

**From:** [REDACTED]  
**To:** [localplan](#)  
**Subject:** TWBC response to Tonbridge & Malling Borough Local Plan Consultation (Regulation 19)  
**Date:** 15 November 2018 11:31:31  
**Attachments:** [Response\\_TMBC Local Plan Reg 19 consultation.pdf](#)

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Hello

Please find attached the response from Tunbridge Wells Borough Council in respect of the above consultation.

Just a minor point, but there is a formatting error in the table on page 351 of the Sustainability Appraisal which you may wish to correct.

I would be grateful if you could acknowledge receipt of our response.

Many thanks and best wishes

[REDACTED]



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Date: 15 November 2018

Dear Sir/Madam

### **Tonbridge & Malling Borough Local Plan Regulation 19 Pre-Submission Publication Consultation**

I refer to your communications dated 1 October 2018 (initial consultation) and 3 October 2018 (Statement of Representations Procedure and Fact), in respect of the current Regulation 19 Consultation for the Tonbridge & Malling Local Plan. Thank you for the opportunity to comment.

Tunbridge Wells Borough Council (TWBC) welcomes the opportunity to engage with Tonbridge & Malling Borough Council (TMBC) as part of this process and has several comments to make.

The headline needs of 13,920 homes and 46.8 hectares of employment land are noted.

The constraints of Tonbridge & Malling borough at 70% Green Belt and 28% AONB, as well as flood risk issues are also recognised.

With specific reference to Tonbridge and its surrounding area, it is noted that land to the South West of Tonbridge has been put forward as a Strategic Development Site (480 dwellings) under proposed Policy LP31. Concern was raised previously by TWBC in response to the TMBC Regulation 18 consultation in respect of increased pressures on infrastructure provision, such as highways and education, in this area in close proximity to the Tunbridge Wells borough boundary. However, TWBC welcomes the stipulated masterplan and planning performance agreement approach (to be prepared and completed prior to the submission of a formal planning application) in proposed Policy LP31. This policy clearly sets out the key infrastructure requirements for primary and secondary school provision, highway junction improvements, medical facilities and improvements to sustainable transport links to Tonbridge town centre; and TWBC considers that such an approach should be followed through in the implementation of any such development.

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The proposed green belt releases and changes to the confines of built development on the proposals maps for site allocations at land south of Vauxhall Gardens (61 dwellings) and Little Postern, Postern Lane (10.8 ha of B2 and B8 use) which are located within close proximity to the Tunbridge Wells borough boundary are also noted; and the requirement that they will only be permitted where proposals are of an acceptable design to the locality, do not result in unacceptable impacts on the highway network, air quality and the amenity of the area.

Overall, based on the strategy presented in the consultation document and most particularly TMBC's identified housing and employment development needs, as well as the suggested location and distribution of development and the detailed requirements of the policies outlined above (including in relation to transport and infrastructure), it is considered there would be no overall significant or direct effect on the area comprising Tunbridge Wells borough.

TWBC also have no additional comments to make in respect of the Sustainability Appraisal and the Habitat Regulations Assessment which support and form part of this consultation document.

TMBC, TWBC and Sevenoaks District Council (SDC) have been in joint discussion for some time now, including regular liaison and meetings to discuss housing, employment and other needs under the Duty to Cooperate and it is noted that the TMBC consultation document makes specific reference to the Duty to Cooperate. However, the document does not make any comment on the possibility of TWBC being asked to meet need from any adjoining authority area or vice versa. I can confirm that TWBC would be happy to continue regular liaison and Duty to Cooperate meetings with TMBC and SDC as the TMBC Plan progresses to examination, and in relation to the progression of the new TWBC Local Plan, and allocations within this – please see below. However, without prejudging the outcome of the TWBC local plan work there should be no presumption that there is capacity within Tunbridge Wells borough to accommodate unmet development need from another authority area. We would ask that account is taken of this when considering the representations made to the Regulation 19 consultation.

As you will be aware from our regular liaison and Duty to Cooperate meetings, TWBC is also undertaking preparation of a new Local Plan, which is intended to have a plan period of 2013-2033. Having completed the Issues and Options consultation process last year, TWBC is currently preparing the Draft Local Plan document ready for consultation (Regulation 18) next year. We will continue to discuss and engage with TMBC ahead of this, including in terms of cross boundary issues such as transport, minerals and infrastructure, and will formally consult TMBC when the plan progresses to this stage.

I hope this information and response is of assistance and clarifies the Council's position.

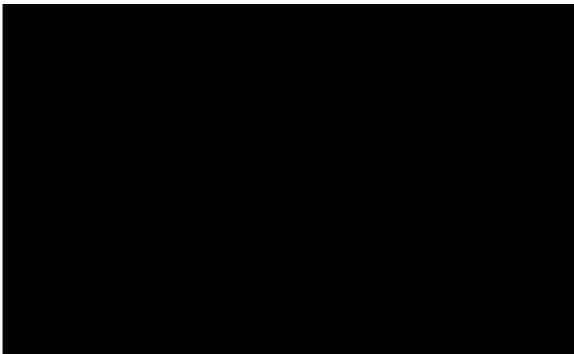
Yours sincerely

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