



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

Representation Form

Please use a separate sheet for each representation

Ref:

(For official use only)

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| <p>Name of the Local Plan to which this representation relates:</p> | <p>Proposed Changes to the Tunbridge Wells Borough Local Plan (2020 - 2038): Response to Examination Inspector's Initial Findings, Received November 2022 and Supporting Documents, including Sustainability Appraisal</p> |
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Completed forms must be received at our offices by **midnight Monday 26 February 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

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 & Climate Change | |
| Organisation (where relevant) | Wealden District Council | |
| Address Line 1 | Council Offices | |

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|--------------------------------|----------------------|--|
| Address Line 2 | Vicarage Lane | |
| Address Line 3 | Hailsham | |
| Address Line 4 | East Sussex | |
| Postcode | BN27 2AX | |
| Telephone number | ██████████ | |
| Email address (where relevant) | ████████████████████ | |

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

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| Name or Organisation | Wealden District Council |
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| 3. | 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? | |
| Chapter and (if applicable) sub heading | | |
| Policy | | |
| Paragraph number or appendix | | |

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| 4. | Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it: (please tick as appropriate) | | | | |
| 4.1 | Legally Compliant | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| 4.2 | Sound | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |

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| 5. | <p>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.</p> <p>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.</p> |
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The text box will automatically expand if necessary.

Wealden District Council (WDC) welcomes the opportunity to formally comment on Tunbridge Wells Borough Council's (TWBCs) 'Consultation on Council's Response to Inspector's Initial Findings' following the Local Plan examination hearing sessions (March to July 2022) for the Tunbridge Wells Submission Local Plan.

It is understood that in response to the Inspector's findings, TWBC is proposing a Revised Development Strategy to the Tunbridge Wells Submission Local Plan (SLP), including, in summary, the following changes:

- Proposed removal of the strategic policy STR/SS 3: The Strategy for Tudeley Village from the Local Plan.
- Revision of the strategic policy STR/SS 1: The Strategy for Paddock Wood and land at east Capel, including a reduction in the amount of residential housing growth by approximately 1,000 dwellings, with all housing being on Flood Zone 1 and employment land on Flood Zone 2, along with a reduction of employment provision, and reconfigured sport and recreation provision and secondary school education provision.
- At Hawkhurst it is proposed to revise site allocation policy number AL/HA 5: Land to the north of Birchfield Grove, to include housing, and land safeguarded for primary school expansion.
- Also at Hawkhurst, the Council proposes the removal of site allocation policy number AL/HA 8: Limes Grove (March's Field) from the Local Plan.
- Progression of a 10 year housing land supply position including the requirement for an immediate review of the plan.

In terms of amendments to housing provision proposed in Response to Inspector's Initial Findings, it is clear that TWBC continues to set out to meet its own need under the 'standard methodology', to 2034/35, i.e. albeit now confirming 10 years supply from the anticipated date of adoption of the Local Plan (being late 2024) rather than 15 years. This coupled with a commitment, through a policy within the plan, for an early review of the Local Plan which will include further investigation of ways of meeting identified housing needs for the period post 2034. This pragmatic approach is supported.

It should also be noted that, WDC will shortly be consulting on its Regulation 18 Draft Local plan. The local housing need calculation for Wealden District is a minimum of 1,200 homes per year. Over the plan period from 1 October 2023 – 31 March 2040 this equates to a district need to deliver 19,800 homes. Our Regulation 18 draft Local Plan provides an overall housing supply of 15,729 dwellings during the plan period. At this stage in the plan-making process, there is a shortfall in housing delivery of 4,071 (net) dwellings, which amounts to a shortfall of 247 dpa. We will also be undertaking further work and testing and a further call for sites to understand whether we can accommodate more housing, taking into account constraints and capacity within the district. As part of Wealden District Council's Local Plan process, we will also be writing to relevant neighbouring authorities, in due course, to ask whether either some or all of our unmet housing need can be met by relevant neighbouring authorities including TWBC.

With respect to the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA), it is noted that advice has been sought from your appointed consultants AECOM in respect of any impacts of the Council's Response to Inspector's Initial Findings on the Habitats Regulation Assessment (HRA) accompanying the Tunbridge Wells Borough Pre-Submission Local Plan, and whether the change will have any effect on recreational pressure on Ashdown Forest. With regard to air quality impacts, the deletion of Tudeley Village would have a neutral impact (and may even have a slightly positive impact). The proposed changes in Hawkhurst, given its location relative to Ashdown Forest (and the distance between Hawkhurst and Ashdown Forest) that an increase of 70 dwellings would not materially alter projected traffic flows through the SAC. In terms of the approach to Paddock Wood parish being to reduce the numbers from up to 3,590 to c. 2,650, which would reduce any air quality impact from what was assessed in the Local Plan HRA, so that would also not have a negative effect on their assessment. Therefore, they indicate that the changes to the Local Plan would not adversely affect the conclusions reached for the Pre-Submission HRA. Both local authorities will continue to work as part of the Ashdown Forest working group for air quality and the Strategic Access Management and Monitoring Strategy (SAMMS) partnership to address visitor pressure in order to secure a common understanding and agreement on effects, mitigation and monitoring and where possible to agree and cost share future studies or surveys.

With respect to legal compliance and specifically duty to cooperate matters, Wealden District Council and Tunbridge Wells Borough Council have signed a Statement of Common Ground (SoCG) in March 2021. The overall aim of the SoCG between the two parties is to demonstrate that ongoing and appropriate engagement and co-ordination is taking place between the parties that includes planning for identified cross-boundary strategic planning issues that exist and/or likely to arise resulting from the emerging Tunbridge Wells Borough Pre-Submission Local Plan that has now been published for its representation stage under regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012 (as amended). This was agreed by Wealden District Council's Portfolio Holder for Planning and Development on 12th March 2021.

The SoCG confirms that effective cooperation is taking place between the parties in relation to matters that includes development on the administrative boundary between the two local planning authorities, housing provision, economic development, cross boundary infrastructure issues and matters relating to the natural environment, including the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA). We will look to review and update this SoCG as the Wealden Local Plan progresses through the statutory processes. In any event, we continually remain of the view that effective cooperation continues to take place between both authorities.

It is considered that TWBCs response to Inspector's Initial Findings does not raise or open up any new cross-boundary strategic issues in relation to matters identified above and therefore the Council is satisfied that the legal requirements of the duty to cooperate have been met with respect to Wealden District Council.

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| 6. | <p>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.</p> <p>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.</p> <p>The text box will automatically expand if necessary.</p> |
| <p>Click or tap here to enter text.</p> | |

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| 7. | <p>Please use this box for any other comments you wish to make.</p> <p>The text box will automatically expand if necessary.</p> |
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| 8. | <p>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?</p> |
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No, I do not wish to participate at the examination hearings

Yes, I wish to participate at the examination hearings

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| 9. | If you wish to participate at the examination hearings stage once it resumes, please outline why you consider this to be necessary: |
| Click or tap here to enter text. | |

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 hearings stage once it resumes.

Sustainability Appraisal

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| 10. | To which part of the Sustainability Appraisal does this representation relate? | |
| Chapter and (if applicable) sub heading | | |
| Policy | | |
| Paragraph number or appendix | | |

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| 11. | <p>Please use this box for any comments you wish to make about the Sustainability Appraisal.</p> <p>The text box will automatically expand if necessary</p> | |
| <p>Click or tap here to enter text.</p> | | |

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.

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| Signature | Nichola Watters | Date | 23.02.24 |
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