



## Briefing notes for local residents wishing to respond to the TWBC Reg 19 Local Plan Consultation

*NOTE: We are providing these Briefing Notes for our supporters and local residents.*

*Your comments can be made via the TWBC website or a downloadable response form which can be emailed or posted. TWBC have produced a virtual exhibition and a YouTube guidance video which can also be accessed under “making representations & next steps”.*

[Pre-Submission Local Plan \(tunbridgewells.gov.uk\)](http://tunbridgewells.gov.uk)

*The format of our representations is structured to assist the Inspector, rather than TWBC, and the most effective method is via the website. These notes are intended to provide residents with assistance on ‘how to respond’ rather than what to say. Save Capel will not be suggesting the duplication of template responses at Reg 19, as these will be ignored and may be considered unhelpful by the Inspector. We will be submitting our petition statement with the support of more than 4,000 signatures.*

*We encourage everyone to respond, to show the strength of opinion against the Capel sites, but in your own words.*

### **IMPORTANT NOTES:**

- There is NO restriction to what you can comment on in relation to this Plan and there is no limit on the number of words. Anyone can comment on ANY ASPECT of the Plan.
- If you submitted comments on the previous Reg 18 version, you should be aware that these will NOT be forwarded to the examining inspector, and hence not seen by him/her. Clearly, TWBC has ignored the community’s unprecedented response at Reg 18, and you should send your updated personal comments in again. Only submissions to this Reg 19 consultation will be seen by the inspector.
- **It is critical that all comments you send in include a reference to the specific section(s), paragraph(s) and/or policies in the Plan they relate to.** See Question 3 below.
- You can make as many Representations as you wish. All representations will be submitted to the Secretary of State alongside the Local Plan and its supporting documents, together with a summary of the main issues raised during the consultation period. The representations will be considered as part of a public Examination held by an independent Planning Inspector.
- You can choose to comment on any one or more of the other policies in the Plan if you have a good understanding of the process, which includes identifying arguments against ‘legal compliance’ and ‘soundness’. However, this is not essential and the sections below describe the method of objecting to the proposals at Tudeley and/or East Capel.
- Please submit your comments using your own words and expressing your own views. **Also, if you have personal examples that support your argument, please add these as they will contribute to the “supporting evidence”.**
- **Please remember, comments must be received by the Council no later than 5pm on Friday 4 June 2021.** Submissions received after this will not be accepted.

**\*\*\* Don't forget to save your work 'SAVE DRAFT' every five minutes \*\*\***

System will log you out after 10 mins inactivity

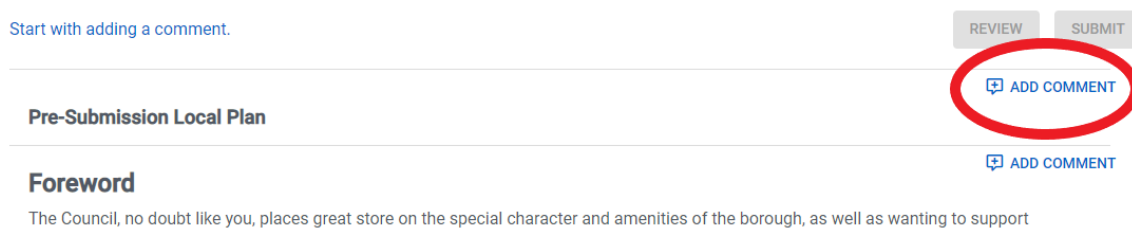
## How to respond

Representations via the TWBC website require you to have registered and sign in to add your comments to the consultation. This method allows you to copy/paste your text already prepared on a word document (see Question 5) and you can save a draft at any time which you can return to.

You can also attach up to three files to each of your submissions, if made online. This is useful if you wish to add maps, photographs, or if you have prepared a formatted response (pdf files are suggested).

[Pre-Submission Local Plan - Keystone \(tunbridgewells.gov.uk\)](http://tunbridgewells.gov.uk)

The home page is shown below - click 'add comment' near the top right of the screen page.



There are 8 questions to answer, with Questions 3 and 4 being particularly important as they will assist the Inspector and we have suggested answers to help you below.

### Part A

**Question 1**  
Respondent's Name and/or Organisation  
Your name|

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**Question 2**  
Agent's Name and Organisation (if applicable)  
Leave blank

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**NEXT**   **SAVE DRAFT**   **DISCARD**

## Question 3 - Policy

It is critical that you identify the policy that you are commenting on. If you wish to comment on both Capel sites, then it is preferable to make two separate representations:

**Policy STR/SS 1** Strategy for Paddock Wood, including land at east Capel

**Policy STR/SS 3** Strategy for Tudeley Village

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### Question 3

To which part of the Local Plan does this representation relate?

Paragraph(s)       Policy       Policies Map

### Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

← → Italic ▾ **B** *I* ≡ ≡ ≡ ≡ ≡ ≡

Enter Policy STR/SS 1 for Paddock Wood, including land at east Capel

Enter Policy STR/SS 3 for Tudeley Village

*IF YOU WISH TO COMMENT ON BOTH SITES, PLEASE CREATE TWO SEPARATE REPRESENTATIONS*

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## Question 4 - Soundness

This is where Reg 19 is different, where the Inspector needs to know whether 'legal compliance' or 'soundness' is being challenged. Unless you have a good understanding of the process we suggest the following answers which will allow you to make any comment you wish on soundness. Legal argument is being submitted with the advice of our barristers.

### Question 4

**Do you consider that the Local Plan:**

	Yes	No	Don't know
Is legally compliant	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Is sound	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Complies with the Duty to Cooperate	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

### Question 4a

**If you consider that the Local Plan is not sound, please answer this question.**

Do you consider that the Local Plan is not sound because:

- It is not positively prepared
- It is not effective
- It is not justified
- It is not consistent with national policy

**\*\*\* Don't forget to save your work 'SAVE DRAFT' every five minutes \*\*\***

System will log you out after 10 mins inactivity

## Question 5 - Your Response

We suggest you may wish to start your submission by giving a little background on who you are - resident where and for how long; and/or working here; local connections. And any relevant *personal* experiences such as traffic congestion, children not able to afford a house locally, shortage of school places, GP surgeries, local flooding or sewerage issues.

Please comment on the issues that most concern you, which might include - traffic, infrastructure, loss of greenbelt/productive farmland, AONB setting, coalescence, heritage, environment, bio-diversity, flood risk, water supply & sewerage, lack of engagement with the public response to Reg 18, alternatives & brownfield sites not prioritised, affordable housing, town centre regeneration.

It is important to explain why you believe Tudeley and/or East Capel is not the right place for the level of housing proposed. Give as much evidence as you can. Please use your own words.

*Here you can paste in your comments from a word document or refer to a formatted response which you can attach below Question 8.*

## Question 6 - Modifications

Here you are asked to provide details of how the Plan can be made 'sound' by suggesting alternatives to the Capel sites, etc. You can leave this blank if necessary.

## Question 7 - Inspector Hearings

Here you can indicate whether you wish to participate at the public examination. Save Capel will be instructing legal and planning experts to represent us at the examination.

Question 7a asks you to explain why it is necessary for you to attend.

## Question 8 - Sustainability Appraisal

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here. Again, you can attach a formatted response (pdf) beneath.

Decide if you wish to be kept informed and 'Save Draft' for later or 'Complete Comment' which cannot be altered later. You will be able to submit further representation(s) if necessary.

### Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

- Yes, I wish to be notified of future stages of the Local Plan
- No, I do not wish to be notified of future stages of the Local Plan

 COMPLETE COMMENT

SAVE DRAFT

DISCARD

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## Responding by email

Representations can also be submitted by email to [localplan@tunbridgewells.gov.uk](mailto:localplan@tunbridgewells.gov.uk) using the standard **downloadable response form**, which contains the same 8 questions above in a word document. You will need to complete your personal information and sign the submission.

Remember, the format is to help the Inspector, rather than TWBC.

The guidance in these briefing notes can still be used, but the option to attach your evidence files will not be available. Your submission would require human intervention for it to be properly registered and must be made on the response form.

## Responding by post

Paper copies of the response form can be printed using the **downloadable response form** and completed paper response forms should be returned to:

Local Plan  
Tunbridge Wells Borough Council  
Town Hall  
Civic Way  
Royal Tunbridge Wells  
Kent, TN1 1RS

## What if you do not have access to the internet

The above form can be printed for friends or neighbours that do not have access or they can call the Planning Policy team on **01892 554056**.

It is possible to make an appointment to view the Pre-Submission Local Plan, Sustainability Appraisal, and supporting documents at the Gateway in Royal Tunbridge Wells, where paper copies of the representation form will be available.

The Gateway is located at 8 Grosvenor Road, Royal Tunbridge Wells, TN1 2AB. The Gateway is open from 9am to 5pm, Monday to Friday. Viewing, which is by appointment only, can be arranged by calling 01892 554056.

## How can you ask questions

Questions can be by email to [localplan@tunbridgewells.gov.uk](mailto:localplan@tunbridgewells.gov.uk) or call Planning on **01892 554056**.

You will also have the opportunity to ask questions to the Save Capel team online via a Zoom call at **7pm on Tuesday 13th April**. Capel Greenbelt Protection Society (CGPS) are kindly hosting this Zoom in support of Save Capel, and you can join by emailing [cgps2021@gmail.com](mailto:cgps2021@gmail.com).

**This is our final opportunity to make our views known against this disastrous Local Plan and the Councillors who are supporting it. Please help us to help you!**

