's therefore appropriate to apply as a minimum the optional building regulations standard of 110 litres per person per day for new development as a minimum water efficiency standard. We believe, and strongly encourage local planning authorities to consider, that all new homes should be built to a minimum standard of 100 litres per person per day, and that proposals should demonstrate how the design will be achieved using the methodology set out in the Building Regulations, with the design performance presented as part of the Sustainability Statement.

We note that MM206 refers to our revised WRMP so have provided link (in the paragraph above) to our final WRMP published in October 2024.

In relation to MM253, South East Water is keen to engage with Tunbridge Wells Borough Council to understand the impact of NPPF and future growth within the Borough as well as keen to discuss any future collaborations with the Council in any potential water efficiency initiatives or proof of concept trials that can benefit customers within the area.

We recently contacted the Council in January 2025 in relation to Source Protection Zones (SPZs) and the importance of these within the planning process, where decisions taken have either had, or have the potential to have, a significant impact on the local water supply. We would like to refer to our recent letter in order to address reference MM206.

Also, we would like to take this opportunity to provide our new Planning mailbox details ([REDACTED]) in order to update the contact details.

Kind regards,

Pedro

Dear Consultee,

Public Consultation on the proposed Main Modifications to the Tunbridge Wells Pre- Submission Local Plan under Section 20(7c) of the Planning and Compulsory Purchase Act 2004 and Part 6 (Section 20) of the Town and Country Planning (Local Planning) (England) Regulations 2012[\[EG1\]](#)

Tunbridge Wells Borough Council submitted its emerging Local Plan for Examination in November 2021, since when an independent Planning Inspector has been examining the Plan on behalf of the Secretary of State.

Stage 1 and 2 Hearing Sessions took place in 2022, and Stage 3 Hearing Sessions were held in June and July 2024, followed by a Public Consultation in September – October on a suite of new evidence base documents. A final Hearing Session was held in November 2024.

The Council is now consulting on proposed 'Main Modifications' to the Pre-Submission Local Plan, these being needed to make the Plan 'Sound' and allowing Tunbridge Wells Borough Council to proceed to adopt the new Local Plan in due course. The proposed 'Main Modifications' are accompanied by a Sustainability Appraisal, Habitats Regulation Assessment and other supporting consultation documents.

Consultation Documents:

The consultation invites comments on the following documents:

Consultation Documents

- [Schedule of proposed 'Main Modifications'](https://forms.tunbridgewells.gov.uk) [forms.tunbridgewells.gov.uk]
- [Schedule of proposed Map Changes \(Policies Map/Inset Maps\)](https://forms.tunbridgewells.gov.uk) [forms.tunbridgewells.gov.uk]
- [Sustainability Appraisal \(Part 2\)](https://forms.tunbridgewells.gov.uk) [forms.tunbridgewells.gov.uk]
- [Habitat Regulations Assessment \(HRA\) \(Part 2\)](https://forms.tunbridgewells.gov.uk) [forms.tunbridgewells.gov.uk]

There are also supporting documents, which are available for background information only and are not for comment:

Supporting Documents

- [Pre-Submission Local Plan](https://forms.tunbridgewells.gov.uk) [forms.tunbridgewells.gov.uk]
- [Updated Trajectory \(following publication of December 2024 National Planning Policy Framework \(NPPF\)\)](https://forms.tunbridgewells.gov.uk) [forms.tunbridgewells.gov.uk]
- [Updated Infrastructure Delivery Plan \(IDP\)](https://forms.tunbridgewells.gov.uk) [forms.tunbridgewells.gov.uk]
- [Schedule of proposed 'Additional Modifications'](https://forms.tunbridgewells.gov.uk) [forms.tunbridgewells.gov.uk]
- [Local Plan Policies Map](https://tunbridgewells.gov.uk) [tunbridgewells.gov.uk]
- [Local Plan Inset Maps](https://tunbridgewells.gov.uk) [tunbridgewells.gov.uk]

The consultation documents along with the Statement of Representations Procedure, and Making Representations Guidance Note can be viewed via the consultation portal <https://consult.tunbridgewells.gov.uk/kse/> [consult.tunbridgewells.gov.uk] or on the Council's website at <https://tunbridgewells.gov.uk/planning/planning-policy/local-plan> [tunbridgewells.gov.uk]

The consultation period runs from **Monday 17th March until midnight on Wednesday 30th April 2025**, during which time representations may be made. Representations must be made in writing and received within the consultation period.

The consultation documents (hard/paper copies) are available for public inspection during the consultation period at:

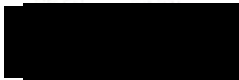
- **The Amelia Scott, Mount Pleasant Road, Royal Tunbridge Wells, TN1 1AW**, which is open from 9am-6pm (Monday to Wednesday and on Friday), 9am-8pm on Thursday, 9am-5pm on Saturday and 10am-4pm on a Sunday (Telephone 01892 526121).
- **All Parish and Town Council Offices** (please find locations and contacts [here](https://democracy.tunbridgewells.gov.uk) [democracy.tunbridgewells.gov.uk]).
- **All libraries** across Tunbridge Wells borough - please find locations and opening times [here](https://tunbridgewells.gov.uk/community-and-leisure/libraries) [tunbridgewells.gov.uk].

Representations can be submitted as follows:

1. Online at [https://consult.tunbridgewells.gov.uk/kse/\[consult.tunbridgewells.gov.uk\]](https://consult.tunbridgewells.gov.uk/kse/[consult.tunbridgewells.gov.uk])
2. By e-mail to localplan@tunbridgewells.gov.uk (a downloadable form is available)
3. By post to Planning Policy, Planning Services, Tunbridge Wells Borough Council, Royal Tunbridge Wells, Kent TN1 1RS

Further details are available on the Local Plan pages of the Council's website, as above. If you have any queries or are seeking assistance, please email localplan@tunbridgewells.gov.uk or telephone 01892 554056.

Yours Faithfully



Carlos Hone MRTPI

Head of Planning

Tunbridge Wells Borough Council

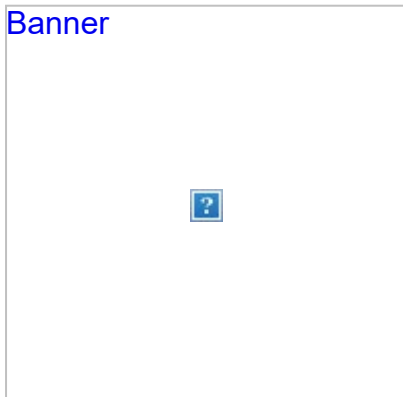
[\[EG1\]](#)EG is confirming this with the Programme Officer.

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Banner



Logo



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South East Water Limited

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