

15th November 2019

Tunbridge Wells Borough Council,
Town Hall,
Royal Tunbridge Wells,
Kent,
TN1 1RS

Dear Sir or Madam,

Representations to the Tunbridge Wells Borough Draft Local Plan Regulation 18 Consultation

AAH Planning Limited is instructed by Future Habitat Limited (hereafter referred to as our Client) to submit representations to the Tunbridge Wells Borough Draft Local Plan Regulation 18 Consultation (Consultation Draft), currently subject to public consultation until 15 November 2019.

Our Client is committed to the highest standards of design, construction and service and are keen to engage with the Council and assist in preparing a sound plan which is positively prepared, justified, effective and consistent.

These representations are made with specific regard to land to the north-west of Heartenoak Road, Hawkhurst. A site location plan is enclosed within this letter and site-specific representations are provided below.

This representation should be read in conjunction with all previous representations submitted on behalf of our Client.

Consultation

The current consultation seeks comments on the Consultation Draft of the Tunbridge Wells Borough Local Plan.

The plan sets out the broad spatial planning and policy framework for the Borough up to 2036. It includes a long-term spatial vision, strategic objectives, and the overarching development strategy for the area and establishes the planning policy framework necessary to deliver the vision and strategy. Once adopted, the Plan will replace

the existing planning framework which is set out in a number of documents, including the Tunbridge Wells Borough Local Plan 2006 (saved policies), the Core Strategy 2010, and the Site Allocations Local Plan 2016.

The current consultation runs until 15 November 2019 and the Council is inviting representations on whether the plan meets certain legal and "soundness" tests prior to submitting to the Planning Inspectorate for examination. Once this consultation window closes, the Council will submit the comments received, along with the plan, to the Secretary of State for Housing, Communities and Local Government who will pass these to the Planning Inspectorate. The Planning Inspectorate will then appoint an Inspector and set a date for the Examination in Public (EiP) which is anticipated in Spring 2020.

The National Planning Context

These representations set out our Client's comments on the Consultation Draft Local Plan and highlight several issues in relation to the Local Plan that our Client believes should be addressed during the examination stage.

Where appropriate, these representations refer to relevant paragraphs in the revised National Planning Policy Framework (2019), with which the Local Plan must be consistent. Paragraph 35 of the Framework sets out that the plan must be:

"Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework."

Reference is also made, where relevant, to the National Planning Practice Guidance (PPG) which provides further explanation to the policies within the Framework.

We trust these representations will be afforded full consideration by Tunbridge Wells Borough Council (the Council) and the Inspector in relation to the emerging Local Plan.

SECTION 3 – VISION AND OBJECTIVES

Section 3 of the Consultation Draft sets out the Council's overarching vision and objectives which identify the ambitions and philosophy of the Local Plan. The vision will set out what the Council believes the Borough will look like at the end of the plan period (2036). In order for this vision to be realised, a number of overarching objectives have been identified.

Vision

The vision, as set out within the Consultation Draft, states:

"In 2036, the Borough of Tunbridge Wells will be vibrant and prosperous. It will have grown throughout the plan period on the basis of being infrastructure-led, with this infrastructure largely funded by development:

The hearts of Royal Tunbridge Wells and SouthBorough will be culturally rich and full of vitality, and will have the flexibility, robustness, and adaptability to cope with changes in the economy and other circumstances. The Main Urban Area of Royal Tunbridge Wells and SouthBorough will offer a diverse range of attractions, and will have benefited from further investment and employment-generating development, while protecting its special qualities and those of its surrounds;

Paddock Wood as a settlement will have developed considerably (including on land in eastern Capel parish) on the basis of garden settlement principles, using a comprehensive, masterplanned approach. This will have provided a vibrant and regenerated town centre, together with enhanced employment, leisure, and other facilities, the delivery of significant and strategically planned infrastructure, to include active travel connections to the new garden settlement at Tudeley Village, Royal Tunbridge Wells and SouthBorough, and Tonbridge, and reducing (existing) flood risk to areas of Paddock Wood ,Capel parish, and Five Oak Green; i.e. resulting in 'betterment' for these areas;

A new garden settlement will have been established at Tudeley Village, including homes, employment, and community facilities: this will continue to develop into the following years. It will be well connected to other settlements, be an exemplar development in design, sustainability, and active travel, and will contribute to strategically planned infrastructure, including reducing (existing) flood risk to areas of Five Oak Green; i.e. resulting in 'betterment' for these areas;

High quality development at other settlements across the Borough will have been realised, with the timely provision of relevant infrastructure. The growth of these settlements will have reflected local input and circumstance, including through assessment against neighbourhood plans; Rural enterprise will have been

supported, and the exceptional quality of the built and natural environments will have been protected and enhanced.

All developments will be of high quality design, having responded to the distinctive and particular character of their locations: in some instances the development will have taken place within valued and protected landscapes, and this will be recognised in the quality of the design of the development, the protection and enhancement of the exceptional quality of the built, natural, and historic environment, and the provision and protection of landscape features and greenspaces. Green, grey and blue infrastructure will be an integral and defining element in the design and layout of new developments, with opportunities for inclusion of public art and improved cultural provision to have been realised.

At the heart of all development in the Borough will be connectivity, active travel, an appropriate mix of uses and accommodation and, above all, the timely delivery of relevant infrastructure, which will have been funded by development: this infrastructure will have mitigated the impact of development, and, wherever possible, resulted in 'betterment' for existing residents, users, businesses, visitors, etc.

The Local Plan, and the appropriate application of the policies, will be one of the key vehicles to deliver this vision.”

In general, our Client is supportive of the proposed vision as set out within the Consultation Draft, however, it is considered that further emphasis should be placed on the commitment to provide a variety of house types and sizes through the delivery of much needed new homes in sustainable locations to better reflect the emphasis on sustainable growth and boosting the supply of housing as highlighted in the NPPF (paragraph 59).

In light of this we advocate the following points added to the vision:

- *The Local Plan will seek to boost significantly the supply of housing within the Borough; ensuring that housing need can be sufficiently met over the plan period and that an appropriate balance between jobs and new homes is achieved.*
- *That growth is focussed on sustainable locations within the Borough including logical extensions to the existing urban area.*

As set out within national policy, the Council must allocate sufficient sites for new housing to meet the social and economic needs of the area, as well as ensuring the right location(s) are chosen to accommodate growth in a sustainable manner. In addition, paragraph 59 of the Framework goes on to place a requirement of Local Planning Authorities (LPAs) to boost significantly the supply of housing. For this to be achieved through the plan

making process, it requires LPAs to fully illustrate the expected rate of housing delivery and set out a strategy to describe how the required delivery will be maintained.

The purpose of the vision is to set out the Council's overall ambitions and philosophy of the Local Plan and it is considered that a stronger emphasis should therefore be placed on housing delivery, which in turn will support economic growth.

The Borough requires a demonstrable supply of residential development sites which are well located to key essential amenities including public transport links, education, healthcare and recreational facilities and which also have the potential to provide long term economic and infrastructure benefits.

It is considered that residential development at Hawkhurst will provide all these benefits and help support the provision of a number of new dwellings to meet the Council's identified housing need.

Strategic Objectives

For the vision to be achieved, the document then sets out several strategic objectives.

The importance of housing delivery is recognised within this section and our Client is generally supportive of these. However, it is considered that the objectives should seek to boost significantly the supply of all housing in addition to affordable housing and, in particular, set a specific aim of enabling the development of at least 13,560 new homes in order to meet the housing needs and aspirations of those living and working in the Borough.

It is also considered the objectives should seek to provide a range of housing products providing types and tenures of homes suitable for all people and have a portfolio of sites of different sizes, different housing products and delivery rates for the short, medium and long term.

This would ensure that the Plan is consistent with national policy contained in the Framework. Without a consistent and robust approach, the objectives can be regarded as unsound for being ineffective and inconsistent with national policy as the Local Plan will be in direct conflict with the clear aspirations of national policy and will undermine the delivery of the overarching vision.

SECTION 4 – THE DEVELOPMENT STRATEGY AND STRATEGIC POLICIES

This section of the Consultation Draft sets out the housing and economic development targets for the plan period to 2036 and describes the Council’s approach to the spatial distribution of development. It comprises a Development Strategy, at Policy STR 1, and other strategic policies that fulfil the expectations of the NPPF.

The Development Strategy

With regard to housing need, this section identifies that the objectively assessed housing need for the Borough over the plan period to 2036 is confirmed as 13,560 dwellings (678 per year), identified by the standard methodology as required by the NPPF. Discounting completions up to March 2019, extant planning permissions, outstanding site allocations, and a windfall allowance of 700 dwellings, this equates to at least 7,593 new additional allocations to meet housing need. The basis of this housing need target, together with assessments of the housing needs of particular groups, is set out in the Housing Needs Assessment Topic Paper.

Whilst our Client generally supports this, the identified housing need should be a minimum requirement in line with national policy. In addition, it is considered that suitable windfall sites and additional site allocations made through the plan will be required in order to meet the identified need and assist in significantly boosting the supply of housing.

It is noted that the Council has prepared a Strategic Housing and Economic Land Availability Assessment (SHELAA) to identify a future supply of land that is suitable, available, and achievable for all housing and economic development needs over the plan period. This is welcomed by our Client and it is noted that previous representations have been prepared to support the allocation of the site for housing in the emerging Local Plan.

Policy STR 1 – The Development Strategy

Policy STR 1 sets out the overarching Development Strategy for the Local Plan. The Key Diagram illustrates the spatial strategy and the broad distribution of development. The supporting table to the policy identifies a range of 643-693 housing allocations, as well as other infrastructure for Hawkhurst.

It is considered that the wording in the supporting text in relation to the number of new homes should specify “*at least*” or “*a minimum of*”, rather than an approximate range, in order to boost significantly the supply of housing in accordance with the NPPF. Furthermore, Policy STR/HA 1 sets out specific requirements for development within Hawkhurst and identifies that approximately 681-731 new dwellings will be delivered through site allocations. It is unclear as to why these ranges differ and some clarity is required to explain this.

In addition, in order to ensure that the overall aims and objectives of the Local Plan can be met, it is important that the development strategy allows for future expansion and flexibility. This is essential to ensure that the

identified housing need can be delivered should some allocations not come forward. The identified development strategy should therefore not be overly restrictive and should allow for additional future development on suitable sites.

Other Strategic Policies

Policy STR 2 – Presumption in favour of sustainable development

Policy STR 2 reflects the presumption in favour of sustainable development contained in the Framework. Our Client supports the general essence of this policy which closely aligns with the contents of the Framework. However, our Client would welcome the additional acknowledgement that the Council will work proactively with applicants to find solutions rather than problems which mean that proposals can be approved wherever possible as emphasised in the Framework.

Policy STR 5 – Essential Infrastructure and Connectivity

Our Client is broadly supportive of this policy but would like to reiterate that the requirements must be subject to viability to ensure that new development can be deliverable.

Our Client is committed to ensuring that new development is supported by suitable infrastructure to ensure that schemes are highly accessible and sustainable long-term. This needs to be set against viability and our Client therefore seeks flexibility in the wording of the policy.

Policy STR 6 – Transport and Parking

Our Client is broadly supportive of this policy but reiterates that any requirements for new development must be subject to viability to ensure deliverability.

Policy STR 7 – Place Shaping and Design

Policy STR 7 seeks to ensure that all new development meets high standards of urban and architectural design and have regard to any design guidance adopted by the Council. It sets out a number of principles and requires that all new development must use the principles relevant to its location, scale, and use.

Whilst our Client broadly supports this policy as currently drafted, we object to the wording of bullet point 7 which requires that development proposals are based on measures to promote environmental sustainability, including energy and water efficiency measures, sustainable design and construction techniques. The requirements of this should be better defined and not overly onerous on the developer. We therefore object on the basis that the policy wording is not effective.

In addition, whilst our Client fully supports sustainable design in new development, it is considered that requirements should be subject to viability. Provision for this should be made within the wording of the policy.

Policy STR 10 – Limits to Built Development Boundaries

Policy STR 10 sets out that the limits to development for all settlements are shown on the draft Policies Map. It stipulates that new development will be focused within the limits to built development, where proposals accord with other relevant policies of the Plan. For development outside the limits to built development, it states that development will normally be limited to that which accords with specific policies of the Plan and/or that for which a rural location is demonstrated to be necessary.

One of the key restrictions to delivering homes during the plan period is development limits of previous policies preventing any development on the ‘wrong’ side of an arbitrary boundary. Sites adjoining settlements can be equally if not more sustainable than those within settlements. It is therefore considered that this policy should be revised to allow flexibility for appropriate developments to come forward on sustainable sites that are well related to existing settlements.

In addition, in order to ensure that the overall aims and objections of the Local Plan can be met, it is important that the settlement development limits are logical and allow for future expansion and flexibility. This is essential to ensure that the identified housing need can be delivered should some allocations not come forward. The identified development limits should therefore not be overly restrictive and should allow for future development in and around the existing and proposed urban area.

Our Client therefore objects to Policy STR 10 in its current form and would suggest that the proposed settlement boundaries are amended to ensure that the identified development limits are appropriate, justified and defensible, as required by national planning policy. Furthermore, it is considered that our Client’s site at Heartenoak Road should be included within the proposed boundary to ensure that suitable and appropriate sites are not dismissed unnecessarily. It is noted that the site was submitted as part of the Local Plan Call for Sites exercise (Site Reference: 167). It is also considered that the wording of Policy STR 10 should be amended to ensure appropriate guidance relating to development outside of the development limits is provided.

SECTION 5 – PLACE SHAPING POLICIES

Section 5 of the Draft Local Plan sets out the spatial priorities and policies for the Borough. The section is arranged by non-parish and parish areas, with reference to the various settlements within these areas, having regard to their characteristics and local issues, as well as reflecting the contribution that each can make to the overall development of the Borough.

Policy STR/HA 1 – The Strategy for Hawkhurst Parish

Policy STR/HA 1 sets out specific requirements for development within Hawkhurst. It specifically identifies that approximately 681-731 new dwellings will be delivered on seven sites allocated in the Local Plan in the plan period (Policies AL/HA 1-4, 6 and 9). It goes on to state that additional housing may be delivered through the redevelopment of appropriate sites and other windfall development in accordance with Policy STR 1.

Our Client welcomes the acknowledgement that additional housing may be delivered through the redevelopment of appropriate sites and other windfall development. However, in order to ensure that the overall aims and objectives of the Local Plan can be met, it is considered that the wording of the policy in relation to the number of new homes should specify “*at least*” or “*a minimum of*”, rather than an approximate range, in order to boost significantly the supply of housing in accordance with the NPPF and ensure that the identified housing need can be delivered should some allocations not come forward.

Furthermore, it is considered that the identified development limits of Hawkhurst are overly restrictive and have been partially defined by existing planning applications, rather than being justified, rational and based on appropriate site assessment and evidence. It is therefore considered that these should be amended to allow for future development in and around the existing and proposed urban area. Our Client’s site at Heartenoak Road (Site Reference: 167) should be included within the proposed boundary to ensure that available, suitable and appropriate sites are not dismissed unnecessarily.

SECTION 6 – DEVELOPMENT MANAGEMENT POLICIES

This section of the Local Plan sets out of a number of strategic, place-based and allocation policies to guide future development in the Borough. The development management policies contained in this section also form part of the policy framework, which aims to achieve the Vision for Tunbridge Wells Borough and the Strategic Objectives of the Local Plan. They provide more detail for decision making in relation to particular issues and for assessing the acceptability of certain types of development.

Environment and Design

Policies EN 1, EN 2, EN 3, EN 4 and EN 5

Policies EN 1 – EN 6 set out a range of criteria and advice relating to design including sustainable design and construction, energy reduction and climate change adaptation. Whilst our Client is supportive of sustainable design and the important role this plays in new development and to provide quality places, this needs to be balanced with the requirement to use development land efficiently and to ensure new development can be viable and deliverable. This can only happen where viability is not unduly affected, and our Client therefore seeks flexibility in terms of any requirements which could have a negative effect on the viability and deliverability of a scheme.

In order to make the policies sound, they should be worded as flexibly as possible so they can adapt to changing circumstances and be considered sound and up to date throughout the plan period.

Natural Environment

Policy EN 22 – Agricultural Land

Policy EN 22 provides protection for the best and most versatile agricultural land. It goes on to state that where site specific ALC studies are not available the Local Planning Authority will assume that the site is classified as best and most versatile.

Whilst our Client is generally supportive of this policy, we do not consider that a blanket approach of assuming all agricultural land is the best and most versatile is appropriate and a more flexible approach should be taken.

Agricultural land is classified into five grades, with grade 1 being the best quality and grade 5 is poorest quality. The best and most versatile agricultural land comprises land in grades 1, 2 and 3a of the Agricultural Land Classification. Natural England has published maps which show agricultural land classifications at a regional level which should be used to inform the likelihood of land being classified as the best and most versatile, rather than automatically requiring full ALC surveys.

Our Client therefore objects to this policy on the basis that it is unjustified, ineffective, not positively planned and therefore unsound.

Housing

Policies H3 and H4 – Housing Mix and Density

Policies H3 and H4 sets out that proposals for residential development should include a mix that would enable the balanced development of the area, unless alternative mix and size requirements are set out in a Local Plan site allocation or in a 'made' neighbourhood plan. It goes on to state that the mix should be informed by analysis of the area within which the site is located, which should be provided in the design and access statement.

Our Client fully supports this requirement to balance the housing market and work towards a mix of housing in order to deliver a range of housing types and sizes that reflect the identified housing needs and demands within the Borough.

Whilst our Client ultimately supports this policy, they have concerns with the wording of the policy and object on the basis that the policy is unjustified, ineffective, not positively planned and inconsistent with national policy and therefore unsound.

Our Client is concerned that the policy fails to include for viability of development. Each application for development should be considered on its merits and the provision of housing types should be informed by market requirements and the availability of development funding. Unrealistic requirements can be an obstacle to house building and in order to promote development and increase the supply of housing, the Council should include flexibility and the consideration of viability in the policy wording.

The policy also needs to ensure that it is sufficiently adaptable over the plan period and can reflect changing requirements that may emerge up to 2036.

Policy H 5 – Affordable Housing

Policy H 5 sets out that sites comprising predominantly greenfield land (i.e. non previously developed land) delivering a net increase of more than nine dwellings will be expected to include a minimum of 40% of the gross number of residential units as on-site affordable housing provision. Where this percentage is not a whole number, it will be rounded up to the next whole number. The policy also states that for sites delivering a net increase of one to nine dwellings will be expected to provide a financial contribution towards the provision of off-site affordable housing (land and build costs) based on 20% of the gross number of residential units to be provided and highlights that further work will take place on the scale of financial contributions, which will inform the next, pre-submission version of the Local Plan.

With regard to tenure, the policy states that the general approach to tenure provision of on-site affordable housing should be that 60% is provided as social rent and 40% as intermediate tenures. The policy also includes the provision of viability and highlights that developments will be assessed on a case-by-case basis.

Our Client agrees that a degree of affordable housing should be provided to accommodate the needs of the Borough and welcomes the provision of viability. However, the requirements must be based on up to date evidence and the full viability of schemes to ensure that the provision of affordable housing on site is achievable.

In order to meet the identified housing need, it is important that the aspirations of the policy are not unrealistic as this could jeopardise future housing delivery.

Transport

Policy TP 2 – Transport Design and Accessibility

Policy TP 2 sets out a range of criteria which every development is required to meet. Whilst our Client is broadly supportive of this policy, we would like to reiterate that the requirements must be subject to viability to ensure that new development can be deliverable.

Our Client is committed to ensure that new development is supported by suitable infrastructure to ensure that schemes are highly accessible and sustainable long-term. This means supporting access by all modes of transport to ensure permeability and integration with adjacent uses. This needs to be set against viability and our Client therefore seeks flexibility in the wording of the policy.

Other Policies

Our Client does not have any specific comments in relation to other policies within this section of the Consultation Draft but reserve the right to comment at a later date.

SITE SPECIFIC REPRESENTATIONS

Site specific representations relating to the site at Heartenoak Road, Hawkhurst are provided below.

Land on the north west side of Heartenoak Road, Hawkhurst (Site Reference: 167)

The site is located to the northern edge of the settlement of Hawkhurst. The site measures an area of approximately 4.9 hectares (12 acres) and comprises two agricultural fields. The proposed development would provide up to 62 new homes.

The site is sustainably located and has a range of services within walking and cycling distance. The site would be accessed via a new vehicular and pedestrian access point off Heartenock Road and is easily accessible by public transport. The nearest bus stops lie on Cranbrook Road where both the bus route 349 and 5 connect Hawkhurst with Maidstone to Sandhurst via Loose, Staplehurst and Cranbrook (route 5) and Sandhurst, Bodiam, Sedlescombe, Hastings (route 349). These bus stops are within the 400m walking distance buffer and the buses run regularly throughout the day.

The site is well enclosed, bounded by two woodland areas to the north east and west as well as boundary hedgerow and tree margins to the east and north west. Hedgerows and fencing make up the site's southern boundary with the settlement's built form. These boundaries restrict the wider view of the site from the north and restrict open views of the site from the east. Views of the site from the south would be seen in context with the settlement of Hawkhurst.

It is noted that an outline planning application has been submitted to the Council (Reference: 18/03979/OUT) which is accompanied by a range of technical work. As set out previously, the site was also submitted as part of the Local Plan Call for Sites exercise (Site Reference: 167) and it has not been included as an allocation within the Consultation Draft.

Transport and Access

The site is located to the north of the settlement and in close proximity to a range of services and facilities. The accompanying Transport Statement illustrates that the increase in vehicular numbers can be accommodated in Hawkhurst without prejudicing highway or pedestrian safety in particularly along Heartenoak Road and the junction in the town centre. The scheme would be brought forward with improvements to the width of the carriageway and the inclusion of a pedestrian footpath to improve pedestrian and highway safety along the road

Ecology

A number of ecological surveys have been carried out on the site which demonstrate that there are no significant ecological constraints to development. Furthermore, the proposed development will achieve net gains for nature conservation in accordance with national planning policy.

Landscape

The Landscape and Visual Impact Assessment accompanying the application confirms that the development would not appear incongruous with the existing settlement pattern particularly following the amendments to the indicative design. Overall, the proposed residential development is considered to have only local visual effects within the immediate locality of the site and with mitigation in place such as the woodland planting in the western field and in that sense the overall impact on the AONB is not considered significant.

The Landscape Appraisal confirms that the site would be a sequentially preferable extension of Hawkhurst in comparison with other areas of the town which are of greater historic landscape value.

The proposed development has been designed to respond to the site and surrounding area and will not result in any adverse effects which would preclude development.

Flood risk

The proposed development site solely comprises Flood Zone 1, the low fluvial and tidal flood risk area. Following an appraisal of topographic and geological records, and additional flood mapping resources, the site is also considered to have a low risk of flooding from surface water, sewers, groundwater and reservoirs. Since the footprint of the site is over 1 hectare, the proposal is subject to Flood Risk Assessment in accordance with the National Planning Policy Framework and an attenuation pond is proposed in the western field.

The development has been designed to ensure that there will be no net increase in surface water and the development will be restricted to pre-development 1 in 1-year Greenfield rates, via SUDS attenuation ponds.

The creation of SUDS areas will allow surface water from the development to be treated naturally in accordance with SUDS guidance, to ensure that water quality is maintained or even enhanced from the current use.

Archaeology

An archaeological desk-based assessment has been undertaken on and around the site. This illustrates that the archaeological value of the site is low and the scheme would not have a significant impact on the values, with appropriate mitigation in place should any finds be unearthed. Based on the desk-based assessment and the

information available, it is concluded that no high quality or important assets have been identified in connection with the site.

Conclusion

The site represents a sustainable and logical extension to the existing settlement. The site is deliverable and will contribute to Tunbridge Wells' identified housing need. The allocation of this is therefore fully supported by our Client.

CONCLUSION

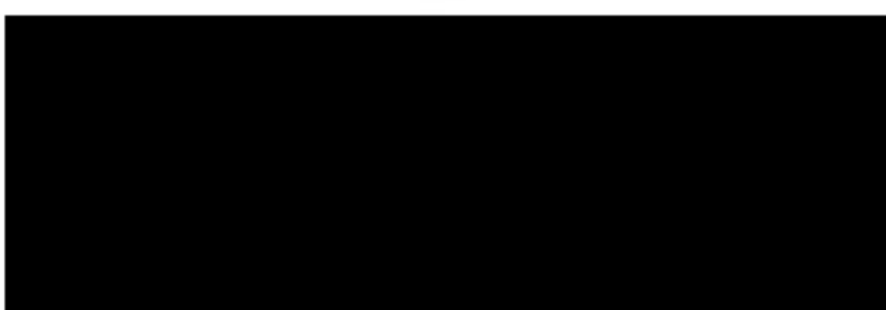
These representations set out our Client's comments on the Consultation Draft Local Plan and highlight several issues in relation to the Local Plan that our Client believes should be addressed during the examination stage. This letter also provides site specific representations in relation to our Client's land interests at Heartenoak Road, Hawkhurst. A site location plan outlining the site is enclosed.

Our Client is committed to ensuring the emerging Local Plan is prepared on a sound and robust basis and ensure that the correct provision of housing is provided throughout the plan period to meet the needs of residents within the district. Subject to a number of amendments, as set out within these representations, Tunbridge Wells' emerging Local Plan can be made sound.

We trust these representations will be afforded full consideration by the Council and the Inspector in relation to the emerging Local Plan.

Should you require any further information please do not hesitate to contact me.

Yours faithfully,



Rachel Gillen

Principal Planner

Enc. Site Location Plan