



Tunbridge Wells Borough Local Plan (2020–2038)

Main Modifications Consultation

Making Representations Guidance Note

March 2025

1. What is the Main Modifications consultation about?

Tunbridge Wells Borough Council submitted its emerging Local Plan for Examination in November 2021, since when an independent Planning Inspector has been examining the Plan on behalf of the Secretary of State.

Stage 1 and 2 Hearing Sessions took place in 2022, and Stage 3 Hearing Sessions were held in June and July 2024, followed by a Public Consultation in September – October on a suite of new evidence base documents. A final Hearing Session was held in November 2024.

Tunbridge Wells Borough Council has prepared a Schedule of Proposed Main Modifications to the Local Plan, which is a formal stage of the examination process, these being needed to make the Plan 'Sound' and allowing Tunbridge Wells Borough Council to proceed to adopt the new Local Plan in due course. The Proposed Main Modifications Schedule has been published for consultation along with an updated Sustainability Appraisal and updated Habitat Regulations Assessment and other supporting documents.

This guidance note includes information on how to view the consultation documents, the time period within which representations can be made and how to submit representations. The note provides guidance on the matters you should consider when completing a representation.

2. When is the Consultation Taking Place?

The consultation period runs from **Monday 17th March until midnight on Wednesday 30th April 2025**, during which time representations may be made. Representations must be made in writing as set out below and received within the consultation period.

3. What is being consulted on?

The consultation invites comments on the following documents:

Consultation Documents

- [Schedule of proposed 'Main Modifications'](#)
- [Schedule of proposed Map Changes \(relating to changes to the Policies Map/Inset Maps\)](#)
- [Sustainability Appraisal \(Part 2\)](#)
- [Habitat Regulations Assessment \(HRA\) \(Part 2\)](#)

There are also supporting documents, which are available for background information only and are not for comment:

Supporting Documents

- [Pre-Submission Local Plan](#)
- [Updated Trajectory \(following publication of December 2024 National Planning Policy Framework \(NPPF\)\)](#)
- [Updated Infrastructure Delivery Plan \(IDP\)](#)
- [Schedule of proposed 'Additional Modifications'](#)
- Local Plan Policies Map (viewable in the [Consultation's webpage](#))
- Local Plan Inset Maps (viewable in the [Consultation's webpage](#))

4. Where can I view the consultation documents?

Online

During the consultation period all consultation documents will be available to view on the consultation portal <https://consult.tunbridgewells.gov.uk/kse/> or on the Council's website at <https://tunbridgewells.gov.uk/planning/planning-policy/local-plan>

Paper Copies

The consultation documents (paper copies) are available for public inspection during the consultation period at:

- **The Amelia Scott, Mount Pleasant Road, Royal Tunbridge Wells, TN1 1AW**, which is open from 9am-6pm (Monday to Wednesday and on Friday), 9am-8pm on Thursday, 9am-5pm on Saturday and 10am-4pm on a Sunday (Telephone 01892 526121).
- **All Parish and Town Council Offices** (please find locations and contacts at <https://democracy.tunbridgewells.gov.uk/mgParishCouncilDetails.aspx?LS=17&SLS=4&bcr=1>).

- **All libraries** across Tunbridge Wells borough - please find locations and opening times at <https://tunbridgewells.gov.uk/community-and-leisure/libraries>.

For those unable to view documents online or unable to visit parish offices/libraries, paper copies can be provided upon request.

5. What is the scope of this public consultation?

Main Modifications and other supporting documents

Representations can only be made on the proposed Main Modifications to the Local Plan, not the full draft Plan as submitted for Examination in November 2021. The consultation is therefore not an opportunity to repeat or raise further representations about the Local Plan or to seek further changes to it. For clarity, the documents on which people are able to comment are:

- Schedule of proposed 'Main Modifications'
- Schedule of proposed Map Changes (relating to changes to the Policies Map/Inset Maps)
- Sustainability Appraisal (Part 2)
- Habitat Regulations Assessment (HRA) (Part 2)

Comments should focus on whether the proposed modifications/other consultation documents comply with the legal requirements and are considered to be sound. It is important that you state each Main Modification number (e.g. MM1), Map title/reference number or paragraph and page number for the other consultation documents (e.g. Sustainability Appraisal, Habitats Regulations Assessment) you are commenting on in the representation form.

You should set out clearly why you consider a Main Modification is unsound or not legally compliant, having regard as appropriate to the legal compliance/soundness criteria set out below. Your representation should be supported by evidence wherever possible. There will not normally be a subsequent opportunity to make further submissions.

Policies Maps

It should be noted that the Policies Maps and Inset Maps do not form part of the development plan itself. The Council is however proposing a number of changes to them considered necessary to reflect some of the proposed Main Modifications. The Policies Map and Inset Maps can be viewed in the [Consultation's webpage](#). The amendments to the maps are to ensure that they are factually correct and provide an

accurate representation of the Local Plan policies. The Schedule of proposed Map Changes is a consultation document and can be commented on as part of this consultation.

Other Additional Modifications

In addition to the Proposed Main Modifications, the Council has prepared a [Schedule of Proposed Additional Modifications](#). Such proposed changes do not materially affect the policies and proposals of the Tunbridge Wells Local Plan but relate to matters such as typographical errors and minor editing. These are published for information purposes only and are not for comment.

Legal compliance

Before making a representation on legal compliance, you should consider the following:

- The process of consultation on the Local Plan must be in general accordance with the [Council's Statement of Community Involvement](#) (SCI). The SCI sets out the Council's strategy for involving the local community and other stakeholders in the preparation of the Local Plan.
- The Council is required to provide a Sustainability Appraisal (SA) Report when it updates and publishes a Plan which should be consistent with the Environmental Assessment of Plans and Programmes Regulations 2004. As above, the [Sustainability Appraisal \(Part 2\)](#) accompanies this Main Modifications consultation.
- The Local Plan in question should be included in the current [Local Development Scheme](#) (LDS) and the key stages should have been followed.
- Preparation of the Plan should comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (the Regulations).

Soundness

The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). The Inspector must be satisfied that the Plan is 'positively prepared', 'justified', 'effective' and 'consistent with national policy'. Plans are considered to be sound if they are:

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 and other statements of national planning policy, where relevant.

6. How can I respond?

Representations can be submitted as follows:

1. Online at <https://consult.tunbridgewells.gov.uk/kse/>
2. By e-mail to localplan@tunbridgewells.gov.uk (a downloadable form is available)
3. By printing a form(s) and posting to Planning Policy, Planning Services, Tunbridge Wells Borough Council, Royal Tunbridge Wells, Kent TN1 1RS

If you have any queries or are seeking assistance (including a request for paper response forms), please email localplan@tunbridgewells.gov.uk or telephone 01892 554056.

Please note that your representation will be shared with the Planning Inspector in full for consideration and a redacted version will be published on the Council's website. Please see the [Council's Privacy Notice](#) and/or [Statement of Representation](#) for further information.

Where groups or individuals share a common view on the Main Modifications/ other supporting consultation documents, it is requested that a single representation be submitted, rather than a large number of separate representations repeating the same points. In such cases the group should indicate the names and contact details of each person, and how many people it is representing.

7. Next Steps

After the consultation has closed, the Inspector will review the representations and write his final report. Subject to that report, the Tunbridge Wells Local Plan can then be adopted by the Council.