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Your ref.  
Our ref.  
Date 18.5.2021

Dear Planning Policy Team,

**Tunbridge Wells Local Plan Regulation 19 Consultation: Response on behalf of Tonbridge and Malling Borough Council (TMBC)**

Thank you for the opportunity to comment on the above consultation.

The consultation draft of the emerging Tunbridge Wells Local Plan was considered at an extraordinary meeting of the Council's Planning and Transportation Advisory Board on the 17<sup>th</sup> May 2021.

Tonbridge and Malling Borough Council welcomes the amendments made to the Regulation 18 draft of the Local Plan in response to the comments by this Council made in October 2019 and recognises the ongoing and pragmatic engagement in respect of the Duty to Cooperate to address the relevant cross-boundary issues and the continuing contributions to the infrastructure planning and master planning of the two strategic allocations at Tudeley and Paddock Wood.

The potential impacts of these strategic sites, particularly on Tonbridge, remains a concern despite the positive actions implemented since the previous draft of the Plan and the Borough Council wishes to reiterate the importance of ensuring that the necessary infrastructure and mitigation measures are finalised and implemented in a timely and effective way. Continued close collaboration between the two authorities in respect of the master planning of both sites and the proposed Supplementary Planning Documents to refine the details is strongly encouraged.

The Local Plan has been prepared in accordance with the requirements of national policy as set out in the National Planning Policy Framework (2019) and the Borough Council does not

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consider there to be any issues of soundness or legal compliance. It is the opinion of Tonbridge and Malling Borough Council that the requirements of the Duty to Cooperate have been met in respect of the preparation of the Tunbridge Wells Local Plan and this will be further acknowledged in the signed Statement of Common Ground that will also be returned by the 4<sup>th</sup> June.

More detailed comments on specific elements of the Local Plan can be found below.

Paragraph 4.12 refers to the situation with respect to unmet housing need in neighbouring Sevenoaks District as being 'unclear' although it recognises that a potential shortfall of 1,900 dwellings may be further tested in the event the Local Plan Examination is allowed to continue. Since the Tunbridge Wells Local Plan was published for consultation on 26<sup>th</sup> March the request by Sevenoaks District Council to appeal the Judicial Review decision in respect of their Local Plan has been declined. Therefore, this contextual paragraph should now be updated.

Paragraph 4.13 recognises that there may be some unmet housing need and that it is therefore appropriate to assess the potential for also contributing to unmet needs. If this exercise has already been carried out, then there should be signposting to the relevant part of the evidence base. However, in light of the events described in paragraph 4.12, it may be more appropriate to update both paragraphs.

There appears to be a mapping error in respect of Map 33 and Map 34, which show the location of the new Secondary School as outside of the Garden Village site boundary, while Map 32 shows the school within the site boundary. For consistency, the maps should make clear that the site is inside the boundary, as the delivery of the school is now addressed by Policy STR/SS3.

Add any additional points requested by Members on 17.5.21: here

Yours sincerely,

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