



**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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Box 1: Name of the Local Plan Evidence Base Document to which this representation relates:	Revised policy and supporting text for Policy STR1
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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		Mr
First Name		Douglas
Last Name		Bond
Job title (where relevant)		Director
Organisation (where relevant)	Castle Hill Developments Ltd	Woolf Bond Planning Ltd
Address Line 1		The Mitfords
Address Line 2		Basingstoke Road

Address Line 3		Three Mile Cross
Address Line 4		Reading
Postcode		RG7 1AT
Telephone number		██████████
Email address (where relevant)		████████████████████

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

Name or Organisation	Castle Hill Developments Ltd
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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	
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 checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.2	Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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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This is covered in the accompanying statement, but in summary, the plan is unsound as it fails the following tests of soundness: positively prepared, justified and consistency with national policy.

6.	<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>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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As indicated in the accompanying statement, the necessary changes to the introductory section of the policy together with that concerning the review of the Plan are amended as follows (deletions shown struck through and additions underlined).:

The broad development strategy for Tunbridge Wells borough over the period 2020-2038, as shown indicatively on the Key Diagram (Figure 5), is to ensure that a minimum of 12,006¹ dwellings (at least 667 dwellings annually) and 14 hectares of employment (Use Classes B and E) land are developed, together with supporting infrastructure and services. The strategy of this plan provides for a housing supply for the first 10 years of the plan period with employment and other development including necessary supporting infrastructure, but with a requirement for an early focussed review of the plan to supply housing and other requisite development and supporting infrastructure for the final 5 years of the plan period.

¹ The reference to 11,880 dwellings has been replaced as explained

Early ~~Partial~~ Review of the Local Plan

Following adoption of the Local Plan, the Council will publish an update to its Local Development Scheme (LDS). This shall set out a timetable for a ~~partial~~ early review of the Local Plan, which shall commence within six months of adoption of the Local Plan. The LDS shall provide an indicative timescale for submission of an updated Local Plan for Examination, to take place no later than 30 months from commencement of the early review of the Local Plan. The Council shall then undertake the early review consistent with national policy to which shall include investigation of ways of meeting identified unmet housing needs over the relevant until the end of the plan period (2038). 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 a the period extending at least 15 years post its 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, and
- (2) provide other requisite development (including such employment development as may be necessary) and supporting infrastructure to meet the needs of the population for the whole of the plan period and beyond.

We also consider that the suggest additional paragraphs 4.49 to 4.57 are not included, especially given that the Inspector confirmed (as noted in draft paragraph 4.53) that the site of the suggested Tudeley village had "high" harm to Green Belt purposes if released. Such a conclusion means that the land cannot qualify as "grey belt" as currently defined in the glossary of the draft NPPF. In such instances, it cannot be detailed as a preferred location for consideration through any review, as this would conflict with national policy.

7.	Please use this box for any other comments you wish to make. The text box will automatically expand if necessary.

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	
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:
As explained in the accompanying statement, it is important to appear given the importance of addressing the issues regarding the review of the plan, as previously stated through the contributions at earlier sessions.	

***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	10/10/24
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