

Tunbridge Wells Borough



Tunbridge Wells Borough Council

# **Consultation Statement for Draft Local Plan Regulation 18 Consultation**

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**(Includes arrangements for consultation on the Draft Local Plan and  
consideration of responses to the earlier Issues and Options consultation)**

**September 2019**



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# 1.0 Introduction

- 2.1 The first part of this Statement sets out the consultation procedures to date in relation to the preparation of the Draft Local Plan including both the previous Issues and Options consultation (Regulation 18) and how the Council will consult on the Draft Local Plan (Regulation 18).
- 2.2 The second part of the Statement (attached as Appendix 1) sets out how the Council has taken account of the responses received to the Issues and Options consultation in the preparation of the Draft Local Plan.
- 2.3 The Council's Statement of Community Involvement 2016 (CSI) sets out how the Council will involve the community in the preparation and review of planning policy for the borough, through the Local Plan and Supplementary Planning Documents, and in decision making on planning applications ([view the Statement of Community Involvement](#)).

## 2.0 Local Plan Timescales

- 3.1 The Draft Local Plan is the second of three stages in preparing the new Local Plan. The first stage was the publication of the Issues and Options document in the summer of 2017, for public consultation. Figure 1 below sets out the various stages of producing the Local Plan. Full details of the Local Plan timetable are set out in the Local Development Scheme (LDS) ([view the LDS](#)). This LDS is/will be updated as the Plan progresses.

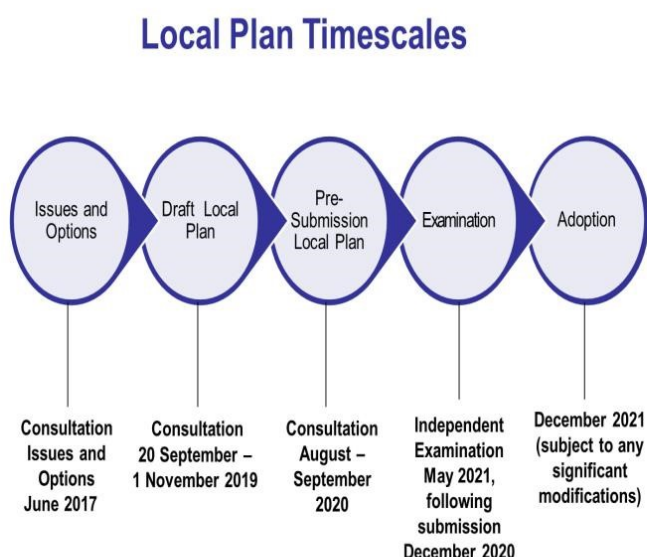


Figure 1: Local Plan timescales

# Issues and Options

- 3.2 The Issues and Options consultation was the first borough-wide public consultation undertaken by the Council with regard to the preparation of the new Local Plan. The public consultation took place over a period of six weeks between Tuesday 2 May and Monday 12 June 2017 and was carried out in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Consultation Statement for the Issues and Options (view the [Issues and Options Consultation Statement 2017](#)) includes two parts: Part 1 provides an overview of the Issues and Options consultation, informing who and how the Council consulted, what consultation material was used, how comments received were considered and an evaluation of the consultation. Part 2 provides a summary of the comments received and the Council's initial response to those comments.
- 3.3 The Issues and Options consultation document included the following:
1. A set of draft objectives for the new Local Plan that give an indication of the expected scope of the Plan's Strategy.
  2. Identification of the main issues and challenges relevant to future development in the borough which will be addressed in the new Local Plan, based on seven themes: 1. Natural and Built Environment, 2. Infrastructure, 3. Housing, 4. Economy, 5. Transport and Parking, 6. Leisure and Recreation and 7. Sustainability
  3. Five potential strategy options for the distribution of new development within the borough, together with commentary on the implications of each.
- 3.4 The main purposes of the consultation were: to publicise the preparation of a new Local Plan, seek early views from a wide cross section of the community and stakeholders on what the Local Plan should seek to achieve over the plan period and to invite comments on potential strategy options for delivering new homes, employment space, retail and leisure facilities in Tunbridge Wells borough.
- 3.5 The consultation also provided opportunity for respondents to identify any additional issues that were considered relevant to preparing a new Local Plan and any alternative development scenarios that it was thought appropriate for the Council to consider.
- 3.6 The following provides a summary of the level and breadth of responses received to the Issues and Options consultation:
- 551 individual responses;
  - A total of 6,686 comments;
  - 465 responses from residents and individuals;
  - 39 responses from organisations and companies (developers and agents);
  - 15 responses from parish and town councils;

- 14 responses from statutory bodies and utilities;
- 11 responses from resident, amenity, and other groups;
- 7 responses from adjoining authorities.

3.7 Some of the key issues/concerns (not an exhaustive list) highlighted through the consultation were as follows:

- Concern over meeting development needs (the objectively assessed need) within a constrained borough;
- Importance of the protection of the landscape (including the Area of Outstanding Natural Beauty) and the historic environment of the borough, as well as non-designated assets that are valued by residents and visitors;
- Protection of the Green Belt when considering new development;
- Importance of the provision of additional infrastructure alongside development;
- Should be aiming to provide the right types of housing throughout the borough for specific groups e.g. older persons and first time buyers, and concern with the overall high amount of housing to be provided for in the new Local Plan;
- Importance of economic growth to meet the needs of local businesses;
- The balance of growth across the borough, including the rural areas;
- The need to tackle pollution and congestion in certain areas of the borough;
- Should be recognition of technological changes that will take place over the course of the plan period, and the Plan should be flexible to adapt to changes.

3.8 All the responses and representations received to the Issues and Options consultation have been carefully considered and taken into account in the development of the Draft Local Plan (Regulation 18). The second part of this Consultation Statement (referred to above) sets out how the responses received to the Issues and Options consultation have been taken into account in the preparation of the Draft Local Plan – this is attached as Appendix 1.

## 3.0 Draft Local Plan (Regulation 18) Consultation

3.1 The second stage, the preparation of this Draft Local Plan, builds on the Issues and Options document and the feedback received during consultation. It sets out the Borough Council's proposed strategy for the future development of the borough, the site allocations that relate to this and the relevant policies against which future development proposals and planning applications will be assessed. Where

alternative approaches have been considered, accompanying documents (including 'Topic Papers') also explains why these are not being pursued.

3.2 The Draft Local Plan will contain:

- The Vision and Objectives for the borough;
- The proposed Development Strategy: how much, and where, development needs will be met;
- Place shaping policies, including proposed site allocations for each parish/settlement within the borough;
- Detailed development management policies to guide development over the plan period.

3.3 The consultation period for the Draft Local Plan (Regulation 18) consultation will run from 20 September to 17.00 on 1 November 2019.

## Who will be consulted?

3.4 Consultation material will be made available for comment to a wide range of organisations and individuals and in a range of ways, in accordance with the Council's Statement of Community Involvement, including the following:

- Statutory consultees
- Internal Council stakeholders including Councillors
- Parish and town Councils
- Royal Tunbridge Wells Town Forum
- Developers and agents
- Local organisations
- General public (including residents and businesses)
- Contacts on the Council's planning consultation database
- Adjoining Local Authorities and Duty to Cooperate partners

## Proposed Consultation Material and Methods

3.5 The Draft Local Plan consultation material will include the following documents:

- Tunbridge Wells Borough Draft Local Plan (Regulation 18)
- Response form for Draft Local Plan document

- Sustainability Appraisal
- Response form for Sustainability Appraisal

3.6 Information comprising the evidence base to support preparation of the new Local Plan is referenced in the consultation documents and published on the Council's website.

3.7 The following methods of consultation will be used:

## Letters

3.8 In accordance with Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012, letters will be sent out prior to the start of the consultation period, by post or by email to all the above consultees (under para 15 above), who are on the Council's database, informing them of the Draft Local Plan consultation and inviting them to comment.

## Posters

3.9 As for the Issues and Options consultation, posters will be displayed at various locations around the borough including the Council's RTW Gateway office in the town centre, in the roundel outside of the Weald Information Centre in Cranbrook, all public libraries and Council car parks. Information posters and summary leaflets (as below) will be sent to all parish and town councils asking that these be displayed where they consider most appropriate e.g. village hall, local shop, notice boards. A4 sized posters will also be sent to local shops on the Council's database requesting they be displayed in shop windows. Parish and town councils will also be encouraged to publicise the Draft Local Plan consultation on their individual websites and in any local magazines.

## Summary leaflets

3.10 The 'Local' magazine is delivered to every household in the borough on a seasonal basis. An article relating to the Draft Local Plan was published in the June 2019 version of this magazine. A further update, including a central summary information leaflet, summarising the proposed development strategy, place shaping policies and development management policies and setting out details of the Local Plan Regulation 18 consultation, will be provided in this magazine and distributed during the week beginning 16 September, just before the formal consultation period for the Draft Local Plan (Regulation 18) starts.

3.11 The same summary leaflets will also be distributed at exhibition events, and will be made available in other public places such as local libraries, the Assembly Hall Theatre and sports centres within the borough (at Tunbridge Wells, Putlands and Cranbrook).

## Consultation exhibition events

- 3.12 A number of consultation exhibition events across the borough are planned as part of the consultation, the details of which are set out below. These will be attended by TWBC officers and (for certain exhibitions by) KCC Highway officers to answer questions and give advice on the Draft Local Plan and other supporting documents forming part of the evidence base.
- 3.13 A series of exhibition boards will be used at the events to display the information relating to various sections of the Draft Local Plan, including maps. The summary leaflets referred to above will also be distributed at these events.

Table 1: List of exhibition events

Venue	Date	Opening Times
Capel Community Centre, Falmouth Place, Five Oak Green TN12 6RD	Saturday 21 September	10am-2pm
Mascalls School Hall, Maidstone Road, Paddock Wood TN12 6LT	Tuesday 24 September	4.30pm-8pm
Royal Victoria Place, Royal Tunbridge Wells	Thursday 26 September	12pm-7pm
Vestry Hall, The Old Fire Station, Stone Street, Cranbrook TN17 3HF	Friday 27 September	4pm-7pm
Royal Victoria Place, Royal Tunbridge Wells	Saturday 28 September	10am-3pm
British Legion Unity Hall, High Street, Hawkhurst TN18 4AG	Monday 30 September	4pm-7pm
Horsmonden Village Hall, 7 Back Lane, Horsmonden TN12 8LQ	Tuesday 1 October	4pm-7pm
Pembury Village Hall, 49 High Street, Pembury TN2 4PH	Wednesday 2 October	4pm-7pm
Mascalls School Hall, Maidstone Road, Paddock Wood TN12 6LT	Thursday 3 October	4.30pm-8pm
Lamberhurst Village Hall, The Broadway, Lamberhurst TN3 8DA	Friday 4 October	4pm-7pm

- 3.14 The exhibitions will also be supplemented by offers to those parish and town councils in any of the parishes where allocations are proposed, but don't have an



exhibition in that specific parish, that an officer attends a parish/town council meeting to provide information and answer questions on the Draft Local Plan.

## Other Briefing Sessions

### Specific meetings with targeted groups

- 3.15 In view of the scale of development and associated infrastructure proposed at both Paddock Wood and in Capel parish, additional presentations/discussions were held with both Capel Parish and Paddock Wood Town Councils in May 2019 with the Head of Planning to discuss publicly (at a high level) the proposed allocations in these parishes. These meetings were very well attended by the public. The Head of Planning and Chief Executive are also attending (following invitation) a public meeting in Capel on 18th September to discuss the proposed allocations in this parish. These followed a series of meetings and workshops with all parish and town councils and neighbourhood plan groups over the course of 2018 and 2019: at least two workshops/meetings have been held with each during this time, and in some instances there have been a number of additional meetings/workshops.
- 3.16 Further meetings will be/have also been arranged with:
- Tunbridge Wells Town Forum – a workshop was held with representatives of the planning and transportation working group on 5th September, and the group relayed the discussions on this to the Town Forum on 12th September 2019;
  - Parish Chairmen on 17th September 2019;
  - local business community representatives – the Council are seeking to engage with local business groups during the course of September/October 2019;
  - planning agents (via the TWBC Agents Forum) on 3rd September 2019;
  - the High Weald AONB Unit as part of a regular officer steering group meeting on 18 September 2019 and a further specific meeting between TWBC officers and an officer from the AONB Unit on 10 October 2019.
- 3.17 In order to encourage young people to consider planning issues and contribute to the plan-making process, planning officers have offered and where accepted will attend a suitable event at each secondary school in the borough.
- 3.18 In line with the SCI, positive consideration has been given to reaching out to sections of the community that may be less able and/or disposed to participate in plan-making. Contact will be made with the local Accessibility Forum and respective disability groups, as well as with 'Family and Friends of Travellers' in relation to gypsy and traveller matters. The Local Plan itself will be available in different formats, as set out below, to aid access.

## Local News Media

### Publicity and Advertising

- 3.19 Information about the consultation, together with details where exhibitions will be held, will be advertised in the following local newspapers/magazines:
- Wealden Advertiser
  - Kent & Sussex Courier
  - Kent Messenger (Weald edition)
  - Times of Tunbridge Wells and Times of Tonbridge
  - Local Magazine (as above)
- 3.20 Coverage by the media is proposed to be further stimulated by a combination of media releases and the offer of interviews. This will include two TV and radio outlets.

## Electronic consultation

- 3.21 The Council's website has been updated to include a new webpage for the New Local Plan. This includes 'click on' options providing links to information such as Supporting Documents, the Call for Sites and Local Plan latest updates. This webpage will be further updated for the Regulation 18 consultation to also include a "click on" link to the Draft Local Plan Regulation 18 Document itself and full details of the consultation, exhibition events and how to make comments.
- 3.22 To help ensure that interested parties prepare to submit comments within the consultation period, the Council's website will prominently advertise the programme of the forthcoming consultation, while advance notice will be sent to consultation bodies and those who have registered an interest via the Council's consultation portal.
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- 3.24 The Council's consultation portal will be used to enable people to view and comment online during the consultation period.
- 3.25 The Council's Facebook, account will be used to advertise the consultation and invite comments. A Facebook Live event is scheduled to take place on 8 October 2019.
- 3.26 Further details in relation to the submission of comments are given below.

## Council staff

- 3.27 All staff briefing sessions about the new Local Plan were held in mid July 2019 to make Council staff aware of the headlines, key messages, the process and how people can get involved in the Local Plan process.

## Councillor information

- 3.28 As part of the development of the Local Plan, planning officers have also presented a draft strategy and policies to the elected Borough Council Members for consideration and discussion at monthly Planning Policy Working Group (PPWG) meetings. This is a cross-party group which provides information and feedback on draft documents and policies, and serves to provide consensus on the potential strategies and content of the Local Plan. It is relevant that throughout the period of preparing the Plan, the papers for the PPWG meetings have been (and continue to be) distributed to all Members of the Council, and all Members have been invited by the Chair of the Working Group (Councillor Alan McDermott, Leader and Portfolio Holder for Planning and Transportation) to attend and make a contribution to the discussions. Attendance has been broad and considerable and there has been much debate of issues.
- 3.29 In order to ensure that those Members who are not able to attend the PPWG meetings were/are aware of relevant information briefings have been provided to all Members of TWBC on the following dates, to provide updates on the development of the Local Plan and to answer questions raised:
- 15th February 2018;
  - 29th March 2018;
  - 12th December 2018;
  - 27th February 2019;
  - 15th May 2019.
- 3.30 Additionally, briefings have been provided to all new Members following the May 2019 elections (on 13th June 2019), and meetings have been held with all the political groups in summer 2019 where specific questions about the Draft Local Plan were answered.

## Submission of comments

- 3.31 Comments will be able to be made in the following ways:

## Via the consultation portal

- 3.32 The consultation document and supporting studies/information will be made available for viewing and allowing comments to be made directly online, using the Council's consultation portal (for details, [see the Council's New Local Plan webpage](#))

## Using a response form

- 3.33 Alternatively, a response form (for filling in electronically or printing out) can be downloaded from the Council's website at [Local Plan](#) or a paper copy requested by phoning the Planning Policy Team; and returned by email or by post.
- 3.34 For those without access to a computer, the consultation documents will be made available for viewing at the following locations:
- Tunbridge Wells Gateway, Grosvenor Road, Royal Tunbridge Wells; and
  - All libraries in the Tunbridge Wells borough area
  - All parish and town councils within the borough
- 3.35 The different forms of consultation will not only make clear how comments can be made but will also provide links to further information relating to documents supporting the consultation document and links to evidence studies for the new Local Plan, where relevant.

# Appendices

# Appendix 1: Consideration of responses received to earlier Issues and Options consultation

## Introduction

This Appendix document summarises the responses received to the Tunbridge Wells Borough Local Plan Issues and Options Consultation 2017 and shows how these responses have been considered in the preparation of the Draft Local Plan (Regulation 18). It is structured on the sections and questions set out in The Issues and Options consultation document.

For the purposes of analysis the responses received to the consultation were divided into the following different respondent groups:

- Adjoining Local Authorities and Other Local Authorities
- Other organisations and companies (e.g. agents and developers)
- Parish and Town Councils
- Residents associations, amenity and various community and other organisations
- Statutory Bodies, Utility Companies, NHS, Emergency Services
- Residents and other individuals

This document summarises the responses received for all of these groups. Whilst the responses received are formatted as a list, they draw together key issues across all the groups in answering a particular question.

## Section 3 – Vision and Objectives

### Vision

#### Introduction

This section of the Issues and Options consultation document relates to the draft Vision for the borough up to 2033. The draft Vision states that new development will be delivered in a sustainable way and will seek to protect and enhance the exceptional quality of the built, natural and historic environment while promoting economic prosperity to ensure the borough remains a special place. Three questions were asked in relation to the draft Vision:

#### **Question 1: Do you agree with the new draft Vision for the borough?**

#### Summary of Responses

244 responses were received to this question. 154 respondents (about 63%) disagreed with the draft Vision, 75 respondents (about 31%) agreed; while a further 15 respondents (about

6%) did not indicate a view. Overall, of those who expressed an opinion, the majority of 67% disagreed with the Vision, while 33% agreed.

**Question 2: What suggestions do you have for improving or updating the draft Vision and relating it to 2033?**

**Summary of responses**

205 responses were received to this question.

**Key issues referred to across the response groups were:**

- Vision is too long, over ambitious and prescriptive and should concentrate on a small number of clear priorities.
- Too much focus on Tunbridge Wells (TW) and Paddock Wood (PW). Vision needs to ensure it illustrates how development will take place across the borough and address the needs of rural villages.
- Vision should include adequate protection of Metropolitan Green Belt as well as the Kent High Weald AONB.
- Should include recognition of need to review current Green Belt boundaries.
- Vision is unsustainable due to constraints of the borough - in particular AONB designation. Should make clear that AONB designation covering 69% of the borough is likely to constrain TWBC meeting its objectively assessed need.
- Vision should reflect responsibility placed on the borough from the duty to cooperate to understand how these plans impact with/on other adjoining boroughs.
- Vision should look how the borough will develop over a much longer period beyond the proposed local plan. Numbers should be based on long term sustainable growth not short term theoretical needs.
- Do not expect to set policy so far into the future. 2033 is too far off to be relevant. Choose goals which are achievable.
- Should include Neighbourhood Plans in the Vision to engage communities in wider borough initiatives, providing social cohesion and housing mix in the villages.
- Vision should include reference to development and provision of additional infrastructure - roads, public transport, water, electricity, broadband, mobile reception.
- Vision should include reference to agriculture.
- Include sustainability in terms of energy production, conservation and consumption.
- Reference to local needs is contrary to the NPPF and is therefore wrong starting point for the Plan - should be to meet all of the borough's development needs.
- Vision is not "inclusive", nor is it compliant with UK Disability Strategy 2012 and the legal compliance post 2025.
- Vision puts development ahead of environmental protection and suggests only environment/heritage of "exceptional quality" will be protected.
- Place greater emphasis on role of TW as a strategic location within wider context of Kent and East Sussex - seek the growth of TW as a sub-regional settlement.

- Vision does not explicitly include commitment to providing sufficient numbers of new homes to meet full housing need arising in the borough.
- Vision should make specific reference to tackling unaffordability of housing as a key need.
- Vision puts an artificial 'cap' or limit on opportunities for sustainable development.
- Vision should generally restrict development in most categories as local roads and infrastructure cannot cope with a 16% population increase.
- Vision is derived from a flawed national plan (central government) requiring further housing in the South East without any regard as to how this can be meaningfully achieved. Many of 'local needs' being 'identified' in the new Plan are dictated by central government not local people.
- Vision should be based on reformulating and strengthening focus on quality environment, not housebuilding.
- Should include focus on brownfield sites to meet the housing demands; and integration of industrial estates with housing to provide jobs locally.
- Vision should mention preservation of historic buildings and historic setting of villages.
- Should include a specific commitment to lower pollution, and ease traffic congestion.
- Vision talks about housing and economic development, but nothing specific about transport infrastructure - availability and suitability of this is a prime requirement.
- Vision seems to be a continuation of yesterday's trends – no mention of new technology and other global influences. Work and transportation will be vastly different in 2033.
- People choose to live in towns or rural villages for different reasons – the two are not interchangeable. Invalid to assume if towns are full people will choose to live in rural communities. Separate housing numbers are required for urban and rural locations.
- Entire Vision is based on cramming housing into already overcrowded villages and towns, instead of focusing on providing a sustainable quality of life.
- Vision should be balanced to both developing existing built town areas and preservation of surrounding countryside and unique historic villages. Rural businesses rely on local communities and visitors to the countryside environment, but this seems to be ignored in the Vision.

### **Question 3: What should we be aiming and aspiring to achieve and why?**

#### **Summary of Responses**

190 responses were received to this question.

#### **Key issues referred to across the response groups were:**

- Aspire to have better local facilities for local communities, economic growth, local education and local jobs.
- Encourage cottage industries and agricultural business.
- Encourage retention of active villages rather than dormitory villages.
- Improve access to the countryside.



- Better protection and preservation of AONB and Green Belt.
- Aim to enhance AONB for future generations and as a tourist asset.
- Green Belt boundaries need to be reviewed, and strategically relaxed to accommodate sustainable development required to meet future housing needs, offering social benefits.
- Green Belt buffer zones between TW borough and adjoining boroughs need to be created to prevent other boroughs from building on our borders and making use of our infrastructure without contributing to its upkeep/ further expansion.
- Concentrate on promoting existing commuting links and the benefit to industry the borough has - such as good access to channel ports, London; High Speed Rail Links and M25.
- Should be aiming to build right type of housing to meet needs of individual areas/settlements, including affordable housing and housing for first time buyers and the elderly and aspiring to achieve an overall spread of housing throughout the borough.
- Aim for development proposals that are well located, deliverable and affordable to meet local needs.
- Aim to encourage effective use of land by re-using land that has been previously developed.
- Recognise town centres as the heart of communities and pursue policies to support their viability and vitality.
- Aim should be to elevate TW borough to a sub-regional status in terms of quality of its retail and employment offer and as a location for people to live.
- Important mistakes of the past – failing to provide properly for economic growth – are not repeated. Good quality economic development that properly meets the needs of businesses is essential both nationally and at local level.
- Should be aiming to devise and agree joined up policies (public and private sector providers) to improve the mental and physical health and wellbeing of all sections of the population.
- Urgently tackle existing atmospheric and noise pollution.
- Overcome present problem of road congestion by enabling shift away from private motor cars – cycle network, pedestrian friendly environment, better public transport.
- Aim to maintain historic fabric and setting of town which contributes to general wellbeing of its residents and considerable future tourism potential.
- Focus on improving local infrastructure first and pushing back on national government.
- Aim to build a limited number of houses that will be for local needs only - the number of proposed houses is massively too high and an unrealistic target. Reduce housing numbers.
- Sustainability is not a vision when combined with the SHMA housing numbers and call for sites.

- Should be measured, realistic and carefully-planned growth, bearing in mind the value of countryside, agriculture and limits of economic/employment potential in the area.
- A more robust, flexible future strategy is needed given lack of housing supply and past failure to achieve the Core Strategy housing requirements, resulting in release of several greenfield sites.
- New development should be designed around major, Council led transport upgrades. Significant investment required in local transport networks, in particular public transport for both urban and rural areas.
- Update and extend existing leisure facilities within surrounding available land.
- Consider changes in technology and impact on lifestyles –e.g. home working / flexible working days based around improved IT connectivity.
- Social, cultural and economic activities too focused on RTW, denying other settlements of such attractions and investment.
- Encourage economic growth in villages to provide job opportunities.
- Overall, should aim to ensure the quality of life for all residents whether in the home, at school, at work, or at leisure in 2033 is better than today.

### **Consideration of responses to Q1, Q2 and Q3 in the preparation of the Draft Local Plan:**

*The Vision, in section 3 of the Draft Local Plan, has been modified from that set out in the Issues and Options Consultation Document 2017 to make provision for the plan period to 2036 (not 2033) and the wording amended, taking into account some of the above comments received to the Issues and Options consultation.*

*The Vision now includes more specific detail relating to the proposed growth strategy for both urban and rural areas across the borough, with emphasis on infrastructure led development, connectivity and active travel, an appropriate mix of uses (employment (including rural enterprise), housing, leisure and culture) with the overall aim of protecting and enhancing the high quality built, natural and historic environment of the borough; while also providing ‘betterment’ for residents, users, businesses and visitors. The Vision also recognises the importance of local input in achieving the proposed growth strategy, including assessment through Neighbourhood Development Plans.*

*It will subsequently be seen throughout this document that many of the issues raised in respect of the Vision above are addressed in other sections and policies of the new Draft Local Plan, such as reviewing Green Belt boundaries, addressing air and noise pollution and building the right type of housing.*

*The Vision should also be read in conjunction with the proposed Strategic Objectives considered below.*

## Objectives

### Introduction

This section of the Issues and Options consultation document relates to the eight draft Strategic Objectives needed to realise the Vision, which are (i) Meeting development needs, (ii) Protecting and enhancing the borough's distinctive environment, (iii) Delivering sufficient infrastructure, (iv) Providing high quality housing, (v) Making provision for economic growth, (vi) Ensuring adequate leisure and recreational facilities, (vii) Delivering sustainable development and (viii) Delivering adequate transport and parking capacity. The following three questions were asked in relation to these draft Objectives:

#### **Question 4: Do you think these are the right Objectives?**

##### **Summary of Responses**

206 responses were received to this question. 88 respondents (about 43%) agreed with the Objectives, 109 respondents (about 53%) disagreed; while 9 respondents (about 4%) did not indicate a view. Overall, of those who expressed an opinion, the slight majority of 55% disagreed with the Objectives, while 45% agreed.

#### **Question 4a: If you answered No, please explain why you don't think these are the right Objectives.**

##### **Summary of Responses**

138 responses were received to this question.

##### **Key issues referred to across the response groups were:**

- Strategic objectives are very vague - talk in generalities without an overriding vision of how they will be achieved.
- Cannot plan for building without first looking at infrastructure of the borough, particularly in the more built up areas. This should be first in the Objectives list.
- The Objectives are not SMART - specific, measurable, achievable, realistic and time-bound.
- Sustainability features a lot in overall document and NPPF but not discussed as a long-term objective.
- Nothing in Objectives about creating social cohesion or balanced communities.
- Objective 1 should include AONB and Green Belt.
- Objective 1 is unrealistic without proper assessments of constraints, limiting ability of TWBC to meet its objectively assessed housing need.
- Modify Objective 1 to provide more certainty that full 'objectively assessed' housing need will be met with sufficient flexibility.
- Objective 1 needs to reflect 'Duty to Cooperate' - TWBC may need to accommodate unmet development needs of neighbouring authorities.

- Objective 1: Should refer to meeting realistic development needs and make reference to maximising use of appropriate brownfield opportunities.
- Objectives 1 and 2 are contradictory - can't do both. New development is never going to protect/enhance the natural, built and historic environment.
- Objective 2 does not reflect need to protect and enhance distinctive character of individual settlements - particularly important given five Options for Growth.
- Objective 2 should include specific mention of AONB.
- Objective 2 too general to be meaningful - natural and built environment should not be conflated and separate.
- Objective 2 fails to consider role of appropriate mitigation in protecting and enhancing the environment whilst the Council makes "every effort" to meet its housing needs (NPPF sustainable objectives).
- Objective 3 should mention water and sewage infrastructure, energy position, health, social care, education and provision of superfast broadband to rural areas.
- Objective 4 should refer to mix of sizes, types and tenures to meet housing need and refer to 'sustainable locations'.
- Objective 4 should include a clear commitment to affordable housing.
- Objective 7 is unnecessary and repetitive; could be replaced with objective on sustainable living and energy use.
- Objective 8 should be for 'good' transport and parking facilities as opposed to 'adequate', and should refer to congestion and related air pollution and technological change.
- Objectives 3, 7 and 8 should be included in Vision.
- No mention of needs/aspirations of existing residents. Should not disrupt/deteriorate people's lives and livelihoods.
- Objectives not particularly specific to TW and could apply to almost anywhere.
- Objectives attempt to cover matters in para.7 of NPPF- economic, social and environmental roles. However, insufficient focus placed on need to support a community's health, social and cultural well-being.
- Objectives do not take account of effect of erosion of historical landscapes or long term effect on AONB.
- Objectives should be more explicit about need to release Green Belt land and exceptional circumstances that exist.
- Objectives do not clearly identifying significant shortage of market and affordable housing within the borough.
- Objectives are poorly drafted - really only 3 objectives (Protecting Borough's environment, Meeting development needs, Delivering sufficient infrastructure), with other 5 Objectives merely being aspects of these three.
- Objectives on climate change and preservation of quantity and quality of natural resources are essential.
- An additional Objective should relate to reduction in impact of traffic on residents of rural areas – speed and frequency of cars and lorries.

- Objectives assume certain levels of employment and retail growth - whilst employment growth is to be encouraged, employment sectors in TW are those most likely to be hit by Brexit.
- Must include needs and space requirements for agriculture and farming and growing own food.
- Wording in Objectives very open to interpretation - “seek, sufficient and adequate” are not good enough. The language needs to be specific and clear.

**Question 5: Are there any amendments required or other Objectives that you think should be included?**

**Summary of Responses**

168 responses were received to this question.

**Key issues referred to across the response groups were:**

- Little mention of how TWBC is going to "ensure" or deliver" most of Objectives - needs to be demonstrated they can be achieved within a reasonable level of cost and supplied in areas where additional housing is actually located.
- Need to be clear about hierarchy of Objectives. Proposed plan is driven by housing numbers which may be flawed and make no distinction between urban and rural need. Everything else appears to be secondary – and sustainability related issues including transport and parking are bottom of the list. These are absolutely key to achieving best outcome for all residents so should be the starting point for building a plan.
- Objectives should include aim to improve present inadequate infrastructure for existing population and detailed requirements for new growth. Should be listed first in the Objectives.
- Need to look at provision of education and social facilities, not just leisure requirement, a lot of people are attracted to the area because of these and need to retain this.
- Should be more direct reference to providing different types and size of housing - entry level housing, housing for the elderly and downsizers, to ensure that the right homes are being built to meet the need.
- Should be an objective to encourage cross boundary partnership working towards economic growth, transport connectivity and infrastructure development.
- Constraints in Objective 1 should take into account AONB and Green Belt.
- Should clearly differentiate between purpose of Objective 1 (housing delivery) and 4 (housing choice) consistent with NPPF 50.
- Objective 2 - include reference to no net loss of biodiversity.
- Concerns Objectives 2 and 3 will not be carefully considered whilst trying to meet main development targets of Objective 1.
- Objective 4- Para. 50 of NPPF does not support limiting provision to local needs, instead directing that a mix of housing should reflect demographic and market trends

(including migration) and needs of specific groups. Therefore, reference to local needs should be omitted.

- Objective 7 does not accurately reflect NPPF paras 6 to 16 (presumption in favour of sustainable development).
- Objective 8 could be revised to specifically include enhancements to provision of walking and cycling facilities and to generally think beyond the needs of the borough.
- Objective 5 should acknowledge wider role of TW in the sub- region.
- Could include Objective to support Neighbourhood Plans and community involvement in planning.
- An additional objective should be added for “ensuring health and wellbeing”.
- Objectives need to consider the immediate requirement of reduction and calming of traffic.
- Another objective should relate to balance of growth and development across the borough, including, looking at how the many rural communities in the borough will be sustained economically over next 15 years.
- Protection of the environment should be a stand alone Objective without reference to development.
- Give greater prominence to agriculture in the Objectives.
- Start point should focus on sustainability and quality of life and full assessment of risks of development to overall carbon footprint is essential.

#### **Consideration of responses to Q4 and Q5 in the preparation of the Draft Local Plan:**

*The Strategic Objectives, set out in section 3 of the new Draft Local Plan, have been amended, re-ordered and extended from those set out in the Issues and Options Consultation Document 2017, taking into account some of the above comments received to the Issues and Options consultation.*

*The Strategic Objectives set out how the Vision above is to be achieved and express the purpose of the Local Plan and what the Development Strategy aims to achieve. The Strategic Objectives now include more specific detail relating to the proposed growth strategy for both urban and rural areas across the borough; infrastructure; active travel and new technology; boosting the supply of affordable housing; to ensure the borough is vibrant, culturally rich and economically buoyant; the protection of the valued built, natural and historic environment of the borough including the AONB; achieving net gains for nature; the release of appropriate land from the Green Belt; tackling climate change and minimising the impact of development on communities, the economy and environment through new technology and renewable energy; to establish garden settlements and to work with neighbourhood plan groups to ensure the formation of locally-led policies.*

*It will subsequently be seen throughout this document that many of the issues raised in the responses above are also addressed in other sections and policies of the new Draft Local Plan, including those not referred to in the Objectives such as health and well-being and agriculture.*

*As advised above, the Strategic Objectives should be read in conjunction with the proposed Vision.*

*In addition, the Sustainability Appraisal which accompanies the Draft Local Plan also sets out a number of Sustainable Development Objectives that support the proposed growth strategy.*

## **Section 4 – Key Issues and Challenges**

### **Introduction**

This section of the Issues and Options consultation document identifies the key issues that the Local Plan will need to consider and address when putting forward a strategy and policies for delivery of growth. These key issues are:- (i) Natural and Built Environment, (ii) Infrastructure, (iii) Housing, (iv) Economy, (v) Transport and Parking, (vi) Leisure and Recreation and (vii) Sustainability. Two questions were asked relating to each issue, as follows:

#### **(i) Natural and Built Environment**

##### **Question 6a: Have we identified the main environmental issues facing the borough?**

##### **Summary of Responses**

198 responses were received to this question. 75 respondents (about 38%) agreed that all environmental issues had been identified, 107 respondents (54%) disagreed; while a further 16 respondents (8%) did not indicate a view. Overall, of those who expressed an opinion, the slight majority of 59% were in disagreement, while 41% agreed.

##### **Question 6b: If No, what environmental issues do you think are missing?**

138 responses were received to this question.

##### **Key issues referred to across the response groups were:**

- Generally thought that housing targets could not be met without serious harm to the environment.
- Give high priority to protection of the Green Belt and AONB. (Others did mention however, that the Green Belt should be reviewed to allow limited sustainable development on the edge of settlements to meet housing needs.)
- Make reference to the importance of both natural and built heritage assets. There was a suggestion that these be dealt with separately as Issues, possibly as 2 sub sections.
- Focus development on brownfield sites.
- Protect ancient woodland and farmland.
- Habitat protection important and should be seeking “net gain” on biodiversity, making space for nature and habitat connectivity in new developments.
- Green Infrastructure - green spaces, links and protection of gardens should be encouraged.

- Ensure good, environmentally friendly design for new development.
- Address light pollution - reference made to CPRE tranquillity and dark skies in rural areas.
- Air and noise pollution need to be addressed.

### **Consideration of responses to Q6a and Q6b in the preparation of the Draft Local Plan:**

*Both the natural and built environment of the borough are of high quality, with 70% of the borough designated as High Weald AONB, of national significance, and all areas have distinct landscape and environmental characteristics. The rural landscape is rich in ancient field patterns and hedgerows, extensive areas of ancient woodland, rural lanes, and scattered medieval farmsteads. The borough also supports a wide network of biodiversity sites and is rich in historic features, including a significant breadth of designated and non-designated heritage assets.*

*For this reason, there are over 30 new Development Management Policies in the new draft Local Plan which seek to protect and/or enhance the urban, rural and historic environment, including consideration of the local distinctiveness, character, amenity and setting of individual settlements and the wider area. These policies are supported by strategic Policy STR7 (Place Shaping and Design) and STR8 (Conserving and enhancing the natural, built and historic environment) in section 4 of the Draft Local Plan.*

### **Consideration of other specific issues raised in the responses above:**

- Generally thought that housing targets could not be met without serious harm to the environment

*The Council's growth strategy and distribution of development are supported by the Council's Distribution of Development Topic Paper 2019 and a comprehensive series of site assessments (In the SHELAA document). The strategy has to balance the need for new development, notably housing, with environmental protection. Limited, local harms are acknowledged in some instances, but these are justified against relevant tests. Allocations include criteria to conserve key assets and are further supported and reinforced by a whole range of development management policies (section 6 of the Plan), as mentioned above, which seek to protect and/or enhance both the urban and rural environment.*

- Give high priority to protection of the Green Belt and AONB. (Others did mention however, that the Green Belt should be reviewed to allow limited sustainable development on the edge of settlements to meet housing needs.)

*The impact of proposed development on the High Weald AONB and Green Belt (including Green Belt review and release) have been carefully considered in the Council's strategy for growth and distribution of development (as set out in the Council's Distribution of Development Topic Paper 2019). It is recognised that without*



*the release of land currently located within the Green Belt and some development in the AONB, the Council will be unable to meet the identified development needs of the borough in a planned and integrated way, primarily for meeting the borough's housing needs but also for employment and education uses.*

*Where relevant, place shaping policies in Section 5 of the new Draft Local Plan have been worded to ensure that the impact on landscape sensitivity is a key consideration and needs to be addressed in the submission of any development proposals.*

*There are also new development management Policies- EN20 (Rural Landscape) and EN21 (High Weald Area of Outstanding Natural Beauty), which seek to protect and/or enhance the rural environment.*

*In addition, the established policy stance of existing 2006 Local Plan Policy MGB1 (Metropolitan Green Belt) has been carried forward into the new strategic policy STR4 (Green Belt) in the Draft Local Plan and makes reference to the functions and requirements of the Green Belt in accordance with the NPPF (which reflects updated national Green Belt policy since the Local Plan). Other new development management policies, such as Policies H14 (Replacement Dwellings outside the Limits to Built Development), and H16 (Residential Extensions, alterations, outbuildings and annexes in the Green Belt and outside the Limits to Built Development), also make reference to Green Belt requirements.*

- Make reference to the importance of both natural and built heritage assets (possibly as 2 sub sections)

*New development management policies EN6 (Historic Environment) and EN7 (Heritage Assets) recognise the built, natural and landscape heritage of the borough as a valuable and important resource; these, in conjunction with a range of other policies across the Draft Local Plan, including strategic policy STR8 (Conserving and enhancing the natural, built and historic environment), demonstrate the importance given to conserving and where possible, enhancing these assets.*

- Focus development on brownfield sites

*The Local Plan promotes the development of brownfield sites within the built-up areas (usually defined by the relevant LBDs); a number of the site allocations in section 4 of the Draft Local Plan are on sites with existing uses and it is expected that development in these locations will be delivered as part of a comprehensive redevelopment of such sites. On a number of the brownfield sites which were previously allocated in the Site Allocations Local Plan 2016, further work has identified the potential for a higher number of residential units to be accommodated, and this is reflected in the proposed site allocations in the Draft Local Plan.*

- Protect ancient woodland and farmland

*New development management Policies EN15 (Ancient Woodland and Veteran Trees) and EN22 (Agricultural Land) seek to protect ancient woodland and the best and most versatile agricultural land from inappropriate development.*

- Habitat protection important and should be seeking “net gain” on biodiversity, making space for nature and habitat connectivity in new developments

*Strategic Policy STR8 (Conserving and enhancing the natural, built and historic environment) and new development management Policy EN11 (Net Gains for Nature: Biodiversity) require that amongst other things, new development will result in measurable long term net gain for biodiversity (to be secured and funded for the lifetime of the development).*

- Green Infrastructure - green spaces, links and protection of gardens should be encouraged

*The provision of Green infrastructure is promoted in new development management Policy EN16 (Green, Grey and Blue Infrastructure) and supported by Strategic Policy STR5 (Essential Infrastructure and Connectivity) in section 4 of the Draft Local Plan, as well as the Council’s Green Infrastructure Framework 2019 and Infrastructure Delivery Plan 2019.*

- Ensure good, environmentally friendly design for new development

*Strategic Policy STR7 (Place Shaping and Design) in section 4 of the Draft Local Plan as well as other new development management policies such as EN1 (Design and other development management criteria) and EN2 (Sustainable Design and Construction) aspire to achieve high quality and sustainable design throughout the borough and will be used to assess all development requiring planning permission.*

- Address light pollution - reference made to CPRE tranquillity and dark skies in rural areas

*New development management Policy EN10 (Outdoor Lighting and Dark Skies) sets out the policy requirements and guidance in seeking to minimise light pollution in urban, rural and dark sky areas.*

- Air and noise pollution need to be addressed

*New development management policy EN1 (Design and other development control criteria) makes reference to both air and noise pollution but there are also several new development management policies in the Draft Local Plan relating firstly, to air pollution including Policy EN23 (Air Quality) and EN24 (Air Quality Management Areas) and secondly, to noise in the form of new development management policy*

**(ii) Infrastructure**

**Question 6c: Have we identified the main infrastructure issues facing the borough?**

**Summary of Response**

179 responses were received to this question. 61 respondents (34%) agreed that all infrastructure issues had been identified, 107 respondents (about 60%) disagreed; while a further 11 respondents (about 6%) did not indicate a view. Overall, of those who expressed an opinion, the majority of 64% disagreed, while 36% agreed.

**Question 6d: If No, what infrastructure issues do you think are missing?**

129 responses were received to this question.

**Key issues referred to across the response groups were:**

- Already a strain on existing infrastructure. Therefore, there should be a robust infrastructure plan in place before any new development commences. This should include issues of deliverability and funding of new infrastructure and a review of funding provided through Section 106 agreements.
- Suggested that phasing of development may be necessary to coordinate capacity in tandem with new development.
- More development will result in an increased demand for school places – therefore assessment needed of existing and new schools to meet this.
- Health care provision will need to be reviewed – existing GP surgeries are already over subscribed and particular focus needed for the elderly.
- Water and sewage issues need to be considered – wastewater, flood defence and water supply (already droughts). More development will put additional pressure on already overloaded sewage and drainage systems.
- Need to address all future energy requirements e.g. already a lack of gas services in rural areas.
- Should safeguard existing mineral and waste management facilities.
- Need to include broadband provision as an issue.
- Should be sustainable infrastructure e.g. electric charging points for cars.

**Consideration of responses to Q6c and Q6d in the preparation of the Draft Local Plan:**

*The Council's Infrastructure Delivery Plan (IDP) 2109 supports the growth proposed in the Draft Local Plan and identifies the scope of infrastructure to be provided, the phasing of the infrastructure linked to planned development and the mechanisms/funding by which the infrastructure should be delivered, including the use of Section 106 legal agreements.*

*With regard to the comments received to this question on particular types of infrastructure, the following are strategic priorities for infrastructure provision and improvement to deliver and support the proposed growth strategy, as set out in the IDP and across all sections of the Draft Local Plan:*

- *Transport*
- *Education*
- *Health*
- *Water*
- *Digital Infrastructure and Utilities (Broadband)*
- *Green, Grey and Blue Infrastructure*
- *Cultural Infrastructure*

*With regard to minerals and waste provision, in accordance with new development management Policy EN32 (Minerals and Waste), development proposals will be assessed against relevant policies in the adopted Kent Minerals and Waste Local Plan (KCC).*

*In terms of sustainable infrastructure such as electric vehicle charging points, these are sought to be provided via a number of new development management policies such as Policy EN1 (Design and other development management criteria), EN2 (Sustainable Design and Construction), EN16 (Green, Grey and Blue Infrastructure), EN29 (Sustainable Drainage) and TP2 (Transport Design and Accessibility).*

#### **Question 6e: Have we identified the main housing issues facing the borough?**

##### **Summary of Responses**

204 responses were received to this question. 57 respondents (about 28%) agreed that the main housing issues had been identified, 138 respondents (about 68%) disagreed, while 9 respondents (about 4%) did not indicate a view. Overall, of those who expressed an opinion, the majority of 71% disagreed, while 29% agreed.

#### **Question 6f: If No, what housing issues do you think are missing?**

156 responses were received to this question.

##### **Key issues referred to across the response groups were:**

- Unrealistic housing target/OAN- should be locally led not target driven. No explanation why there is such a significant increase since the Site Allocations Plan 2016. Recognised that OAN may change again when new central government methodology introduced.
- The SMHA is based on migration (especially from London). Brexit may affect this.
- The Local Plan should be supported by a Housing Needs Study.
- Should significantly increase number of affordable homes (to buy or rent) and the price of affordable homes reviewed as still too expensive, forcing local people out.

- Encourage higher densities to reduce pressure in rural areas and to meet overall housing target.
- More housing needed for specialist groups – elderly, disabled, special needs, key workers.
- Smaller sites and self build should be encouraged (to create local employment opportunities).
- Borough is made up of 2 distinctive groups – urban and rural. Methodology used for assessing growth/need does not account for 2 different environments, infrastructure and economic development.
- Concern more development in rural areas will result in dormitory settlements with residents commuting to work in larger urban areas.
- Use of existing empty properties in borough e.g. conversions should be encouraged.
- A better range of housing is needed overall, especially smaller properties for downsizing.
- Duty to cooperate important in terms of addressing cross boundary housing needs.
- New homes should be ecologically friendly and sustainable.
- No mention of gypsy/traveller needs in the borough.
- May need to release land on edge of settlements in sustainable locations, to address need.

### **Consideration of responses Q6e and Q6f in the preparation of the Draft Local Plan:**

*To provide some background to the above comments received in response to the Issues and Options consultation, national planning policy (NPPF) requires that local planning authorities should assess the housing needs within their areas in terms of both the amount and types of housing needed, and that they have a clear understanding of the amount and location of land that is available for housing. There are a number of Council evidence base documents which set out and support the objectively assessed housing need for the borough over the plan period to 2036 - confirmed as 13,560 dwellings (678 per year) and calculated using the standard method (on 2014 projections) as required by the NPPF/G. The basis of this housing need target, together with assessments of the housing needs of particular groups, is set out in the Council's Housing Needs Assessment Topic Paper 2019. In addition, the outstanding housing need, as at 1 April 2019, taking account of housing completions April 2016 to March 2019, extant planning permissions at 1 April 2019, outstanding site allocations from the Site Allocations Local Plan 2016 and a windfall allowance, is set out in the Council's Housing Supply and Trajectory Topic Paper 2019.*

*In terms of assessing and addressing the needs for particular housing types for different groups in settlements/parishes across the borough, this is identified and set out in the both the Council's Housing Needs Study 2018 and Housing Needs Assessment Topic Paper 2019, the results of which, have been used and incorporated into various policies for different housing types across the Draft Local Plan including the site allocation policies in section 5 and various new development management housing policies such as H9 (Housing for Older People), H13 (Gypsies and Travellers) and H10 (Rural Workers' Dwellings); as well as Policy*

*H5 (Affordable Housing) which identifies the requirements for different types of tenure such as social rent, affordable rent and intermediate housing. The Council's Housing Supply and Trajectory Topic Paper 2019 provides further information on these matters.*

**Consideration of specific issues raised in the responses above:**

- *New development management Policy H4 (Housing Density) requires that development proposals make efficient use of land whilst having regard to its context.*
- *With regard to smaller sites and self build, this is identified in the Council's Housing Needs Assessment Topic Paper 2019 and Housing Supply and Trajectory Topic Paper 2019 and is sought to be addressed in new development management Policy H11 (Self-Build and Custom House Building).*
- *With regard to the comment/response made in respect of the duty to cooperate in terms of addressing cross boundary housing needs, Tunbridge Wells has had and will continue on-going discussions with all adjoining authorities in respect of housing need and delivery under the Duty to Cooperate, as explained in more detail under Question 7 below.*
- *New homes should be ecologically friendly and sustainable – this is addressed under Question 6b above.*
- *The need to release land on edge of settlements in sustainable locations, has been considered and taken forward as part of the Council's growth strategy as supported by the Council's Distribution for Development Topic Paper 2019.*

**(iii) Economy**

**Question 6g: Have we identified the main economic issues facing the borough?**

**Summary of Responses**

174 responses were received to this question. 65 respondents (about 37%) agreed that the main economic issues facing the borough had been identified, 96 respondents (about 55%) disagreed, while 13 respondents (about 8%) did not express an opinion. Overall, of those who expressed an opinion, the majority of 60% disagreed, while 40% agreed.

**Question 6h: If No, what economic issues do you think are missing?**

121 responses were received to this question.

**Key issues referred to across the response groups were:**

- Council's Economic Needs Study acknowledged. However 11-15 hectares of economic floorspace is considered to be insufficient for current and future population.
- Need to incorporate opportunities for smaller businesses to reduce commuting e.g. better broadband provision.
- Should focus on Key Employment Areas and improving employment outside of RTW to ease pressure on the central area.

- New employment land and leisure facilities should be located close to future housing to reduce commuting and pollution.
- The quality (not just quantity) of employment floorspace is important.
- Need for independently accessible work places and long term employment for people with disabilities.
- Concern employment/commercial uses being lost to residential conversions.
- Rural and farming economy important - should be encouraging farming and cottage industries in rural areas.
- Value of sport to the economy should be referred to in Local Plan.
- Less out of town development and encourage regeneration of existing towns and villages – less commuting.
- Need to consider wider economic drivers e.g. migration and Brexit will have an impact on employment.
- No recognition of technological changes and how these will impact employment.
- Significant shift in retail trends from high street to online which will impact any retail expansion.
- Encourage small, independent shops.
- Tourist industry important – promote TW more as a tourist destination for both rural and urban areas (will need to address congestion issues first).
- Review hotel accommodation in the borough.
- No mention of business rates in Local Plan.

#### **Consideration of responses to Q6g and Q6h in the preparation of the Draft Local Plan:**

*In the Draft Local Plan and as part of the Council's growth strategy, provision is made for a minimum increase in employment land of at least 14 hectares over the plan period to 2036 to maintain a broad balance between homes and jobs and to maintain a diverse economic base. The findings of the Council's Economic Needs Study 2016 have informed the approach to employment provision within the Draft Local Plan, which has taken into account the existing and future sector base, commuting patterns, and modern ways of working, such as increased home working.*

*The overall employment distribution strategy is set out within Table 3 of strategic Policy STR 1 (The Spatial Development Strategy), while further details are addressed in new economic development management policies in section 6 and the place shaping and site allocation policies in Section 5 of the Draft Local Plan.*

#### **Response to other specific issues raised in the responses above:**

- Opportunities for smaller businesses to reduce commuting e.g. better broadband provision

*This is recognised and sought through new development management Policy ED3 (Digital Communications and Fibre to the Premises).*

- Should focus on Key Employment Areas and improving employment outside of RTW to ease pressure on the central area

*The Council's Economic Needs Study 2016 considers that all of the existing Key Employment Areas, as previously defined in the Core Strategy 2010, are performing well and should therefore be retained as broad employment locations to provide future economic development opportunities over the plan period. These are defined in development management Policy ED1 (The Key Employment Areas). In addition, the existing Limits to Built Development at both Brook Farm, Capel and Gill's Green, Hawkhurst are to be removed and replaced by Key Employment Area designations. The Hawkhurst Key Employment Area will also be extended to the south. It is recognised that there are other smaller employment 'hubs' across the whole borough, particularly in the rural areas and these will be afforded protection through the retention of existing employment sites and buildings, as set out in new development management Policy ED 2.*

- New employment land and leisure facilities should be located close to future housing to reduce commuting and pollution

*This is a main intention behind the growth strategy set out in strategic Policy STR1 (The Development Strategy) and new development management Policy ED1, where proposed economic development is encouraged to be located close to existing similar uses and/or in sustainable locations e.g. the proposed allocations in North Farm/Longfield Road, including a sizeable business park adjacent to Longfield Road (AL/RTW12)*

- The quality (not just quantity) of employment floorspace is important

*This is recognised in an independent assessment of office accommodation which was recently undertaken (early 2018) to assess the quality of existing office accommodation in the borough, to assist with the formulation of economic and employment policies in the new Draft Local Plan.*

- Need for independently accessible work places and long term employment for people with disabilities.

*A new policy is put forward for an element of housing designed for people with a disability (see policy H9), which may support home-working. This takes advantage of an optional technical standard for residential development. However, technical standards for commercial buildings are set by the Building Regulations, while other regulatory regimes govern meeting the needs of people with disabilities in the workplace.*



- Concern about employment/commercial uses being lost to residential conversions

*Changes in recent years to the General Permitted Development Order (PD Rights) enable the conversion of B1 office space to residential use without the need for full planning permission. This has had a significant impact on the supply of office stock within the borough, particularly in relation to Royal Tunbridge Wells Town Centre. The Council has subsequently served a number of Article 4 Directions on existing office locations across Royal Tunbridge Wells Town Centre and the wider urban area where appropriate, in order to protect the existing office stock. An Article 4 Direction does not prohibit the change of use of an office building to residential, but it does require that a full planning application must be submitted, which will then be subject to the relevant policies set out within the borough's Development Plan at the time of the application. New development management Policy ED2 (Retention of existing employment sites and buildings) seeks to prevent such losses.*

- Rural and farming economy important - should be encouraging farming and cottage industries in rural areas

*This is sought to be addressed in new development management Policy ED4 (Rural Diversification).*

- Value of sport to the economy should be referred to in Local Plan

*The economic benefits of some commercial leisure uses are recognised in the Council's Retail and Leisure Study 2017. In the Draft Local Plan, it is recognised that sports, recreation areas and facilities can contribute positively to the wellbeing and quality of communities, as well as having a positive impact upon the quality of the built environment and be of ecological value.*

- Significant shift in retail trends from high street to online which will impact any retail expansion

*In the Draft Local Plan and based on the recommendations of the Retail and Leisure Study 2017, the Council is promoting a more flexible approach to the provision of retail and complementary uses and makes mixed use site allocations (in section 5 of the Plan) within the defined centres to broadly meet the needs and provide a range of sites to meet future needs. This is reflected in new development management Policy ED8 (Town, Rural Service, Neighbourhood and Village Centres Hierarchy), ED9 (Defined Town and Rural Service Centres) and ED11 (Primary Shopping Areas and Retail Frontages).*

- Encourage small, independent shops

*Again, a more flexible has been applied to retail policies, as above.*

- Tourist industry important – promote TW more as a tourist destination for both rural and urban areas (will need to address congestion issues first)

*The tourist industry is significant to the borough and is considered to be an important contributor to the local economy of Tunbridge Wells in both the urban and rural areas, in terms of providing investment opportunities and generating employment. New development management Policy ED7 (Retention, of and promotion of new tourist accommodation and attractions) supports this approach.*

- Review hotel accommodation in the borough

*This has been undertaken in the Council's Hotel Capacity Study 2016, which makes recommendations for the provision of new visitor accommodation, which is reflected within the individual allocations and place shaping policies in section 5 of the Draft Local Plan. Policy ED7 relates to Retention of, and promotion of new, tourist accommodation and attractions.*

- No mention of business rates in Local Plan  
*This is not a planning matter.*

#### **(iv) Transport and Parking**

##### **Question 6i: Have we identified the main transport and parking issues facing the borough?**

##### **Summary of Responses**

188 responses were received to this question. 52 respondents (about 28%) agreed that the main transport and parking issues had been identified, 119 respondents (about 63%) disagreed, while 17 respondents (9%) did not express an opinion. Overall, of those who expressed an opinion, the majority of 70% disagreed, while 30% agreed.

##### **Question 6j: If No, what transport and parking issues do you think are missing?**

156 responses were received to this question.

##### **Key issues referred to across the response groups were:**

- Better bus, train and cycling coordination needed across the County- important to work with other statutory authorities to ensure funding and delivery.
- Rail services important for the borough .Concern that services are to be reduced, putting more pressure on already over stretched services and station car parking; this includes settlements outside of/adjoining the borough e.g. Marden.

- Better and more affordable bus services needed, especially for rural areas, school children and the elderly.
- Main routes through the borough and into RTW are already heavily congested and there are existing car parking problems. These need to be tackled before any new development.
- Review of overall highway capacity and assessment of key journey patterns for all growth Options needed.
- Include provision of access for people with disabilities to public transport e.g. access ramps, surfacing, assistance at train stations.
- Safer cycle routes needed. Council's Cycling Strategy acknowledged, but difficulty is cycle routes are not joined up. Also should encourage better cycle storage/parking on public transport and car parks.
- Parking strategy needed for both urban and rural areas.
- Better parking for tourist attractions e.g. free parking days.
- Other parking strategies to consider- one hour on street parking in towns, peak/non-peak charges, better car parking needed at train stations and Pembury Hospital.
- Consider Park and Ride for the town.
- Improve PROW network, including provision of higher status PROWs e.g. bridleways.
- Consider progressive technologies e.g. need for electric car charging points.
- Need to tackle HGV routing, especially in rural areas.
- Many rural roads need repairing and cannot sustain any increase in traffic.
- Shortage of car parking leading to on street parking in residential areas is a problem generally.
- Overall, there should be a policy intention to reduce car use, increase public transport use and reduce transport caused pollution (noise and air).

#### **Consideration of responses to Q6i and Q6j in the preparation of the Draft Local Plan:**

*The Borough Council has continued to engage with Kent County Council (KCC) - Highways and Highways England, as well as KCC: PROWs and Access (Cycling), KCC: Public Transport, several railway networks, the Department for Transport and several bus operators in the preparation of the Council's emerging Transport Strategy and the Infrastructure Delivery Plan 2019, to support the proposed growth strategy and distribution of development in the Local Plan. This has also involved on going discussions with neighbouring authorities on cross boundary transport issues under the Duty to Cooperate.*

#### **Response to other specific issues raised in the responses above:**

- Congestion, reduce car use – sustainable modes and active travel

*This is sought to be addressed in development management Policy TP1 (Transport Assessments, Travel Plans and Mitigation), supported by the Strategic Policy STR6 (Transport and Parking) in section 4 of the Draft Local Plan and considered as part of*

*the Council's emerging Transport Strategy and Infrastructure Delivery Plan 2019 above.*

- **Cycling Strategy**

*The Council's existing Cycling Strategy is currently being updated as part of the Council's Transport Strategy and has formed part of the ongoing discussions above. Provision is made for cycling (including cycle parking and e-bike charging points) in Strategic Policy STR6 (Transport and Parking) in section 4 of the Draft Local Plan, as well as new development management Policy TP2 (Transport Design and Accessibility). There is an emphasis on active travel through-out the Draft Local Plan.*

- **Parking Strategy**

*The Council's revised parking strategy is set out in the Residential Parking Standards Topic Paper 2019, as well as new development management Policy TP3 (Parking Standards) which sets out standards for both residential and non-residential parking.*

- **Improve access to PROWS**

*This is sought in new development management policies including Policy EN1 (Design and other development management criteria), Policy TP2 (Design and accessibility) which safeguards existing PROWs and seeks the creation of a new PROWs in new development, where appropriate; as well as Policy EN21 (High Weald AONB) which seeks to improve access to the open countryside and the provision of way marking to support this. Provision and improvement of such links is also sought in some of the site allocation policies in section 5 of the Plan.*

- **Park and Ride**

*Existing 2006 Local Plan Policy TP17 (Allocations for Park and Ride Sites) has not been retained; rather, the Draft Local Plan gives added emphasis to bus service (and other sustainable transport) improvements, including new services in the Pembury and North Farm areas. Traffic management options will be reviewed for the final, Pre-Submission version of the Local Plan, in the light of any amendments to development provisions and further modelling information.*

- **Disabled access**

*New development management Policy TP2 (Transport Design and Accessibility) seeks that all facilities and services open or provided to the public within a proposed development be made available to persons with disabilities in accordance with Articles 9 and 19 of the United Nations Convention on the Rights of Persons with Disabilities.*

*In terms of accessibility onto forms of public transport, this is a matter which would need to be agreed directly with the transport provider.*

**(v) Leisure and Recreation**

**Question 6k: Have we identified the main leisure and recreation issues facing the borough?**

**Summary of Responses**

174 responses were received to this question. 79 respondents (about 45%) agreed that the main leisure and recreation issues had been identified, 86 respondents (about 49%) disagreed, while 9 respondents (about 6%) did not indicate a view. Overall, of those who expressed an opinion, there was a slight majority of 52% in disagreement and 48% in agreement.

**Question 6l: If No, what leisure and recreation issues do you think are missing?**

104 responses were received to this question.

**Key issues referred to across the response groups were:**

- Reference should be made to relationship between location of leisure/recreation facilities and house prices – higher house prices if closer.
- Encouragement and improvement of existing pitches/sporting facilities for dual use to meet local needs e.g. schools.
- Open space important in new development – health and well being.
- More all weather facilities needed. Though concern was also raised about not having too many all weather pitches with floodlights.
- More emphasis needed on cultural facilities, including the arts in rural areas.
- Countryside important as a leisure and tourist attraction – protect AONB and Green Belt.
- The enjoyment of the existing countryside recognised as important but more innovative recreational facilities such as outdoor gyms should be encouraged.
- Retain woodland, common land and green spaces.
- Over use of PROWs could put pressures on enjoyment of countryside.
- More bed and breakfast accommodation needed.
- Stated that leisure and recreation facilities in RTW far outweigh rural areas and should be distributed fairly across the borough. However, also mentioned that this could be unrealistic for travel and economic reasons.
- Include provision of network of green spaces.
- Lack of cycle paths in borough.
- Should be a policy to protect playing fields from development.

### **Consideration of responses to Q6k and Q6l in the preparation of the Draft Local Plan:**

*The Council has undertaken an Open Space, Sport and Recreation Study 2018, to assess the availability, quality, quantity and accessibility of existing open space, sport and recreation provision within the borough (for both urban and rural areas). The full assessment comprises of an Open Space Study, Indoor/Built Sports Facilities Needs Assessment and a Playing Pitch Strategy. The outcomes of the Study have enabled the Council to put forward a strategic approach to the future provision, maintenance and enhancement of sports facilities, through the place shaping policies and site allocations in section 5 of the Draft Local Plan; as well as further detailed policy requirements in new development management Policies OSSR1 (Retention of Open Space) and OSSR2 (The Provision of publicly accessible open space and recreation), all of which go some way to address some of the above comments received in response to the Issues and Options consultation.*

#### **Response to other specific issues raised in the responses above:**

- provision of cultural facilities, including the arts in rural areas

*This is sought to be addressed in the Vision and Strategic Objectives above, as well as Strategic Policy STR5 (Essential Infrastructure and Connectivity), new development management Policy ED7 (Retention and promotion of new tourist accommodation and attractions) and other site allocation and place shaping policies in section 5 of the Draft Local Plan. These policies are supported by the Council's the Hotel Capacity Study 2016 and Retail and Leisure Study 2017 and the Infrastructure Delivery Plan 2019: public realm, art, and cultural infrastructure is addressed under Theme 10. .*

- network of green spaces

*This is sought to be addressed in Strategic Policy STR5 (Essential Infrastructure and Connectivity), new development management Policy EN16 (Green, Grey and Blue Infrastructure) and is supported by the Council's Infrastructure Delivery Plan 2019 and Green Infrastructure Framework 2019.*

- lack of cycle paths

*This is sought to be addressed in Strategic Policy STR6 (Transport and Parking) and new development management Policy TP2 (Transport Design and Accessibility) and is supported by the Council's emerging Transport Strategy. As above, there is an emphasis on active travel through-out the Draft Local Plan.*

- Regard to open green space, leisure uses and the protection of playing pitches

*These issues are sought to be addressed in new development management Policies Policy OSSR1 (Retention of Open Space) and Policy OSSR2 (The provision of publicly accessible open space and recreation) in the Draft Local Plan, and through particular*

*allocations, including, for example AL/RTW23 Land to the north of Hawkenbury Recreation Ground. These policies are supported by the Council's Open Space, Sport and Recreation Study 2018.*

- More bed and breakfast accommodation needed

*This is sought to be addressed in new development management Policy ED7 (Retention and promotion of new tourist accommodation and attractions) and is supported by the Council's the Hotel Capacity Study 2016 and Retail and Leisure Study 2017.*

## **(vi) Sustainability**

### **Question 6m: Having regard to the prepared Sustainability Appraisal Scoping Report (link given here in I/O document), have we identified the main sustainability issues facing the borough?**

#### **Summary of Responses**

171 responses were received to this question. 95 respondents (about 56%) disagreed that the main sustainability issues had been identified, 61 respondents (about 36%) agreed, while 15 respondents (about 8%) did not indicate a view. Overall, of those who expressed an opinion, the majority of 61% were in disagreement and 39% in agreement.

### **Question 6n: If No, what sustainability issues do you think are missing?**

121 responses were received to this question.

#### **Key issues referred to across the response groups were:**

- Sustainability mitigating factors should be included in planning policy for developers.
- Better recycling facilities needed across the borough.
- Water resources, drainage and flooding not discussed in enough detail.
- Should be greater emphasis on monitoring of air and noise pollution.
- Water should be seen as a constraint and also a possible leisure use e.g. reservoirs.
- Parking should be included in SA choices.
- Concern about additional pressures on existing infrastructure - congested roads, school, health etc.
- Sustainability should be judged in a flexible way - factors which contribute to sustainability vary between urban and rural areas e.g. urban areas use cleaner fuels and have sewage disposal; rural areas rely on high sulphur fossil fuels and have no sewage disposal.
- The SA issues conflict: development needs/housing/transport v climate change/energy strategy.
- SA fails to meet special needs of people with disabilities and health needs of ageing population.

- Fails to mention importance of designing development to reduce carbon emissions. All new buildings should be Zero Carbon – use of solar panels, rainwater collection.
- Not enough emphasis on transport as a sustainable issue.
- Encourage electric cars and charging points.
- Relative scoring of each growth Option is too high level and may eliminate sites with strong credentials.
- Assessing development against a set of sustainability criteria will not prevent unsustainable piecemeal development of 13 000 houses. Approach should be based on sustainability criteria and sites identified afterwards.
- Important indicators for wellbeing should be listed – e.g. air quality, road noise, landscape loss in AONB/Green Belt.
- Reduce light pollution.

### **Consideration of responses to Q6m and Q6n in the preparation of the Draft Local Plan:**

*The principle of sustainability runs through all sections of the Draft Local Plan. The following documents and policies are of particular relevance in response to some of the issues raised in the above responses received to this question in the Issues and Options consultation:*

#### **Sustainability Appraisal**

*To make meaningful progress towards a more sustainable way of living, it is essential that Local Plans are developed with a detailed consideration of sustainability issues from the outset. This is the purpose of the Council's Sustainability Appraisal (SA), mentioned under the Strategic Objectives section above, which supports the Draft Local Plan.*

*The SA is essentially a framework (a legal requirement under the Planning and Compulsory Purchase Act 2004 and based on a framework using a methodology agreed with Natural England, the Environment Agency and Historic England) used to create a consistent and robust test, to determine the degree to which the 19 sustainability objectives in the framework support all the various elements of the Draft Local Plan, namely:*

- *the ten strategic objectives;*
- *the ten strategic policies including the formation of the spatial development strategy;*
- *the sites proposed for allocation; and*
- *the development management policies.*

*Reasonable alternatives to these elements were also tested. As a whole, this process enabled mitigation measures to be recommended so that the beneficial effects of the Draft Local Plan could be maximised, and any adverse effects could be minimised.*

#### **Strategic Policies - section 4 of the new Draft Local Plan**

*These include:*

- *STR2 (Presumption in favour of Sustainable Development)*
- *STR6 (Transport and Parking)*



- STR7 (Place Shaping and Design)

#### Site allocation Policies - section 5 of the new Draft Local Plan

A number of the site allocation policies make reference to sustainability issues and requirements such as sustainable design, climate change strategies and air quality assessments where applicable.

#### Development Management Policies - section 6 of the new Draft Local Plan

These include: Policies EN2 (Sustainable Design and Construction), EN3 (Sustainable Design Standards), EN4 (Energy Reduction in New Buildings), EN5 (Climate change adaptation), EN23 (Air Quality) and EN24 (Air Quality Management Areas), EN25 (Biomass Technology), EN26 (Water Quality, Supply and Treatment), EN27 (Conservation of water resources) and EN29 (Sustainable Drainage), TP2 (Transport Design and Accessibility). This is not a finite list.

#### Supporting Topic Papers include:

- Energy Topic Paper 2019
- Water Efficiency Topic Paper 2017

Other issues raised in the responses above, such as meeting the special needs of people with disabilities, health needs of an ageing population and light pollution are addressed in other policies including environmental, housing and transport policies within the Plan.

## **Section 5 – Strategy Considerations**

### **Introduction**

Under this section of the Issues and Options consultation document, there are a number of strategic considerations which include:- (i) Cross-boundary Strategic Planning and Duty to Cooperate, (ii) Settlements in the Borough, (iii) Development Boundaries and (iv) Strategic Options (Five possible options – 1. Focused growth, 2. Semi-dispersed growth, 3. Dispersed growth, 4. Growth Corridor-led Approach and 5. New Settlement growth). At least two questions were asked relating to each of the strategic considerations as follows:

#### **(i) Cross-boundary Strategic Planning**

#### **Question 7: Are there any specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?**

### **Summary of Responses**

177 responses were received to this question. 134 respondents (about 76%) agreed there were specific cross boundary issues that should be considered, 30 respondents (about 17%) disagreed, while 13 respondents (about 7%) did not express an opinion. Overall, of those who expressed an opinion, the vast majority of 81% agreed that there were specific cross-boundary issues that need to be considered.

**Question 7a: If Yes, what are the specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?**

**Summary of Responses**

152 responses were received to this question.

**Key issues referred to across the response groups were:**

- A combined approach with all Kent and East Sussex authorities on the provision of essential services, utilities and infrastructure is imperative – schools, healthcare, water supply, waste management, flood management, energy and roads.
- There is unmet housing need in all neighbouring boroughs and districts - TWBC should assess the capacity of the borough more comprehensively, including considering suitable sites in the Green Belt.
- Development in the borough will create demands on road, rail and other infrastructure but similar development in other boroughs will amplify the issues. The development of 13,000 houses in the borough coupled with similar growth in other boroughs will create new bottlenecks.
- Major improvement to public transport network, location of railway stations and rail links, surrounding road infrastructure and car parking are required.
- As a high percentage of borough is AONB - should consider cross boundary discussion with others to take some of TWBC's housing numbers.
- Wealden District Council is planning for levels of housing growth below their OAHN due to concerns about protecting the health of the Ashdown Forest SPA/SAC. The Issues and Options paper does not indicate whether any discussion has taken place or how this matter will be addressed.
- Cross boundary discussion with Tonbridge and Malling, Maidstone and Ashford Borough Councils over the opportunities for development along the Ashford to Charing Cross railway line.
- Cross border discussion with neighbouring authorities along the Uckfield to London railway line, especially in view of the opportunities potentially offered by the BML2 rail project if it materialises.
- DoT has recently published a consultation that contemplates reducing current train services to smaller stations between London and Hastings/Ashford, heavily relied on by TWBC residents who commute to London. Council should seek to cooperate with neighbouring LPAs to resist such reduction and mitigate any impact if it does take place.
- Opportunities to improve smaller railway stations e.g. West Malling, to improve links to London and beyond.
- SHMA advises that in event of an unmet need it would be appropriate to approach authorities which share the HMA namely Sevenoaks, Tonbridge & Malling, Wealden and Rother. Therefore, in the event of a proven unmet need, Maidstone BC (MBC) would expect opportunities to be fully explored in these authority areas as priority.

- TW Economic Study (2016) concludes TW borough shares a functional economic market area with Sevenoaks District and Tonbridge & Malling borough. Again, MBC considers TW should be directed to these authorities for unmet needs.
- Proposals which could upgrade transport connections, and specifically public transport services, between TW and MBC would be welcome. MBC request further clarification and discussion on this as part of Duty to Co-operate.
- Integral that consideration given to potential impacts of London's anticipated growth on borough's existing/future infrastructure requirements. KCC would welcome further engagement to assess implications of such growth on infrastructure and services.
- Appropriate coordination of new secondary school provision across the West Kent area and East Sussex will be required.
- PROW networks and high ecological connectivity cross boundaries and should be taken into consideration in new Local Plan.
- Should be discussion between TW, Tonbridge and Maidstone for possible joint development along boundaries with a new station between Tonbridge and Paddock Wood with parking facilities and access to the now duelled A21 and M25 beyond.
- Council needs to do much more than have an exchange of correspondence with neighbouring authorities, as suggested at Para 5.5.- need joint plans and policies or formal planning agreements for cross boundary developments.
- Long-distance visual impact of developments is important.
- Green Belt important - protect or review?
- HGV routing problem especially in rural areas - need to address HGV access (or lack of it) at M25/M26 junction – creates cross country traffic that could otherwise use motorways and trunk roads.
- Consider provision of sites for Gypsy and Traveller communities.
- "Garden village" concept as this may not fall within one specific borough.
- Engage in consultation on noise and air pollution as a result of airport expansion, especially Gatwick.

### **Consideration of responses to Q7 and Q7a in the preparation of the Draft Local Plan:**

*In line with the requirements of the 'duty to cooperate' (created in the Localism Act 2011), which places a legal duty on local planning authorities to engage constructively, actively, and on an ongoing basis, to ensure the effectiveness of Local Plan preparation relating to strategic matters, Tunbridge Wells Borough Council has been actively engaging with all of its neighbours within Kent: Sevenoaks District Council, Tonbridge & Malling Borough Council, Ashford Borough Council, and Maidstone Borough Council, and with neighbouring authorities that share a border in East Sussex: Rother District Council and Wealden District Council. In particular, the West Kent (Tunbridge Wells, Sevenoaks, and Tonbridge & Malling) authorities have been working collaboratively on a number of cross border issues, such as housing and employment studies, and have taken part in a Planning Advisory Service (PAS) pilot project on the Duty to Cooperate and the production of a Statement of Common Ground.*

*These discussions have also included other issues raised above in the responses to the Issues and Options consultation relating to key infrastructure such as road and rail transport, provision for Gypsies and Travellers, the movement of water (including at times of flood), education requirements, health provision and other wider environmental issues.*

*Additionally, the Council has been actively involved on wider duty to cooperate matters affecting the Ashdown Forest (in Wealden District) - a European site protected under the Habitat Regulations. Cross boundary issues of visitor pressure and vehicle emissions have the potential to adversely affect the protected habitats and species found on the Ashdown Forest. The Council has been working in partnership with other affected authorities to commission studies, undertake detailed analysis and to develop policy to ensure planned development can go ahead without causing harm to the designated site. Two Statements of Common Ground have been signed - one to manage visitor pressure to the Ashdown Forest and the other in respect of vehicle emissions.*

*The Council has also been involved in, and continues to undertake, extensive duty to cooperate discussions with Kent County Council in terms of its role as the upper tier local authority, minerals and waste local planning authority, and infrastructure provider.*

*Duty to cooperate discussions have also been held with other organisations, agencies, and infrastructure providers, including the Highways Agency, Environment Agency, Natural England, and the West Kent Clinical Commissioning Group, as set out in the Council's Infrastructure Delivery Plan 2019.*

*The above discussions will continue as the Plan progresses, and the Council intends to agree Statements of Common Ground where relevant. Further information in respect of the Duty to Cooperate and completed Statements of Common Ground can be found in the Council's Duty to Cooperate Statement.*

## **(ii) Settlement Groupings**

### **Question 8: – Do you agree with the suggested groupings of settlements?**

#### **Summary of Responses**

202 responses were received to this question. 56 respondents (about 28%) agreed with the suggested settlement groupings, 130 respondents (about 64%) disagreed, while 16 respondents (about 8%) did not express an opinion. Overall, of those who expressed an opinion, the majority of 70% disagreed with the suggested groupings, while 30% agreed.

### **Question 8a: If No, what changes do you suggest to the groupings of settlements and why?**

#### **Summary of Responses**

158 responses were received to this question.

**General issues referred to across the response groups were:**

- Extremely flawed methodology - status of range of services and facilities available is highly unstable and therefore an illogical means of providing an indication of the level of sustainability and appropriateness of any settlement to accommodate further growth.
- Some small settlements could take proportionally more housing and probably be re-vitalised as a result.
- Groupings should be weighted in view of transport links (to train stations and main roads), availability of public transport (trains and bus services) and flooding issues.
- Retail sector has changed to Supermarket deliveries, online buying etc.
- Accessibility to good quality educational facilities important.
- Groupings also need to reflect levels of deliverable development, ease of growth and access to areas of employment.
- Hierarchy is based on numbers of shops, pubs and facilities, ignoring location, transport links, and other constraints.
- Weighting of some criteria inappropriate. e.g. a Primary school scores 3 and Secondary school scores 5 - fails to reflect there are only 9 state secondary schools within whole borough and it would be more sustainable for development to be located closer to secondary schools. More sense for primary schools to be attributed 1 point rather than 3.
- Purpose of groupings and what the categorisation means is inadequately described - stronger justification of the groupings could be presented within the Issues and Options document to support the evidence base.
- Questioned whether each nursery/pre-school should be given an equal score - as with shops, the existence of a service is surely more important than additional ones which merely provide further choice.
- Value of a train station has been significantly underestimated. Train travel is a highly sustainable mode of transport, allowing access to high-quality employment without use of a car. Suggested that scoring given to train line is reconsidered.
- Scoring must be amended to reflect an accurate representation of the value of a facility/service e.g. a mobile service (available only for a few hours on one day a week) is 1 point, the same as other convenience/comparison shops/health services, open 5 - 7 days each week.
- Suggested that group B and C villages are combined as 'sustainable villages', containing core day-to-day services that support an element of future growth, whilst group D and E villages combined as 'other villages' where services are more limited and therefore development may need to be more controlled to ensure a sustainable approach to growth.
- Questioned whether points should be given for Sustrans Cycle Route 18 – as generally an on-road route, with no dedicated cycle lanes, on winding, highly hazardous roads.
- Topography of villages in relation to development sites and access to services facilities should be taken into account e.g. some on steep slopes while others are flat.

- Number of services and amenities in a village can depend on proximity to larger settlements e.g. where more isolated may have more self supporting facilities.
- Hierarchy should also include a Group F for hamlets of Colliers Green, Hartley, Cranbrook Common, Wilsley Green, Wilsley Pound and Golford.

### **Consideration of responses to Q8 and Q8a in the preparation of the Draft Local Plan:**

*Although some of the findings of the Council's Settlement Role and Function Study 2017, which formed the basis of the grouping of settlements for Question 8a above, have been used to identify what key services and facilities are available at each of the settlements across the borough, the Council's proposed growth strategy and distribution for development in the new Draft Local Plan has regard to but is not based upon these groupings. As set out under Question 10 below, instead, it is based on a combination of housing growth at the majority of settlements across the borough that have defined Limits to Built Development, in conjunction with the delivery of a new 'stand alone' garden settlement at Tudeley and the expansion of Paddock Wood (into Capel Parish), based on garden settlement principles. Section 5 of the Draft Local Plan sets out the spatial priorities and site allocation policies for the borough, 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.*

*This format is intended to help clarify the planning policy approach within each parish (in parished areas) and, elsewhere, the main towns. The inclusion of a strategic policy for each area at the beginning provides an overview for the respective allocations and any proposals for "windfall development", as well as a framework for any neighbourhood plans for that area.*

### **(iii) Development Boundaries**

#### **Question 9: – Should the policy approach of defining settlement "Limits to Built Development" continue in principle?**

##### **Summary of Responses**

223 responses were received to this question. 190 respondents (about 85%) agreed that the policy approach of defining Limits to Built Development should continue, 6 respondents (about 3%) disagreed, while 27 respondents (about 12%) did not express an opinion. Overall, of those who expressed an opinion, the vast majority of 97% agreed that the policy approach of Limits to Built Development should continue.

#### **Question 9a: Should the defined Limits to Built Development as currently drawn be retained in their current form or in order to maintain settlement patterns, or be removed to enable the delivery of suitable sites?**

##### **Summary of Responses**

218 responses were received to this question. 162 respondents (about 74%) agreed that Limits to Built Development should be retained in their current form, 28 respondents (about 13%) thought that they should be removed, while 28 respondents (about 13%) did not express an opinion. Overall, of those who expressed an opinion, a significant majority of 85% felt that the Limits to Built Development should be retained in their current form.

**Question 9b: If the currently defined limits are to be reviewed/redrawn, what criteria do you think should be applied in redrawing the boundaries?**

**Summary of Responses**

169 responses were received to this question.

**Key issues referred to across the response groups were:**

- Any proposed changes to existing LBDs should allow a small % of flexibility, considered on a case by case basis, in consultation with local communities and Parish Councils.
- Should be reviewed in some of smaller settlements where development might make the settlement more sustainable (whilst ensuring that character/ setting not destroyed).
- Review to allow flexibility and organic growth, to meet longer term needs for both housing and employment.
- Re-draw but exclude Green Belt and AONB land.
- Re-draw to reflect existing built development and planned allocations.
- Review taking into account natural constraints: - flood plains, sensitive areas of landscape characteristics, conservation areas and common land, of Green Belt or AONB.
- Should encompass all of recognised village (built area) and be drawn with care.
- Review to include garden areas where current LBD cuts through it.
- Consider relationship to existing settlement boundary, built development within the settlement and character of area.
- Likely some defined LBDs will be out of date and therefore need to be reviewed. For larger settlements, may be redrawn to include land where development can be supported and sustainable.
- Criteria for defining LBD boundaries should be based on a robust up to date evidence base, assessing and meeting the housing needs of the borough and specific communities; making use of appropriate assessments on landscape, highway and sustainability and considering role of mitigation where appropriate to balance sustainable needs of the Local Plan as set out in the NPPF.
- Need to assess sustainability of any extended limits, and whether justifiable based on relevant criteria such as (a) current/future availability of additional local infrastructure (healthcare, schools and roads) to adequately support such development and (b) harm to the environment (habitats and noise and air pollution).
- Should only be redrawn where potential developments would allow - walking distance to schools, shops and local facilities; and existing infrastructure is strong enough to

allow extra capacity on roads with infrastructure to allow/encourage walking and cycling.

- The proposition assumes that infrastructure exists and services are provided in a uniform way across the borough. In towns extension of services is a practical proposition but in the villages the same levels of infrastructure are not in place and are not easily extensible.
- Request that some hamlets have own LBDs.

### **Consideration of responses to Q9, Q9a and Q9b in the preparation of the Draft Local Plan:**

*Overall, of those who expressed an opinion in the Issues and Options consultation, the vast majority agreed that the policy approach of LBDs should continue; it is therefore proposed that this well-established policy approach be retained and updated as part of the Local Plan review.*

*The existing LBDs (in the 2006 Local Plan and Site Allocations Local Plan 2016) have been reviewed to take account of the need for further development across the borough in line with the Council's emerging growth strategy in Section 4 of the Draft Local Plan and to ensure features that define the LBD have not changed and remain current and relevant. The current policy stance, set out in Policy LBD1 of the Local Plan 2006, seeking to focus development in sustainable locations i.e. around existing settlements and site allocations, has been taken forward into the new strategic Policy STR10 (Limits to Built Development Boundaries) in section 4 of the new Draft Local Plan.*

*Reviewing the LBDs also ensures that development will be focused in those settlements which are most sustainable in terms of providing facilities and services to meet everyday needs in accordance with the Town, Rural Service, Neighbourhood, and Village Centres Hierarchy set out in proposed Policy ED8 (Town, Rural Service, Neighbourhood and Village Centres Hierarchy) in Section 6 of the Draft Local Plan.*

*The boundaries were reviewed using the strict and consistent application of a set of principles and criteria, some of them of which include comments made in the Issues and Options responses above such as the consideration of the 'relationship to existing settlement boundary, built development within the settlement and character of area' and 're-draw to reflect existing built development and planned allocations'.*

*Details of the full LBD review, methodology and outcomes are set out in the Council's Limits to Built Development Topic Paper 2019.*

*It is noted that the precise alignment of LBDs around development allocations may need to be refined as the Local Plan progresses and more detailed layout and design work is undertaken, particularly ahead of the Regulation 19 consultation. The NPPF sets out that policies in Local Plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. If there is a need to further refine LBD boundaries*



*around site allocations as a result of more detailed work (e.g. through the planning application process), then this will be undertaken at this point.*

**(iv) Strategic Options (Five possible options as above)**

**Question 10: Please let us know your preferred option or combination of options in order of preference.**

**Summary of Responses**

289 responses were received to this question in terms of ranking Strategic Options in order of preference. However, a significant number of these respondents stated they preferred a combination of Options as set out in Question 10a below. One respondent stated they did not agree with any of the Options.

Of those who ranked the Strategic Options:

- 116 respondents (about 60%) ranked Option 4 (Growth Corridor-led Approach) as their most preferred Option;
- 34 respondents (about 18%) ranked Option 5 (New freestanding settlement) as their most preferred Option;
- 26 respondents (about 13%) ranked Option 1 (Focused Growth) as their most preferred Option;
- 16 respondents (about 8%) ranked Option 3 (Dispersed Growth) as their most preferred Option;
- 2 respondents (about 1%) ranked Option 2 (Semi-dispersed Growth) as their most preferred Option.

However, some of these Options were ranked in combination with other Options (as below).

From these responses, it can be concluded that of those who ranked the Strategic Options, the majority of 60% of respondents chose **Option 4 (Growth Corridor-led Approach)** as their preferred Option.

**Question 10a: If you prefer a combination of options, please state which ones.**

**Summary of Responses**

149 responses were received to this question, stating their preferred combinations. However, some respondents made a comment rather than state a preference.

Of those who stated their combination preference:

- 66 respondents (46.8%) chose a combination of Option 4 (Growth Corridor-led Approach) and Option 5 (New Settlement Growth) as their preference.

- 29 respondents (20%) chose a combination of Option 4 (Growth Corridor-led Approach), Option 3 (Dispersed Growth) and Option 1 (Focused Growth) as their preference.
- 10 respondents (7%) chose a combination of Option 1 (Focused Growth) and Option 4 (Growth Corridor-led Approach) as their preference.
- 6 respondents (4.3%) chose a combination of Option 3 (Dispersed Growth) and Option 5 (New Settlement Growth) as their preference.
- 6 respondents (4.3%) chose a combination of Option 2 (Semi-dispersed Growth) and Option 4 (Growth Corridor-led Approach) as their preference.
- 6 respondents (4.3%) chose a combination of Option 1 (Focused Growth) and Option 2 (Semi-dispersed Growth) as their preference.
- 6 respondents (4.3%) chose a combination of Option 1 (Focused Growth) and Option 5 (New Settlement Growth) as their preference.
- 3 respondents (2%) chose a combination of Option 4 (Growth Corridor-led Approach), Option 3 (Dispersed Growth) and Option 5 (New Settlement Growth) as their preference.
- 2 respondents (1.4%) chose a combination of Option 4 (Growth Corridor-led Approach), Option 1 (Focused Growth) and Option 2 (Semi-dispersed Growth) as their preference.
- 2 respondents (1.4%) chose a combination of Option 1 (Focused Growth), Option 4 (Growth Corridor-led Approach) and Option 5 (New Settlement Growth) as their preference.
- 2 respondents (1.4%) chose a combination of Option 3 (Dispersed Growth) and Option 2 (Semi-dispersed Growth) as their preference.
- 1 respondent (0.7%) chose a combination of Option 1 (Focused Growth), Option 3 (Dispersed Growth) and Option 4 (Growth Corridor-led Approach) as their preference.
- 1 respondent (0.7%) chose a combination of Option 2 (Semi-dispersed Growth), Option 3 (Dispersed Growth) and Option 4 (Growth Corridor-led Approach) as their preference.
- 1 respondent (0.7%) chose a combination of Option 1 (Focused Growth) and Option 3 (Dispersed Growth) as their preference.
- 1 respondent (0.7%) chose a combination of Option 3 (Dispersed Growth) and Option 4 (Growth Corridor-led Approach) as their preference.

Overall, although there was a range of preferred combinations of strategic Options among respondents, of those who expressed an opinion, the majority of 46.8% chose a **combination of Option 4 (Growth Corridor-led Approach) and Option 5 (New freestanding settlement)** as their preference.

**Consideration of to Q10 and Q10a received in the preparation of the Draft Local Plan:**

*Although the number of responses to the Issues and Options questions relating to the development strategy options was relatively low, they have provided a useful starting point and some useful indicators in considering the Council's growth strategy, such as:*

- Exploring further the potential for 'new settlement growth', as this was the most commonly preferred (alone or in combination) of all the options;*
- Further consideration of Option 4 - the growth corridor-led approach. However, this raised particular issues in relation to accessibility, linear development and associated tendency towards coalescence;*
- Further consideration of Option 1- focused growth. Although, considered a little more favourable than the remaining options, it was countered to some extent by traffic concerns around Royal Tunbridge Wells.*

*In preparing the new Draft Local and the proposed strategy for growth, each of the Options in Question 10 above has been assessed, having regard to:*

- the extent to which it would satisfy national policy requirements;*
- the outcome of the Local Plan Issues and Options consultation responses in relation to Question 10 above and consideration of other issues raised in response to other Questions;*
- the findings of the Sustainability Appraisal in respect of development needs and environmental constraints;*
- the findings of the evidence base studies and reports;*
- the nature and location of development opportunities that are suitable, available, and achievable in order to meet the identified needs.*

*This has resulted in the Council's growth strategy and distribution of development in the new Draft Local Plan being based on a combination of housing growth at the majority of settlements across the borough that have defined Limits to Built Development, in conjunction with the delivery of a new 'stand alone' garden settlement at Tudeley and the expansion of Paddock Wood (into Capel Parish), based on garden settlement principles.*

*The Council's Distribution of Development Topic Paper 2019 provides further details of and justification for the Council's strategy for growth.*

**Question 11: What views do you have about the possibility of a new settlement somewhere in the borough providing for future development needs?**

**Summary of Responses**

199 responses were received to this question.

### **Key issues referred to across the response groups were:**

- Would need excellent transport links- i.e. on a main train line and possibly its own train station with good parking facilities
- Advantage – Implementation and higher level funding for a master infrastructure plan (should be implemented before built).
- Would result in additional large volumes of traffic and would therefore need higher level funding and government cooperation to improve A road networks.
- It could take up a large area of greenfield land.
- Should be located outside the AONB and Green Belt.
- Must be a sustainable mixed development with option to expand in future plan periods and compatible with its surroundings.
- Employment opportunities.
- Must be standalone, self-sufficient, sustainable and have no impact on existing already heavily developed and populated areas.
- Due to Green Belt, AONB and other landscape designations and known physical constraints such as flood risk, there is no suitable location for a new settlement in the borough.
- Until the Council has properly assessed maximum levels of growth that could be accommodated within/adjacent to existing settlements, should not be considering new settlement option.
- Need to assess how it would relate to and respect the character of historic heritage of settlements within the borough.
- Would not provide a balanced growth strategy and would not serve housing needs within rural areas, underprovided by the previous Core strategy.
- New settlement should be planned as a whole rather than piecemeal.
- Placing such an enormous number of houses in the rural borough would destroy rural TW wherever it is located.
- Description of 'Garden Village' is misleading. 5000 - 7000 homes is a town -difficult, if not impossible, to find a suitable location for a new settlement of that size.
- Would take a very long time to come about and may not meet houses needs in Plan period.
- Due to high level of AONB landscape (70%) such a large scale development will not be possible.
- Any new settlement would need to have all necessary schools, doctors, leisure facilities and transport links in place before any people move in.
- Detrimental to farmland and agriculture.
- Without a shared vision from all landowners then a new settlement will not materialise into a successful conclusion.
- Any new 'garden village' should be outside the borough altogether.

### **Question 11a: Where do you think a possible new settlement could be located?**

## Summary of Responses

165 responses were received to this question.

### Locations identified across the response groups were:

- North of the borough, adjacent to a main railway line.
- Outside of the AONB and Green Belt.
- Eastern part of the Borough because transport links afforded by Ashford are far superior to those to the west of the borough.
- Somewhere with potential for local employment.
- Create a new settlement between TW, Pembury and Tonbridge - By the A21 and good access to M25 with access to TW, Tonbridge and PW train stations (or build another station between Tonbridge and PW) - access to hospital, schools, Industrial estates, shops; access to all Tonbridge and TW facilities and jobs.
- Locate the new settlement in the A21 growth corridor - sustainable location.
- Staplehurst Parish Council - new settlement should not be situated in areas adjoining Staplehurst or in Cranbrook and Hawkhurst areas to the south of Staplehurst, as the impact would be unsustainable.
- Locate to the south of Kippings Cross roundabout.
- To the South East around Cranbrook and Hawkhurst area.
- Between Pembury and Paddock Wood (PW).
- South East of PW – not too far from the train line.
- West or east of PW in Maidstone Borough.
- Area of flat land between Tudeley and Five Oak Green.
- On government owned land adjoining Blantyre House.
- New Settlement to the north of borough near Marden or Staplehurst on the Ashford to Tonbridge Railway line.
- Create a new settlement between TW/Pembury/Tonbridge.
- Capel/Five Oak Green area.
- As close to the existing railway stations at Staplehurst and Headcorn as possible - north of Frittenden.
- Lower-lying area to minimise visual impacts - either NW or SW of Goudhurst.
- In between Lamberhurst and Pembury or PW and Southborough.
- Use land at Bewl Country Park.
- North of North Farm Industrial Estate between the railway line and A21.
- East of Ashdown Forest, south of TW and the Weald -minimum impact on environment and AONB.
- One option would be a sensitive development of a number of hamlets and farmsteads around a core settlement with new transport and infrastructure. A rail link is essential.
- Consideration should be given under duty to co-operate to a new settlement outside the borough boundary close to an existing train station.

### **Consideration of responses Q11 and Q11a in the preparation of the Draft Local Plan:**

*A level of support was indicated in the Issues and Options responses for a new settlement. In response to some of the comments raised in the Issues and Options responses to Question 11 above, key factors identified to support this option include opportunities presented by existing or planned investment in infrastructure, the economic potential of the area and the scope for net environmental gains.*

*It was also considered that the scale, size and location of a new garden settlement should be able to support a sustainable community, with sufficient access to services and employment opportunities within the development itself or in nearby larger towns to which there is good access.*

*This has resulted in the proposed comprehensive expansion of the settlement of Paddock Wood (including land within Capel parish) following garden settlement principles; as well as a new garden settlement at Tudeley Village within Capel parish to deliver development within this plan period and into the next plan period, securing a long term option for the borough to deliver the needs of future generations. These proposals are to be progressed through a master planned approach.*

*The place shaping policies in section 5 of the new Draft Local Plan and the Council's Distribution of Development Topic Paper 2019 provide further detail of and justification for the proposed development of these strategic settlement proposals.*

### **Question 12: Do you think we have considered and identified all reasonable options for accommodating future development growth within the borough?**

#### **Summary of Responses**

176 responses were received to this question. 84 respondents (about 48%) agreed that all reasonable options for accommodating future growth have been identified and considered, 91 respondents (about 52%) disagreed, while one respondent (about 0.6%) did not express an opinion. Overall, of those who expressed an opinion, the slight majority of 52% were in disagreement, with 48% in agreement.

### **Question 12a: If No, please set out what other options for accommodating future development growth within the borough you think should be considered.**

#### **Summary of Responses**

119 responses were received to this question.

#### **Other options/comments made across the response groups were:**

- Not convinced that such substantial growth is in fact required within the borough - 13,000 housing target is based on SMHA survey. However, the projection is largely based on the past; not based on local need; and does not split the growth forecasts between TW towns and TW rural areas which are not the same; the projection takes

no account of AONB, landscape character, trains, jobs, services, traffic, etc. as constraints have not yet been applied.

- Challenge the Objectively Assessed Need.
- Needs to be a firm policy of brownfield first.
- Rational policy would be: a main focus for development in main urban area; subsidiary focus on development in small towns/larger villages; small scale development in smaller villages; and an overall focus on locating development where it is sustainable, with good transport links and environmental constraints are not breached.
- Options for increasing housing density in existing settlements should be explored.
- Role of farmsteads and hamlets, including modern farm buildings should be addressed.
- One aspect not explored is wider scale compulsory purchase, to allow development in run-down areas, rather than green field areas.
- There are areas just outside the borough where development would make more sense - e.g. Marden and Staplehurst.
- Need to start building upwards. Current developments use far too much land.
- Should be more focus along the A21 corridor.

### **Consideration of responses to Q12 and Q12a in the preparation of the Draft Local Plan:**

*It is noted that no other options for growth were put forward in the responses received to this question. The other issues raised in the responses are addressed in other sections in this document, as well as the Council's Distribution of Development Topic Paper 2019.*

## **Section 6 – Development Management Policies**

### **Introduction**

This section of the Issues and Options consultation document considers the policies that are currently in place in the Tunbridge Wells Borough Local Plan 2006, Core Strategy 2010 and Site Allocations Plan 2016 and identifies the key topics that may merit and necessitate new development management policies, especially in the light of government guidance in the NPPF (2019) and any updated local evidence. Three questions were asked relating to (i) existing policies, two questions relating to (ii) new policies and one question relating to (iii) detailed policies, as follows:

#### **(i) Existing Policies**

### **Question 13: Which policies do you consider are suitable for continued use?**

#### **Summary of Responses**

67 responses were received to this question, but not all respondents specifically identified policies considered suitable for continued use.

**Summary of policies identified to be suitable for continued use across the response groups were:**

**Tunbridge Wells Borough Local Plan 2006:**

***Chapter 3 – Green Belt, Rural Fringe and Limits to Built Development***

Policy LBD1 (also already replaced (in part) by Policy AL/STR 1 in Site Allocations Local Plan 2016)

Policies MGB1 and MGB2

Policies RF1 and RF2

**Consideration of responses to Q13 re Chapter 3 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*Existing 2006 Local Plan Policy LBD1 (Limits to Built Development) has been reviewed and updated and is proposed as a strategic policy STR10 (Limits to Built Development) in the Draft Local Plan. This policy is supported by the Council's Limits to Built Development Topic Paper 2019.*

*The established policy stance of existing 2006 Local Plan Policy MGB1 (Metropolitan Green Belt) has been carried forward into the new strategic policy STR4 (Green Belt) in the Draft Local Plan and makes reference to the functions and requirements of the Green Belt in accordance with the NPPF. Development Management Policies in the Draft Local Plan, for example some of those relating to Housing, such as Policies H14 (Replacement Dwellings outside the Limits to Built Development), and H16 (Residential Extensions, alterations, outbuildings and annexes in the Green Belt and outside the Limits to Built Development), also make reference to Green Belt requirements. New Green Belt policy is supported by the Council's Green Belt Study 2016 (Parts 1 and 2) and Distribution of Development Topic Paper 2019.*

*Policy MGB2 relating to major developed sites (Tunbridge Wells Hospital (at Pembury), Kent College and Holmewood House School) in the Green Belt were previously deleted from the 2006 Local Plan but are included in the Core Strategy 2010 and were carried forward into the Site Allocations Local Plan 2016. The main reason why Kent College and Holmewood House School were originally designated as major sites in the Green Belt was that they both had proposed extensive building programmes extending over a long period. However, the building works at these sites has been and/or is nearing completion, so they have not been carried forward as major sites in the Green Belt in the Draft Local Plan. Tunbridge Wells Hospital (at Pembury) has instead been carried forward as a site allocation AL/PE6 (in section 5 of the Draft Plan) if future expansion of the hospital and/or further medical related development on the site is justified as exceptional circumstances to overcome harm to the Green Belt.*



*Policies RF1 and RF2 relating to the Rural Fringe were previously deleted from the 2006 Local Plan but are referenced in the Core Strategy 2010 and were carried forward into the Site Allocations Local Plan 2016. Three sites: Culverden Down, North Farm Tip and Grange Road Allotments, Rusthall. The Culverden Down and North Farm Tip sites have now been incorporated into site allocation policies in section 5 of the Plan; while Grange Road Allotments are designated as open space and protected by new Policy OSSR1 (Retention of Open Space).*

## **Chapter 4 – Environment**

Policies EN1, EN2, EN4, EN5, EN6, EN8, EN10, EN11, EN12, EN13, EN15, EN16, EN17, EN19, EN20, EN21, EN22, EN23, EN25, EN26, EN27 and EN28

### **Consideration of responses to Q13 re Chapter 4 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*Existing 2006 Local Plan Policy EN1 (Design and other development control criteria) has been reviewed, updated and replaced by development management Policy (also) EN1 in the Draft Local Plan. This is also supported by Strategic Policy STR7 (Place Shaping and Design) as well as the place shaping policies in Section 5 of the new Draft Local Plan.*

*Existing 2006 Local Plan Policies EN2 (Demolition of Listed Buildings), EN3 (Alterations to Listed Buildings), EN4 (Demolition in Conservation Areas), EN5 (Development in Conservation Areas) have been reviewed, updated and replaced by development management Policies EN6 (The Historic Environment) and EN7 (Heritage Assets) in the Draft Local Plan. New Policy EN7 also includes scheduled monuments, archaeological sites and Historic Parks and Gardens which replace existing Policies EN9 (Scheduled Ancient Monuments), EN10 (Archaeological Sites) and EN11 (Historic Parks and Gardens) of the 2006 Local plan. The new policies are also supported by Strategic Policy STR8 (Conserving and enhancing the natural, built and historic environment), the Council's Historic Environment Review 2018 and Supplementary Planning Document Local Heritage Assets 2012, as well as a range of Conservation Area Appraisals for all the Conservation Areas in the borough.*

*Existing 2006 Local Plan Policy EN6 (Shop fronts) has been reviewed, updated and replaced by development management Policy EN8 (Shop fronts) in the Draft Local Plan.*

*Existing 2006 Local Plan Policy EN8 (Outdoor lighting) has been reviewed, updated and replaced by development management Policy EN10 (Outdoor Lighting and Dark Skies) in the Draft Local Plan.*

*Policy EN12 (Skylines) previously deleted from the 2006 Local Plan has not been reinstated but included as a consideration in other newly proposed development management policies, such as Policy EN1 (Design and other development management criteria) and EN18 (Landscape within the Built Environment).*

*Existing 2006 Local Plan Policy EN13 (Tree and Woodland Protection) has been reviewed, updated and replaced by development management Policies EN14 (Trees, Woodlands,*

*Hedges and Development) and EN15 (Ancient Woodland and Veteran trees) in the Draft Local Plan.*

*Existing 2006 Local Plan Policy EN15 (Sites of Nature Conservation Interest and Local Nature Conservation Value) and previously deleted Policy EN14 (Sites of Special Scientific Interest) have been reviewed, updated and replaced by development management Policies EN11 (Net Gains for Nature: Biodiversity) and EN12 (Protection of designated sites and habitats) in the Draft Local Plan.*

*Existing 2006 Local Plan Policies EN16 (Water), EN17 (Capacity of Sewerage and Water Supply Services), and EN18 (Flood Risk) have been reviewed, updated and replaced by development management Policies EN26 (Water Quality, Supply and Treatment), EN27 (Conservation of water resources), EN28 (Flood Risk) and EN29 (Sustainable Drainage) in the Draft Local Plan. These policies are supported by the Council's Strategic Flood Risk Assessment 2019 – Levels 1 and 2, and Water Efficiency Background Paper 2017.*

*Policy EN19 (Contaminated Land) previously deleted from the 2006 Local Plan has been reviewed, updated and reinstated as development management Policy EN31 (Land Contamination) in the Draft Local Plan. This policy is supported by the Council's Supplementary Planning Document: Contaminated Land 2016.*

*Existing 2006 Local Plan Policy EN20 (Telecommunication Equipment) has been reviewed, updated and replaced by development management Policy ED3 (Digital Communications and Fibre to the Premises (FTTP)) in the Draft Local Plan. This is supported by Strategic Policy STR5 (Essential Infrastructure and Connectivity) in section 4 of the Plan as well as the Council's Infrastructure Delivery Plan 2019.*

*Existing 2006 Local Plan Policies EN21 (Areas of Important Open space), EN22 (Areas of Landscape Importance) and EN23 (Important Landscape Approaches) have been reviewed, updated and combined to form development management Policy EN18 (Landscape in the Built Environment) in the Draft Local Plan.*

*Existing 2006 Local Plan Policy EN25 (Development proposals outside the Limits to Built Development) has been reviewed, updated and incorporated into development management Policies EN1 (Design and other Development Criteria), EN20 (Rural Landscape) and Policies H14 (Replacement Dwellings outside the Limits to Built Development), and H16 (Residential Extensions, alterations, outbuildings and annexes in the Green Belt and outside the Limits to Built Development) in the Draft Local Plan.*

*Policies EN26 (High Weald Area of Outstanding Natural Beauty) and EN27 (Special Landscape Areas) previously deleted from the 2006 Local Plan, have been reviewed, updated and reinstated/replaced as development management Policies EN20 (Rural Landscape) and EN21 (High Weald Area of Outstanding Natural Beauty) in the Draft Local Plan. These new policies are also supported by Strategic Policy STR8 (Conserving and enhancing the natural, built and historic environment), as well as other Council adopted Landscape Studies.*

*Policy EN28 (Agricultural Land) was previously deleted from the 2006 Local Plan but has been reviewed, updated and reinstated as development management Policy EN22 (Agricultural Land) in the Draft Local Plan.*

## **Chapter 5 – Town, Neighbourhood and Village Centres**

Policies CR1, CR2, CR3, CR9 and CR12

### **Consideration of responses to Q13 re Chapter 5 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*Existing 2006 Local Plan Policies CR1 (Large-scale development of centre uses), CR2 (Development outside Primary Shopping Areas), CR3 (Small scale development of centre uses) have been reviewed, updated, combined and replaced by one development management Policy ED9 (Town and Retail Service Centres) in the Draft Local Plan.*

*Existing 2006 Local Plan Policies CR9 (Paddock Wood Primary Shopping Area) and CR12 (Hawkhurst Town Centre) have been reviewed, updated, combined and replaced by one development management Policy ED11 (Primary Shopping Areas and Retail Frontages) in the Draft Local Plan.*

*The new retail policies are supported by the Council's Retail and Leisure Study 2017.*

## **Chapter 6 – Housing**

Policies H1 to H13 (Policies H6 and H7 already replaced by other housing allocation policies in Site Allocations Local Plan 2016)

### **Consideration of responses to Q13 re Chapter 6 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*Existing 2006 Local Plan Policy H1 (Retention of existing stock) has not been carried forward as this policy was found to be unnecessary.*

*Existing 2006 Local Plan Policy H2 (Small and intermediate dwellings) has been reviewed, updated and replaced by development management Policy H3 (Housing Mix) in the Draft Local Plan. This is supported by the Councils' Housing Needs Survey 2018.*

*Policy H3 (Affordable Housing within Development Schemes) of the 2006 Local Plan which was previously deleted has been reviewed, updated and reinstated/replaced as development management Policy H5 (Affordable Housing) in the Draft Local Plan. This is supported by the Councils' Housing Needs Survey 2018 and Housing Needs Assessment Topic Paper 2019, and Housing Supply and Trajectory Topic Paper 2019. .*

*Existing 2006 Local Plan Policy H4 (Gypsy Sites) has been reviewed, updated and replaced as development management Policy H13 (Gypsies and Travellers) in the new Draft Local Plan. This is supported by the Council's Housing Needs Assessment Topic Paper 2019 and Housing Supply and Trajectory Topic Paper 2019.*

*Existing 2006 Local Plan Policy H5 (Residential development within the Limits to Built Development) has been reviewed, updated and incorporated into other policies in the Draft Local Plan, such as the place shaping policies in Section 5.*

*Policy H6 (Allocations for development on previously developed sites) of the 2006 Local Plan, which was previously deleted, has been superseded by the place shaping policies in Section 5 of the Draft Local Plan.*

*Policy H7 (Housing Allocation at the Kent and Sussex Hospital) was previously deleted from the 2006 Local Plan. This site is under construction and nearing completion, so no further reference is made to it as an allocation in the Draft Local Plan.*

*Existing 2006 Local Plan Policy H8 (Affordable Housing outside the Limits to Built Development) has been reviewed, updated and incorporated into development management Policy H5 (Affordable Housing) in the Draft Local Plan. This is supported by the Council's Strategic Housing Market Assessment (SHMA), Housing Needs Study 2018, Housing Needs Assessment Topic Paper 2019 and Housing Supply and Trajectory Topic Paper 2019.*

*Existing 2006 Local Plan Policy H9 (Key workers' dwellings in association with rural employment) has been reviewed, updated and replaced by development management Policy H10 (Rural Workers' Dwellings) in the Draft Local Plan.*

*Existing 2006 Local Plan Policy H10 (Replacement Dwellings outside the defined Limits to Built Development) has been reviewed, updated and replaced by development management Policy H14 (Replacement Dwellings outside the Limits to Built Development) in the Draft Local Plan.*

*Existing 2006 Local Plan Policy H11 (Extensions to Dwellings outside the Limits to Built Development) has been reviewed, updated and replaced by development management Policy H16 (Residential Extensions, alterations, outbuildings and annexes in the Green Belt and outside the Limits to Built Development) in the Draft Local Plan.*

*Existing 2006 Local Plan Policy H12 (Extensions to curtilages outside the Limits to Built Development) has been reviewed, updated and replaced by development management Policy H17 (Extensions to residential curtilages (domestic gardens) outside the Limits to Built Development) in the Draft Local Plan.*

*Existing 2006 Local Plan Policy H13 (Conversion of rural buildings to residential use outside the Limits to Built Development) has been reviewed, updated and incorporated into development management Policy ED5 (Conversion of Rural Buildings outside the Limits to Built Development) in the Draft Local Plan.*

## **Chapter 7 – Economic Development**

Policies ED1, ED2, ED3 and ED5

**Consideration of responses to Q13 re Chapter 7 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*Existing 2006 Local Plan Policies ED1 (Large scale B1 proposals in Economic Development Areas), ED2 (small scale B1 proposals in the Limits to Built Development), ED3 (B2 and B8 proposals in Economic Development Areas) have been reviewed, updated, combined and replaced by one development management Policy ED1 in the Draft Local Plan.*

*Existing 2006 Local Plan Policy ED5 has been reviewed and replaced by development management Policy (also) ED5 (Conversion of Rural Buildings outside the Limits to Built Development) in the Draft Local Plan.*

*The new economic policies are supported by the Council's Economic Needs Study 2016.*

**Chapter 8 – Tourism**

Policies T1, T2 and T3

**Consideration of responses to Q13 re Chapter 8 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*Existing 2006 Local Plan Policies T1 (small scale proposals for serviced/non-serviced tourist accommodation), T2 (Retention of service/non-serviced tourist accommodation) and T3 (New tourist accommodation outside the Limits to Built Development) have been reviewed, updated, combined and replaced by one development management Policy ,ED7 (Retention of and promotion of new tourist accommodation and attractions) in the Draft Local Plan.*

*The new tourism policies are supported by the Council's Hotel Capacity Study 2016 and Retail and Leisure Study 2017.*

**Chapter 9 – Recreation**

Policies R1, R2 and R6

**Consideration of responses to Q13 re Chapter 9 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*Existing 2006 Local Plan Policies R1 (Loss of recreation open space) and R6 (Allotments) have been reviewed, updated, combined and replaced by one development management Policy OSSR1 (Retention of Open Space) in the Draft Local Plan.*

*Existing 2006 Local Plan Policy R2 (Provision of recreation open space in new residential development) has been reviewed, updated and replaced by development management Policy OSSR2 (The provision of publicly accessible open space and recreation) in the Draft Local Plan.*

*Reference is made where relevant in site allocation policies, and these policies are supported by the Council's Open Space, Sport and Recreation Study 2018 and Infrastructure Delivery Plan 2019.*

## **Chapter 10 – Community Services**

Policy CS3, CS4, CS5 and CS6

### **Consideration of responses to Q13 re Chapter 10 of the 2006 Local Plan in the preparation of the Draft Local Plan (Regulation 18):**

*Existing 2006 Local Plan Policy CS4 (Development contributions to local education authority school provision) and previously deleted policies CS3 (Schools) and CS5 (Redundant schools) have been reviewed and replaced by Strategic Policy 5 (Essential Infrastructure and Connectivity), place shaping policies in Section 5 of the Draft Local Plan and supported by the recommendations of the Council's Infrastructure Delivery Plan 2019.*

*Existing 2006 Local Plan Policy CS6 (Provision of Community Buildings) has been reviewed, updated and replaced by development management Policy ED12 (Retention of local services and facilities within defined Neighbourhood and Village Centres) in the Draft Local Plan.*

## **Chapter 11 – Transport and Parking**

Policies TP1, TP2, TP3, TP4, TP5, TP6, TP7, TP8, TP9, TP17, TP18 and TP27 (specific reference made to additional provision of public car park in Rusthall)

One respondent considered all policies in Chapters 3 to 10 of the 2006 Local Plan, including those that were not saved, with the exception of site-specific policies where the sites have been developed since the 2006 Plan, should be reinstated in the new Local Plan.

While another respondent indicated that no policies are suitable for continued use.

### **Consideration of responses to Q13 re Chapter 11 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*Existing 2006 Local Plan Policy TP1 (Major development requiring Transport Assessments and Travel Plans) has been reviewed, updated and replaced by development management Policy TP1 (Transport Assessments, Travel Plans and Mitigation) in the Draft Local Plan.*

*Existing 2006 Local Plan Policy TP2 (Multi-modal access for smaller-scale non-residential development) has been reviewed, updated and incorporated into development management Policy TP2 (Transport Design and Accessibility) in the Draft Local Plan.*

*Existing 2006 Local Plan Policy TP3 (Multi-modal access for large-scale residential developments) has been reviewed, updated and incorporated into development management Policy TP2 (Transport Design and Accessibility) in the Draft Local Plan.*

*Existing 2006 Local Plan Policy TP4 (Access to the road network) has been reviewed, updated and incorporated into criterion 5 of development management Policy EN1 (Design and other development management criteria) and Policy TP2 (Transport Design and Accessibility) in the Draft Local Plan.*

*Existing 2006 Local Plan Policy TP5 (Vehicle Parking Standards) has been reviewed, updated and incorporated into development management Policy TP3 (Parking Standards) in the Draft Local Plan, supported by the Council's Residential Parking Standards Topic Paper 2019.*

*Existing 2006 Local Plan Policy TP6 (Tunbridge Wells Central Access Zone (residential) vehicle parking standards) has been reviewed, updated and incorporated into development management Policy TP3 (Parking Standards) in the Draft Local Plan, supported by the Council's Residential Parking Standards Topic Paper 2019.*

*Existing 2006 Local Plan Policy TP7 (Tunbridge Wells Central parking Zone (Commercial)) has been reviewed, updated and incorporated into development management Policy TP3 (Parking Standards) in the Draft Local Plan.*

*Existing 2006 Local Plan Policy TP8 (Vehicle Parking for small-scale changes of use to non-residential and development affecting Listed Buildings and Conservation Areas) has been reviewed, updated and incorporated into development management Policy TP3 (Parking Standards) in the Draft Local Plan.*

*Existing 2006 Local Plan Policy TP9 (Cycle Parking) has been reviewed, updated and incorporated into development management Policy TP3 (Parking Standards) in the Draft Local Plan.*

*Existing 2006 Local Plan Policy TP17 (Allocations for Park and Ride Sites) - This policy has not been retained; rather, the Draft Local Plan gives added emphasis to bus service (and other sustainable transport) improvements, including new services in the Pembury and North Farm areas. Traffic management options will be reviewed for the final, Pre-Submission version of the Local Plan, in the light of any amendments to development provisions and further modelling information.*

*Existing 2006 Local Plan Policy TP18 (Cycle Route Network in Royal Tunbridge Wells) has been reviewed, updated and incorporated into development management Policy TP2 (Transport Design and Accessibility) in the Draft Local Plan; and is also supported by the Council's Cycling Strategy and forthcoming Local Cycling and Walking Infrastructure Plan.*

*Existing 2006 Local Plan Policy TP27 (Retention of public car parks in villages) has been reviewed, updated and incorporated into development management Policy TP4 (Public Car Parks) in the Draft Local Plan.*

*All the above policies are supported by Strategic Policy STR6 (Transport and Parking) in the New Draft Local Plan, as well as the Council's existing and emerging Transport Strategy and Residential Parking Standards Topic Paper 2019.*

## **Core Strategy 2010:**

CP2: Green Belt; CP3: Transport Infrastructure; CP4: Environment; CP5: Sustainable Design and Construction; CP6: Housing Provision; CP7: Employment Provision and CP8: Retail, Leisure and Community Facilities Provision could all be usefully reproduced in new Local Plan.

Most of the policies should be carried through to new document and updated as necessary in consultation with community and statutory consultees.

### **Consideration of responses to Q13 re the 2010 Core Strategy in the preparation of the Draft Local Plan:**

*Existing Core Policy 2 (Green Belt) has been reviewed and carried forward into the new strategic policy STR4 (Green Belt) in the Draft Local Plan and makes reference to the functions and requirements of the Green Belt in accordance with the NPPF. Development Management Policies in the Draft Local Plan, for example some of those relating to housing such as Policies H14 (Replacement Dwellings outside the Limits to Built Development), and H16 (Residential Extensions, alterations, outbuildings and annexes in the Green Belt and outside the Limits to Built Development), also make reference to Green Belt requirements.*

*As above, the new Green Belt policy is supported by the Council's Green Belt Study 2018 (Parts 1 and 2) and Distribution of Development Topic Paper 2019.*

*Existing Core Policy 3 (Transport Infrastructure) has been reviewed and carried forward into Strategic Policy STR6 (Transport and Parking) as well as development management Policies TP1 (Transport Assessments, Travel Plans and Mitigation), TP2 (Transport Design and Accessibility), TP5 (Safeguarding Railway Land) and TP6 (Safeguarding Roads) in the Draft Local Plan.*

*As above, the new transport and parking policies are supported by Strategic Policy STR6 (Transport and Parking) in the New Draft Local Plan, as well as the Council's existing and emerging Transport Strategy and Residential Parking Standards Topic Paper 2019.*

*Existing Core Policy 4 (Environment) has been reviewed and carried forward into the new strategic policies STR7 (Place shaping and design) and STR8 (Conserving and enhancing the natural, built and historic environment) as well as development management policies EN1 (Design and other development management criteria), EN11 (Net Gains for Nature: Biodiversity), EN12 (Protection of Designated sites and Habitats), EN20 (Rural Landscape), EN21 (High Weald Area of Outstanding Natural Beauty), EN6 (Historic Environment), EN7 (Heritage Assets) and EN16 (Green, grey and blue infrastructure) in the Draft Local Plan. These policies are supported by other Council documents as listed in the environment policies section above.*



*Existing Core Policy 5 (Sustainable Design and Construction) has been reviewed and carried forward into the new strategic policies STR7 (Place shaping and design) as well as development management Policies EN1 (design and other development management criteria), EN2 (Sustainable Design and Construction), EN3 (Sustainable Design Standards), EN4 (Energy reduction in new buildings), EN5 (Climate change adaptation), EN23 (Air Quality), EN26 (Water Quality, Supply and Treatment), EN27 (Conservation of water resource), EN28 (Flood Risk), EN29 (Sustainable Drainage), EN30 (Noise), EN31 (Land Contamination) in the Draft Local Plan. These policies are supported by other Council documents including Water Efficiency and Air Quality Topic Papers, and the Council's Strategic Flood Risk Assessment 2019 referred to above.*

*Existing Core Policy 6 (Housing Provision) has been reviewed, updated and carried forward into the new strategic policy STR1 (The Development Strategy), place shaping policies in Section 5, as well as development management Policies H3 (Dwelling Mix), H4 (Housing Density), H5 (Affordable Housing) and H13 (Gypsies and Travellers) in the Draft Local Plan. These policies are supported by the Council's Housing Supply and Trajectory, Housing Needs Assessment and Distribution of Development Topic Papers 2019.*

*Existing Core Policy 7 (Employment Provision) has been reviewed, updated and carried forward into the new strategic policy STR1 (The Development Strategy), place shaping policies in section 5, as well as development management Policies ED1 (The Key Employment Areas), ED2 (Retention of existing employment sites and buildings), ED4 (Rural Diversification) and ED7 (Retention of and promotion of new tourist accommodation and attractions) in the Draft Local Plan. These policies are supported by the Council's Economic Needs Study 2016 and Retail and Leisure Study 2107.*

*Existing Core Policy 8 (Retail, Leisure and Community Services) has been reviewed, updated and carried forward into the new strategic policy STR1 (The Development Strategy), place shaping policies in section 5, as well as development management Policies ED8 (Town, Rural Service, Neighbourhood and Village Centres Hierarchy), ED9 (Town and Rural Service Centres), ED10 (Sequential test and Local Impact Test), OSSR1 (Retention of Open Space), ED12 (Retention of local services and facilities within defined Neighbourhood and Village Centres), TP2 (Transport Design and Accessibility) and EN16 (Green, Blue and Grey Infrastructure) in the Draft Local Plan. These policies are supported by the Council's Economic Needs Study 2016 and Retail and Leisure Study 2107; supported by Strategic Policy STR6 (Transport and Parking) in the New Draft Local Plan and the Council's emerging Transport Strategy; Open Space, Sport and Recreation Study 2018 and Green Infrastructure Framework 2019.*

## **Tunbridge Wells Site Allocations Local Plan 2016**

Recommended existing principles and designations set out for RTW Primary Shopping Area are continued, mainly drawing on adopted policies of Local Plan Allocations Document.

**Consideration of responses to Q13 re the Site Allocations Local Plan in the preparation of the Draft Local Plan:**

*The enhancement and development of Royal Tunbridge Wells town centre is carried forward into the new strategic policy STR1 (The Development Strategy) and the Royal Tunbridge Wells place shaping strategy, STR/RTW1, and policies in section 5 of the new Draft Local Plan, which includes several proposed site allocations for the town centre. This approach is supported by the Councils' Retail and Leisure Study 2017.*

**Other general comments:**

- High Weald AONB Management Plan (not a policy but should be given due regard and not mentioned in the plan).
- Retain all policies that protect environment.
- One respondent - Not been given information needed to answer.
- New strategy must review all old policies and decide on validity.
- One respondent - too many policies to consider - surely for the officers/members to decide.
- One respondent - Not identified any policies unsuitable for continued use.
- Very important to take forward relevant saved policies and DPD policy/ allocations into new Local Plan in coherent and comprehensive manner to avoid wording anomalies in 2010 Core Policy.
- If Community Infrastructure Levy is to be introduced - may also require revision of some policies.

**Consideration of responses making other comments in the preparation of the Draft Local Plan:**

*There are over 30 new Development Management Policies in the draft Local Plan which seek to protect and enhance the environment including reference to the High Weald Area of Outstanding Natural Beauty Management Plan in several policies including development management Policy EN21(High Weald Area of Outstanding Natural Beauty). These policies are supported by strategic Policy STR7 (Place Shaping and Design) in section 4 of the Draft Local Plan.*

*The introduction of the Community Infrastructure Levy is still being considered and, if taken forward, will be applied accordingly.*

*All the existing policies above (from the 2006 Local Plan, Core Strategy 2010 and Site Allocations Local 2016) have been carefully reviewed, revised and produced following a rigorous process involving a range of Council Officers, Members and external statutory bodies.*

**Question 14: Which policies do you think may be out of date or no longer necessary?**

**Summary of Responses**

46 responses were received to this question, but not all respondents specifically identified policies which were considered to be out of date.

**Summary of Policies considered to be out of date across the response groups were:**

**Tunbridge Wells Borough Local Plan 2006:**

***Chapter 3 – Green Belt, Rural Fringe and Limits to Built Development***

Policy LBD1 (also already replaced (in part) by Policy AL/STR 1 in Site Allocations Local Plan 2016)- does not relate to Local Plan period to 2033.

**Consideration of responses to Q14 re Chapter 3 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*As above, existing Policy LBD1 has been reviewed and updated to form strategic policy STR10 (Limits to Built Development) in the Draft Local Plan, as above, supported by the Draft Limits to Built Development Topic Paper 2019.*

***Chapter 6 – Housing***

Policy H7 (already replaced by other housing allocation policies in Site Allocations Local Plan 2016)

**Consideration of responses to Q14 re Chapter 6 of the 2006 Local Plan in the preparation of the Draft Local Plan (Regulation 18):**

*As above, Policy H7 (Housing Allocation at the Kent and Sussex Hospital) was previously deleted from the 2006 Local Plan. This site is under construction and nearing completion, so no further reference is made to it as an allocation in the Draft Local Plan.*

***Chapter 7 – Economic Development***

Policies ED1 and ED3

**Consideration of responses to Q14 re Chapter 7 of the 2006 Local Plan in the preparation of the Draft Local Plan (Regulation 18):**

*As above, existing 2006 Local Plan Policies ED1 (Large scale B1 proposals in Economic Development Areas), and ED3 (B2 and B8 proposals in Economic Development Areas) have been reviewed, updated, combined and replaced by one development management Policy ED1 in the Draft Local Plan. This policy is supported by the Council's Economic Needs Study 2016.*

***Chapter 9 – Recreation***

Policy R6 criterion 3

**Consideration of response to Q14 re Chapter 8 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*The retention of allotment land is included in proposed development management Policy OSSR1 (Retention of Open Space) in the new draft Local Plan. This is supported by the findings of the Council's Open Space, Sport and Recreation Study 2018.*

**Chapter 10 – Community Services**

Policies CS4 and CS6

**Consideration of responses to Q14 re Chapter 10 of the 2006 Local Plan in the preparation of the Draft Local Plan**

*Existing 2006 Local Plan Policy CS4 (Development Contributions to Local Education Authority School Provision) has been reviewed and incorporated into Strategic Policy STR5 (Essential Infrastructure and Connectivity) in section 4; and the place shaping policies in section 5 of the Draft Local Plan, which where relevant make reference to contributions towards primary and secondary education. These policies are supported by the education requirements set out in the Council's Infrastructure Delivery Plan 2019.*

*Existing 2006 Local Plan Policy CS6 (Provision of Community Buildings) has been reviewed and incorporated where applicable into the place shaping policies in section 5, as well as development management Policy ED7 (Retention of local services and facilities within defined Neighbourhood and Village Centres) of the Draft Local Plan. These policies are supported by the community, public and social requirements set out in the Council's Infrastructure Delivery Plan 2019.*

**Chapter 11 – Transport and Parking**

Policies TP10 (A21 bypass nearly complete)

Policy TP11

Policy TP26

**Consideration of responses to Q14 re Chapter 11 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*Existing 2006 Local Plan Policy TP10 (The A21 Trunk Road – Tonbridge to Pembury Bypass) is no longer applicable and has not been carried forward, as the work relating to this scheme has now been undertaken.*

*Existing 2006 Local Plan Policy TP11 (Other improvements to the A21- Kippings Cross to Lamberhurst Bypass) has been reviewed and incorporated into development management Policy TP6 (Safeguarding Roads) in the Draft Local Plan, to ensure the long term safeguarding of this section of the A21 for upgrading works.*

*Existing 2006 Local Plan Policy TP26 (Hawkhurst - Parking Provision) has been reviewed and the public car parking provision at Fowlers Park incorporated into development management Policy TP4 (Public Car Parks). Policy STR/HA1 in the place shaping section (section 5) of the Draft Local Plan also makes reference to improvements to and increasing the provision of public parking to serve Hawkhurst (Highgate).*

**Other comments:**

- New strategy must review all policies and decide on validity.
- One respondent - too many policies to consider - surely for the officers/members to decide.
- Policy CS6 for Community Buildings does not fully reflect the NPPF and requires updating.
- The Theatres Trust recommend policy wording - support arts and culture at all levels to support local economy and ensure all residents, visitors and future generations have access to cultural opportunities. Policies should protect, support and enhance cultural facilities and activities and promote cultural led development as a catalyst for regeneration in town centres.

**Consideration of responses to Q14 making other comments in the preparation of the Draft Local Plan:**

*As above, existing 2006 Local Plan Policy CS6 (Provision of Community Buildings) has been reviewed and incorporated where applicable into the place shaping policies in section 5, as well as development management Policy ED7 (Retention of local services and facilities within defined Neighbourhood and Village Centres) of the Draft Local Plan.*

*With regard to cultural opportunities, both the Vision and Strategic Objective 5 in section 3 of the Draft Local Plan promote the need for a vibrant, culturally rich and buoyant economy across the borough. While Strategic Policy STR5 (Essential Infrastructure and Connectivity) requires that cultural infrastructure be provided to mitigate the impact of cultural need through the provision of buildings and spaces that will increase and improve cultural opportunity including public art. Some of the place shaping policies in section 5 also require the provision of public art and cultural facilities, such as Policy AL/RTW1 which includes a new theatre and AL/RTW5 which provides for a new cultural and learning hub in the centre of Royal Tunbridge Wells. This approach is supported by the Council's Infrastructure Delivery Plan 2019.*

**Question 15: Which policies do you think could be updated or amended, and how?**

**Summary of Responses**

55 responses were received to this question, but not all respondents specifically identified policies to be updated / amended.

**Summary of policies suggested for updating/amendment across the response groups were:**

**Tunbridge Wells Borough Local Plan 2006:**

***Chapter 3 – Green Belt, Rural Fringe and Limits to Built Development***

Policy LBD1 – amend to reflect NPPF and more positive approach in rural areas to ensure robust housing supply.

MGB1 – amend to allow for larger settlement expansion to meet housing needs.

**Consideration of responses to Q15 re Chapter 3 of the 2006 Local Plan in the preparation of the Draft Local Plan (Regulation 18):**

*As above, existing 2006 Local Plan Policy LBD1 (Limits to Built Development) has been reviewed and updated and is proposed as a strategic policy STR10 (Limits to Built Development) in the Draft Local Plan.*

*Also, as above, the established policy stance of existing 2006 Local Plan Policy MGB1 (Metropolitan Green Belt) has been carried forward into the new strategic policy STR4 (Green Belt) in the Draft Local Plan and makes reference to the functions and requirements of the Green Belt in accordance with the NPPF. Development Management Policies in the new Draft Local Plan, for example some of those relating to Housing such as Policies H14 (Replacement Dwellings outside the Limits to Built Development), and H16 (Residential Extensions, alterations, outbuildings and annexes in the Green Belt and outside the Limits to Built Development), also make reference to Green Belt requirements.*

***Chapter 4 – Environment***

Policy EN1 – Add reference to air quality in paragraph 1.

Policy EN2 – review and replace.

Policy EN4 - review and replace.

Policy EN5 - review and replace.

Policy EN6 - add Hawkhurst Colonnade

EN8 - update to refer to need to maintain and improve intrinsically Dark Night Skies in High Weald and add new policy for street lighting to reflect modern preference for 'dark skies'.

Policy EN10 - Needs to be updated and strengthened as too heavily in favour of development and does not fully reflect significance of heritage assets awarded by NPPF (paras. 132 and 135). Recommended Policy EN 10 amended to state the following:

- “that permission or consent will only be granted for proposals that are based on a thorough understanding of the heritage significance of the asset and its setting;
- that the impact of the proposal on the heritage significance must be fully explained in the application;
- that proposals will only be accepted where they conserve or enhance that significance;
- that the only exceptions to the above principles will be where limited and fully justifiable enabling development is required or where there are very significant economic, social or environmental benefits that would accrue to the wider community from the proposal; that these cannot be delivered by an alternative proposal and that the benefits of the proposal significantly outweigh the impact on the heritage asset; and
- where proposals impact on the significance of heritage assets there will be a requirement for proper archaeological recording and publication”.

Policy EN11 - In 2009-10 TWBC worked with KCC and the Kent Gardens Trust to identify and survey a number of historic gardens, including Statements of Significance useful for development control purposes. KCC advises that a revised Gardens policy should make reference to both the Kent Gardens Compendium and revised garden surveys.

Policy EN13 - removed trees should be replaced by another and cut down only if an ALTERNATIVE SITE is not available and add the word “*significantly*” in front of “*outweighs*” in paragraph 2.

Policy EN14 – review and replace.

Policy EN15 - Add the word “*significantly*” in front of “*outweigh*” in paragraph 1.

Policy EN16 - review and replace.

Policy EN 18 - second paragraph may require updating taking account of latest technological possibilities for avoiding incidence/consequences of flooding and exceptional need to provide housing to meet central government imposed targets for the borough.

Policy EN20 - review and replace.

Policy EN21- review and replace. Council should incorporate Local Green Space proposals as appropriate.

Policy EN22 - review and replace. Council should retain areas of local landscape importance to reflect value of locally important landscapes.

Policy EN23 - Add Hawkhurst to para 4.156 - as it's green bordered approaches, particularly along the ridge, are part of its character.

Policy EN24 - review and replace.

Policy EN25 - review and replace.

Policy EN26 - review and replace.

Policy EN27 - review and replace.

Policy EN28 - review and replace.

**Consideration of responses to Q15 re Chapter 4 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*As above, existing 2006 Local Plan Policy EN1 (Design and other development control criteria) has been reviewed, updated and replaced by development management Policy (also) EN1 in the Draft Local Plan. This policy does make reference to air pollution but there are also several new development management policies relating to air pollution in the new Draft Local Plan including Policy EN23 (Air Quality) and EN24 (Air Quality Management Areas).*

*As above, existing 2006 Local Plan Policies EN2 (Demolition of Listed Buildings), EN3 (Alterations to Listed Buildings), EN4 (Demolition in Conservation Areas), EN5 (Development in Conservation Areas), have been reviewed, updated and replaced by development management Policies EN6 (The Historic Environment) and EN7 (Heritage Assets) in the Draft Local Plan. New Policy EN7 also includes scheduled monuments, archaeological sites and Historic Parks and Gardens which replace existing Policies EN9 (Scheduled Ancient Monuments), EN10 (Archaeological Sites) and EN11 (Historic Parks and Gardens) of the 2006 Local Plan. The new development management policies EN6 and EN7 require that proposals for development reflect the local distinctiveness, condition and sensitivity to change of the historic environment in accordance with NPPF and other advice and guidance listed in the policy; and proposals that affect a designated or non-designated heritage asset, or its setting, will only be permitted where the development conserves or enhances the character, appearance, amenity and setting of the asset. The policies also require all proposals to be accompanied by the submission of a heritage statement, archaeological assessment and/or management plan, as applicable. These policies are also supported by Strategic Policy STR8 (Conserving and enhancing the natural, built and historic environment).*

*As above, existing 2006 Local Plan Policy EN6 (Shop fronts) has been reviewed, updated and replaced by development management Policy EN8 (Shop fronts) in the Draft Local Plan. This policy does not make specific reference to Hawkhurst Colonnade, but would be used in any assessment for any future proposals affecting the Colonnade and other shop front proposals across the borough.*

*As above, existing 2006 Local Plan Policy EN13 (Tree and Woodland Protection) has been reviewed, updated and replaced by development management Policies EN14 (Trees, Woodlands, Hedges and Development) and EN15 (Ancient Woodland and Veteran trees) in the Draft Local Plan.*

*As above, previously deleted Policy EN14 (Sites of Special Scientific Interest) and existing Policy EN15 (Sites of Nature Conservation Interest and Local Nature Conservation Value) of*



*the 2006 Local Plan have been reviewed, updated and replaced by development management Policies EN11 (Net Gains for Nature: Biodiversity) and EN12 (Protection of designated sites and habitats) in the Draft Local Plan. This is supported by Strategic Policy STR8 (Conserving and enhancing the natural, built and historic environment) in Section 4 of the Plan.*

*As above, existing 2006 Local Plan Policies EN16 (Water), EN17 (Capacity of Sewerage and Water Supply Services), and EN18 (Flood Risk) have been reviewed, updated and replaced by development management Policies EN26 (Water Quality, Supply and Treatment), EN27 (Conservation of water resources), EN28 (Flood Risk) and EN29 (Sustainable Drainage) in the Draft Local Plan. These policies are supported by the Council's Infrastructure Delivery Plan and Strategic Flood Risk Assessment (Levels 1 and 2) 2019.*

*As above, existing 2006 Local Plan Policy EN20 (Telecommunication Equipment) has been reviewed, updated and replaced by development management Policy ED3 (Digital Communications and Fibre to the Premises (FTTP)) in the Draft Local Plan. This is supported by Strategic Policy STR5 (Essential Infrastructure and Connectivity) in the section 4 of the Plan as well as the Council's Infrastructure Delivery Plan 2019.*

*As above, existing 2006 Local Plan Policies EN21 (Areas of Important Open space), EN22 (Areas of Landscape Importance) and EN23 (Important Landscape Approaches) have been reviewed, updated and combined to form development management Policy EN18 (Landscape in the Built Environment) in the Draft Local Plan. These policies are supported by Strategic Policy STR8 (Conserving the natural, built and historic environment) in section 4 of the Plan.*

*As above, existing 2006 Local Plan Policy EN25 (Development proposals outside the Limits to Built Development) has been reviewed, updated and incorporated into development management Policies EN1 (Design and other Development Criteria), EN20 (Rural Landscape) and Policies H14 (Replacement Dwellings outside the Limits to Built Development), and H16 (Residential Extensions, alterations, outbuildings and annexes in the Green Belt and outside the Limits to Built Development) in the Draft Local Plan.*

*As above, existing Policies EN26 (High Weald Area of Outstanding Natural Beauty) and EN27 (Special Landscape Areas) previously deleted from the 2006 Local Plan, have been reviewed, updated and reinstated/replaced as development management Policies EN20 (Rural Landscape) and EN21 (High Weald Area of Outstanding Natural Beauty) in the Draft Local Plan. These new policies are also supported by Strategic Policy STR8 (Conserving and enhancing the natural, built and historic environment).*

*As above, Policy EN28 (Agricultural Land) was previously deleted from the 2006 Local Plan but has been reviewed, updated and reinstated as development management Policy EN22 (Agricultural Land) in the Draft Local Plan.*

## **Chapter 5 – Town, Neighbourhood and Village Centres**

Recommended updating to general text as follows:

- 5.26 - there is no Royal Victoria Hall (RVH) and Council offices.
- 5.90 - incorrect as there are numerous convenience provisions including Tesco, Premier Southborough Stores and Osbornes.
- 5.91- incorrect as no plans for a supermarket in proposed Hub development.
- 5.93 - references to RVH refurbishment should now be deleted.
- 5.96 - now incorrect as the plans for the area are specific in terms of parking.
- 5.97 - 'high quality' and 'high standard' are subjective and cannot be measured.
- 5.98 - incorrect reference to RVH again.
- 5.100 – 5.103 - redraft post Southborough Hub development.
- 5.149 - refers to recycling. Should have more significance and a commitment for better provision.

**Consideration of responses to Q15 re Chapter 5 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*The above paragraphs which refer to Southborough have been superseded by the new place shaping section for Southborough (in Section 5 of the new Draft Local Plan) under Policy STR/SO1 (The Strategy for Southborough) and associated site allocation policies.*

Recommended updating to policies text as follows:

Policy CR1 - review and update.

Policy CR2 - review and update.

Policy CR3 - review and update.

Policy CR5 – update in light of subsequent executed or proposed development in town centre of RTW.

Policy CR7 – review and update.

Policy CR13 - not clear why all defined neighbourhood centres in RTW were deleted from this policy. This effectively negates Policy CS6 for RTW

**Consideration of responses to Q15 re Chapter 5 policies of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*As above, existing 2006 Local Plan Policies CR1 (Large-scale development of centre uses), CR2 (Development outside Primary Shopping Areas) and CR3 (Small scale development of centre uses) have been reviewed, updated, combined and replaced by one development management Policy ED9 (Town and Retail Service Centres) in the Draft Local Plan.*

*Existing 2006 Local Plan Policies CR5 (Royal Tunbridge Wells Primary Shopping Area) and CR7 (Southborough Primary Shopping Area) have been reviewed along with other retail centres, updated, combined and replaced by one development management Policy ED11 (Primary Shopping Areas and Retail Frontages) in the Draft Local Plan.*

*Existing Policy CR13 (Neighbourhood and Village Centres) has been reviewed, updated and replaced by development management Policy ED12 (Retention of local services and facilities within defined Neighbourhood and Village Centres). The Neighbourhood Centres are listed in the retail hierarchy in Policy ED8 (Town, Rural service, Neighbourhood and Village Centres Hierarchy).*

*The new retail policies are supported by the Council's Retail and Leisure Study 2017.*

## **Chapter 6 – Housing**

Recommended updating to general text as follows:

6.56 - revise as number of piecemeal developments granted since the original plan.

Policy H1 – review and update.

Policy H2 – needs to be updated to accord with NPPF and National Space Standards

Policy H4 - needs to be reviewed / updated with proper traveller site allocations made.

Policies relating to 'housing development outside the limits to built development' should be reviewed and replaced, including Policies H8, H9, H10, H11 and 13.

### **Consideration of responses to Q15 re Chapter 6 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*As above, existing 2006 Local Plan Policy H1 (Retention of existing stock) is not carried forward as it was found to be unnecessary.*

*As above, existing 2006 Local Plan Policy H2 (Small and intermediate dwellings) has been reviewed, updated and replaced by development management Policy H3 (Housing Mix) in the Draft Local Plan. This is supported by the Councils' Housing Needs Survey 2018.*

*As above, Policy H3 (Affordable Housing within Development Schemes) of the 2006 Local Plan which was previously deleted has been reviewed, updated and reinstated/replaced as development management Policy H5 (Affordable Housing) in the Draft Local Plan. This is supported by the Councils' Housing Needs Survey 2018 and Housing Needs assessment Topic Paper 2019.*

*As above, existing 2006 Local Plan Policy H4 (Gypsy Sites) has been reviewed, updated and replaced as development management Policy H13 (Gypsies and Travellers) in the Draft Local Plan. This is supported by the Council's Housing Needs Assessment Topic Paper 2019.*

*As above, existing 2006 Local Plan Policy H8 (Affordable Housing outside the Limits to Built Development) has been reviewed, updated and incorporated into development management Policy H5 (Affordable Housing) in the Draft Local Plan. This is supported by the Council's Strategic Housing Market Assessment (SHMA), Housing Needs Survey 2018 and Housing Needs Assessment Topic Paper 2019.*

*As above, existing 2006 Local Plan Policy H9 (Key workers' dwellings is association with rural employment) has been reviewed, updated and replaced by development management Policy H10 (Rural Workers' Dwellings) in the Draft Local Plan.*

*As above, existing 2006 Local Plan Policy H10 (Replacement Dwellings outside the defined Limits to Built Development) has been reviewed, updated and replaced by development management Policy H14 (Replacement Dwellings outside the Limits to Built Development) in the Draft Local Plan.*

*As above, existing 2006 Local Plan Policy H11 (Extensions to Dwellings outside the Limits to Built Development) has been reviewed, updated and replaced by development management Policy H16 (Residential Extensions, alterations, outbuildings and annexes in the Green Belt and outside the Limits to Built Development) in the Draft Local Plan.*

*As above, existing 2006 Local Plan Policy H13 (Conversion of rural buildings to residential use outside the Limits to Built Development) has been reviewed, updated and incorporated into development management Policy ED5 (Conversion of Rural Buildings outside the Limits to Built Development) in the Draft Local Plan.*

## **Chapter 7 – Economic Development**

Policies ED1, ED2, ED3 and ED5 – review and update.

### **Consideration of responses to Q15 re Chapter 7 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*As above, existing 2006 Local Plan Policies ED1 (Large scale B1 proposals in Economic Development Areas), ED2 (small scale B1 proposals in the Limits to Built Development), ED3 (B2 and B8 proposals in Economic Development Areas) have been reviewed, updated, combined and replaced by one development management Policy ED1 in the Draft Local Plan.*

*As above, existing 2006 Local Plan Policy ED5 has been reviewed and replaced by development management Policy (also) ED5 (Conversion of Rural Buildings outside the Limits to Built Development) in the Draft Local Plan.*

*The new economic policies are supported by the Council's Economic Needs Study 2016.*

## **Chapter 9 – Recreation**

Policy R1 - Sport England recommends this policy is amended to better reflect NPPF in relation to assessment of open space and buildings, any losses replaced by equivalent or better provision in terms of quantity and quality in a suitable location or if the development is for alternative sports and recreational provision, the needs of which clearly outweigh the loss.

Policy R2 - review and update.

Policy R6 criterion 3- No current allotment site should be used for development on pretext that there is no better alternative.

**Consideration of responses to Q15 re Chapter 9 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*As above, existing 2006 Local Plan Policies R1 (Loss of recreation open space) and R6 (Allotments) have been reviewed, updated, combined and replaced by one development management Policy OSSR1 (Retention of Open Space) in the Draft Local Plan.*

*As above, existing 2006 Local Plan Policy R2 (Provision of recreation open space in new residential development) has been reviewed, updated and replaced by development management Policy OSSR2 (The provision of publicly accessible open space and recreation) in the Draft Local Plan.*

*These policies are supported by the Council's Open Space, Sport and Recreation Study 2018.*

**Chapter 10 – Community Services**

Policy CS4 - In relation to developer contributions, reference to 2 mile radius threshold applicable to primary provision should be amended to 1 mile to reflect reasonable accessibility for children on foot.

Policy CS6 - does not fully reflect NPPF Para 70 “in promoting healthy communities planning decisions should plan positively for cultural buildings and guard against the loss of cultural facilities and services”. This should be reflected in a new policy with recommended wording suggested by the Theatres Trust.

**Consideration of responses to Q15 re Chapter 10 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*As above, existing 2006 Local Plan Policy CS4 (Development contributions to local education authority school provision) and previously deleted policies CS3 (Schools) and CS5 (Redundant schools) have been reviewed and replaced by Strategic Policy 5 (Essential Infrastructure and Connectivity), place shaping policies in Section 5 of the Draft Local Plan and supported by the recommendations of the Council's Infrastructure Delivery Plan 2019.*

*Existing 2006 Local Plan Policy CS6 (Provision of Community Buildings) has been reviewed and incorporated where applicable into the place shaping policies in section 5, as well as development management Policy ED7 (Retention of local services and facilities within defined Neighbourhood and Village Centres) of the Draft Local Plan. These policies are supported by the community, public and social requirements set out in the Council's Infrastructure Delivery Plan 2019. The provision for Cultural opportunities is also sought in both the Vision and Strategic Objective 5 in section 3 of the Draft Local Plan and Strategic Policy STR5 (Essential Infrastructure and Connectivity) in section 4. This approach is supported by the Council's Infrastructure Delivery Plan 2019.*

## **Chapter 11 – Transport and Parking**

Recommended updating to general text as follows:

- 11.128 and TP121 - still stand but with amendment.
- 11.130 - will be out of date following Southborough Hub development as there are parking provisions re provided throughout the area.

Policy TP1 - Delete words “*non-residential*” from paragraph 1.

Policy TP3 - Add words “*and travel plan*” after words “*transport assessment*” in paragraph 2.

Policy TP4 - Add a new 6<sup>th</sup> criterion: “*The traffic generated by the proposal will not materially increase atmospheric pollution within an Air Quality Management Area or noise in an Important Area for Road Noise*”.

Policies TP5, TP6, TP7, TP8 and TP9 - may need updating once an agreed strategy for parking has been formulated under updated Transport Strategy. To promote active travel, may be appropriate to increase required cycle parking from 1 to 2 spaces per dwelling unit.

Policy TP11 - review and update.

Policy TP18 - update in light of recently agreed Cycling Strategy.

Policy TP19 - update as some of policy objectives were delivered during previous plan period.

Policy TP26 - car parks in Hawkhurst now limited (few public spaces in North Grove, some parking at primary school and short stay convenience store car parks).

### **Consideration of responses to Q15 re Chapter 11 of the 2006 Local Plan in the preparation of the Draft Local Plan:**

*As above, existing 2006 Local Plan Policy TP1 (Major development requiring Transport Assessments and a Travel Plan) has been reviewed, updated and replaced by development management Policy (also) TP1 (Transport Assessments, Travel Plans and Mitigation) in the Draft Local Plan.*

*As above, existing 2006 Local Plan Policy TP3 (Multi-modal access for large-scale residential developments) has been reviewed, updated and incorporated into development management Policy TP2 (Transport Design and Accessibility) in the Draft Local Plan.*

*As above, existing 2006 Local Plan Policy TP4 (Access to the road network) has been reviewed, updated and incorporated into criterion 5 of development management Policy EN1 (Design and other development management criteria) and Policy TP2 (Transport Design and Accessibility) in the Draft Local Plan. Reference to the new development management Policy*

*EN23 (Air Quality) is made in criterion 3 of new development management Policy TP1 (Transport Assessments, Travel Plans and Mitigation).*

*As above, existing 2006 Local Plan Policy TP5 (Vehicle Parking Standards) has been reviewed, updated and incorporated into development management Policy TP3 (Parking Standards) in the Draft Local Plan, supported by the Council's Residential Parking Standards Topic Paper 2019.*

*As above, existing 2006 Local Plan Policy TP6 (Tunbridge Wells Central Access Zone (residential) vehicle parking standards) has been reviewed, updated and incorporated into development management Policy TP3 (Parking Standards) in the Draft Local Plan, supported by the Council's Residential Parking Standards Topic Paper 2019.*

*As above, existing 2006 Local Plan Policy TP7 (Tunbridge Wells Central parking Zone (Commercial)) has been reviewed, updated and incorporated into development management Policy TP3 (Parking Standards) in the Draft Local Plan.*

*As above, existing 2006 Local Plan Policy TP8 (Vehicle Parking for small-scale changes of use to non-residential and development affecting Listed Buildings and Conservation Areas) has been reviewed, updated and incorporated into development management Policy TP3 (Parking Standards) in the Draft Local Plan.*

*As above, existing 2006 Local Plan Policy TP9 (Cycle Parking) has been reviewed, updated and incorporated into development management Policy TP3 (Parking Standards) in the Draft Local Plan.*

*As above, existing 2006 Local Plan Policy TP11 (Other improvements to the A21- Kippings Cross to Lamberhurst Bypass) has been reviewed and incorporated into development management Policy TP6 (Safeguarding Roads) in the Draft Local Plan, to ensure the long term safeguarding of this section of the A21 for upgrading works.*

*As above, existing 2006 Local Plan Policy TP18 (Cycle Route Network in Royal Tunbridge Wells) has been reviewed, updated and incorporated into development management Policy TP2 (Transport Design and Accessibility) in the Draft Local Plan; and is also supported by the Council's Cycling Strategy.*

*Existing 2006 Local Plan Policy TP19 (Main Transport Routes) has not been carried forward as most of these highway improvement works have either been undertaken and/or form part of the Council's emerging Transport Strategy.*

*As above, existing 2006 Local Plan Policy TP26 (Hawkhurst - Parking Provision) has been reviewed and the public car parking provision at Fowlers Park incorporated into development management Policy TP4 (Public Car Parks). Policy STR/HA1 in the place shaping section (section 5) of the Draft Local Plan also makes reference to improvements to and increasing the provision of public parking to serve Hawkhurst (Highgate).*

*All the above policies are supported by Strategic Policy STR6 (Transport and Parking) in the Draft Local Plan, as well as the Council's emerging Transport Strategy and Residential Parking Standards Topic Paper 2019.*

### **Core Strategy 2010:**

Core Policy 1 (delivery of development): Replace with an updated policy. Should incorporate eventual spatial/development strategy and exception sites policy.

#### **Consideration of response to Q15 re CP1 of the Core Strategy in the preparation of the Draft Local Plan:**

*Existing 2010 Core Strategy Policy CP1 (Delivery of Development) has been reviewed, updated and incorporated into Strategic Policy STR1 (The Development Strategy) in section 4, as well as the place shaping policies in section 5 of the Draft Local Plan. These policies are supported by the Council's Distribution of Development Topic Paper 2019.*

Core Policy 7 – review and update.

#### **Consideration of response to Q15 re CP7 of the Core Strategy in the preparation of the Draft Local Plan:**

*As above, existing 2010 Core Policy 7 (Employment Provision) has been reviewed, updated and carried forward into the new strategic policy STR1 (The Development Strategy), place shaping policies in section 4, as well as development management Policies ED1 (The Key Employment Areas), ED2 (Retention of existing employment sites and buildings), ED4 (Rural Diversification) and ED7 (Retention of and promotion of new tourist accommodation and attractions) in the Draft Local Plan. These policies are supported by the Council's Economic Needs Study 2016 and Retail and Leisure Study 2107.*

### **Site Allocations Local Plan 2016 (SALP):**

Policy AL / STR2: Environmental and Recreation Designations - designations should be reviewed and replaced.

#### **Consideration of response to Q15 re AL/STR2 of the SALP in the preparation of the Draft Local Plan:**

*Existing 2016 Site Allocations Local Plan Policy AL/STR2 (Environmental and Recreation Designations) which refers to existing policies in the 2006 Local Plan has been reviewed, updated and incorporated into the following development management policies in the Draft Local Plan: existing Policy R1 (Recreation Open Space) to development management Policy OSSR1(Retention of Open Space); Policies EN21 (Areas of Important Open space), EN22 (Areas of Landscape Importance) and EN23 (Important Landscape Approaches) have been combined to form development management Policy EN18 (Landscape in the Built Environment); existing Policy EN24 (Arcadian Areas) has been updated and carried forward into development management Policy EN20 (Arcadian Areas). These policies are supported*



*by Strategic Policy STR8 (Conserving the natural, built and historic environment) in section 4 of the Draft Local Plan.*

Policy AL/ STR3: Safeguarding Former Railway Lines - review and replace.

**Consideration of response to Q15 re AL/STR3 of the SALP in the preparation of the Draft Local Plan:**

*Existing 2016 Site Allocations Local Plan Policy AL/STR3 (Safeguarding Former Railway Lines) has been reviewed, updated and carried forward into development management Policy TP5 (Safeguarding Railway Land) in the Draft Local Plan.*

**Other comments:**

- Policies relating to infrastructure and services should be reviewed.
- New Local Plan should review and update all existing policies contained in extant Local Plan, adopted Core Strategy and Site Allocations Local Plan to ensure they meet any new government policy changes.
- All policies, such as space standards and those relating to sustainable and renewable energy should be reviewed against changes in national policy.
- Policies relating to the limits to built development need updating to reflect a more positive approach to planning in rural areas and to ensure a robust supply of housing.
- Green Belt policies should be updated to reflect provisions of NPPF and provide localised definitions of how key terms are defined.
- Travel sustainability policy should be updated to account for proposed reduction in rail services at PW, Marden and Staplehurst.
- Existing policies for public transport and cycling have not resulted in adequate improvements. Therefore should be emphasised much more strongly within policy documents.

**Consideration of responses to Q15 re other comments in the preparation of the Draft Local Plan:**

*All existing policies contained in the existing 2006 Local Plan, 2010 adopted Core Strategy and 2016 Site Allocations Local Plan have been carefully reviewed, revised and produced in accordance with current government, other relevant guidance and taking account of other significant factors; following a rigorous process.*

*In terms of the specific items listed above – all sections of the Draft Local Plan seek to make provision for improvements to infrastructure, sustainability, renewable energy and sustainable transport methods and cycling, while the existing Limits to Built Development (LBDs) and Green Belt boundaries have been reviewed to reflect the Council's Strategy for growth and distribution set out in the Plan. This is supported by the Council's Distribution of Development Topic Paper 2019.*

**(ii) New Policies and Topic Areas**

**Question 16: Considering the topic areas above, are there any other topics that you think the new Tunbridge Wells Borough Local Plan should include?**

**Summary of Responses**

66 responses were received to this question. One respondent answered “No”.

**Summary of suggested New Policies/ Topic Areas across the response groups:**

**New Policies:**

- Street lighting (EN policy) – to align with modern thinking on “dark skies”. Replace street lighting with sustainable path lighting (for people). Outside urban areas (not including village centres or LBDs) no lighting should be required.
- A21/M26 junction (TP policy) – joint strategy needed with adjoining boroughs to re-route HGVs at reduced diesel consumption (due to steady optimum speed) and less damage to settlements on cross country routes.
- Technology (ED policy) – to facilitate local IT and communications based industries.
- Policies should be included to protect distinctive character of existing settlements.
- Policy supporting renewable energy.
- Policy to ensure best practice approaches to remediating land contamination on brownfield sites.
- Policy to tackle diffuse pollution from current foul drainage infrastructure, with infrastructure for new development allowing capacity for existing rural areas to link to mains sewer extensions where feasible.

**Consideration of responses to Q16 in the preparation of the Draft Local Plan:**

*New Policy EN10 (Outdoor Lighting and Dark Skies) sets out the policy requirements and guidance in seeking to minimise light pollution in urban, rural and dark sky areas.*

*New Policy EN31 (Land Contamination) sets out the policy requirements and guidance relating to development proposals affected by land contamination. This policy is supported by the Council’s Supplementary Planning Document – Contaminated Land 2016.*

*There are over 30 new Development Management Policies in the Draft Local plan which seek to protect and/or enhance both the urban and rural environment, including consideration of the local distinctiveness, character, amenity and setting of individual settlements and the wider area. These policies are supported by strategic Policy STR7 (Place Shaping and Design) in section 4 of the Plan.*

*New Policy EN4 (Energy Reduction in New Buildings) sets out the policy requirements and guidance in seeking to reduce the carbon footprint and other emissions from proposed development and encourages the use of renewable energy generating technology. This policy is supported by the Council's Energy Topic Paper 2019.*

*New Policy EN26 (Water Quality Supply and Treatment) sets out the policy requirements and guidance for wastewater treatment and connection to the sewerage system for all new development. This policy is supported by the Council's Infrastructure Delivery Plan 2019.*

*New Policy ED3 (Digital Communications and Fibre to the Premises) sets out the policy requirements and guidance for electronic and digital communications in new development and is supported by Strategic Policy STR5 (Essential Infrastructure and Connectivity) in section 4 of the Draft Local Plan and the Council's Infrastructure Delivery Plan 2019.*

*Highway works/requirements will be considered in the Council's emerging Transport Strategy. However, matters relating to major routes such as the M26/A21 would need to be endorsed by Highways England and Kent County Council – Highways.*

- **New Topic Areas:**

- Natural Resources.
- Provision of water supply (distinct from flooding).
- Suitable housing for older people (allowing downsizing and to free up larger family homes).
- Plans to enable young people to afford to stay in the area – buying options, not just rental.
- New strategy must review all old policies and decide on validity.
- Master planning for all settlement growth to be achieved through NDPs.
- Co-housing schemes and Community Land Trusts should be included in policy.
- Protection of ancient woodland, farmland and fieldscapes.
- Green infrastructure (GI)- should be fundamental part of Local Plan. If well planned, GI can be embedded into development early in planning process and enable Local Plan to deliver sustainable growth to benefit the borough's communities, environment and local economy.
- Impact of climate change.
- Infrastructure - waste disposal, care of elderly, roadway repairs, noise pollution.
- Air pollution.
- Ecology and protected species.
- Brownfield sites over natural, built and historic environment.
- Add infrastructure improvements to roads, paving and lighting.
- Providing public conveniences to the smaller towns and villages.
- Traffic problems and how to alleviate them.
- Careful use of natural resources.
- Maintaining biodiversity and green spaces.

- Clear statement on carbon emissions and energy consumption targets is needed projected to at least 2050, and a view on how this is aligned with the Paris climate change agreement.
- More detail of “cumulative impact” referenced in section 4.8 needed in next consultation draft.
- Further topic be addressed – “The Presumption in Favour of Sustainable Development” which underpins NPPF.

**Consideration of responses to Q16 re new topic areas in the preparation of the Draft Local Plan:**

- *Natural Resources – addressed in new development management Policy EN2 (Sustainable Design and Construction)*
- *Provision of water supply (distinct from flooding) – addressed in new development management Policy EN26 (Water Quality, Supply and Treatment) and supported by the Council’s Infrastructure Delivery Plan.*
- *Suitable housing for older people (allowing downsizing and to free up larger family homes) – addressed in new development management Policy H9 (Housing for Older People) and supported by the Council’s Housing Needs Study 2018, Housing Needs Assessment Topic Paper 2019 and Housing Supply and Trajectory Topic Paper 2019.*
- *Plans to enable young people to afford to stay in the area – buying options, not just rental - addressed in new development management Policy H5 (Affordable Housing) and supported by the Council’s SHMA , Housing Needs Study 2018 and Housing Needs Assessment Topic Paper 2019 and Housing Supply and Trajectory Topic Paper 2019..*
- *New strategy must review all old policies and decide on validity – undertaken using a robust strategy as outlined above.*
- *Master planning for all settlement growth to be achieved through NDPs – The Borough Council’s approach to working with Neighbourhood Planning Groups is addressed in new strategic Policy STR9 (Neighbourhood Plans) .*
- *Co-housing schemes and Community Land Trusts should be included in policy – these are not specifically mentioned in the housing policies but will be considered if put forward as part of any development proposal/masterplan.*
- *Protection of ancient woodland, farmland and fieldsapes – addressed in new development management Policies EN15 (Ancient Woodland and Veteran Trees), EN20 (Rural Landscape, EN21 (High Weald AONB) and EN22 (Agricultural Land).*
- *Green infrastructure (GI) - should be fundamental part of Local Plan. If well planned, GI can be embedded into development early in planning process and enable Local Plan to deliver sustainable growth to benefit the borough’s communities, environment and local economy - addressed in new development management Policy EN16*

*(Green, Grey and Blue Infrastructure) and supported by Strategic Policy STR5 (Essential Infrastructure and Connectivity) in section 4 of the new Draft Local Plan, the Council's Green Infrastructure Framework 2019 and Infrastructure Delivery Plan 2019.*

- *Impact of climate change - addressed in new development management Policy EN5 (Climate change adaptation) and supported by the Council's Energy Topic Paper 2019.*
- *Infrastructure - waste disposal (addressed in Council's Infrastructure Delivery Plan 2019), care of elderly (addressed in Council's Infrastructure Delivery Plan 2019 and new development management Policy H9 (Housing for Older People) , roadway repairs (referenced in Infrastructure Delivery Plan 2019, emerging Transport Strategy and some of the place shaping policies in section 5 of the new Draft Local Plan), noise pollution - (addressed in new development management Policy EN30 (Noise) and supported by the Council's Supplementary Planning Document – Noise and Vibration 2014).*
- *Air pollution - addressed in new development management Policy EN23 (Air Quality) and supported by the Council's Air Quality Topic Paper 2019.*
- *Ecology and protected species - addressed in new development management Policies EN11: Net Gains for Nature: Biodiversity) and EN12 (Protection of designated sites and habitats).*
- *Brownfield sites over natural, built and historic environment – The Local Plan promotes the development of brownfield sites within the built-up areas (usually defined by the relevant LBDs); a number of the site allocations in section 4 of the Draft Local Plan are on sites with existing uses and it is expected that development in these locations will be delivered as part of a comprehensive redevelopment of such sites.*
- *Add infrastructure improvements to roads, paving and lighting - referenced in Infrastructure Delivery Plan 2019, emerging Transport Strategy and some of the place shaping policies in section 5 of the Draft Local Plan.*
- *Providing public conveniences to the smaller towns and villages – this is considered to be a Parish/Town Council matter which could be considered as part of a Neighbourhood Development Plan.*
- *Traffic problems and how to alleviate them - addressed in new development management Policies TP1 (Transport Assessments, Travel Plans and Mitigation), supported by the Strategic Policy STR6 (Transport and parking) in section 4 of the Draft Local Plan and considered as part of the Council's emerging Transport Strategy and Infrastructure Delivery Plan 2019.*
- *Careful use of natural resources -as for point 1 above.*
- *Maintaining biodiversity and green spaces – already set out above.*
- *Clear statement on carbon emissions and energy consumption targets is needed projected to at least 2050, and a view on how this is aligned with the Paris climate*

*change agreement – addressed in in new development management Policies EN4 (Energy Reduction in New Buildings) and EN5 (Climate Change Adaptation) and supported by the Council's Energy Topic Paper 2019.*

- *More detail of “cumulative impact” referenced in section 4.8 needed in next consultation draft – this refers to the possible cumulative impact of multiple developments on the natural environment. As referred to above, there are over 30 new Development Management Policies in the Draft Local plan which seek to protect and/or enhance both the urban and rural environment, including consideration of the local distinctiveness, character, amenity and setting of individual settlements and the wider area. These policies are supported by strategic Policy STR7 (Place Shaping and Design) in section 4 of the Plan.*
- *Further topic be addressed – “The Presumption in Favour of Sustainable Development” which underpins NPPF – addressed in Strategic Policy STR2 (Presumption in Favour of Sustainable Development) which is at the heart of the strategy for growth for the borough, throughout the Plan.*

#### **Other comments:**

- Kent Police -consider Section 106 contributions be made to the police service, including infrastructure and policing infrastructure.
- Consultation document fails to take in to account wider definition of “Healthy Communities” as defined under the NPPF, namely “safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion”.

#### **Consideration of responses to Q16 re other comments in the preparation of the Draft Local Plan:**

*The Council will not be asking for Section 106 contributions in relation to the police service and policing infrastructure , as it is not normally regarded as justified or meeting legislative or national policy requirements.*

*New development management Policy EN1 (Design and other development management criteria) includes reference to guidance and requires the incorporation of adequate security measures and features to deter crime, fear of crime and anti-social behaviour in new developments.*

#### **Question 17: Are there any topics that you consider do not require any further detailed development management policies because there is sufficient coverage already in place, i.e. in national guidance (the NPPF)?**

#### **Summary of Responses**

34 responses were received to this question, of which 24 respondents answered “No” and 5 had no comment.

**General comments across the response groups were:**

- It should be a self-contained document capable of being stand alone and read as such to avoid multiplicity of documents on different websites.
- New strategy must review all old policies and decide on validity, tailored to specific circumstances of the borough.
- No mention of AONB Management Plan.
- Brexit - local policies could be particularly useful in fields currently covered by European environmental legislation.

**Consideration of responses to Q17 re general comments in the preparation of the Draft Local Plan:**

- *Self-contained document - it is not possible to have the Local Plan as a stand- alone document, as it is supported by a substantial evidence base. Clear links to other relevant documents are provided throughout the Plan.*
- *New strategy must review all old policies and decide on validity tailored to specific circumstances of the borough - addressed above.*
- *No mention of AONB Management Plan – mentioned in new development management Policies EN6 (Historic Environment) and EN21 (High Weald AONB) and Strategic Policy STR8 (Conserving and enhancing the natural, built and historic environment).*
- *Brexit - local policies could be particularly useful in fields currently covered by European environmental legislation – noted, but the Local Plan is essentially framed by national legislation and policies.*

**(iii) Detailed Policies**

**Question 18: Are there any specific planning issues affecting the borough of Tunbridge Wells that you consider are not adequately covered by the NPPF or already referenced in this chapter and which you would like to see addressed in a policy?**

**Summary of Responses**

59 responses were received to this question, of which 2 respondents answered “No”.

**Summary of Specific Issues which should be included/considered across the response groups:**

- Can housing numbers be met as 70% of borough is in AONB?

- Should be specific, prominent and robust policy addressing development within High Weald AONB (original EN26 was deleted, presumably it repeated national policy). However, a locally distinctive policy for the High Weald AONB, referencing the Management Plan, would reinforce national policy and explain how it should be applied locally.
- High Weald AONB Unit should be an automatic planning consultee.
- High percentage of AONB land in the Borough – key tourism attraction – at odds with NPPF.
- Have labour costs in terms of new housing development and incoming labour to the area been taken into account?
- Should be a policy that states the context of a site and its surroundings should be considered first and the detail within it second.
- KCC - there are existing policies relating to KCC's PROWs and Access Service. However, provision of a new/specific policy that clarifies TWBC's aspirations for PROWs, Village Greens and Common Land is recommended.
- Consider compensation and offsetting for land where mitigation does not sufficiently cover biodiversity loss.
- Compliance with all articles of the UNCRDP & UKDS 2012 by 2025 to provide independent access for all.
- Process of assignment of Section 106 funds should be addressed.
- New and updated policy to enable construction of rural workers dwellings in the countryside.
- An opportunity to apply a flexible approach to barn conversions.
- Policies ED1/ED5 - concerned scope of these is extremely limiting and does not provide sufficient scope for farm businesses to consolidate and grow.
- Shape future rather than leave to market forces, retaining key assets for the future and generating income to support community health and welfare.
- Identify robust constraints on development and focus on affordable housing.
- Create at least one sustainable Garden Village in the borough as a new community with schools, health services, employment and transport infrastructure, including new or existing railway stations.
- Develop network of high quality, integrated sustainable transport solutions and infrastructure focussing on walking, cycling and public transport for short journeys.
- Within RTW, increase quantity and quality of local employment, building on existing core sectors while developing new sectors such as media, health, tourism, arts and culture, and designate new zones dedicated to employment use.
- Maintain high visual amenity and cultural value of landscapes within and on perimeter of town that contribute to its economic health.
- Move developments away from main urban area to ease traffic congestion.
- Air quality caused by traffic congestion.
- Borough policy to conserve Green Belt and AONB areas.
- Separate policy to indicate clear activities scheduled to be undertaken to reduce traffic congestion to A26 area.



- Add infrastructure improvements to roads, paving and lighting.
- Need for a good supply of local needs housing.
- Concentrate on TW town centre to ensure all buildings are used and it provides a good shopping environment.
- Need to take crime prevention into account as in planning/design of new development.
- Where will the water supply come from – given the South East is a water shortage area?

### **Consideration of responses to Q18 in the preparation of the Draft Local Plan:**

#### **AONB comments**

*The impact on the High Weald AONB has been carefully considered in the Council's strategy for growth and distribution of development and where relevant, place shaping policies in Section 5 of the Draft Local Plan have been worded to ensure that the impact on landscape sensitivity is a key consideration and needs to be addressed in the submission of any development proposal.*

*As above, there is a new development management Policy EN21 (High Weald AONB) which refers to the High Weald AONB Management Plan and the High Weald AONB Unit were involved in the drafting of this policy.*

*This policy also promotes the improvement of public access to the countryside by way marking and interpretation material to assist public enjoyment of the AONB. Reference is also made to the AONB in the pre-text to the new Historic Environment Policy EN6 where the Council recognises that the built, natural and landscape heritage of the borough is a valuable resource in terms of its social, cultural and economic potential.*

#### **Response to other specific issues raised in the responses above:**

- *Have labour costs in terms of new housing development and incoming labour to the area been taken into account? - The Local Plan and growth strategy have been subject to a viability assessment, which takes account of building costs.*
- *Should be a policy that states the context of a site and its surroundings be considered first and the detail within it second? – This is addressed in development management Policy EN1 (Design and other development management criteria) as well as other policies such as those relating to heritage assets and the rural landscape.*
- *KCC PROWs, village greens and common land – PROWs are referred to in several policies such as new development policies EN1 (Design and other development management criteria), TP2 (Transport Design and Accessibility) and EN21 (High Weald AONB). Where applicable, links to existing PROWs are also encouraged in the site allocation policies in section 5 of the Draft Local Plan.*

- Consider compensation and offsetting for land where mitigation does not sufficiently cover biodiversity loss – This is addressed in new development management Policy EN11 (Net Gains for Nature: Biodiversity).
- Compliance with all articles of the UNCRDP & UKDS 2012 by 2025 to provide independent access for all – Inclusivity and access for all is addressed in new development management policy EN1 (Design and other development management criteria) as well as housing Policy H5 (Affordable Housing) which requires that as a minimum such new housing should meet the Building Regulation Standard Part M4(2) and Policy TP2 (Transport Design and Accessibility). This is also supported in the Council's Housing Needs Assessment Topic Paper 2019.
- Process of assignment of Section 106 funds should be addressed – Section 106 contributions are referred to and sought where relevant in the proposed site allocations in section 5 of the Draft Local Plan. The Council's Infrastructure Delivery Plan 2019 supports this approach.
- New and updated policy to enable construction of rural workers dwellings in the countryside – There is a new and updated development management Policy H10 (Rural Worker's Dwellings).
- An opportunity to apply a flexible approach to barn conversions – Existing policies relating to the conversion of buildings in the countryside have been combined and updated to form new development management Policy ED5 (Conversion of rural buildings outside the LBD). To support a stronger rural economy, this Policy gives priority to the conversion of rural buildings for business, recreation and tourism uses. Only after it has been demonstrated (in accordance with strict criteria) that attempts have been made to secure such a use, will conversion to residential use be considered.
- Policies ED1/ED5 - concerned scope of these is extremely limiting and does not provide sufficient scope for farm businesses to consolidate and grow – This is addressed in the new Policy ED4 (Farm Diversification) which promotes development and diversification of agricultural and other agricultural land based businesses.
- Shape future rather than leave to market forces, retaining key assets for the future and generating income to support community health and welfare – This is reflected in the Council's Vision and Strategic Objectives in section 3 of the Draft Local Plan and continues to run through the subsequent sections and policy proposals.
- Identify robust constraints on development and focus on affordable housing – This is addressed through a wide range of new development management policies including new Policy H5 (Affordable Housing).
- Create at least one sustainable Garden Village in the borough as a new community with schools, health services, employment and transport infrastructure, including new or existing railway stations – The Council's proposed growth strategy includes a new garden settlement at Tudeley as well as the expansion around Paddock Wood into the eastern part of Capel Parish, as set out in Strategic Policy STR1 (The Development Strategy), the relevant place shaping policies in section 5 of the Draft Local Plan and the Council's supporting Distribution of Development Topic Paper 2019.

- *Develop network of high quality, integrated sustainable transport solutions and infrastructure focussing on walking, cycling and public transport for short journeys – This is addressed in new development management Policies TP1 (Transport Assessments, Travel Plans and Mitigation), supported by the Strategic Policy STR6 (Transport and parking) in section 4 of the Draft Local Plan and considered as part of the Council's emerging Transport Strategy and Infrastructure Delivery Plan 2019. Site Allocation and strategic policies STR/CA1, STR/PW1, AL/CA1, AL/CA23 and AL/PW1 and AL/PW2 specifically require masterplanning of these developments, with one element of this being such transport infrastructure between these settlements and Tonbridge and Royal Tunbridge Wells. .*
- *Within RTW, increase quantity and quality of local employment, building on existing core sectors while developing new sectors such as media, health, tourism, arts and culture, and designate new zones dedicated to employment use – This is addressed in Strategic Policy STR1 (The Development Strategy) as well as the place shaping and site allocation policies for Royal Tunbridge Wells in section 5 of the new Draft Local Plan.*
- *Maintain high visual amenity and cultural value of landscapes within and on perimeter of town that contribute to its economic health – As above, there are over 30 new Development Management Policies in the Draft Local plan which seek to protect and/or enhance both the urban and rural environment, and promote this as part including consideration of the local distinctiveness, character, amenity and setting of individual settlements and the wider area. These policies are supported by strategic Policy STR7 (Place Shaping and Design) in section 4 of the Plan.*
- *Move developments away from main urban area to ease traffic congestion – The existing Core Strategy 2010 focuses more growth around Royal Tunbridge Wells, whereas, the proposed growth strategy and distribution of development promoted in the Draft Local Plan seeks to distribute development and growth across the borough, including the proposed garden settlement at Tudeley and extension of Paddock Wood and Capel as described above.*
- *Air quality caused by traffic congestion – as above, this is addressed in new development management Policy EN23 (Air Quality) and EN24 (Air Quality Management Areas).*
- *Borough policy to conserve Green Belt and AONB areas – As above, there are updated strategic and development management policies relating to the Green Belt and AONB which are supported by the Council's Distribution of Development Topic Paper 2019.*
- *Separate policy to indicate clear activities scheduled to be undertaken to reduce traffic congestion to A26 area – There is no separate policy relating to the A26 but sustainable and innovative forms of transport are promoted in new development management Policies TP1 (Transport Assessments, Travel Plans and Mitigation), supported by the Strategic Policy STR6 (Transport and parking) in section 4 of the Draft Local Plan and considered as part of the Council's emerging Transport Strategy and Infrastructure Delivery Plan 2019, to help relieve congestion.*

- *Add infrastructure improvements to roads, paving and lighting – Already addressed above.*
- *Need for a good supply of local needs housing - Already addressed above.*
- *Concentrate on TW town centre to ensure all buildings are used and it provides a good shopping environment – Addressed in proposed Strategic Policy STR1 (The Development Strategy) and the place shaping and site allocation policies for Royal Tunbridge Wells in section 5 as well as further development management economic and retail policies (ED policies) in section 6 of the Draft Local Plan. These policies are supported by the Council's Economic Needs Study 2016 and Retail and Leisure Study 2017.*
- *Need to take crime prevention into account as in planning/design of new development – As above, new development management Policy EN1 (Design and other development management criteria) includes reference to guidance and requires the incorporation of adequate security measures and features to deter crime, fear of crime and anti-social behaviour in new developments.*
- *Where will the water supply come from – given the South East is a water shortage area? – This is already addressed above.*

*As can be seen from the extensive number and range of proposed strategic, place shaping and development management policies referred to above, existing policies have been reviewed and updated and new policies formulated to satisfy both national policy and other legislative requirements as well as addressing local needs; whilst also taking into account the comments and issues raised in response to the Issues and Options consultation.*

*The Council is continuing to explore the use of the Community Infrastructure Levy for new development.*

## Conclusion

## Introduction

This final section of the of the Issues and Options consultation allowed the opportunity to comment on any other planning and development related matters that should be considered or have not been mentioned in the Issues and Options document; and also for any general comments to be made, under the following question:

**Question 19: Are there any other planning and development matters that you think the new Local Plan should consider or cover that have not been mentioned in this Issues and Options document? You can also make any general comments here.**

## Summary of Responses

462 responses were received to this question.

More than 60% of these comments were objections made in relation to specific sites from the Call for Sites process, which ran at the same time as the Issues and Options consultation. The responses received in relation to these specific sites will be considered separately alongside work to produce a final Strategic Housing and Economic Land Availability Assessment (SHELAA) and decide upon allocations to be included in the draft Local Plan.

In addition, many of the other comments received in response to this question, such as housing numbers and need, transport and congestion, infrastructure needs, AONB, Green Belt, historic and environmental protection, air and noise pollution and cross boundary issues have already been referred to in responses to the previous questions above.

In some cases, adjoining and other Local Authorities and Statutory bodies felt they were unable to provide a detailed response to some of the questions given the high level detail of the Issues and Options consultation document at this early stage in the Local Plan Process; and would welcome further engagement on matters such as infrastructure provision, education, medical facilities as the Plan preparation progresses.

**Planning and development matters not mentioned in the Issues and Options Document and other general comments across the response groups were:**

- Objectively Assessed Need (OAN) of 648 dwellings per annum or 12,950 dwellings from 2013 -2033 is noted. However, the Issues and Options document does not indicate the overall level of growth being considered and whether this is above or below the OAN.
- At a time of considerable economic and political uncertainty (Brexit, possible change in government) together with rapid technological change, it seems rash to inflict such major changes in terms of housing development on the borough.
- The proposed business development will not create number of jobs required to support 13,000 households and the proposed mix of jobs is merely an extension of historic development activities.
- Specific reference should be made to the Ashdown Forest Special Area of Conservation with regards to atmospheric pollution and nitrogen deposition.
- It is not clear the degree to which any of the Options will meet housing need given the potential constraints on development that are still to be considered.
- Have not developed a concrete infrastructure plan for each Option. Therefore impossible to choose an Option without knowing what exact infrastructure will be behind that Option.
  
- Any new Local Plan will need to provide a range of different sites to ensure a robust supply of developable land to meet needs across the plan period - therefore do not think it appropriate to indicate whether one approach would be preferable to others.
- Important that the Council and surrounding authorities acknowledge and adequately address migratory patterns in their evidence base and emerging housing targets to ensure appropriate level of planned growth is achieved across the area.

- In accordance with the tests of soundness, affordable housing requirements need to be consistent with national planning policy, to ensure delivery over the plan period and flexible enough to deal with changing circumstances.
- It is vital to continue to direct development in line with the settlement groupings, which will ensure that sustainable locations are developed and gives the borough the best opportunity to meet its required needs.
- The Borough Transport Strategy needs refreshing and updating to cover the proposed Plan period.
- The Council should not lose sight of the wishes of the local communities, where greater than envisaged growth might be desired to help maintain the viability of settlements.
- The Council is advised to consider a focused consultation with local people and parish councils to begin identifying potential Local Green Space designations.
- The Council should give special consideration to the emerging draft policies in Neighbourhood Development Plans (NDPs) and consult closely with parish councils responsible for NDPs in drawing up the Local Plan, to maximize co-ordination and avoid discrediting the neighbourhood planning process.
- Older people should not be isolated in special build, out-of-the-way places but integrated into lively, mixed-age areas.
- New homes should be built with all ages in mind, accessible for wheelchairs and fit for later adaptations.
- Absolute need to match the scale of new proposed development with master planning and urban design of highest quality procured through design teams working to national and international standards.
- Any associated proposals maps for the Local Plan should show the boundaries of the Parishes and Town Councils, highlight major road and rail links, along with secondary school concentrations and their catchment areas.
- Seems to be a significant and viable option missing from proposals - The Rail Corridor.
- Another way of opening up the borough is resurrecting the PW branch line that went from PW via Horsmonden and Goudhurst to Hawkhurst.
- Should include developing conservation areas of the future.
- The publicity for this consultation was very limited and the time for consultation far too short.
- Four days for public consultation exhibitions were not properly promoted and were hardly adequate to do justice to the importance of the subject in hand.

### **Consideration of responses to Q19 in the preparation of the Draft Local Plan:**

*The majority of comments received in response to Question 19 of the Issues and Options consultation have sought to be addressed in other sections above.*

*The Borough Council has continued to work with parish and town councils and other community groups, in the preparation of the Draft Local Plan as well as the progression of*

*Neighbourhood Development Plans. This has also successfully led to the proposed designation of Local Green Spaces, supported by new development management Policy EN17 (Local Green Space) as well as the Local Green Space Assessment 2019 and Local Green Space Designation Methodology 2019 (background papers).*

*As mentioned under Question 7 above, the Borough Council has been engaging with neighbouring authorities, statutory bodies and other organisations in the preparation of the Council's growth strategy, infrastructure delivery and new policies across the Draft Local Plan. This engagement will continue as the Plan progresses to the Regulation 19 stage.*

*In view of the comments received above, as set out in the main document for the Consultation Statement for the Regulation 18 Local Plan, more exhibition events are to be held and in more locations across the borough for this consultation.*

**If you require this document in another format,  
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