



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

**Main Modifications Consultation  
Representation Form**

**Please use a separate form/sheet for each  
representation/main modification**

Ref:

(For official  
use only)

We welcome your comments on the Tunbridge Wells Borough Local Plan Main Modifications Consultation.

The consultation also includes a number of other documents as listed in Box 1 below upon which representations can be made, including an updated Sustainability Appraisal and updated Habitats Regulations Assessment.

Completed forms must be received at our offices by midnight on **Wednesday 30<sup>th</sup> April 2025**.

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 print them off and send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

Please refer to the [Guidance Note on Making Representations](#) for further information. The Guidance Note explains the soundness tests and statutory plan making requirements relevant to this consultation.

**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                    |                     | Troy                             |
| Last Name                     |                     | Hayes MRTPI                      |
| Job title<br>(where relevant) |                     | Founder & Managing Director      |

|                                           |  |                               |
|-------------------------------------------|--|-------------------------------|
| <b>Organisation<br/>(where relevant)</b>  |  | <b>Troy Planning + Design</b> |
| <b>Address Line 1</b>                     |  | <b>33 Foley Street</b>        |
| <b>Address Line 2</b>                     |  | <b>London</b>                 |
| <b>Address Line 3</b>                     |  |                               |
| <b>Postcode</b>                           |  | <b>W1W 7TL</b>                |
| <b>Telephone<br/>number</b>               |  | <b>0207 0961 329</b>          |
| <b>Email address<br/>(where relevant)</b> |  | <b>info@troyplanning.com</b>  |

## **PART B – YOUR REPRESENTATION**

**(Please use a separate form/sheet for each representation)**

|           |                                                                                 |
|-----------|---------------------------------------------------------------------------------|
| <b>1.</b> | <b>Name of the Document to which this representation relates (please tick):</b> |
| <b>X</b>  | <b>Schedule of Proposed Main Modifications</b>                                  |
|           | <b>Sustainability Appraisal (Part 2)</b>                                        |
|           | <b>Habitats Regulations Assessment (Part 2)</b>                                 |
|           | <b>Schedule of proposed Map Changes (Policies Map/Inset Maps)</b>               |

|                                                                    |                                                                                                |
|--------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| <b>2.</b>                                                          | <b>To which part of the document listed in Box 1 above does this representation relate to?</b> |
| <b>If Main Modification<br/>(please quote<br/>number e.g. MM1)</b> | MM15                                                                                           |
| <b>Chapter and (if<br/>applicable)<br/>subheading</b>              |                                                                                                |
| <b>Policy/Paragraph<br/>number</b>                                 |                                                                                                |

|           |                                                                                                                                                                                           |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>3.</b> | <b>Do you consider the Main Modification / document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):</b> |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|     |                   |     |  |    |   |
|-----|-------------------|-----|--|----|---|
|     |                   |     |  |    |   |
| 3.1 | Legally Compliant | Yes |  | No | X |
| 3.2 | Sound             | Yes |  | No | X |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| 4.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p><b>Please give details of why you consider the Main Modification/document not to be legally compliant or sound. Please be as precise as possible and provide evidence to support this.</b></p> <p><b>Or</b></p> <p><b>If you wish to support the legal compliance or soundness of a main modification/document, please also use this box to set out your comments.</b></p> <p><b>The text box will automatically expand if necessary.</b></p> |
| <p><b><u>Main Modification MM15 – After paragraph 4.49 (new paragraphs)</u></b></p> <p>This new proposed text states that following the deletion of Tudeley Village the adopted Local Plan does not provide for the full housing needs up to 2038. However, the NPPF refers to strategic policy-making authorities needing to establish a <u>housing requirement figure</u> for their whole area. Therefore, the Local Plan should set out this requirement in clear policy terms rather than just referring to ‘needs’.</p> <p>We question why the Council is only proposing referring to the deletion of Tudeley Village as the reason for not being able to meet its full housing needs when there has been a decrease of approximately 1,000 dwellings at Paddock Wood as well which has also led to a housing shortfall.</p> <p>This Main Modification states that apart from findings ways of meeting unmet housing needs that “<i>All other policies included in the Plan remain applicable for the entire plan period 2020-2038</i>”. Which policies does TWBC consider applies to this issue of unmet housing needs – this is unclear. Furthermore the ‘early review’ may need to pick up other matters of importance introduced through the NPPF and new legislation there the scope of the ‘early review’ should not be predetermined and should be part of the Regulation 18 consultation period. This is, after all, what Regulation 18 of the Regulations states as the scope of this stage of the process:<br/> <i>“invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain”.</i></p> <p>Furthermore, the NPPF policy regarding the need to assess whether a Local Plan requires a review at least every five years still applies to TWBC – as currently proposed the Main Modification reads as if a ‘focused early review’ is the only need to review the Local Plan until 2038.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5. | <p>If you do not agree with the proposed Main Modification/document, 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 4 (above) where this relates to legal compliance or soundness.</p> <p>Please be as precise as possible.</p> <p>The text box will automatically expand if necessary.</p> |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|    |                                                                                                                                 |
|----|---------------------------------------------------------------------------------------------------------------------------------|
| 6. | <p>Please use this box for any other comments you wish to make.</p> <p>The text box will automatically expand if necessary.</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.

|    |                                                                                                                            |   |
|----|----------------------------------------------------------------------------------------------------------------------------|---|
| 7. | <p>Please tick this box if you wish to be kept informed about the Inspector's Report and/or adoption of the Local Plan</p> | X |
|----|----------------------------------------------------------------------------------------------------------------------------|---|

|           |                                                                                     |      |            |
|-----------|-------------------------------------------------------------------------------------|------|------------|
| Signature |  | Date | 30.04.2025 |
|-----------|-------------------------------------------------------------------------------------|------|------------|

Thank you for taking the time to complete this form.

**Closing date for responses: midnight on Wednesday 30th April 2025**