

Tunbridge Wells Borough



Tunbridge Wells Borough Council

# **Authority Monitoring Report 2023/24**

**April 2025**



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# 1.0 Introduction

- 1.1 This Local Plan Authority Monitoring Report (AMR) is split into sections as set out below and monitors progress in relation to:
- a) the **Planning Context** that serves to highlight key demographic, social, economic and environmental characteristics of the borough, with a commentary on the extent to which any changes over the last year or so bear upon planning policy aims;
  - b) **Local Plan preparation**, having regard to the timetable and milestones set out in the programme previously set out in the [Local Development Scheme \(LDS\)](#);
  - c) the preparation and making of **Neighbourhood Development Plans** in the borough;
  - d) actions undertaken in plan-making to meet the ‘**Duty to Cooperate**’ on strategic matters;
  - e) the **effectiveness of Core Strategy policies** and the extent to which they are successful in achieving the Council’s strategic aims for the borough; and,
  - f) the **updating and refinement of monitoring frameworks** that will be used to assess the sustainability of, as well as the effectiveness of, policies in the new Local Plan.
- 1.2 This AMR, in conjunction with the Council’s Housing Monitoring Reports ([see Monitoring Information](#)), fulfils the Council’s obligation to produce an AMR containing the above information at least annually and to make it publicly available ([see Regulation 34 of the Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#)). It relates to the period 01 April 2023 to 31 March 2024 as it coincides with the statistical monitoring period, although in some cases data and commentary is added relating to more recent periods where this is considered to be helpful.

## 2.0 Planning Context

2.1 This section reviews ‘contextual Indicators’ that relate to the wider social, environmental and economic conditions prevalent within the borough and which provide a broad framework against which to assess the appropriateness of planning policies.

2.2 Reviewing these indicators also fulfils the requirements of Section 13 of the Planning and Compulsory Purchase Act 2004, which states:

*‘Survey of area*

*(1) The local planning authority must keep under review the matters which may be expected to affect the development of their area or the planning of its development.*

*(2) These matters include—*

- (a) the principal physical, economic, social and environmental characteristics of the area of the authority;*
- (b) the principal purposes for which land is used in the area;*
- (c) the size, composition and distribution of the population of the area;*
- (d) the communications, transport system and traffic of the area;*
- (e) any other considerations which may be expected to affect those matters;*
- (f) such other matters as may be prescribed or as the Secretary of State (in a particular case) may direct.*

*(3) The matters also include—*

- (a) any changes which the authority think may occur in relation to any other matter;*
- (b) the effect such changes are likely to have on the development of the authority’s area or on the planning of such development.’*

2.3 In this AMR, a wide variety of contextual indicators are considered and grouped across three broad subject areas:

- **Communities & Housing**
- **Economy & Business**
- **Environment**

# Communities and Housing

- 2.4 Key indicators are regarded as being around the population size, its age range and spatial distribution, as well as projections for changes in these. Insofar as planning is primarily concerned with the land use implications of meeting people's evolving needs, information about household characteristics is also reviewed. Relating to this is information about the affordability of homes, as well as wider measures of prosperity/deprivation.

## Borough Profile

- 2.5 Tunbridge Wells borough lies in the south-west of Kent, bordering East Sussex to the south. It covers an area of 326 square kilometres. The borough borders the local authorities of Sevenoaks, Tonbridge & Malling, Maidstone and Ashford in Kent; and Rother and Wealden in East Sussex.
- 2.6 The main town is Royal Tunbridge Wells. Together with Southborough it forms the 'main urban area', with Southborough having a separate, smaller town centre. The towns/settlements of Paddock Wood, Cranbrook, and Hawkhurst also serve a wider rural hinterland, with a range of more local services.

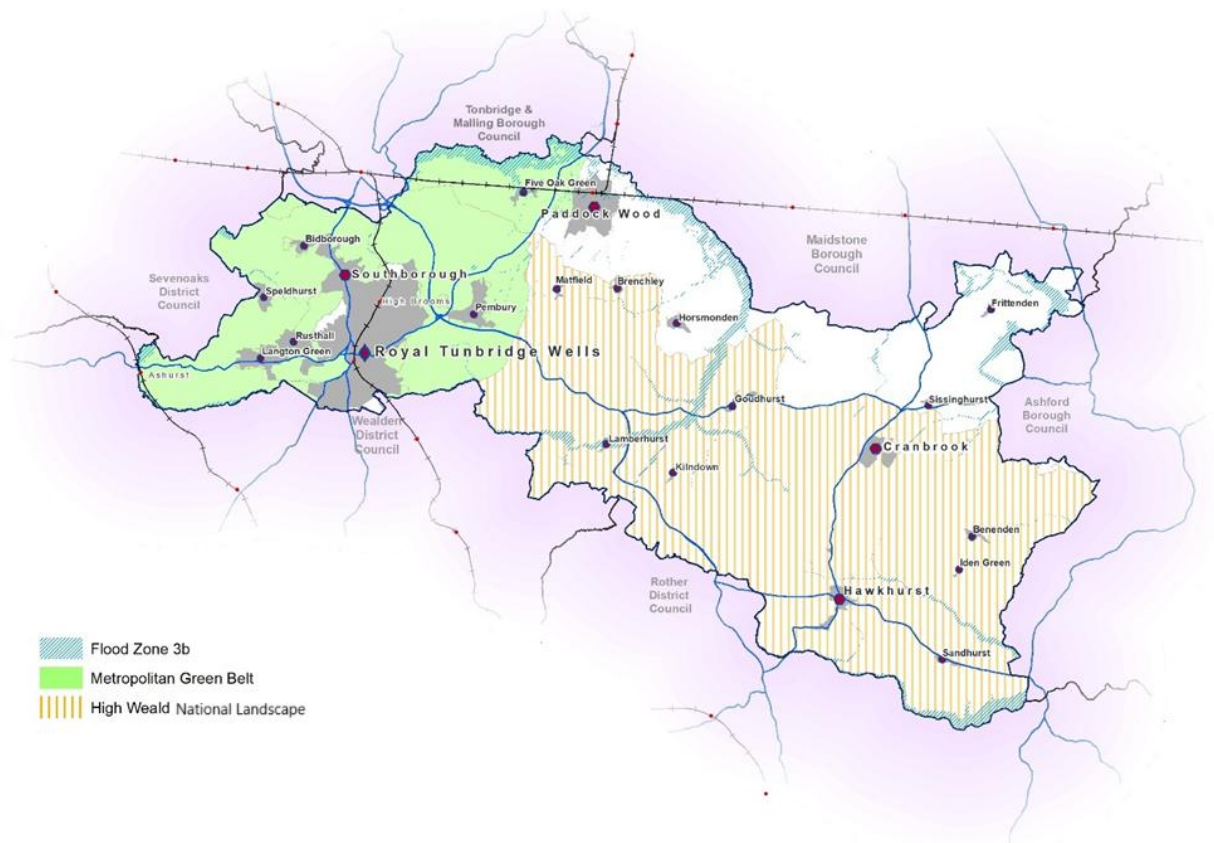


Figure 1: Borough Overview Map



# Population

Table 1: Population Projection for Tunbridge Wells Borough 2022-2042 (Source: ONS, 2018-Based Projections)

Data	2022	2026	2030	2034	2038	2042
Population	119,767	121,172	122,293	123,557	125,002	126,620

2.7 The projections in **Table 1** are those produced by the Office of National Statistics (ONS; [see ONS 2018 Population Projections for Local Authorities: Table 2](#)), using 2018-based data. They suggest that the borough's population is likely to increase by 6,853 (approximately 5.7%) over a 20-year period 2022-2042. The forecast also provides a breakdown of the population forecast by gender.

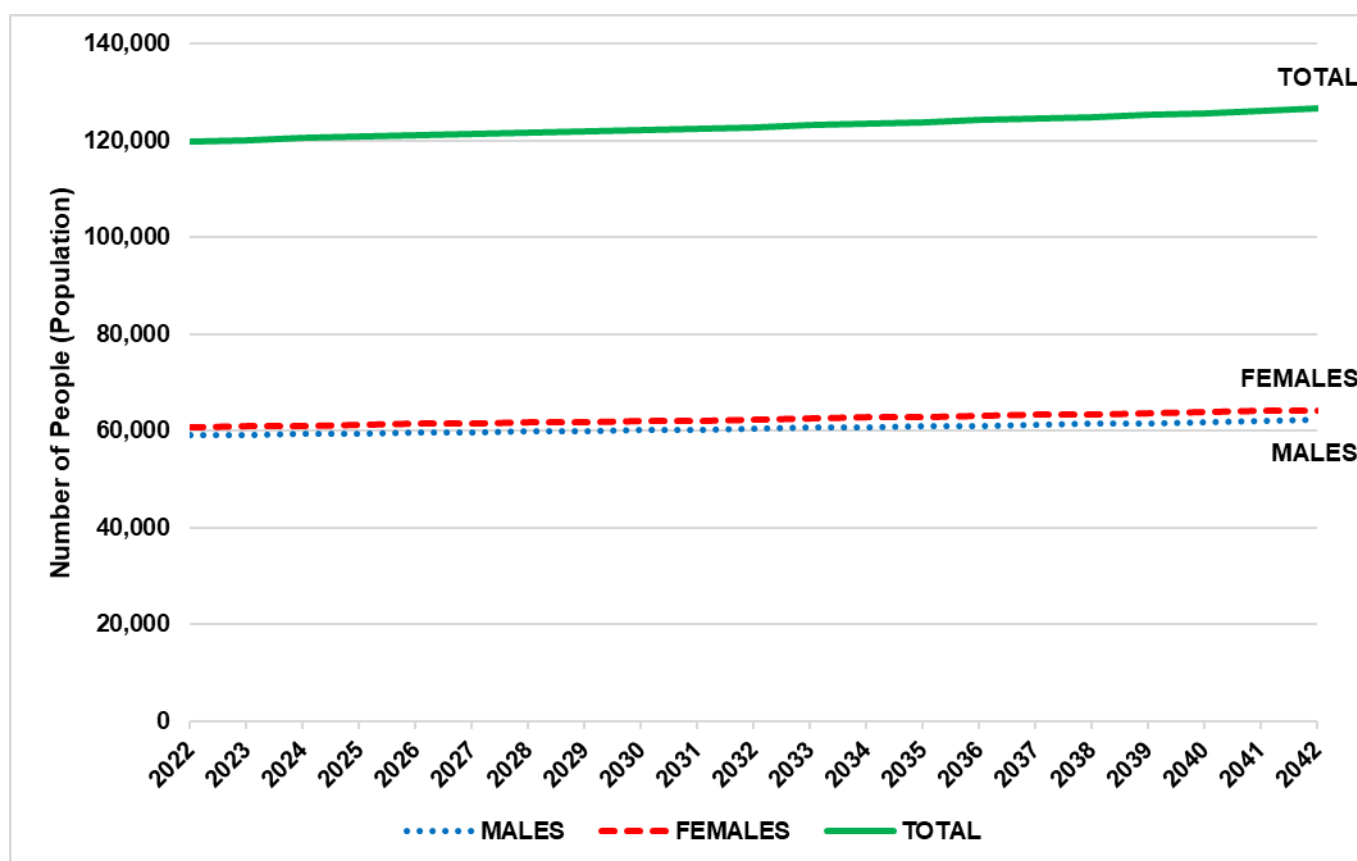


Figure 2: Population Projection by Gender for Tunbridge Wells Borough 2022-2042 (Source: ONS, 2018-Based Projections)

2.8 As shown in **Figure 2**, there are very slightly more females than males currently within the borough of Tunbridge Wells (1,640 more females than males in 2022). This gap is predicted to increase to around 2,052 individuals by 2042.

# Age Structure

2.9 From the borough population by age ([see ONS 2018 Population Projections for Local Authorities: Table 2](#)), it can be seen that the overall size of the population between 15-64 years of age is predicted to decrease by 0.7% between 2022 and 2042 and the child population (0-14) is set to decrease by around 8.8%. These are relatively modest decreases when compared to the increase of 41.1% in the 65 years and over category. **Figure 3** below illustrates this trend towards an ageing population.

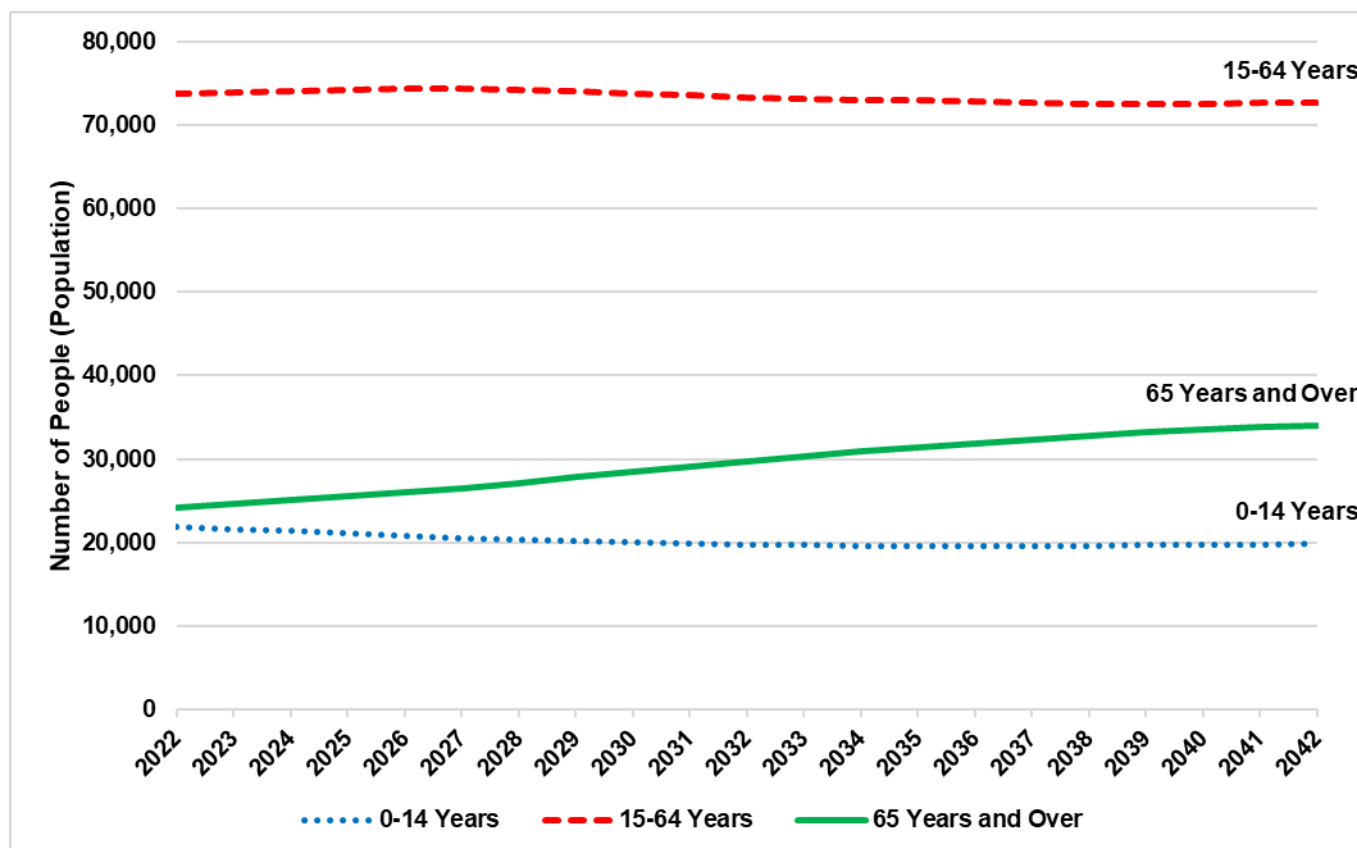


Figure 3: Population Projection by Age for Tunbridge Wells Borough 2022-2042 (Source: ONS, 2018-Based Projections)

# Household Projections

- 2.10 **Table 2** below shows that, based on past trends and future estimates, a 12.8% increase in the number of households in the borough is anticipated over a 20-year period to 2042.

Table 2: Household Projections for Tunbridge Wells Borough 2022-2042 (Source: ONS, 2018-Based Projections)

Data	2022	2026	2030	2034	2038	2042
Households	50,549	51,999	53,346	54,581	55,755	56,885

- 2.11 The above figures are based on the most recent, ONS 2018 Household Projections ([see ONS 2018 Household Projections for England](#)). However, it should be noted that the projected increase in households up to 2042 based on the latest 2018 data is much lower than the projected increase in the previous 2014 Household Projections, which were the figures used before the release of the NPPF 2024 in calculating the objectively assessed need via the standard method unless required otherwise by the Government. The standard method was amended alongside the release of the NPPF 2024 which changed the source of the baseline figure from the 2014 household projections to the existing housing stock, as set out in the [Planning Practice Guidance \(Paragraph: 004 Reference ID: 2a-004-20241212\)](#).
- 2.12 The [Submission Local Plan](#) was submitted and is being examined under the NPPF 2021 and will therefore aim to meet housing need based on the 2014-based household projections as calculated via the pre-2024 NPPF Standard Method. The Council's [Housing Needs Assessment](#) and [Housing Supply and Trajectory](#) Topic Papers, produced for the emerging Local Plan, had explained in more detail how this need was calculated, although it is noted that more recent updates to this need calculation can be found in the more recent [January 2024 Local Plan Development Strategy Topic Paper Addendum](#) and the latest Local Plan Housing Trajectory can be found [here](#). The Local Plan Review, which will commence following adoption of the Local Plan, will seek to plan for the housing figure derived from the NPPF 2024 standard method.
- 2.13 Projections are also available, albeit over a somewhat longer timeframe, between 2018 and 2043, of changes in types of household ([see ONS 2018 Household Projections for England](#)). As presented in **Table 3**, these show clear trends in increases in the number of one-person and two or more person households, as well as a relatively small decrease in the number of households with two and three or more dependent children.

Table 3: Projected Household Composition for Tunbridge Wells Borough 2018-2043 (Source: ONS, 2018-Based Projections)

Category of Households	2018	2043	% Change
One Person Households: Female	7,779	10,073	29.5%
One Person Households: Male	6,918	8,258	19.4%
Total: One Person Households	14,697	18,331	24.7%
Households with One Dependent Child	5,816	5,819	0.05%
Households with Two Dependent Children	5,595	5,357	-4.3%
Households with Three or More Dependent Children	2,623	2,496	-4.8%
Other Households with Two or More Adults	20,392	25,158	23.4%

## Ethnic composition

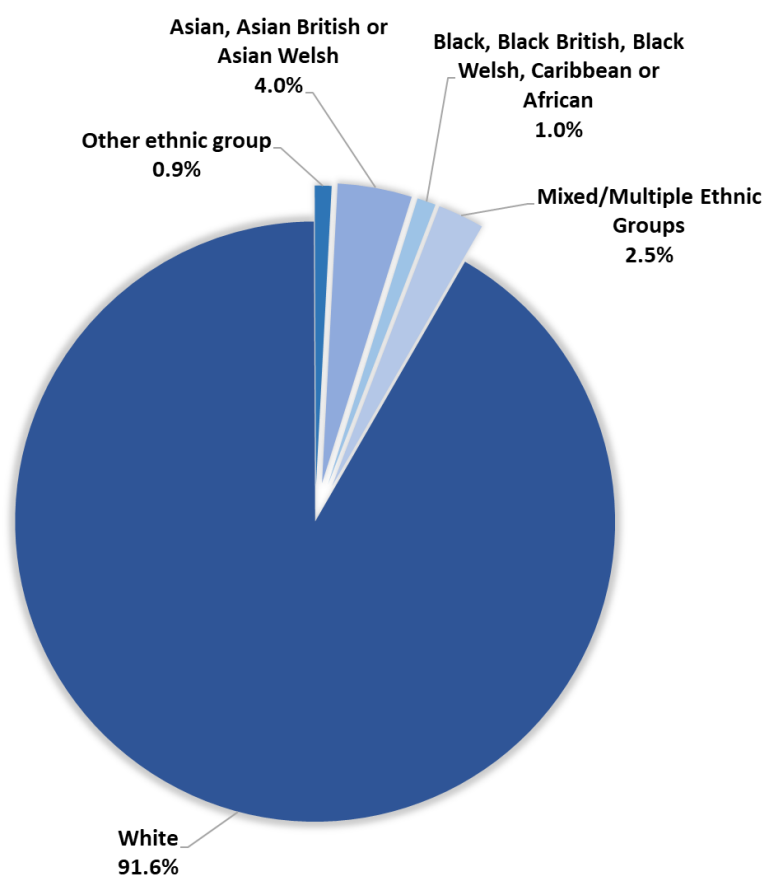


Figure 4: Tunbridge Wells Ethnic Composition as at 2021 Census (Source: ONS, 2022)

- 2.14 As shown in **Figure 4**, in 2021, 91.6% of the population was classified as White, which is slightly lower than in the 2011 Census at 94.9% (ONS, 2022; [see 2021 Census: Key Statistics for Local Authorities in England and Wales](#)).

## Deprivation

- 2.15 The Index of Multiple Deprivation (IMD) provides a weighted average figure for the levels of deprivation in an area and were most recently published in 2019 (MHCLG, 2019: [see English Indices of Deprivation](#)). It is reported at the spatial scale of Lower Super Output Areas (LSOAs). The IMD consists of six separate 'domain' indices, which are weighted as follows in order to arrive at an overall IMD value: Education, Skills Training 13.5%, Employment 22.5%, Crime 9.3%, Health Deprivation & Disability 13.5%, Barriers to Housing and Services 9.3%, Income 22.5%, and Living Environment 9.3%.
- 2.16 Based on their IMD value, it is possible to rank all LSOAs across the country with a view to assessing relative deprivation. **Table 4** identifies the 2015-2019 difference in IMD rankings across the borough by number of LSOAs, and **Figure 5** shows where the LSOAs in Tunbridge Wells fall within the overall national ranking of LSOAs in 2019; the lower the percentage, the more deprived an area is. One LSOA, in Sherwood ward, falls within the 0-20% most deprived category; five LSOAs (in the Broadwater, Southborough and High Brooms, Rusthall and Sherwood wards) fall within the 20.01-40% most deprived category. There has been a small decline in the 60-100% least deprived categories across the borough, with more areas now scoring <60%.

Table 4: 2015-2019 Difference in IMD Rankings Across the Tunbridge Wells Borough by Number of LSOAs (Source: MHCLG, 2019)

No. of Lower Super Output Areas				
Level of Deprivation	Percentage	2015	2019	Change
Most Deprived	0.00-20.00	1	1	0
	20.01-40.00	3	5	+2
	40.01-60.00	13	15	+2
	60.01-80.00	21	18	-3
Least Deprived	80.01-100.00	30	29	-1

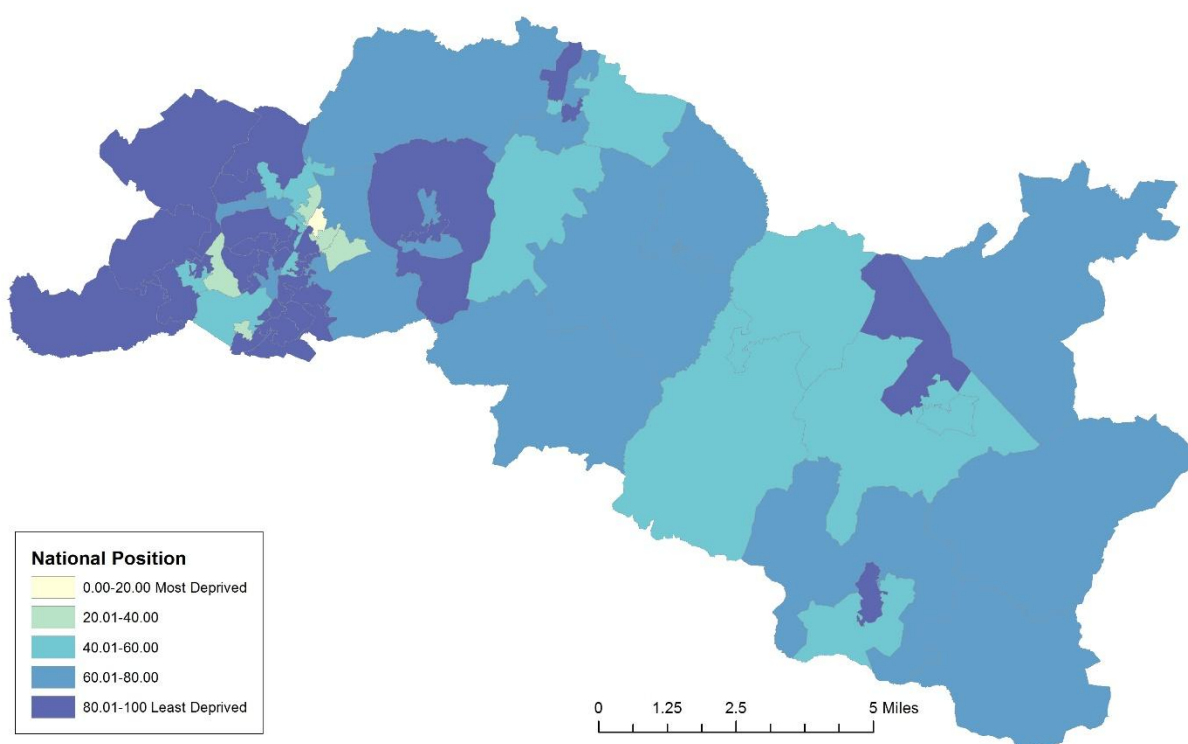


Figure 5: 2019 IMD Scores Across the Tunbridge Wells Borough (Source: MHCLG, 2019)

## School Provision Across the Borough

- 2.17 **Figure 6** illustrates the number of pupils currently on roll as well as the capacity of schools at both primary and secondary level (KELSI, 2024; see [Facts and Figures](#)). The green lines represent the space availability (%) at both primary and secondary schools across the borough.
- 2.18 **Figure 6** shows that, the number of pupils on roll have increased consistently for both primary and secondary schools in the last decade. In recent years, the number of primary school pupils has plateaued but secondary school pupil numbers have observed a notable increase. While the availability of places has fluctuated, it has been able to keep up with demand. Since 2012, there has generally been an increase in the availability of primary school capacity within the borough although it has fallen in recent years to 7.4% (from a high of 9.16% in 2021) . Whilst secondary school capacity has been consistently able to meet the demand of a growing number of secondary school pupils on roll the availability of space has gradually fallen since 2012. Since 2020, the availability of space has fluctuated year and year, currently standing at 5.20% (down from 6.48% in 2022). It should be noted that while this presents the borough-wide position, there may be local variations.

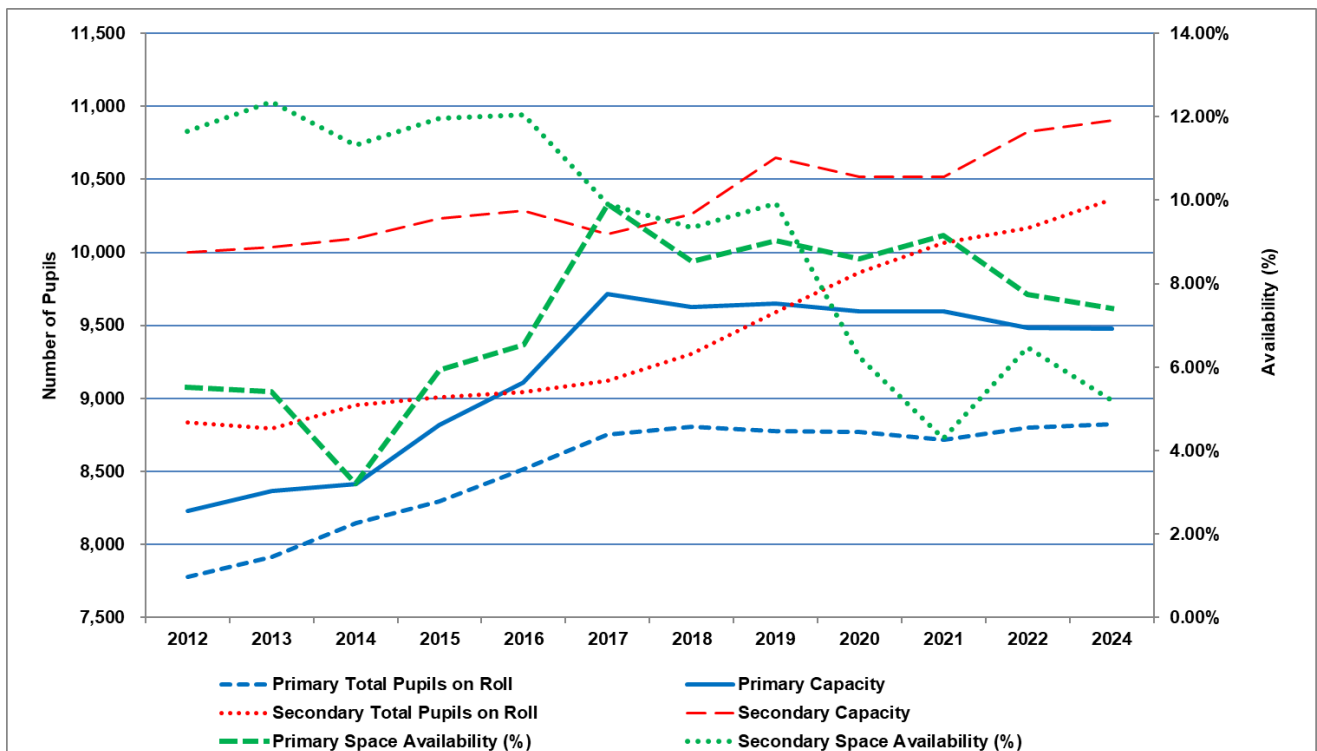


Figure 6: School Provision Across the Borough (Source: KELSI, 2024)

# Crime

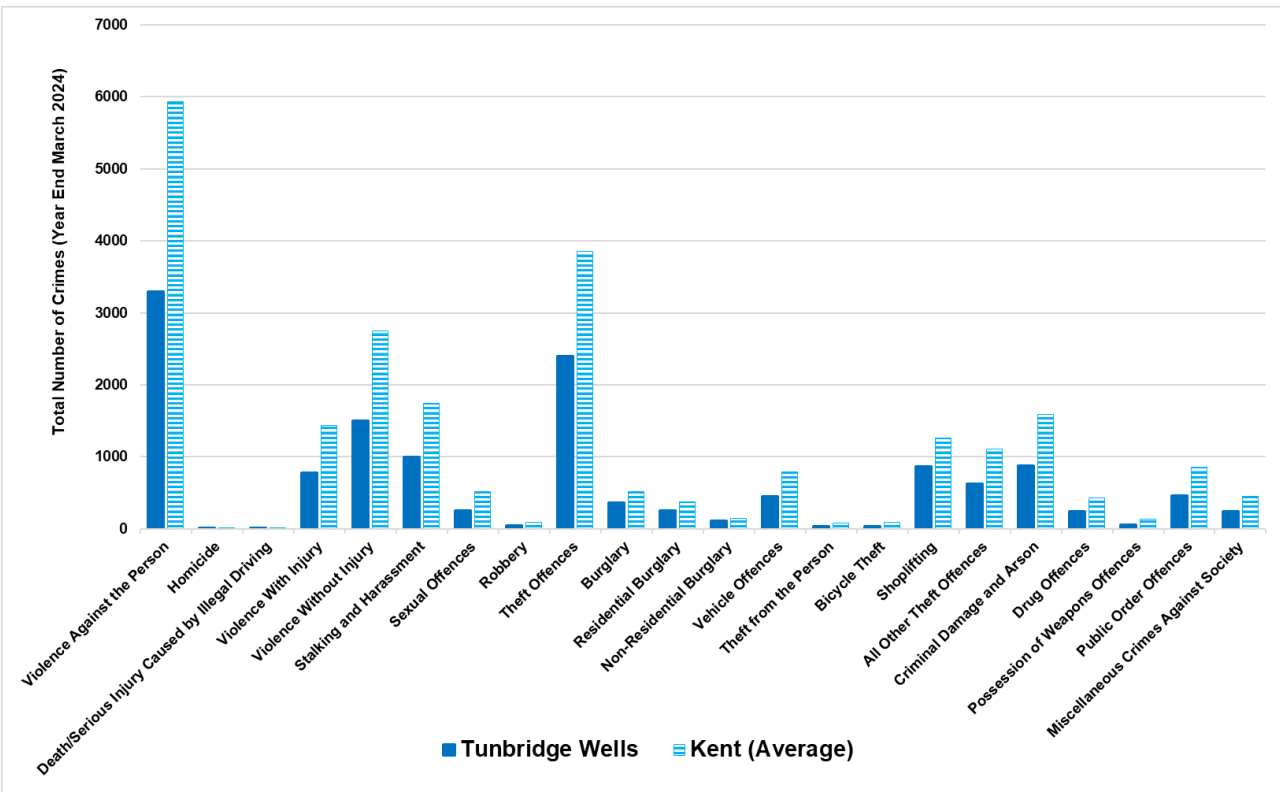


Figure 7: Level of Crime Across the Borough, Year Ending March 2024 (Source: ONS, 2024)

2.19 The borough experiences a lower level of crime than the average found across the county of Kent (in most cases around half the average). **Figure 7** illustrates the differences in crime rates between Tunbridge Wells and the Kent average (ONS, 2024; [see Recorded Crime Data by Community Safety Partnership Area](#)). It can be seen that differences exist across all crime types.

# House Prices

2.20 **Figure 8** below shows average house prices across Tunbridge Wells, Kent and South-East England by quarter from January 2006 to September 2024 (HM Land Registry, 2024; [see UK House Price Index](#)). It shows that Tunbridge Wells borough continues to have higher average house prices than the average for Kent and South-East England. It also shows that average house price trends in all three areas have followed a similar pattern. Between March 2006 and September 2024, the average price of a house in Tunbridge Wells has increased by £222,492; an increase of 95%. Comparatively, increases of 90% (£165,303) and 89% (£180,378) have been seen across Kent and South-East England respectively.



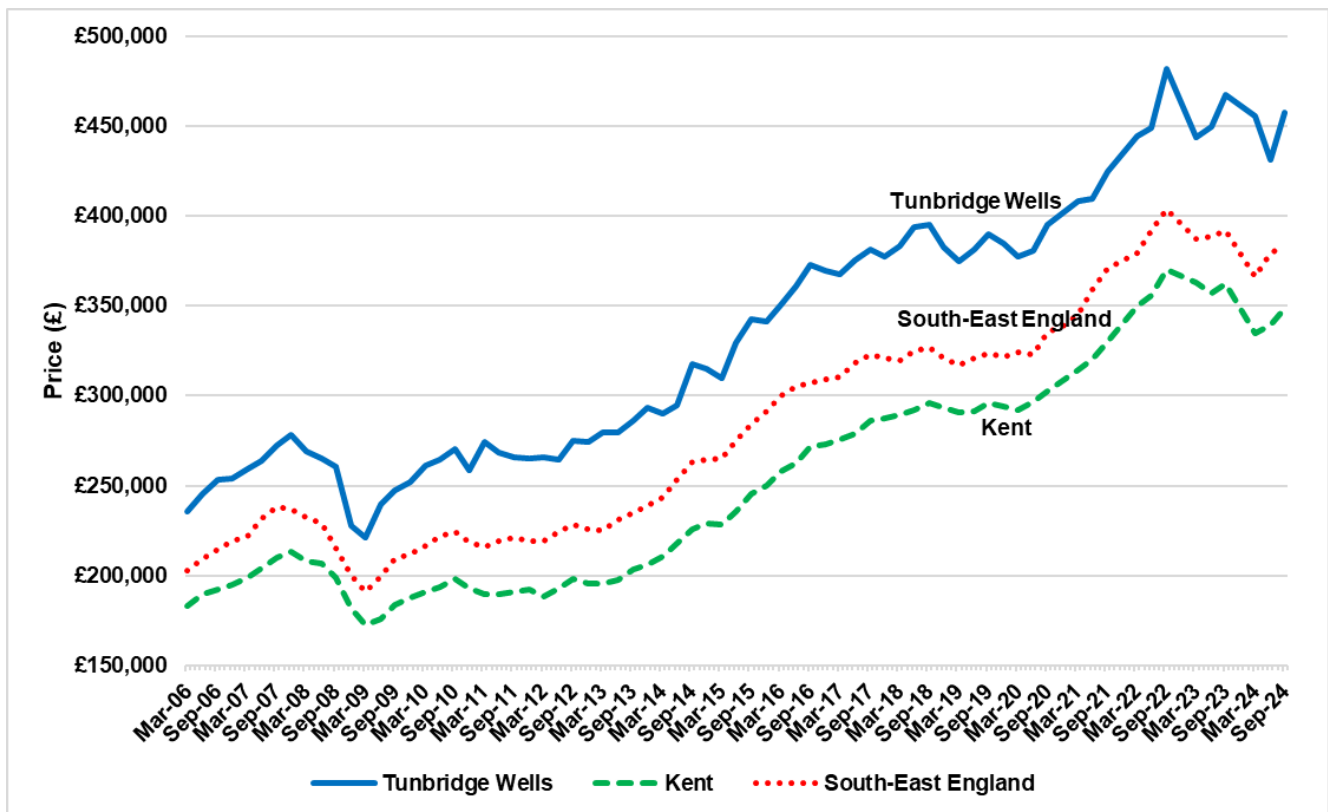


Figure 8: Average House Prices in Tunbridge Wells Borough, Kent, and South-East England (Source: HM Land Registry, 2024)

2.21 **Figure 9** shows that the higher relative house prices in the borough applies across all house types as at September 2024 (HM Land Registry, 2024; [see UK House Price Index](#)).

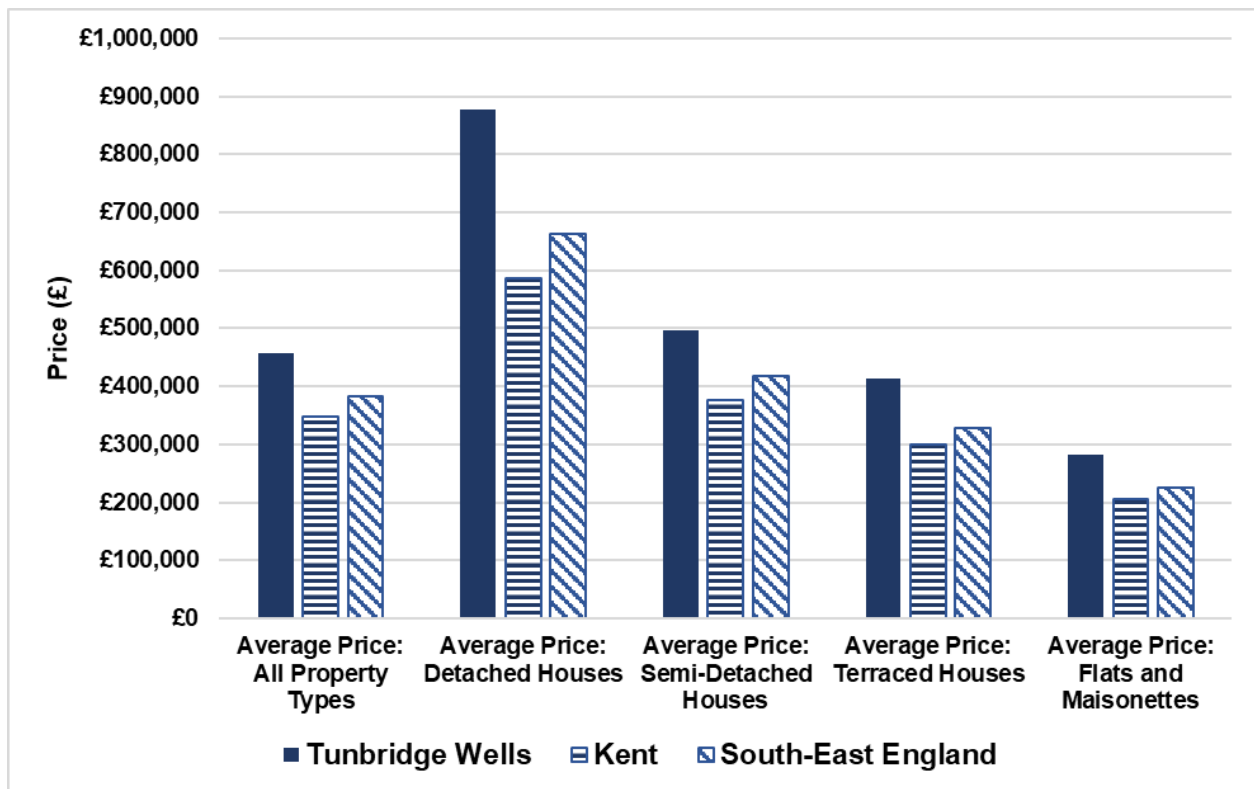


Figure 9: Average House Prices by Dwelling Type in Tunbridge Wells Borough, Kent, and South-East England as at September 2024 (Source: HM Land Registry, 2024)

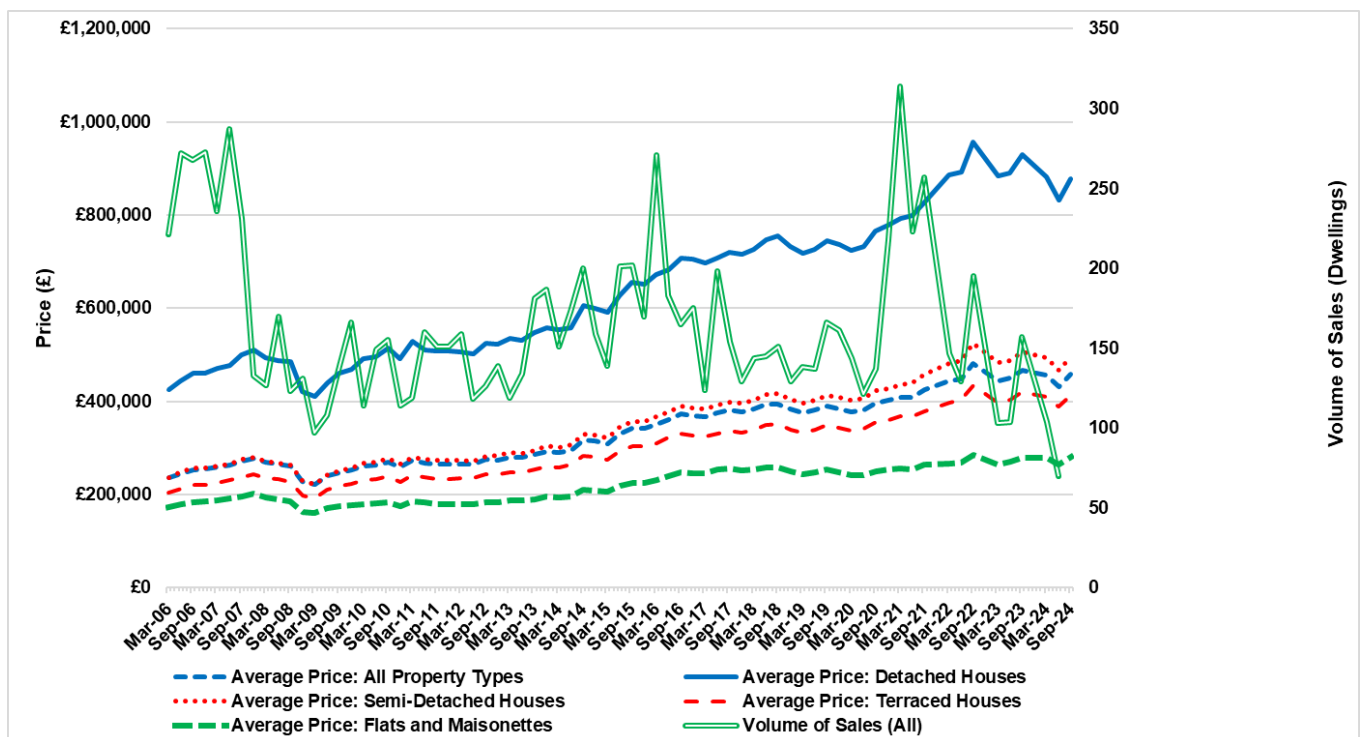


Figure 10: House Prices by Dwelling Type, and Volume of Sales in Tunbridge Wells Borough (Source: HM Land Registry, 2024)

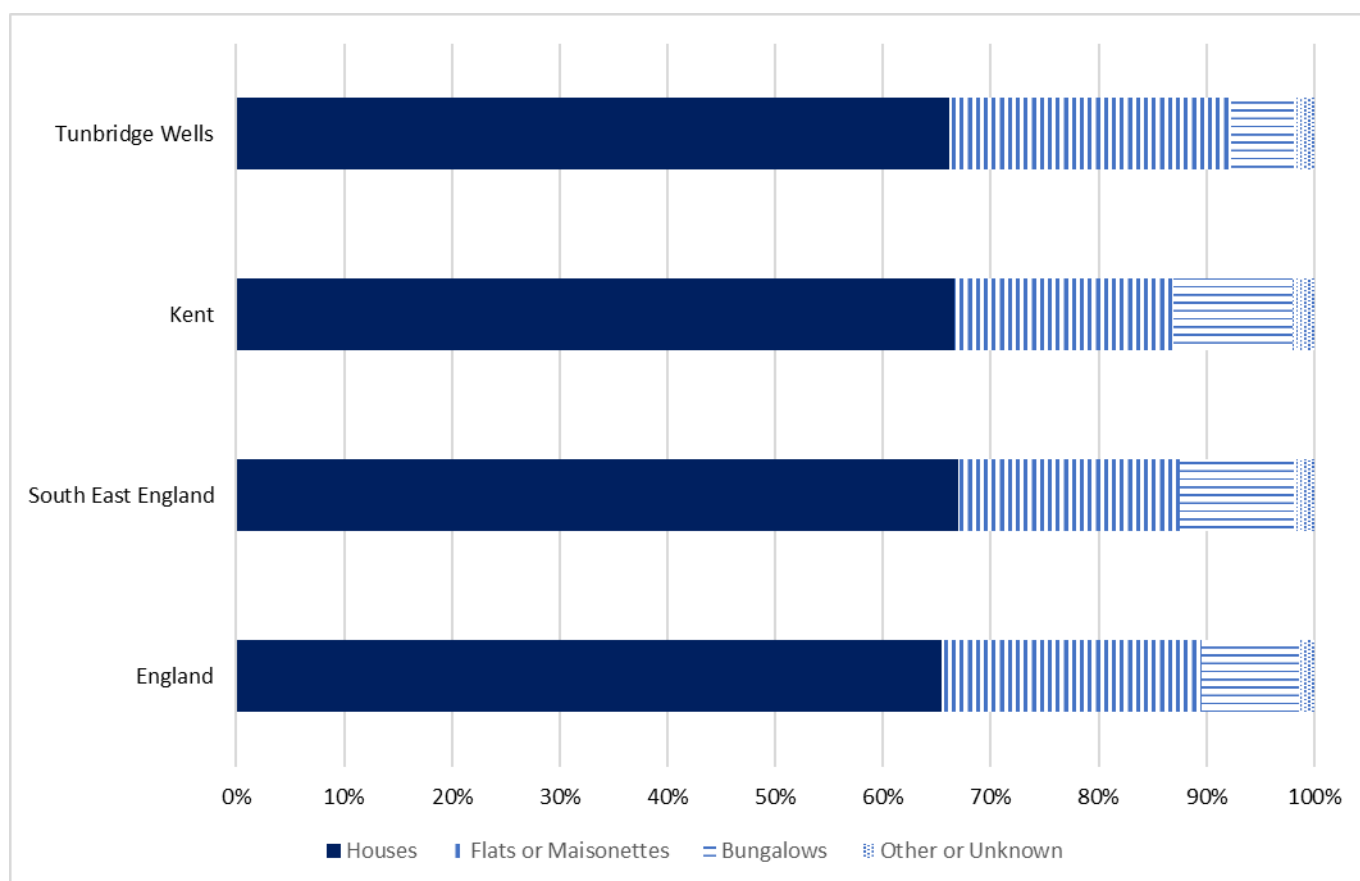
2.22 **Figure 10** shows that, following a fall in average house prices for all types of dwellings around the end of 2008, all types have experienced a rising trend in

average prices (HM Land Registry, 2024; [see UK House Price Index](#)). The largest increase was in the price for detached dwellings, which is 106% higher in September 2024 than in March 2006. Since September 2022, house prices across all property types have fluctuated, with house prices being 5% lower in September 2024. In terms of the volume of sales, **Figure 10** also shows that in June 2024 the lowest number of sales since 2006 was recorded (70).

## Dwelling Stock

2.23 **Figure 11**, shows that, as at 31 March 2024, the residential dwelling stock of Tunbridge Wells Borough consists of approximately the same percentage of houses, a higher percentage of flats/maisonettes, and a lower percentage of bungalows compared to national, regional and county figures. See [KCC, 2024; Statistical Bulletin October 2024, Housing Stock in Kent](#).

Figure 11: Dwelling Stock by Dwelling Type as at 31 March 2024 (Source: KCC, 2024)



2.24 As shown in **Figure 12**, in terms of tenure balance, as at 31 March 2023 92% of the dwelling stock within the Borough is owner occupied or private rented accommodation, which is higher than the average for England at 83%, but less than that for Kent at 87% ([See KCC, 2024; Statistical Bulletin October 2024, Housing Stock in Kent](#)). The majority of the remaining stock in the borough is owned by

Private Registered Providers (14%). Only 0.11% of the dwelling stock in the borough is owned by the Local Authority, compared to 4.45% and 6.19% in Kent and England respectively.

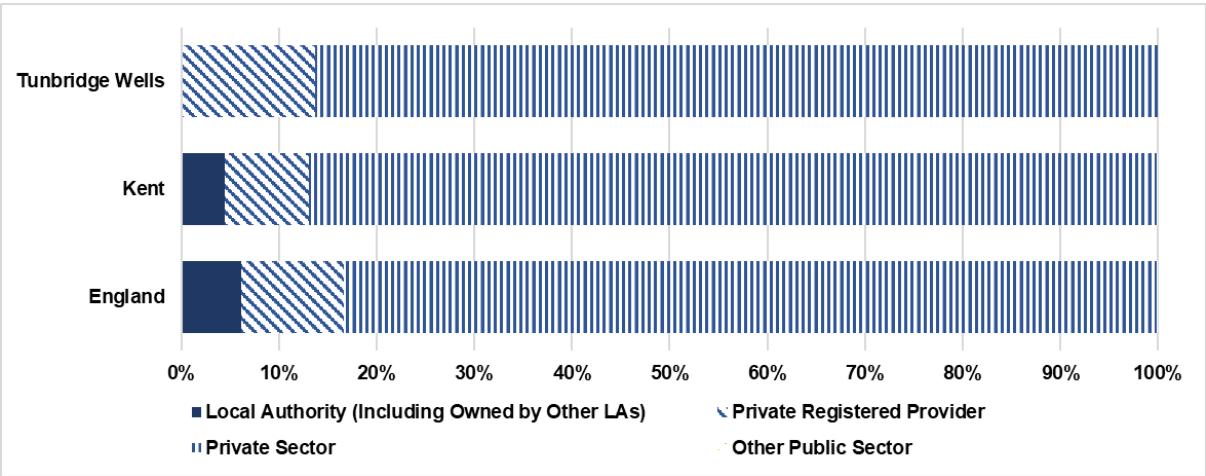


Figure 12: Dwelling Stock by Tenure as at March 2023 (Source: KCC, 2024)

2.25 **Table 5** shows the annual increase in the dwelling stock in Tunbridge Wells borough, Kent, and England over the last 5 years ([KCC, 2024](#); see [Statistical Bulletin October 2024, Housing Stock in Kent](#)). This indicates a 4% increase for Tunbridge Wells, compared to 4.35% for Kent and 3.8% for England.

Table 5: Total Dwelling Stock as at 31 March 2023 (Source: KCC, 2024)

Area	2019	2020	2021	2022	2023
Tunbridge Wells	50,085	50,402	50,935	51,453	52,089
Kent	679,132	685,905	693,168	700,949	708,630
England	24,461,243	24,709,834	24,927,588	25,160,404	25,396,447

# Housing Affordability

2.26 Affordability ratios provide an important indication of the level of housing affordability in an area, measured as the ratio of house prices to annual workplace-based earnings; therefore, generally, the lower the ratio, the more housing is considered to be affordable in relation to incomes. **Figure 13** shows that in 2024, the lower quartile affordability ratio was 11.23 in Tunbridge Wells, representing a 11% increase since 2006 (ONS, 2025; see [House Price to Workplace-Based Earnings Ratio](#)), albeit the ratio has improved from a high of 14.49 in 2021. Indeed, the relative affordability of homes in Kent as a whole has followed a similar negative trend in both absolute terms and relative to the rest of England, albeit has remained below the ratio in Tunbridge Wells. This trend is likely to largely reflect the relative economic strength of London and its housing market.

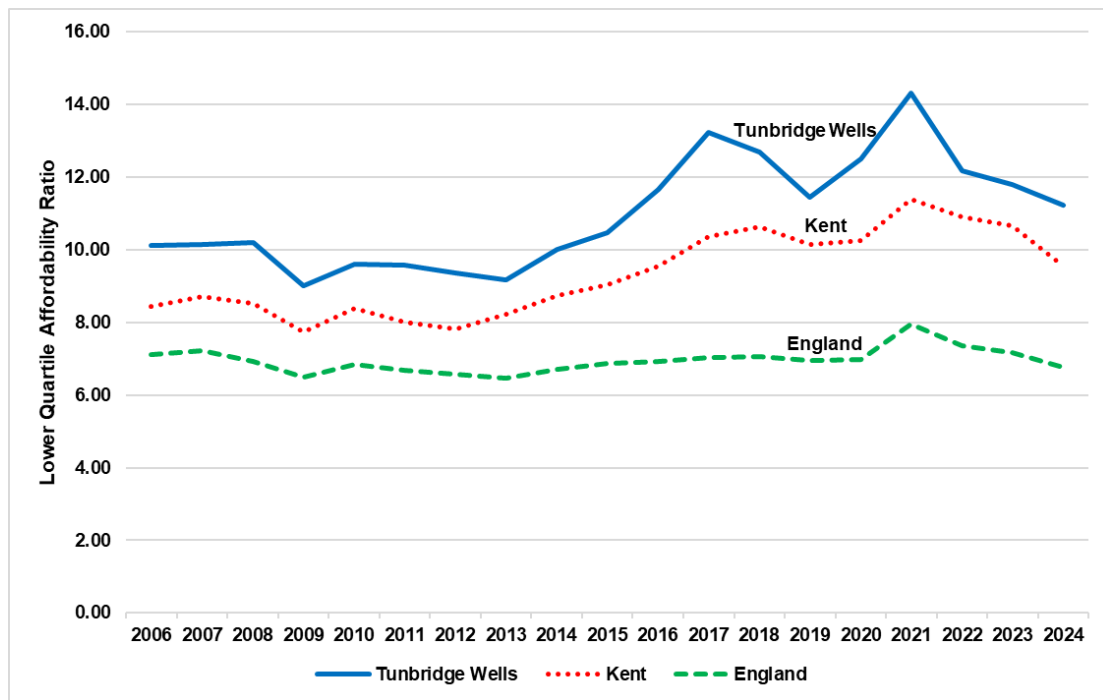


Figure 13: 2006-2024 Ratio of Lower Quartile House Prices to Lower Quartile Gross Annual Workplace-Based Earnings in Tunbridge Wells, Kent, and England (Source: ONS, 2025)

2.27 **Figure 14** shows the median house price to median gross annual workplace-based ratio. A similar pattern can be identified, with Tunbridge Wells' affordability ratio being worse off than both the County and Country. In 2024, the median affordability ratio was 11.51 in Tunbridge Wells, representing a 16% increase since 2006, from 9.92.

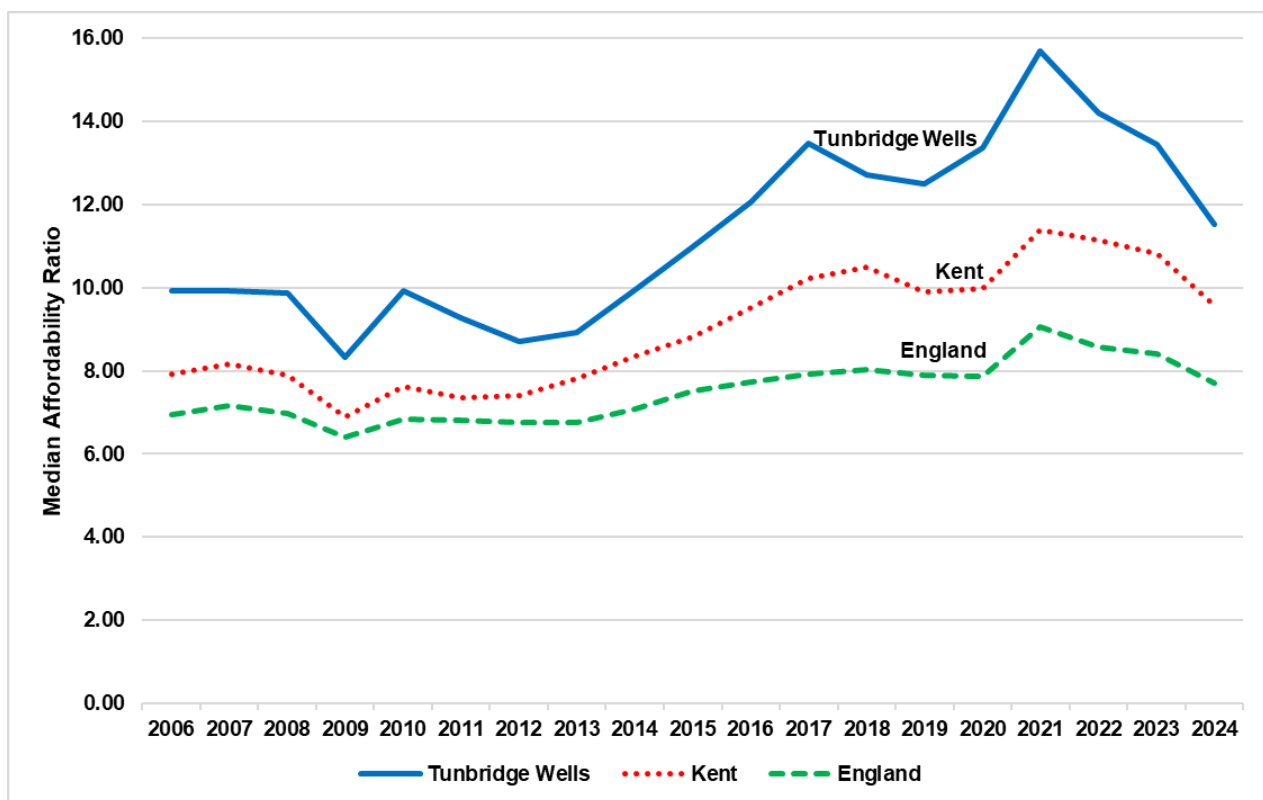


Figure 14: 2006-2023 Ratio of Median House Prices to Median Gross Annual Workplace-Based Earnings in Tunbridge Wells, Kent, and England (Source: ONS, 2025)

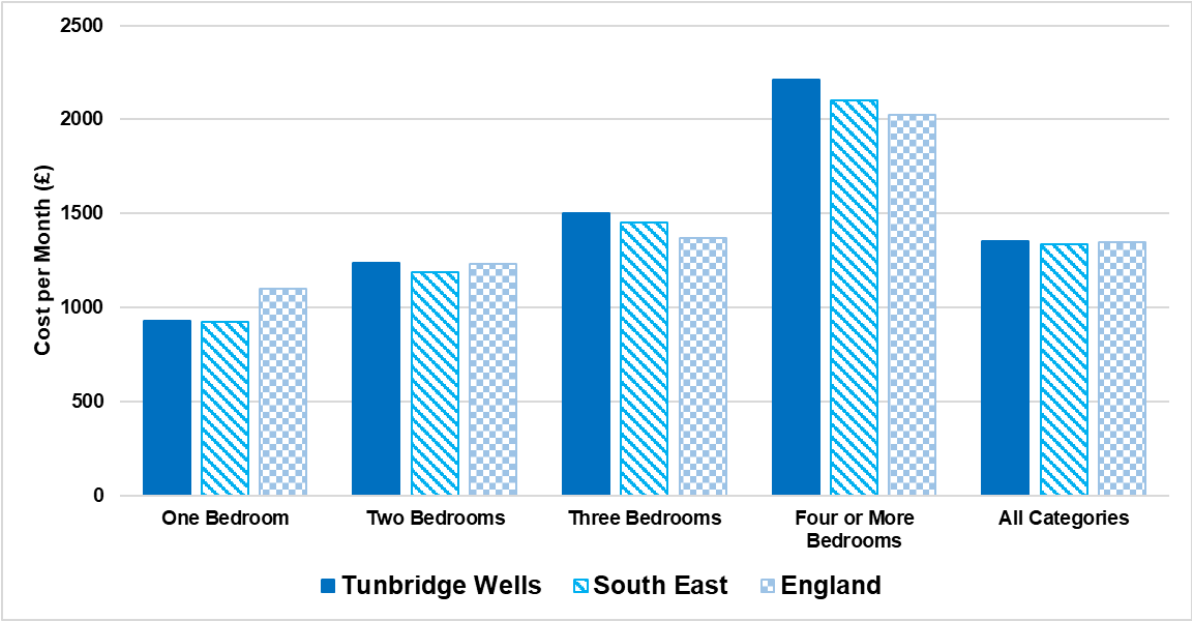


Figure 15: Average Private Rent in Tunbridge Wells, South East, and England for at October 2024 (Source: ONS, November 2024)

2.28 **Figure 15** shows that it is also more expensive to rent all types of property in Tunbridge Wells borough with the exception of one bedroom properties when compared with the South East and England figures (ONS, 2024; [see Private Rent and House Prices November 2024](#)). The largest difference is found on four or more bedroomed properties, where the mean/average monthly private rent is 5% and 9% greater in Tunbridge Wells than in the South East and England respectively.

## Economy and Business

- 2.29 The data in this sub-section is obtained from NOMIS (2024; [see Labour Market Profile – Tunbridge Wells](#)). **Figure 16** shows that the number of people in Tunbridge Wells borough who are economically active (i.e., those in work or actively seeking work) has fluctuated significantly from 2004/2005 to 2023/2024. The percentage of the population in the borough that are economically active has likewise fluctuated over the same period. The percentage has fluctuated between 74.2% (April 2014–March 2015) and 84% (July 2023 – June 2024). This recent high percentage followed a low percentage of 74.9% between October 2021 and September 2022.
- 2.30 As shown in **Table 6**, the total number of jobs has also increased in the borough from 57,000 in 2013 to 65,000 in 2022 (the last date for which information is available), and likewise job density (measured as a ratio of total jobs to population aged 16-64) has increased from 0.80 to 0.93 suggesting that there has been an increase in employment opportunities for the 16-64 age group in absolute and relative terms. As shown in **Table 7**, although there is no data on the number of employee jobs prior to 2015, the number of employee jobs has decreased from

61,000 in 2015 to 52,000 in 2023, despite increasing by 3,000 since 2020. These changes may suggest that there may have been an increase in the number of those in self-employment (as the number of total jobs decreased by only 8,000 between 2015 and 2022).

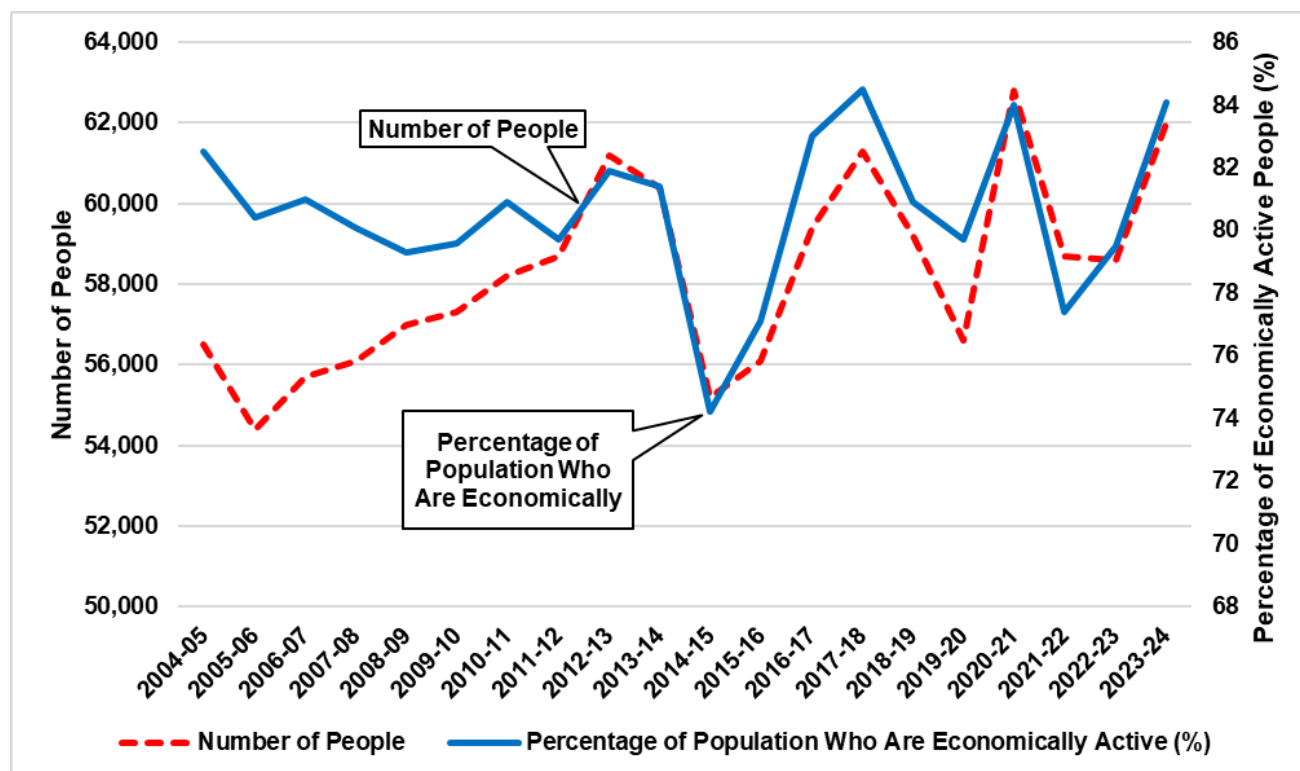


Figure 16: Number of Economically Active People Aged 16 and Over, and Percentage of Economically Active People Aged 16-64 in Tunbridge Wells Borough between 2004 and 2024.(Source: NOMIS, 2024)

Table 6: Total Number of Jobs and Job Density in Tunbridge Wells Borough 2013-2022 (Source: NOMIS, 2024)

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Total Jobs	57,000	65,000	73,000	66,000	65,000	62,000	65,000	66,000	71,000	65,000
Job Density	0.8	0.91	1.02	0.92	0.90	0.86	0.91	0.92	1.01	0.93

Table 7: Employee Jobs in Tunbridge Wells Borough 2015-2023 (Source: NOMIS, 2024)

Employee Jobs	2015	2016	2017	2018	2019	2020	2021	2022	2023
Total Employee Jobs	61,000	53,000	51,000	50,000	51,000	49,000	52,000	51,000	52,000

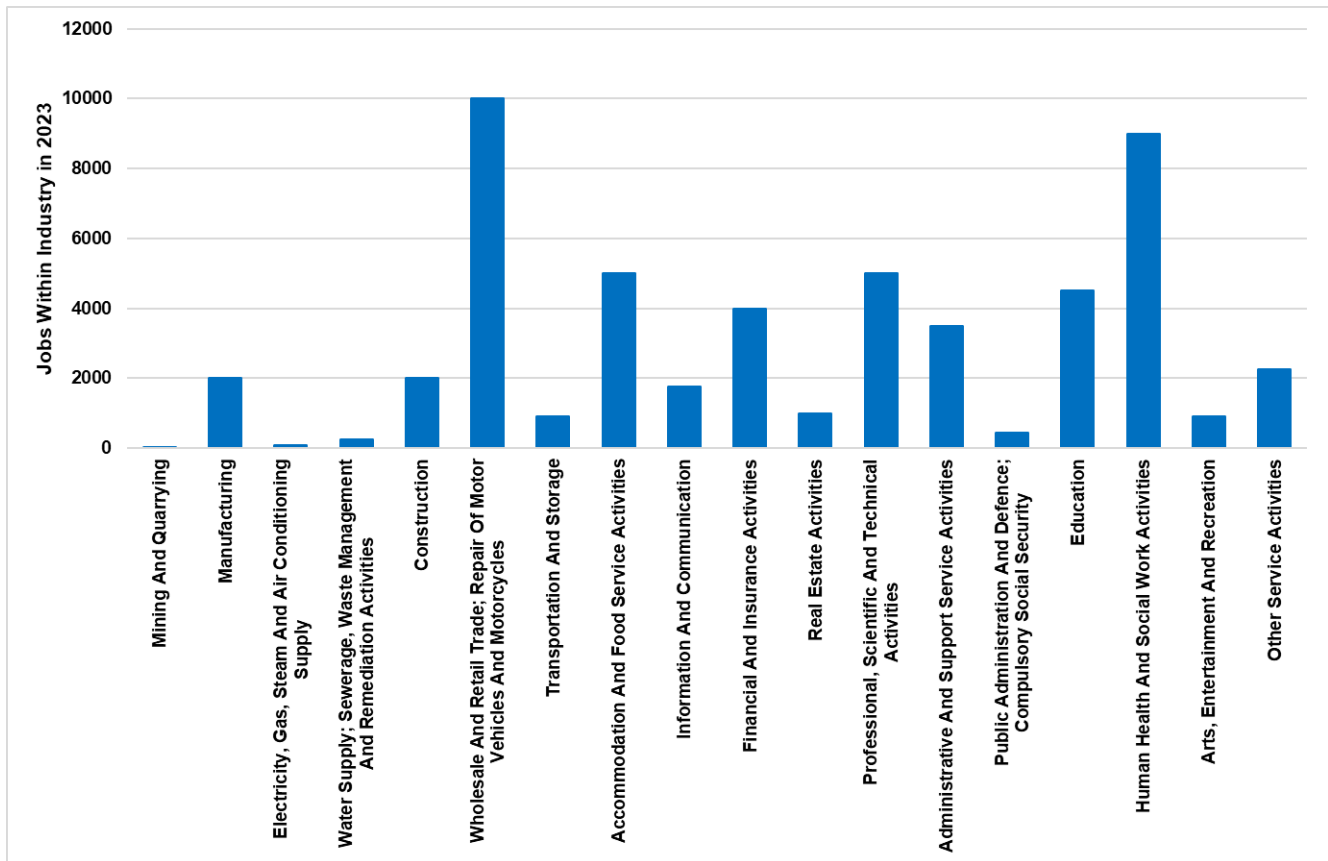


Figure 17: Employee Jobs Within Tunbridge Wells Borough by Industry in 2023 (Source: NOMIS, 2024)

2.31 **Figure 17** provides an overview of the makeup of jobs across the borough. As such, it is evident that the largest industries in the borough are Wholesale and Retail Trade and Human Health and Social Work Activities, followed by Professional, Scientific and Technical Activities and Accommodation and food service activities.



# Unemployment

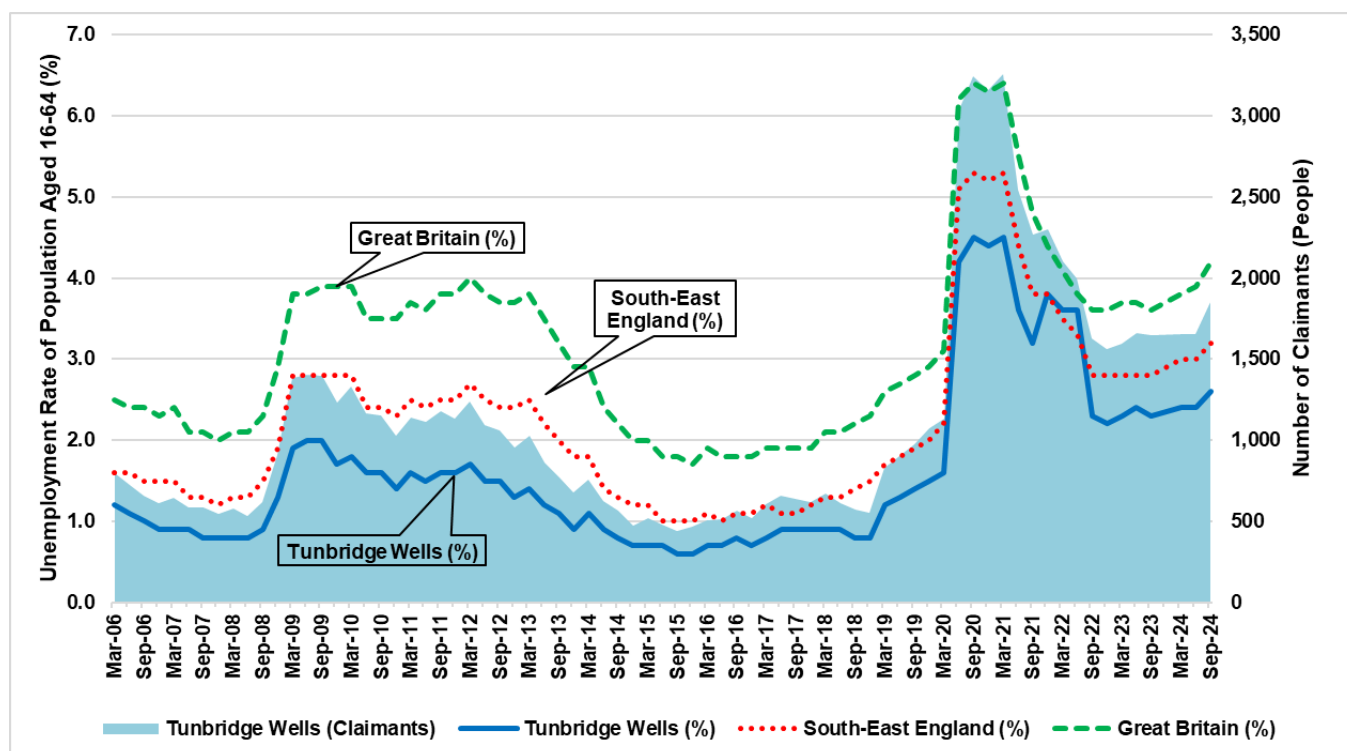


Figure 18: Unemployment Rate of Population Aged 16-64 (%) and Number of Claimants in Tunbridge Wells, South-East England, and Great Britain by Quarter from March 2006 – September 2024 (Source: NOMIS, 2024)

2.32 **Figure 18** illustrates the trends in unemployment rates of the population aged 16-64 and the number of benefit claimants across the Tunbridge Wells borough, South-East England, and in Great Britain (NOMIS, 2024; [see Labour Market Profile – Tunbridge Wells](#)). This shows that, while unemployment in Tunbridge Wells has fluctuated since March 2006, it was largely the same/following previous trends as at March 2020, albeit showing a notable increase in unemployment rates and the number of benefit claimants in the borough since December 2018. However, reflecting the impact of the COVID-19 pandemic on the economy and government-imposed national lockdowns, unemployment rates and the number of claimants rose significantly above any previous rate/number in this period at all three area levels from March 2020 to March 2021. From a peak unemployment rate in March 2021, numbers declined rapidly, falling 35.5% by March 2022. Since then, although unemployment rates have fluctuated a little, the unemployment rate in Tunbridge Wells has consistently remained lower than both the rate found in South-East England and Great Britain overall.

# Businesses

2.33 **Table 8** illustrates that, between 2012 and 2024, there was a 9.5% increase in the number of enterprises in the borough (NOMIS, 2024; [see Labour Market Profile – Tunbridge Wells](#)).

Table 8: Total Number of Enterprises in Tunbridge Wells Borough 2012-2024 (Source: NOMIS, 2024)

Year	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Tunbridge Wells	5,600	5,555	5,755	6,115	6,225	6,335	6,365	6,420	6,330	6,300	6,245	6,130	6,130

Table 9: Median Gross Weekly Pay for Full Time Workers From 2006-2024 (Source: NOMIS, 2024)

Year	Tunbridge Wells (£)	South-East England (£)	Great Britain (£)
2006	433.3	469.0	444.8
2007	489.7	481.9	459.3
2008	474.1	500.9	479.1
2009	463.5	513.3	489.9
2010	483.0	523.8	500.3
2011	488.7	529.0	500.0
2012	555.1	536.6	507.9
2013	513.7	536.6	517.6
2014	521.1	541.7	520.4
2015	517.9	552.0	528.5
2016	523.9	565.4	540.1
2017	514.8	574.9	552.0
2018	536.4	589.1	570.2
2019	564.0	614.0	587.0
2020	563.2	608.6	586.7
2021	577.0	635.0	612.8
2022	623.2	664.3	584.5
2023	684.1	709.1	689.6
2024	686.4	754.1	729.6

2.34 As shown in **Table 9**, the average (median) gross weekly pay for full time workers in Tunbridge Wells Borough has been lower than both the average within South-East England and the average found across Great Britain (with the exception of 2022). It should be noted that the values presented are for employees working in the area and therefore does not consider those who live within the borough but commute elsewhere for work.

# Environment

- 2.35 Both the natural and built environment of the borough are of high quality. Nearly 70% of the borough designated as High Weald National Landscape (NL) (previously known as Area of Outstanding Natural Beauty) is of national significance, and all areas have distinct landscape and environmental characteristics much valued by residents, with commons, village greens, and parks providing important spaces and links to the countryside.
- 2.36 Also, around 22% of the western part of the borough surrounding Royal Tunbridge Wells, Southborough, Pembury and other villages, and abutting the western edge of Paddock Wood, is Metropolitan Green Belt, which contributes significantly to the discrete identity and setting of settlements.
- 2.37 Together, the NL and Green Belt cover 75% of the borough, with substantial overlaps. **Figure 1** shows the extent of the NL and Green Belt in the borough.
- 2.38 The borough supports a network of biodiversity sites, including 10 Sites of Special Scientific Interest, 60 Local Wildlife Sites, 16 Sites of Local Nature Conservation Value, 13 Roadside Nature Reserves, and four Local Nature Reserves and 9 Candidate Local Nature Reserves.
- 2.39 There is also an extensive network of public rights of way which provides public access to many parts of the borough, supporting the natural and built environment as an important public recreation and amenity resource, and with potential to enhance health and wellbeing.
- 2.40 In addition, the historic environment is intertwined with the evolution of the landscape, in terms of the rural setting of both assets and settlements, and as a determinant of the historic pattern of economic and agricultural activities and uses.
- 2.41 The Council requires Biodiversity Net Gain (BNG) from all new relevant development under existing policies and national guidance and will update its practice when BNG becomes mandatory under the Environment Act in 2024. Set out below is the data for the provision of BNG achieved as of 2024 off site and where significant on site. The Council is preparing to collate data from Mandatory BNG that will be set out in the Councils Biodiversity Report as required by the Biodiversity Duty. The First Considerations for the Biodiversity Report were [published in December 2023](#) and the first full report will be published in autumn 2025. The data from the Biodiversity Report will be fed into the AMR.

## Historic Environment

- 2.42 The borough is rich in historic features and has a significant breadth of designated and non-designated heritage assets, including listed buildings, conservation areas, scheduled ancient monuments, historic parks and gardens, agricultural buildings and farmsteads, historic routeways, medieval field patterns, and ancient woodland.

The features of the historic environment fall under themes that are particular to the borough, and are identified in the borough's [Historic Environment Review](#).

- 2.43 The borough contains 2,857 buildings of architectural or historic interest, which make a significant contribution to the quality and distinctiveness of the local environment. The borough also contains 25 conservation areas, within which the combination of the buildings, spaces, and landscape is of great importance in creating the distinctive character of the area.

## Natural Environment

- 2.44 Reference should be made to the Council's published report, Biodiversity Evidence Base for the Pre-Submission Local Plan, February 2021, which brings together baseline information on biodiversity to inform the Local Plan process ([see Biodiversity Evidence Base for Pre-Submission Local Plan](#)).
- 2.45 The latest information on the condition of the 24 units in the 10 Sites of Special Scientific Interest (SSSIs) in the borough is provided by [Natural England \(2024\)](#) and summarised in **Table 10** below. It shows 67% of SSSI units to be in either favourable or unfavourable recovering condition.

Table 10: SSSIs in Tunbridge Wells - Condition of Units (Source: Natural England, 2024)

Condition	Percentage of SSSI Units
Favourable	46%
Unfavourable Recovering	21%
Unfavourable No Change	0%
Unfavourable Declining	33%

- 2.46 Local Wildlife Sites (LWS) are non-statutory sites which are identified and designated locally. The proportion of LWS in positive management for the reporting period April 2017 – March 2018 was 48% (29/60), set against a county figure of 43% (193/454). A number of sites previously counted as being in management are now excluded due to having finished and not renewed their Woodland Grant Scheme or Environmental Stewardship agreements.

Table 11: Proportion of LWS in Positive Management

Year	Tunbridge Wells	Kent (Excluding Medway)
2017/2018	29/60, 48%	193/454, 43%

## Flood Risk

- 2.47 The Borough Council has commissioned and published both a [Level 1 and 2 Strategic Flood Risk Assessment](#) (SFRA) as part of the preparation of the Local

Plan. The flood zones mapped within these Assessments have been endorsed and adopted by the Environment Agency. The following figures are based on the mapping of residential properties across the identified flood risk zones.

*Note: properties counted within flood zone 2 may also be counted in flood zone 3.*

Table 12: Area of Flood Risk Within the Borough (Source: TWBC Monitoring, 2025)

Flood Zone	Residential Properties (2025)	Non-Residential Properties (2025)
Flood Zone 2	2082	326
Flood Zone 3	1084	188

## Energy Use

2.48 **Table 13** and **Table 14** are produced from data obtained from the Departments for Energy Security and Net Zero and Business, Energy and Industrial Strategy (DESNZ/BEIS, 2024; [see Total Final Energy Consumption at sub-national level: 2005 to 2022](#)). Table 13 shows that in all sectors, energy consumption (measured in Gigawatt Hours (GWh)) within Tunbridge Wells borough decreased by 331GWh/16% over the period 2005-2022, with the largest decrease in energy consumption seen in the Domestic sector (-278GWh/25%). Over the period 2005 – 2022 the Transport sector has not shown significant changes observed in other sectors. Overall there has been an increase of 51GWh/8%, although within this there have been periods where the GWh has decreased followed by an increase. A 10.9% decline in 2020 may be evidence of the decline in travel caused by the Covid-19 pandemic but since then GWh has increased by 22%. Overall, the decrease in energy consumption in the borough illustrates that improvements have been made to more sustainable and efficient energy consumption practices.

2.49 **Table 14** shows that use and consumption of all fuel types, with the exception of Bioenergy and Wastes (reflecting the increasing trend of using renewable resources as a sustainable source of energy), and petroleum products has decreased within Tunbridge Wells borough over the period 2005-2022, with the largest percentage decrease seen for Coal, having decreased by 14GWh/66.6%, with the smallest percentage decrease seen in use of Electricity (98GWh/17.6%).

Table 13: Energy Consumption Measured in Gigawatt Hours (GWh) by Sector within Tunbridge Wells Borough 2005-2022 (Source: DESNZ/BEIS, 2024)

Year	Industrial & Commercial	Domestic	Transport	All Sectors
2005	654	1106	606	2367
2006	638	1095	613	2346
2007	604	1074	633	2311
2008	589	1056	610	2255
2009	571	1005	595	2170
2010	574	1031	583	2188
2011	564	963	587	2114
2012	571	977	571	2119

Year	Industrial & Commercial	Domestic	Transport	All Sectors
2013	554	977	568	2099
2014	547	956	584	2086
2015	541	971	589	2101
2016	510	965	599	2074
2017	516	971	588	2075
2018	515	980	588	2084
2019	514	993	608	2115
2020	497	946	540	1983
2021	578	912	618	2108
2022	551	828	657	2036
2005-2022 Change	-103	-278	+51	-331

Table 14: Energy Consumption Measured in Gigawatt Hours (GWh) by Fuel Type within Tunbridge Wells Borough 2005-2022 (Source: DESNZ/BEIS, 2024)

Year	Coal	Manufactured Fuels	Petroleum Products	Gas	Electricity	Bioenergy and Wastes	All Fuels
2005	21	9	821	934	555	27	2367
2006	20	9	823	926	540	28	2346
2007	19	8	829	902	525	28	2311
2008	23	9	797	872	520	34	2255
2009	26	5	773	814	515	37	2170
2010	28	6	778	796	532	48	2188
2011	28	6	750	754	534	41	2114
2012	30	6	737	756	536	54	2119
2013	34	6	729	740	526	63	2099
2014	29	6	740	723	527	60	2086
2015	23	6	753	731	522	67	2101
2016	22	6	762	712	499	72	2074
2017	20	7	754	721	503	71	2075
2018	18	7	752	726	504	76	2084
2019	13	9	744	726	505	119	2115
2020	7	5	663	748	515	45	1983
2021	8	3	835	727	479	53	2107
2022	7	5	854	645	457	69	2036
2005-2022 Change (Percentage change)	-14 (-66.6%)	-4 (-44.4%)	+33 (+4%)	-289 (-30.9%)	-98 (-17.6%)	+42 (+64%)	-331 (-13.9%)

## CO<sub>2</sub> Emissions

2.50 **Table 15** is produced from data obtained from DESNZ (2024; [see Emissions of Carbon Dioxide for Local Authority Areas](#)). This **Table** illustrates that CO<sub>2</sub> emissions, measured in kilotonnes (Kt), have fallen across all sectors in Tunbridge Wells borough over the period 2005-2022, with the largest percentage decrease seen in the Industry and Commercial sector (171.4Kt/70.5%). Per capita emissions also fell by 3 tonnes over the same period. Overall, and including the increasing offsetting of CO<sub>2</sub> emissions in the Land Use, Land Use Change, and Forestry Net Emissions (LULUCF) sector, there has been a significant decrease in the level of CO<sub>2</sub> emissions in the borough over the period 2005-2022, decreasing by 284.2Kt/42.8%.

Table 15: Tunbridge Wells Borough CO<sub>2</sub> Emissions by Sector Measured in Kilotonnes (Kt), and Per Capita Measured in Tonnes (t) 2005-2022 (Source: DESNZ, 2024)

Year	Industry and Commercial Total	Domestic Total	Transport Total	Land Use, Land Use Change, and Forestry Net Emissions	Total	Per Capita Emissions (t)
2005	243.1	288.9	179.4	-48.6	662.8	6.3
2006	243.7	292.1	176.6	-50.6	661.8	6.2
2007	228.4	285.3	181.6	-51.2	644.0	5.9
2008	227.7	286.5	170.5	-52.3	632.3	5.7
2009	207.4	261.1	164.0	-52.3	580.2	5.1
2010	220.6	281.4	161.7	-53.1	610.5	5.4
2011	209.1	245.8	161.7	-53.9	562.7	4.9
2012	224.3	266.1	157.7	-54.5	593.5	5.1
2013	208.5	259.0	156.3	-56.2	567.6	4.9
2014	179.3	219.2	160.3	-55.9	502.9	4.3
2015	161.2	214.0	164.3	-57.4	482.2	4.1
2016	136.1	200.7	169.4	-56.6	449.6	3.8
2017	125.7	187.0	166.6	-58.1	421.2	3.6
2018	121.5	186.7	165.6	-58.4	415.5	3.5
2019	94.3	183.5	161.0	-58.4	380.4	3.3
2020	65.0	177.7	137.6	-56.2	324.1	2.7
2021	64.7	184.1	153.4	-54.0	348.1	3.0
2022	71.7	161.3	152.2	-53.3	378.6	3.3
2005-2022 Change	-171.4	-127.6	-27.2	-4.7	-284.2	-3



## Energy Efficiency of Dwelling Stock

- 2.51 Energy Performance Certificates (EPCs) for new homes are used to show the energy efficiency of domestic buildings, based on a rating of A to G, with A being the most energy efficient and G being the least energy efficient. Since 2011, 40,934 dwellings in Tunbridge Wells borough have had an EPC (MHCLG, 2023: see [Live Tables on Energy Performance of Buildings Certificates](#)). Amongst these dwellings, the trends shown in **Table 16** can be seen. This generally shows that, in Tunbridge Wells borough over the period 2011-2024, there has been a positive trend of an increase in A or B ratings (+103%), while there has been a decrease in the number of F or G ratings (-58%), indicating that existing and new domestic properties are improving in energy efficiency. However, 2024 saw a reduction A or B ratings and an increase F or G ratings compared to the figures between 2021-2023. Additionally, the most common EPC rating improved from D to C in 2022 and has remained the most common rating in each subsequent year.

Table 16: Energy Efficiency of All Existing and New Domestic Properties in Tunbridge Wells Borough 2011-2024 (Source: MHCLG, 2025)

Data	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Number of Dwellings Given EPC Rating: A or B	282	93	166	232	523	395	264	438	502	502	629	751	656	573
Number of Dwellings Given EPC Rating: F or G	306	238	178	192	293	165	144	172	119	147	104	104	84	129
Most Common Rating	D	D	D	D	D	D	D	D	D	D	D	C	C	C

## Commentary

- 2.52 The above review of a range of key contextual indicators shows that over recent years there have been some changes which may have implications for the future planning, as well as service delivery, across the borough.
- 2.53 There will be expected increases in population and households over the upcoming Local Plan period (2020-2038), but this will be a population that is ageing, with by



far the greatest increases in those people aged 65+. This correlates with the predicted increase in the number of one person households. This has been a known trend for some time, and as such, planning for older and single person households has been carefully reviewed through the provision of specific policies set out in the new Local Plan.

- 2.54 Across the borough, there is a lower than national rate of deprivation; however, there have been recent decreases in the IMD score, with more of the borough falling within the middle to top rather than the highest IMD score tiers. Although still relatively less deprived, the lower scores highlight a need not to be complacent and to consider further policies to prevent a further decline in the IMD scores found across the borough, including in relation to local job opportunities.
- 2.55 The degree of household change is uncertain, as more recent projections suggest a lower level of growth than the earlier, 2014-based, projections (albeit these are still used by Government in the calculation of local housing need as part of the Standard Method). Notwithstanding this, houses prices across the borough generally continue to be higher than the South-East and England averages, although house prices for all property types have fallen since March 2022. Also, overall, homes are becoming less affordable. This suggests, firstly, that there is a case, on affordability grounds, for agreeing with the Government's favoured earlier projections, since a greater supply of homes should help slow house price growth. Secondly, while existing local planning policies are supportive towards affordable housing, the worsening affordability of homes has resulted in a review of affordable housing policy through the new Local Plan seeking higher percentages of affordable housing on greenfield sites and financial contributions towards affordable housing on smaller sites in the National Landscape.
- 2.56 Unemployment within the borough increased significantly following the recession around 2008, then gradually reduced back to pre-recession levels, then increasing significantly to over twice the level of unemployment caused by the 2008 recession due to the Covid-19 pandemic and its impact on the economy. Unemployment figures remain higher than 2008 recession levels but are falling sharply following the easing of Covid-19 restrictions since March 2021 and continue to remain lower than the National average. There are now more enterprises in the borough, albeit decreasing slightly since 2019. However, median gross weekly pay within the borough remains below the average for Great Britain although it has increased by 19% since 2021 and continued policy support for local business growth appears to be well justified.
- 2.57 The environmental quality across the borough has largely improved since 2011, with declines in both energy usage and CO<sub>2</sub> emissions. In addition, new Local Plan Policy STR 7 states *'All development within the borough will recognise the Climate Emergency and be supportive of the Council's ultimate target to achieve net zero emissions across the borough by 2030.'*

## 3.0 Local Plan Preparation

- 3.1 The Council is at an advanced stage with the preparation of its new Local Plan, and is currently consulting on proposed Main Modifications, needed to ensure the Plan is 'sound' and enabling the Council to proceed to adoption in due course. Further details on the new Local Plan can be found on the [Council's website](#). The Plan will guide development in the borough through a new growth strategy, allocating sites for development and providing general Development Management policies to guide development across the borough.
- 3.2 As per the [Local Development Scheme \(LDS\)](#) (dated March 2025), the Submission Local Plan is due to be adopted by the Council between March-May 2025. Once adopted, this Local Plan will supersede the 'saved' policies of the 2006 Local Plan, the 2010 Core Strategy, as well as the 2016 Site Allocations Local Plan.
- 3.3 The Local Development Scheme (LDS) sets out details of the planning policy documents that the Council has adopted or is currently preparing, and those it intends to prepare. The LDS provides information to interested parties to help them participate in the plan-making process. The current LDS came into effect in March 2025, and can be viewed on the [Council's website](#). It was updated to set out an indication of when the Local Plan Review will begin. The Council intends to publish a further updated LDS following adoption of the Local Plan, in order to set out a more detailed timetable for the production of the Local Plan Review, likely to be prepared under the new plan-making regime.

## 4.0 Neighbourhood Development Plans (NDPs)

- 4.1 The Localism Act 2011 introduced Neighbourhood Planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. This allows local communities the option of producing their own Neighbourhood Development Plan (NDP; more commonly referred to simply as a Neighbourhood Plan), as well as Neighbourhood Development Orders or Community Right to Build Orders for their local area.
- 4.2 An NDP may contain a vision, aims, site allocations for new development and/or policies for conserving and improving existing amenities and facilities.
- 4.3 NDPs need to be in general conformity with the strategic policies set out in local planning policy documents and have regard to national policy.
- 4.4 There is a formal procedure for producing NDPs and, if 'made' (adopted) after successful examination and a local referendum, an NDP will form part of the statutory development plan for the area.

# Neighbourhood Plans Within Tunbridge Wells Borough

- 4.5 The first step in producing an NDP is for the local community to apply to the Borough Council for the designation of their area as a Neighbourhood Area. The Borough Council then consults on the application for Neighbourhood Area status. If the Borough Council confirms the application following consultation, then the local community can begin to draft the NDP.
- 4.6 As at March 2025 there are ten made (adopted) NDPs in the borough and three in production. These can be seen in **Table 17**.

Table 17: Neighbourhood Development Plans Within Tunbridge Wells Borough as at March 2025

Parish	Stage
Benenden	Neighbourhood Plan made, February 2022.
Brenchley and Matfield	Neighbourhood Plan made, December 2022.
Capel	Neighbourhood Plan made, October 2024.
Cranbrook & Sissinghurst	Neighbourhood Plan made, October 2023.
Goudhurst	Neighbourhood Plan made, February 2022.
Hawkhurst	Neighbourhood Plan made March 2018, and modified April 2020.
Horsmonden	Neighbourhood Plan made, July 2023.
Lamberhurst	Neighbourhood Plan made, October 2021.
Paddock Wood	Neighbourhood Plan made, October 2023.
Pembury	Neighbourhood Plan made, October 2023.
Sandhurst	Neighbourhood area designation approved September 2014. Regulation 14 consultation undertaken between June and August 2024.
Southborough	Neighbourhood area designation approved June 2023. Regulation 14 consultation undertaken between December 2024 and January 2025.

- 4.7 For up-to-date information on the progress of neighbourhood plans in the borough, [see the Neighbourhood Plans page of the Council's website.](#)

## 5.0 Duty to Cooperate

- 5.1 The Duty to Cooperate (DtC) was introduced in the Localism Act 2011, the effect of which is to place a legal duty on Local Planning Authorities to co-operate with neighbouring authorities, County Councils and other prescribed bodies when planning for sustainable development. The Duty requires on-going, constructive collaboration and active engagement between Local Planning Authorities and their neighbours, as well as other statutory bodies such as Natural England, Historic England and the Environment Agency, throughout the preparation process of all development plan documents. This is in addition to statutory consultations.
- 5.2 The Duty is a formalisation of established good practice, through which the Council liaises with a number of groups including Neighbouring Local Planning Authorities, Town and Parish Councils, statutory consultees, and infrastructure/service providers on an on-going basis in relation to cross boundary strategic matters.
- 5.3 For the purposes of the DtC, a strategic matter is defined as sustainable development, use of land or strategic infrastructure that has or would have a significant impact on at least two planning areas. These matters can relate to a number of issues such as housing, employment, transport, water/flooding and other forms of infrastructure, and strategic environmental and nature conservation issues.
- 5.4 Amongst other DtC engagement, the National Planning Policy Framework promotes the on-going preparation and production of Statements of Common Ground between Local Planning Authorities. There has been significant progress on the production and completion of these prior to, and since, the submission of the Local Plan to the Secretary of State for examination purposes. These SoCGs and full details of engagement with neighbouring authorities and other bodies are included in the Council's 'Duty to Cooperate Statement' ([see Core Documents list](#)) produced in support of the new Local Plan.
- 5.5 The primary strategic matter has been the ability of the borough, as well as neighbouring authorities, to meet housing growth needs. This has been subject of ongoing assessment through the preparation of the new Local Plan, as well as those under production by the neighbouring authorities. As set out previously, the councils new Local Plan is at an advanced stage in the examination process. Following Stage 1 and 2 Hearing Sessions held in 2022, the Council received its [Initial Findings letter](#) from the appointed inspector examining the Local Plan in November 2022. A revised development strategy followed, which saw the deletion of the Tudeley Garden Village from the Local Plan, and a reduction in proposed growth at the strategic allocation of Paddock Wood and Land at east Capel, resulting in a housing land supply of 10 years rather than the previous 15 year housing land supply achieved in the Submission Local Plan. Wealden District Council and Rother District Council both undertook a Regulation 18 Draft Local Plan consultation which did not meet their full growth needs. TWBC engaged and submitted representations to those consultations, and will continue to do so, both at the formal consultation stages, and through the Duty to Cooperate .

- 5.6 TWBC is proposing to undertake an early review of the new Local Plan upon adoption to seeks ways to meet the unmet housing growth needs, having full regard to the new OAN which has resulted in a significant uplift in housing growth needs for the borough (from 678 dwellings per annum to 1,100 dwellings per annum, an uplift of some 62%). Given the constraints of the borough, and because the Council is unable to meet its own housing needs through the revised development strategy, TWBC considers it is unable to contribute to meeting the wider housing needs of adjoining authorities. Of note, dialogue with Sevenoaks District Council, and Tonbridge and Malling Borough Council (both at Regulation 18 stage) is continuing to clarify whether they will be capable of meeting their own housing need through the production of new Local Plans.
- 5.7 The National Planning Policy Framework (2024) maintains the Duty to Cooperate (previously sought to be abolished in favour of an 'alignment policy' under the Levelling Up and Regeneration Act 2023) as a means of ensuring effective strategic planning across local planning authority boundaries.

# 6.0 Effectiveness of the Core Strategy (2010) Policies

6.1 This section reviews the monitoring framework from the adopted [Core Strategy \(2010\)](#). It provides an assessment of the currency of indicators and, where possible, a commentary on them across the eight borough-wide Core Policies. Where other, new local indicators are needed in monitoring the performance of the Core Strategy policies, these are also considered.

## Core Strategy Monitoring Framework

6.2 **Table 18** displays indicators from the Core Strategy (2010) Monitoring Framework, whether they have been successfully monitored in this Report and, where monitored, the performance over the period 01 April 2023 to 31 March 2024.

Table 18: Core Strategy (2010) Monitoring Framework Overview Over Period 01 April 2022 to 31 March 2023

Core Policy	Indicator	Target	Monitored
1 – Delivery of Development	Core Indicator: Housing completions	300 dwellings pa	611 dwellings (2006/07 – 2023/24 average of 406 dwellings; 2019-2024 5-year average of 580 dwellings)
	Local Indicators: CP1 a) Percentage of all new development/ redevelopment within LBD	65%	Yes monitored – 78.4% (completions)
	Local Indicators: CP1 b) Percentage of all new development/ redevelopment on PDL	65%	Yes monitored – 35.7% (completions)
2 – Green Belt	Local Indicator: CP2 a) Retention of Green Belt	No development in Green Belt other than as identified in Town Centre Area Action Plan or Allocations DPD, or that which is in accordance with PPG2	18 applications for residential dwellings have been permitted in the Green Belt during the period 01 April 2023 to 31 March 2024.  All except 1 of these applications were redevelopments/conversions of existing brownfield sites/on previously development land where it

Core Policy	Indicator	Target	Monitored
			was considered that the proposals were in accordance with NPPF Green Belt policy and there has been no deviation from the Local Plan. The remaining application was for a 4 dwelling development partially on previously developed land. See table 20 and paragraph 6.7 for more details of this scheme in relation to the Green Belt.
	Local Indicator: CP2 b) Maintenance of long-term land reserve	Developable land identified beyond 2026	Development on all three of the allocated sites (AL/GB 1 – AL/GB 3) is now complete.
3 – Transport Infrastructure	Local Indicators: CP3 a) Completion of Infrastructure Projects	Completion of Key specific projects identified through Plan	Yes – Outcome found under Core Policy 3 section
	Local Indicators: CP3 b) Number of Travel Plans approved	Travel plans will be secured for appropriate development schemes in accordance with PPG13 (2001) (Superseded)	Not recorded, but required for major developments
	Contextual Indicator: TP1: Movement across outer and inner Royal Tunbridge Wells and Southborough cordons by different modes of transport	N/A	<a href="#">See Transport Strategy Review Context and Way Forward</a>
	Contextual Indicator: TP2: Journeys taken from Tunbridge Wells Railway station	N/A	<a href="#">See Transport Strategy Review Context and Way Forward</a>
	AMR Core Indicators: Change in areas of biodiversity importance	Monitoring of priority habitats	Yes – outcome found in Core Policy 4 section

Core Policy	Indicator	Target	Monitored
4 – Environment	Local Indicators: CP4 a) Implementation of Kent BAP & LBAP	As per Kent BAP and LBAP targets	Yes – BAPs implemented
	Contextual Indicators: E1: Number of listed buildings	N/A	Yes monitored – see Environment contextual indicators section
	Contextual Indicators: Number of Conservation Areas	N/A	Yes monitored – see Environment contextual indicators section
5 – Sustainability	AMR Core Indicators: E1) Number of planning permissions granted against Environment Agency advice	No development with unacceptable effect on groundwater surface water or water quality; and no development in areas at high risk from flooding will be permitted contrary to EA advice or without measures acceptable to the EA to protect it and prevent the increased risk of flooding elsewhere	Yes – four Environment Agency objections, all requesting a flood risk assessment. The applications were: <ul style="list-style-type: none"> <li>permitted before the objection was received</li> <li>permitted as an FRA was not considered necessary</li> <li>permitted after an FRA was submitted and the Objection was removed. A condition suggested by the EA was included</li> <li>Withdrawn</li> </ul>
	AMR Core Indicators: E3) Renewable Energy Generation	As per renewable energy SPD	Yes – there has been a net increase in renewable energy generation capacity.
	AMR Core Indicators: H6) Design Quality	30% Good or Very Good Quality, increasing over plan period	No – data not available
	Contextual Indicators: Air quality at monitoring station	N/A	Yes – see Sustainability Core Policy 5 section
	Contextual Indicators: Household waste per capita	N/A	No
	Contextual Indicators: Number of applications with Low Emissions Strategies	N/A	No
	Contextual Indicators: Number of developments meeting different CfSH/BREEAM levels	CfSH – all new housing to be zero- carbon by 2016	No – data not available



Core Policy	Indicator	Target	Monitored
	Contextual Indicators: Energy use per household	N/A	Yes – see Sustainability contextual indicators section
6 – Housing Provision	AMR Core Indicators: H4: Net additional gypsy and traveller pitches	Target to be set by South East Plan	Yes – see Core Policy 6 Section
	Local Indicators: CP6 a) New homes built on previously developed land	65%	35.7%
	Local Indicators: CP6 b) Completion of Infrastructure Projects	Completion of specific projects	Yes – average affordable housing provided across the borough at greater than 70 units per year
	Contextual Indicators: H1: Average house prices by type	N/A	Yes – see Community and Housing contextual indicators section
	Contextual Indicators: H2: Percentage of homes built of different types and sizes	N/A	Yes/No – see Community and Housing contextual indicators section for information on dwelling type and size data
	Contextual Indicator: H3: Percentage of homes built at densities over than 30 dwellings per hectare	N/A	Yes – see Core Policy 6 section
7 – Employment Provision	AMR Core Indicators: BD1) Total amount of additional employment floorspace by type	Meet targets to be set out within the South East Plan. Targets to be confirmed by the TCAAP and Allocations DPDs	Yes – see Core Policy 7 section
	AMR Core Indicators: BD2) Total amount of employment floorspace on previously developed land by type	Meet targets to be set out within the South East Plan. Targets to be confirmed by the TCAAP and Allocations DPDs	Yes – see Core Policy 7 section
	AMR Core Indicators: BD3) Employment land available by type	Meet targets to be set out within the South East Plan. Targets to be confirmed by the TCAAP and Allocations DPDs	Yes – see Core Policy 7 section
	AMR Core Indicators: BD4) Total amount of floorspace for 'Town	Meet targets to be set out within the South East Plan. Targets to	Yes – see Core Policy 7 section

Core Policy	Indicator	Target	Monitored
	Centre Uses' within the defined Town Centres	be confirmed by the TCAAP and Allocations DPDs	
	Local Indicators: CP7 a) Net gain/loss of tourist accommodation	483 new hotel bedrooms	No – latest hotel accommodation is Premier Inn (110 bedrooms) opened in Royal Tunbridge Wells in 2020, as well as 8 additional rooms with extant planning permission at the Queens Inn in Hawkhurst (18/02717/FULL).  Covered by <a href="#">Hotel Capacity Study</a> (2017) on the Council's website
	Contextual Indicators: ED1) Economic activity rates	N/A	Yes – see Economy and Business Context section
	Contextual Indicators: ED 2) Employee jobs within the borough by sector	N/A	Yes – see Economy and Business Context section
	Contextual Indicators: ED 3) Unemployment Levels	N/A	Yes – see Economy and Business Context section
8 – Retail, Leisure and Community Facilities Provision	AMR Core Indicators: BD 4) Total amount of floorspace for Town Centre uses within the defined Town Centres	N/A	Yes – see Core Policy 8 section
	Local Indicators: CP8 a) Retention of Community Services	No net loss of community facilities in neighbourhood or village centres	Yes – see Core Policy 8 section
	Local Indicators: CP8 b) Retention/Provision of Recreation Open Space	Retention/provision of adequate recreation open space	Yes – see Core Policy 8 section
	Local Indicators: CP8 c) Amount of new retail floorspace provided	26,236 sqm of net comparison floorspace by 2017; provision of a convenience supermarket at Southborough	Yes – see Core Policy 8 section

Core Policy	Indicator	Target	Monitored
	Local Indicators: CP8 d) Completion of Infrastructure Projects	Completion of Key Specific Projects identified	Yes – see Core Policy 8 section
	Contextual Indicators: Eligible Open Spaces Managed to Green Flag Award Standard	N/A	Yes – see Core Policy 8 section

## Review of Core Policy Indicators

### Core Policy 1: Delivery of Development

**Housing Delivery Target** – 300 dwellings per annum is the Core Strategy requirement 2006-2026.

- 6.3 As shown **Table 19**, 611 dwellings were built in the most recent (01 April 2023 – 31 March 2024) monitoring year, giving an average over the Plan period, from 2006 to date, of 406 dwellings per annum. In the last five years (since 2019/20), the average has increased to 580 per annum. The number of completions within the 2020/21 monitoring year is the highest rate of delivery within the borough on record, which indicates that actions undertaken by the Council to-date, such as increased frequent communication with site promoters, have had a positive impact. While the number of completions reduced in 2023/24 by comparison, this reflects national house-building trends following the Covid-19 Pandemic and its impact on the development industry, as well as reflecting the effective ‘phasing-out’ of the existing Site Allocations Local Plan (SALP, 2016), where the majority of these allocations have either been built or are under construction (mostly substantially), while at the same time the Council intends to adopt the new Local Plan with new allocations which will meet a 10 year local housing need over the new plan period. The Council’s latest [Housing Delivery Test Action Plan](#) identifies the approach the Council has taken/will take to continue supporting the development industry in the borough.

Table 19: Net Additional Dwellings Complete by Monitoring Year (Source: TWBC Monitoring, 2024)

Year	Total Net Completions
2006/2007	517
2007/2008	517
2008/2009	411
2009/2010	104
2010/2011	315
2011/2012	212
2012/2013	-5
2013/2014	-16
2014/2015	323
2015/2016	447

Year	Total Net Completions
2016/2017	461
2017/2018	537
2018/2019	554
2019/2020	474
2020/2021	688
2021/2022	518
2022/2023	636
2023/2024	611
2006/07 – 2023/24 Average	406
2019/20 – 2023/24 5-Year Average	580

**CP1 – Local Indicator CP1a Percentage of all new development/redevelopment sites within Limits to Built Development**

**Target** – 65% of sites within the LBD

2022/23: 78.4% of net new units were built within the LBD (Source; Housing Monitoring, 2023).

**CP1 – Local Indicator CP1b Percentage of all new development/redevelopment sites on previously developed land**

**Target** – 65% of all new development on PDL

2022/23: 35.7% of net new units were built on PDL (Source; Housing Monitoring, 2024).

## Core Policy 2: Green Belt

- 6.4 The Metropolitan Green Belt within Tunbridge Wells borough extends around the built-up area of Royal Tunbridge Wells and Southborough. The detailed boundaries of the Green Belt are established in the 2006 Local Plan through Policy MGB1.
- 6.5 Areas of long-term land reserve within the Green Belt (the areas of Rural Fringe), are set out in Local Plan Policy RF1 and within the 2016 Site Allocations Local Plan (SALP) Policies AL/GB1, AL/GB2 and AL/GB3.

### Retention of Green Belt

**Objective:** To protect the open character of the Green Belt and encourage only those types of development that will preserve this openness.

**Targets:** No development within the Metropolitan Green Belt will be permitted other than that which is in accordance with the relevant policies in the NPPF, the 2006 Local Plan and 2016 SALP.

In order to meet this objective (to retain the Green Belt) the Council monitors planning applications that were granted permission by the Council or on appeal by a Planning

Inspector, to assess whether the issue of Green Belt development has been addressed in line with national guidance and local policy. **Table 20** provides this assessment for the 2023-2024 monitoring year.

## b) Maintenance of Long-Term Land Reserve

**Objective:** Maintain a long-term development land reserve

**Core Strategy Policies:** CP2

**Site Allocations Local Plan:** AL/GB4

**Targets:** Developable land identified beyond 2026

Table 20: Planning Applications for New Dwellings Approved Within the Green Belt in Monitoring Year 01 April 2023 – 31 March 2024 (Source: TWBC Monitoring, 2024)

Application Reference	Proposal	Net Dwellings	Comments Regarding Impact on Green Belt
23/01340/FULL	Demolition of existing dwelling and erection of two storey replacement dwelling	0	<p>'The site is located within the Metropolitan Green Belt where paragraph 149 states that a LPA should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this include:</p> <p>The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;</p> <p>As explained above the proposal is in the same use and despite size differences would not be materially larger than the existing. The impact on the Green Belt is therefore considered acceptable'</p>
23/01770/FULL	Conversion of barn, addition of front and rear extensions, addition of balcony and dormers, erection of detached garage, alterations to retaining walls (Amended scheme to 19/02737/FULL)	1	<p>'Certain forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. This includes the re-use of buildings provided that the buildings are of permanent and substantial construction. The subject building is an existing, permanent construction and therefore complies with this criterion.'</p>

<b>Application Reference</b>	<b>Proposal</b>	<b>Net Dwellings</b>	<b>Comments Regarding Impact on Green Belt</b>
23/00414/FULL	Change of use, conversion and extensions to redundant barn to form a single dwelling, and associated new landscaping	1	'The proposal is for the conversion and extension of the current barn. A photograph in the Planning Statement shows the building as it was in 1960 and this shows that the barn previously had additional buildings on either side, which extended in length to twice that of the existing barn. As such, the current built form is less than the footprint of previous structures. Given this, it is considered that the increased scale and footprint of the proposed dwelling can be considered acceptable within the sensitive areas of the AONB and GB, subject to all other material matters being found acceptable.'
23/01513/FULL	Conversion of the existing barn to create a self-contained, two-bedroom dwelling with associated parking and landscaping. New cycle and bin shed storage.	1	'The [assessment of the application in relation to Local Plan Policy H13 criteria 1-3] centre on visual impact and, at this point it is appropriate to discuss general impact on the landscape qualities of the HWLN AONB; and on the openness of the Green Belt. This would be a conversion of an existing building, without extension, that is competently handled in design terms. The associated development ie hardstandings, fencing, etc. is restrained and would benefit from existing and proposed landscaping. In all, I do not consider there would be an adverse impact on the character of the countryside. In terms of openness, similar considerations apply: no new buildings of any significance are proposed in this case and the hard landscaping shown would have minimal impact in terms of the potential erosion of open space.'
23/02496/FULL	Change of use of redundant building to 1No residential unit with parking	1	Green Belt listed as a constraint but no direct comments on the Green Belt provided in the appraisal of the officer's Delegated Report, Policy H13 compliant not inappropriate development.
23/01615/FULL	Conversion of barn to a 4-bedroom dwellinghouse	1	'The barn also lies within the Green Belt; Part 13 of the National Planning Policy Framework is particularly relevant here as it addresses the Green Belt. Para 152 states that inappropriate development is by definition harmful to the Green Belt and should not be approved. Paragraph 154 states that the construction of new buildings comprises inappropriate development in the Green Belt. There are however certain exceptions to this: NPPF 155(d) allows the re-use of buildings

Application Reference	Proposal	Net Dwellings	Comments Regarding Impact on Green Belt
			provided that the buildings are of permanent and substantial construction.'
23/01843/FULL	Conversion of existing barn to a three-bedroom dwelling including provision of utility room/gym and home office outbuildings (alternative proposal to extant permission 21/00366/FULL)	1	Green Belt listed as a constraint but no direct comments on the Green Belt provided in the appraisal of the officer's Delegated Report (same for 21/00366/FULL). Policy H13 compliant not inappropriate development.
23/01753/FULL	Part conversion and part extension of the existing Hay Barn into one residential three bedroom dwelling, Conversion of the Dairy Block into one residential three bedroom dwelling, Erection of car port structures following demolition of existing buildings, together with associated hard and soft landscaping works	2	<p>Conclusion of Green Belt comments on re-constructed hay barn dwellings (see full comments in the officer's <a href="#">Delegated Report</a>):</p> <p>'On balance it is considered that there would be no greater harm to the openness of the Green Belt. This element of the proposal concentrates building operations within the existing developed area and removes the riding arena. The current use also impacts the openness of the Green Belt - the limited size of the curtilage is such that within the site area the impact of residential curtilages vs the existing equestrian use impact is negligible. On this basis, the Very Special Circumstances provisions within NPPF para 147 are not engaged in respect of the hay barn dwelling.'</p> <p>Comments on dairy block conversion:</p> <p>'Para 150 also lists further development which is 'not inappropriate' provided the proposal preserves the openness of the Green Belt and does not conflict with the purposes of including land within it. One of these is;</p> <p><i>d) the re-use of buildings provided that the buildings are of permanent and substantial construction;</i></p> <p>Policy MGB1 (3) of the 2006 LP allows the re-use of buildings in the Green Belt provided the proposal is in</p>

Application Reference	Proposal	Net Dwellings	Comments Regarding Impact on Green Belt
			accordance with LP Policy H13 (for residential conversions). Any associated uses of land around the building must not conflict with the openness of the GB and the purposes of including land within it. CP2 of the Core Strategy echoes this. Policy H13 is also central for assessing landscape and AONB impact and is addressed below. As the proposal is considered to comply with H13, it is also considered to comply with MGB1 and the NPPF in respect of GB impact.'
23/02130/FULL	Part demolition of existing gym and erection of new dwelling, part conversion of existing gym to residential use in association with existing dwelling.	1	<p>'It is noted that part of this building is located within the Green Belt but given that the footprint remains as existing and this is located close to the existing built form in this area it is not considered that the increased height would have a harmful impact on the openness of the Green Belt.</p> <p>The remaining land to the south has historically formed part of the garden Orchard Brook and more recently contained outdoor gym equipment. Therefore, the use of this area as garden is not considered to be out of keeping with the character of the area. The extent of hard surfacing will also be reduced and this would have a positive impact on the character of the site. However, any further extensions and outbuildings could have an impact on the character of the site and openness of the Green Belt and as such it is recommended that permitted development rights are removed in relation to alterations and extensions to the dwelling and buildings within its curtilage.'</p>
23/02668/FULL	Redevelopment of existing workshop and cart shed to one bed single storey dwelling with associated hard and soft landscaping	1	<p>'Core Policy 2 of the Core Strategy states that there will be a general presumption against inappropriate development that would not preserve the openness of the Green Belt. There is a general presumption against new building and development in such areas, although paragraph 150 of the NPPF states that the re-use of a building can be appropriate, provided that the building is of permanent and substantial construction.</p> <p>The proposal would see the re-use of existing buildings with an appropriate extension. As such, the proposal is not considered to have a harmful impact on the openness, appearance or setting of the Green Belt in accordance with LP Policy MGB1 and the NPPF.'</p>



Application Reference	Proposal	Net Dwellings	Comments Regarding Impact on Green Belt
23/03311/FULL	Demolition of existing building and change of use of the land for the stationing of a mobile home for residential purposes in association with the existing garden nursery business.	1	<p>'In terms of the impact on the Green Belt, new housing is regarded as 'inappropriate development' but, in the circumstances of this case, I regard the need for essential accommodation to constitute 'very special circumstances'. The impact on openness is limited in this case in that a small structure would be removed to make way for the mobile home and the home would be part of a built group, thereby benefitting from some screening and filtered views. I consider the circumstances of this case outweigh that limited harm to openness.'</p>
23/01618/FULL	Conversion of disused hopper huts to a single residential dwelling with single storey rear extension, associated landscaping and creation of residential curtilage	1	<p>'Core Policy 2 of the Core Strategy states that there will be a general presumption against inappropriate development that would not preserve the openness of the Green Belt. There is a general presumption against new building and development in such areas, although paragraph 150 of the NPPF states that the re-use of a building can be appropriate, provided that the building is of permanent and substantial construction.</p> <p>The proposal would see the re-use of existing buildings with an appropriate extension. As such, the proposal is not considered to have a harmful impact on the openness, appearance or setting of the Green Belt.'</p>
23/02215/FULL	Conversion of the existing barn to create a five-bedroom dwelling, including upward extension by 350 mm to allow for insulation in the roof and to remove no. 4 living containers situated to the rear of the application building,	1	<p>'The site is located within the Metropolitan Green Belt where the NPPF at para 149 states:</p> <p><i>A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt.</i></p> <p>The paragraph lists development which can be acceptable however none are considered to apply here.</p> <p>Para 150 goes on to say:</p> <p><i>Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These include:</i></p> <p><i>d) the re-use of buildings provided that the buildings are of permanent and substantial construction;</i></p>

Application Reference	Proposal	Net Dwellings	Comments Regarding Impact on Green Belt
	including amenity space, parking and access.		The proposal is considered to comply with this paragraph of the NPPF as the existing building is of a permanent and substantial construction and would not involve any significant increase in size.'
24/00145/FULL	Demolition of outbuilding and erection of 2 single storey dwellings with associated garaging and external works	2	<p>'As the proposal is within the garden of no. 64 it is considered to be previously developed land. As affordable housing is not being proposed here the test is whether the proposal would have a greater impact on the openness of the Green Belt than the existing development. In addition, Pembury is a village and the site is bounded on three sides by residential gardens and/or dwellinghouses.</p> <p>The two new dwellings would be located within the residential garden of the existing property, which does have an unusually large plot compared to other properties in the street. The site does also have previously developed land on three sides, and it is the eastern boundary would be more open to the protected landscape.</p> <p>While it is considered that would be a change to the development of the site, the dwellings would be single storey in height and would not include any detached garages. There is also mature trees and planting on the eastern boundary which screen the site from further views in the landscape and Green Belt. Furthermore when viewed in the wider context it is considered that the new dwellings would be read against the existing extensive settlement to the north and west which rise up with the land levels. Therefore, given the hitherto open land would be occupied by two dwellings, there would be some impact on GB openness. Thus it is considered that the proposal would amount to 'limited infilling in villages' and is acceptable in principle via that route.'</p>
23/01267/FULL	Alterations and change of use of agricultural barn to a single dwelling house with new parking, cycle	1	'Core Policy 2 of the Core Strategy states that there will be a general presumption against inappropriate development that would not preserve the openness of the Green Belt. There is a general presumption against new building and development in such areas, although paragraph 150 of the NPPF states that the re-use of a building can be appropriate, provided that the building is of permanent and substantial construction.

Application Reference	Proposal	Net Dwellings	Comments Regarding Impact on Green Belt
	and refuse areas		The proposal would see the re-use of an existing building. As such, the proposal is not considered to have a harmful impact on the openness, appearance or setting of the Green Belt.'
23/01688/FULL	Demolition of existing bungalow, replacement dwelling and associated landscaping	0	<p>'Paragraph 149 [of the NPPF] states that the construction of new buildings comprises inappropriate development in the Green Belt. There are however certain exceptions to this. The proposals set out within this application would fall within one of these categories:</p> <p>d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;</p> <p>Thus, by definition, the proposal would not comprise 'inappropriate development' within the Green Belt, providing they would not harm its openness. 'Openness' is the absence of</p> <p>development such as buildings, hard surfacing and the residential use of land. It is essentially freedom from operational development and relates primarily to the quantum and extent of development and its physical effect on the application site. It is a different consideration to 'visual impact' as the openness of the Green Belt has a spatial aspect as well as a visual aspect. The absence of visual intrusion does not in itself mean that there is no impact on the openness of the Green Belt as a result (for example) of constructing a new building/extension there.'</p>
23/01726/OUT	Outline permission (All matters reserved) - Erection of up to 4 No. dwellings	4	<p>'As set out earlier, part of the site is PDL, but only that which relates to the commercial yard and buildings. The rest has a lawful use for agriculture. The agent's previous assertion that the area around and including the existing buildings is PDL is not supported by the definition of PDL within the NPPF annex, nor by the site circumstances. Some of the buildings may well have an extant permission for conversion to residential use, but this does not make them PDL.</p> <p>The proposal would result in the removal of the open storage area within the contractors yard plus the buildings, tennis court and mobile homes near it. It would also remove the series of functional agricultural structures to the south. The northern part of the site</p>

Application Reference	Proposal	Net Dwellings	Comments Regarding Impact on Green Belt
			<p>beyond the northern edge of the commercial yard is open grassland, free from buildings and other built form.</p> <p>The development (by way of Plots 1-2 and 4) would also spread built form out in to the area currently used by the contractors' yard. That use already has an impact on the openness of the Green Belt from the outdoor storage areas and the surrounding bunds. Condition 6 of the 2002 appeal permission limits the height of the outdoor storage to 3m.</p> <p>Whilst these farmyard structures are typical agricultural buildings of limited height and presence, their replacement (Unit 3) would be of very similar size and scale. The proposal would introduce three single/1.5 storey buildings on to the site of the builders yard, albeit these plans are indicative. Whilst this would include surrounding curtilage space involving the introduction of domestic paraphernalia consistent with an established residential use on the land, the quantum and extent of development and its physical effect on the application site would not materially impact the openness of the Green Belt by comparison. Plots 1-2 and 4 would therefore not have a greater impact on the openness of the Green Belt than the existing development.</p> <p>There is an extant permission for conversion of the building which would make way for Unit 3. However this element of the proposal would be contrary to GB Policy as this part of the site is not PDL. The acceptability of this part of the scheme would therefore depend on whether Very Special Circumstances justify Unit 3.</p> <p><i>Very Special Circumstances</i></p> <p>Merely because a proposed development is by definition inappropriate does not mean that there is a prohibition on it. Para 153 sets out that 'inappropriate development' should not be approved except in 'Very Special Circumstances'. Whether a factor constitutes a very special circumstance is a matter for the decision maker in the exercise of their judgment in any particular case. The categories of what constitutes very special circumstances are not closed. In order to qualify as</p>

Application Reference	Proposal	Net Dwellings	Comments Regarding Impact on Green Belt
			<p>“very special”, circumstances do not have to be rarely occurring.</p> <p>In this case the height, scale and form of Unit 3 would be very similar to the extant residential conversion (21/03422/FULL). In fact it would be slightly smaller as the store shown to be retained to the east of the building under 21/03422/FULL would be demolished. The curtilages would not be materially larger and the permission can be conditioned to prevent both this and 21/03422/FULL being implemented at the same time. This is necessary because the eastern-most building in this southern group is included in the 2021 permission and would comprise a dwelling in itself.</p> <p>On this basis, the impact on the Green Belt is considered acceptable.’</p>
23/01411/FULL	Conversion of agricultural barn (C) into residential use with rear patio area, Retrospective conversion of part of existing barn (A) into residential use, Alterations to existing stables (B), Removal of outbuilding, New fence, Associated landscaping	2	<p>‘Point c) of [NPPF] Paragraph 149 allows for the extension or alteration of a building with the Green Belt provided that it does not result in is proportionate additions over and above the size of the original building. Barn B is to remain in use as stables. The proposed changes do not result in an extension to the building and only external alterations are proposed in connection to access arrangement to an altered internal layout. In this case, the alteration of this barn within the Green Belt could be considered acceptable in principle.</p> <p>Paragraph 150 goes on to say that the re-use of buildings provided that the buildings are of permanent and substantial construction could be an appropriate form of development providing it preserve the openness of the Green Belt and does not conflict with the purposes of including land within it.</p> <p>Policy MGB1 (3) of the Local Plan allows the re-use of buildings in the Green Belt provided the proposal is in accordance with Local Plan Policy H13 (for residential conversions) and that any associated uses of land around the building do not conflict with the openness of the Green Belt and the purposes of including land within it. CP2 of the Core Strategy echoes this.</p> <p>Therefore, as previously assessed, the principle of the proposed works to provide dwelling within existing Barns A and C is acceptable in the Green Belt provided</p>

<b>Application Reference</b>	<b>Proposal</b>	<b>Net Dwellings</b>	<b>Comments Regarding Impact on Green Belt</b>
			its openness is preserved and meets the criteria set out in Local Plan Policy H13.'

- 6.6 **Table 20** shows that 22 dwellings have been permitted in the Green Belt during the period 01 April 2023 to 31 March 2024. All except one of these applications were redevelopments/conversions of existing brownfield sites/on previously developed land where it was considered that the proposals were in accordance with NPPF Green Belt policy and there has been no deviation from the Local Plan.
- 6.7 The remaining application (23/01726/OUT) was also on a previously developed site, but where the proposal would extend built form. The scheme was for four dwellings, three of which (plots 1,2 and 4) were considered to not have a greater impact on the openness of the Green Belt than the existing development. As plot 3 was of a similar height, scale and form to an extant permission on the site (21/03422/FULL), it was also considered to be acceptable with a condition that only one of 23/01726/OUT or 21/03422/FULL could be implemented.
- 6.8 Three sites designated as Rural Fringe by saved Local Plan Policy RF1 'Rural Fringe' have been allocated for development in the adopted SALP:
- Speldhurst Road, former allotments (AL/GB1)
  - Home Farm, Sherwood Park and Greggs Wood (AL/GB2 'Knights Wood')
  - Hawkenbury Farm, Hawkenbury Road (AL/GB3)
- Developments on all three of these sites (AL/GB1 – 3) have now been completed.
- 6.9 Policy AL/GB4 in the SALP replaced Policy RF1 in the 2006 Local Plan. Three sites are designated to fulfil the function of a long-term land reserve under Policy AL/GB4 in the SALP:
- Culverden Down
  - Grange Road Allotments, Rusthall
  - North Farm Tip

## Core Policy 3: Transport Infrastructure

### CP3 Key Infrastructure Schemes

**A21** – the dual carriageway down to the Pembury Roundabout has been completed, future routes are proposed to be protected by Local Plan policies.

**Park and Ride** – further work commissioned on Park & Ride (completed June 2018 ([see the Tunbridge Wells Park and Ride Feasibility Study](#))). The proposed site (Woodgate Corner, Pembury) is no longer suitable and is now a proposed allocation for specialist housing for older people and others with care needs (up to 80 C3 extra care units or up to 120 C2 residential care home/nursing care units) in the Submission Local Plan AL/PE6.

**North Farm Estate** – these works have now been completed and link up with the new A21 scheme.

**Borough Transport Strategy** – a new transport strategy review has been published ([see Transport Strategy Review Context and Way Forward](#))

**Parking Strategy** – The Councils parking team is currently working on producing a new parking strategy for the borough which is likely to be adopted in 2025.

## Core Policy 4: Environment

### Local Indicator CP4a: Monitoring of Habitats and land-cover analysis

6.10 Habitat monitoring not been updated since last monitored in 2012. Even so, while there have clearly been some changes since then, it is reproduced in **Table 21** as a useful indication of the respective forms of land cover (KCC, 2012: [see Kent Habitat Survey 2012 Report](#)).

Table 21: Habitat Cover Analysis (Source: KCC, 2012)

Habitat Type	Tunbridge Wells Borough, 2012/13 (Percentages)	Kent County Area, 2012/13 (Percentages)
Built-up Areas	3.2	4
Boundary and Linear Features	2.8	3
Improved Grassland	37.5	30
Arable and Horticulture	26.2	35
Broadleaved, Mixed, and Yew Woodland	18.1	11
Coniferous Woodland	2.6	1
Neutral Grassland	7.1	7
Orchard	1	<1
Standing Open Water	1	1
Other (see Biodiversity Evidence Base)	0.5	10

## Core Policy 5: Sustainable Design and Construction

### Local Indicator E1: Permissions Granted Contrary to Environment Agency Advice

**Objective:** To make efficient use of resources by the application of sustainable design principles and to mitigate and adapt to climate change

#### Targets:

- No development that would have an unacceptable effect on the quality or potential yield of groundwater, the quality within, or supply to, surface water features will be permitted
- No development in areas at high risk from flooding will be permitted without measures to protect it and prevent the increased risk of flooding elsewhere



Table 22: EA Objections to Applications on Flood Risk Basis 2023-2024 (Source: EA, 2024 and TWBC Monitoring, 2024)

Planning Reference	Application Type	EA Comment	Application Result
23/00724/FULL	Residential - Non-Major	Recommended that permission is refused in the absence of a Flood Risk Assessment (FRA)	Application permitted – the EA's comments were received after the application was decided
23/00773/FULL	Heavy Industry/Warehousing - Major	Recommended that permission is refused in the absence of an FRA	Application permitted – whilst part of the site, is within Flood Zones 2 and 3, the new building is outside of these zones and on existing hardstanding. An FRA was therefore not considered to be required.
23/02087/FULL	Residential - Non-Major	Recommended that permission is refused in the absence of an FRA	Application permitted – EA objection removed following submission of an FRA, and permitted with a condition requested by the EA
24/00441/FULL	Caravan Sites - Non-Major	Recommended that permission is refused in the absence of an FRA	Application withdrawn

**Table 22**, showing Environment Agency (EA) objections to planning on the basis of flood risk 2023 to 2024, is based on data obtained from the EA (2024: [see Environment Agency Objections to Planning on the Basis of Flood Risk](#)) as well as from TWBC monitoring (2024). This indicates that within 2023-2024, the EA objected to only 4 applications, 3 (non-major) and 1 major, all objected due to an absence of a Flood Risk Assessment (FRA). Of the non-major applications, one was subsequently withdrawn and two were permitted. One of these was permitted ahead of the late representation from the EA, the other was permitted following the submission of a satisfactory FRA and with a condition requested by the EA. The major application was permitted as an FRA was not considered necessary as the proposed building was on existing hardstanding and outside of the flood zones. **Local Indicator E3: Renewable Energy Generation**

**Objective:** To make efficient use of resources by the application of sustainable design principles and to mitigate and adapt to climate change.

**Targets:** All development (either new build or conversion) with 10 or more residential units or a site area over 0.5ha, or non-residential development with a floorspace of 1,000sqm or a site area over 1.0ha, should incorporate renewable energy technology on site to reduce predicted CO2 emissions by at least 10%.

6.11 Renewable energy installations and capacity data is monitored nationally by the Department for Energy Security and Net Zero (DESNZ). Trends in Tunbridge Wells borough are shown in **Table 23** (DESNZ, 2024: [see Renewable Energy Statistics](#); also [see Renewable Energy Planning Database Quarterly Extract](#)). This indicates

that the number of sites producing renewable energy has continually increased over the period 2015-2023, with a significant increase between 2022-2023. These were all photovoltaic installations, and of a small scale as evidenced by a moderate increase in capacity and a slight decrease in generation. The number of operational renewable electricity generation and storage projects above 150kW in the borough has remained at 5 since 2018. .

Table 23: Renewable Energy Installations, Capacity, Electricity Generated, and Number of Operational Renewable Electricity Generation and Storage Projects in Tunbridge Wells Borough 2015-2023 (Source: DESNZ, 2024)

Data	2015	2016	2017	2018	2019	2020	2021	2022	2023
Total Number of Sites Producing Renewable Electricity	1,240	1,290	1,325	1,373	1,472	1,509	1,910	2,337	3,014
Capacity (MW)	35.6	41.0	41.1	41.5	40.8	41.4	43.3	44.8	47.5
Total Electricity Generated (MWh)	30,987	42,071	42,824	45,095	45,367	47,425	38,955	44,122	43,769
Number of Operational Renewable Electricity Generation and Storage Projects (>150kW)	2	3	4	5	5	5	5	5	5

## Local Indicator H6: Design Quality

**Objectives:** To make efficient use of resources by the application of sustainable design principles and to mitigate and adapt to climate change.

**Targets:** 30% of major residential applications to be categorised as 'Good' or 'Very Good' under Building for Life criteria.

6.12 There is no monitoring data in relation to Building for Life criteria, although they are largely incorporated into the Council's design policies and guidance.

## Air Quality

6.13 An Air Quality Management Area (AQMA) was initially declared in Royal Tunbridge Wells in 2005, based on exceedances of the Air Quality Strategy annual mean objective for nitrogen dioxide (NO<sub>2</sub>). The AQMA was extended in 2011 and adjusted at the end of 2018 as part of updating this action plan. The AQMA was revoked in April 2024 as it has been compliant with all air quality objectives for several years. The pollutants monitored in the AQMA were nitrogen dioxide (NO<sub>2</sub>) and PM10 (particulate matter less than 10 microns diameter).

6.14 An AQMA was declared along part of Cranbrook Road in Hawkhurst in 2021 to monitor nitrogen dioxide (NO<sub>2</sub>). Whilst there has been clear improvements in air quality in Hawkhurst, the AQMA currently remains in place. See the [Tunbridge Wells Borough Annual Status Report 2024](#) for more further information on air quality monitoring in the borough.

## Ultra-Low emissions vehicles (ULEVs) registered within the borough

- 6.15 (Ultra-low emission vehicles (ULEVs) are vehicles that emit less than 75g of carbon dioxide (CO<sub>2</sub>) from the tailpipe for every kilometre travelled. In practice, the term typically refers to battery electric, plug-in hybrid electric and fuel cell electric vehicles).

Table 24: Total Number of ULEVs Registered Within the Tunbridge Wells Borough 2013-2024 (Source: DfT/DVLA, 2024). The figures are for the number of registered ULEVs at the end of each year, except 2024 where the most recently published data for the number of registered ULEVs at the end of June.

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Number of ULEV Registered	28	57	109	180	288	379	533	747	1,175	1,733	2,400	2,728

- 6.16 **Table 24** shows the number of ULEVs registered within the Tunbridge Wells borough over the period 2013-2024 (DfT/DVA, 2024: [see Statistical Data Set: All Vehicles \(VEH0132\): Ultra-Low Emissions Vehicles \(ULEVs\)](#)). This indicates that the number of ULEVs registered in the borough has continued to increase over recent years at an increasing year-on-year rate.

## Waste and Recycling

Table 25: Waste and Recycling in Tunbridge Wells Borough 2014/15-2022/23 (Source: DEFRA, 2024)

Year	Total Collected Waste (Tonnes)	Collected Waste Sent for Recycling, Composting, or Reuse (Tonnes)	Collected Waste Not Sent for Recycling (Tonnes)
2014/15	46,375	21,649	24,726
2015/16	46,201	21,024	25,177
2016/17	45,700	22,422	23,278
2017/18	44,557	21,514	23,043
2018/19	42,909	20,477	22,432
2019/20	42,704	21,426	21,244
2020/21	42,285	20,083	22,174
2021/22	43,097	20,613	22,484
2022/23	40,537	19,386	21,151

- 6.17 **Table 25** is based on data obtained from DEFRA (2024: [see Statistical Data Set: Local Authority Collected Waste: Annual Results Tables](#)). This shows that the total collected waste (in tonnes) has continually decreased in the borough over the period 2014/15-2022/23. The level of waste sent for recycling/composting/reuse has fluctuated while the level of waste not sent for recycling has decreased, however, the total tonnage of waste recycled has declined less than the total not recycled, indicating that recycling is increasing in relative terms.

## Core Policy 6: Housing Provision

### Five Year Housing Land Supply

- 6.18 Housing completion figures are provided in relation to Core Policy 1 – Delivery of Development. Please see the Council’s website for detailed information on the Five-Year Housing Land Supply and the Housing Delivery Test ([see Monitoring Information](#)).
- 6.19 The Five-Year Housing Land Supply Statement contains information on all sites and planning permissions that contribute to the land supply while the Housing Delivery Test Action Plan addresses how the Council intends to support future housing delivery across the borough.

### Dwellings Completed on PDL

- Core Strategy Target of 65% on PDL between 2010 and 2026; 2023/24 = 35.7%

### Local Indicator H4; Net Additional Traveller Pitches

**Target:** None set

6.20

- 6.21 The Council published a new [Gypsy and Traveller Accommodation Assessment](#) (GTAA) in 2024 which identified Gypsy and Traveller pitch needs to 2039. As set out within the Council’s [Five-Year Gypsy and Traveller Pitch Supply Statement 2024](#), the Council can demonstrate a pitch supply of 3.24 years under the ethnic definition (which the Council proposes to adopt) as at 1 April 2024. The Submission Local Plan aims to plan for additional pitches over the Plan period (to 2038) that will meet the outstanding Gypsy and Traveller Accommodation Assessment need. This outstanding need is based on the need for 52 pitches (ethnic definition) over the period 2024-2038. As at 1 April 2024, a supply of 40-41 pitches is identified through existing/anticipated supply, potential additional pitch capacity at existing sites, and potential additional pitches at new site allocations. Further pitches are anticipated to come forward as windfalls. Further details are provided in the Submission Local Plan and Housing Topic Papers as part of the Local Plan evidence base, along with the latest Five-Year Gypsy and Traveller Pitch Supply Statement 2024 referred to above.

## Affordable Housing Completions

**Local Indicator H5:** Gross Affordable Housing Completions (Source: TWBC Affordable Housing Completions)

**Target:** 70 affordable units per annum

Table 26: Gross Affordable Housing Completions (Source: TWBC Monitoring, 2024)

Year	Affordable Homes
2006/07	107
2007/08	53
2008/09	64
2009/10	17
2010/11	96
2011/12	85
2012/13	36
2013/14	14
2014/15	221
2015/16	108
2016/17	139
2017/18	61
2018/19	72
2019/20	70
2020/21	119
2021/22	91
2022/23	153
2023/24	107
Average	89.61per annum

6.22 As shown in **Table 26**, on average, the target set by the Council's Housing Strategy (2012-2017) to achieve 70 affordable units per annum has been met over the monitoring period. This helps to ensure that housing remains accessible and affordable to local residents.

**Local Indicator H8: Percentage of Completed Dwellings at less than 30 per hectare, between 30 and 50 per hectare and over 50 per hectare**

**Objective:** To provide for the housing needs of all people with a range of house types

**Targets:** To be identified through the Local Development Framework in the relevant DPD

6.23 In the most recent monitoring year (01 April 2023 – 31 March 2024), the following densities were achieved on site:

Table 27: Approximate Housing Density Achieved On Sites Completed in Monitoring Year 01 April 2023 – 31 March 2024 (Source: TWBC Monitoring, 2024)

Density	2023/24 Completed Housing Schemes
Less than 30 dph	307 dwellings* (67% of total completions)

Density	2023/24 Completed Housing Schemes
Between 30 and 50 dph	43 dwellings (9% of total completions)
Greater than 50 dph	108 dwellings (24% of total completions)

\*This figure may be disproportionate due to larger sites including extensive areas for landscaping, etc.

- 6.24 As indicated in **Table 27**, over 67% of all dwellings on completed sites in 2023/24 has achieved densities under 30 units per hectare. In comparison, approximately 24% of dwellings on completed sites were found to be over 50 units per hectare, suggesting a broad variation in housing density on development sites across the borough. It should be noted, however, that these are gross densities based on the site area relating to the planning permission (so includes non-developable areas, such as for open space/landscaping, and/or roads (including access roads) which is particularly relevant for the larger sites). As such, in the future it would be useful to review net densities further, particularly on larger sites, having more detailed regard to developable areas.

### Self-Build and Custom Housebuilding

- 6.25 Since 01 April 2016, the Council, as the Local Planning Authority, has a statutory responsibility to keep a Self-Build and Custom Housebuilding Register for the borough, allowing people who wish to build their own home to register their interest. The Council is expected to permit, within 3 years, an equal number of serviced plots to those on the Register as at 30 October each year.
- 6.26 On 25 June 2020, Tunbridge Wells Borough Council's Cabinet approved the proposal to implement a local connection test to the Council's Self-Build and Custom Housebuilding Register. This resulted in the splitting of the Register into two parts. Part 1 lists all those people on the Register who meet the local connection test criteria, and Part 2 lists all those people on the Register who do not meet the local connection test criteria. The Council contacted all those people on the Register to update their details accordingly, and in accordance with the Regulations removed all those who did not respond or who requested to be removed from the Register.
- 6.27 As of the end of the last base period (31 October 2024), there were 258 registrations on the Register; 176 are placed on Part 1, and 82 are placed on Part 2. It is the need of those on Part 1 which the emerging Local Plan will need to plan for. Further details as to how the Council has calculated the need and supply for self/custom build housing within the emerging Local Plan can be found in the latest Housing Needs Assessment and Housing Supply and Trajectory Topic Papers (see the Submission Local Plan's [Core Documents List](#)); a further update can also be found within the [January 2024 Local Plan Development Strategy Topic Paper Addendum](#).

## Core Policy 7: Employment Provision

### Local Indicator BD1: Total Amount of Additional Employment Floorspace - by type

**Objectives of indicator:** To provide good quality employment land to contribute to strategic and local requirements (see [Class Use Change Guide](#); for class definitions)

**Target:** Maintain overall amount of floorspace in the borough

Table 28: Permitted Employment Floorspace Across the Tunbridge Wells Borough for Monitoring Year 01 April 2023 – 31 March 2024 (Source: TWBC Monitoring, 2024)

Data	E	B2	B8
Gain (sqm)	2785	430	8803
Loss (sqm)	12104	1025	334
Net (sqm)	-9319	-595	8469

During the monitoring year 01 April 2023 – 31 March 2024, there has been a loss of E class uses floorspace (Commercial, Business and Service) and B2 (general industrial) while B8 (Storage and Distribution) uses witnessed a notable gain. The losses seen in the E class use can primarily be attributed to conversions of buildings into dwellings (C3), along with a 5317sqm change of use from a use class E building to a car showroom/garage facility (Sui Generis use class) under application 22/03262/FULL . The gains in B8 uses can largely be attributed to a permission granted for the redevelopment of a vehicle repair/car sales site (use classes B2 and Sui Generis) to a self-storage unit under application 23/01048/FULL, accounting for a 8316sqm gain in use class B8 floorspace.

- 6.28 Acknowledging the issue of office loss, a Town Centre Office Market Review was produced in March 2018, and since updated in February 2021. The conclusions of the report included that between May 2013 and March 2018, 22% of existing office space had been lost and through change of use to residential via Permitted Development Rights and a further 22% is at risk. Following the updated review, a further 8% of net office space was lost in the March 2018 to February 2021 period. As a result of the findings in this report, a number of Article 4 Directions were served on Office accommodation across Tunbridge Wells by the Council. The service of an Article 4 Direction removes Permitted Development Rights from the properties in question and means that any proposal to change the use to residential at that site would now require full planning permission and be subject to assessment and consideration against relevant national and local planning policy.



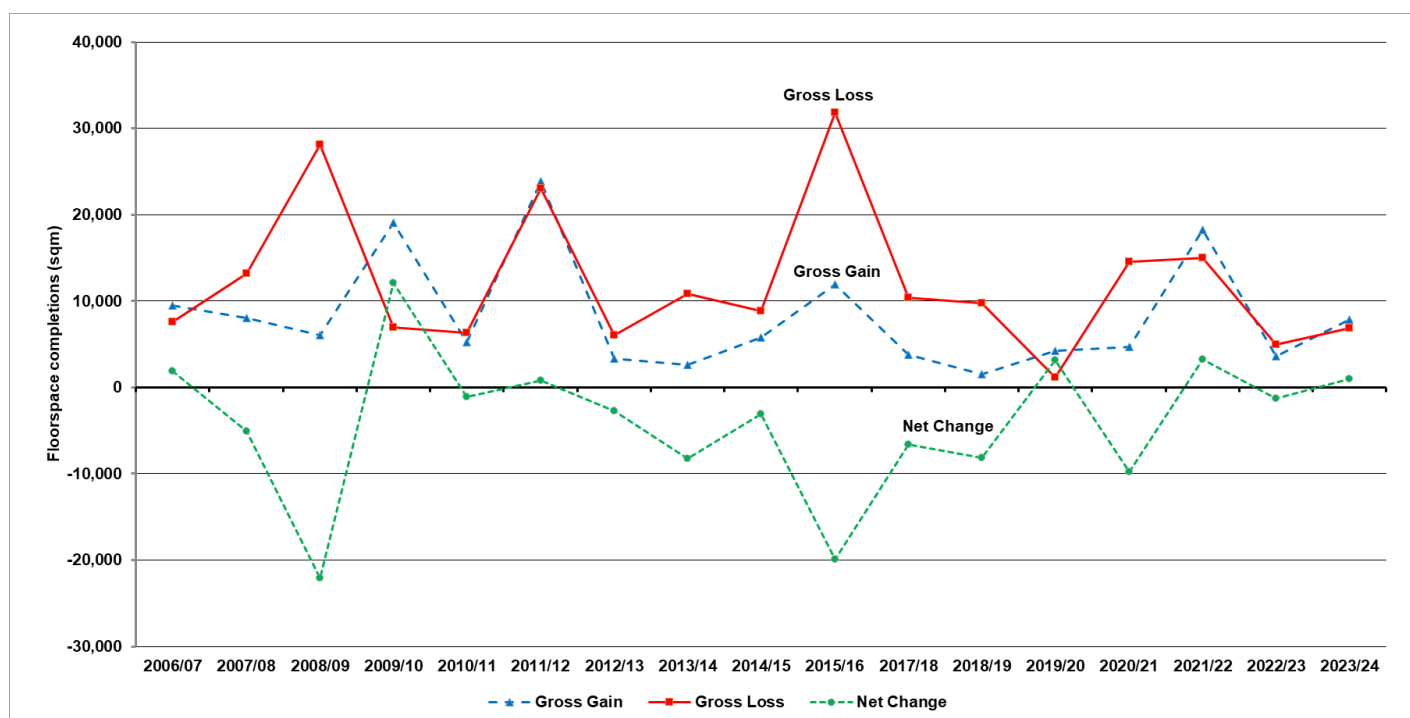


Figure 19: B2, B8 and E uses Total Floorspace Completed (sqm) (Source: TWBC Monitoring, 2024)

6.29 As **Figure 19** illustrates, the 2023/24 monitoring year saw a small net gain in employment floorspace completions. The Council hope that the implementation of Article 4 directions and both the policies and allocations contained within the new Local Plan will encourage further gains in employment floorspace. The figures for 2022/23 have been amended in Figure 22 as the 2022/23 monitoring used data for permissions rather than completions.

## Local Indicator BD2: Total Amount of Employment Floorspace on Previously Developed Land (PDL) – by type

**Objective:** To conserve finite, non-renewable resources such as land, energy, water, soil and air quality

**Targets:** >45% on PDL

Table 29: Gross Employment Floorspace Permitted on Previously Developed Land in Monitoring Year 01 April 2023 – 31 March 2024 (Source: TWBC Monitoring, 2024)

Data	E	B2	B8
Total Gross Gain (sqm)	2785	430	8803
Gross Gain (sqm) on PDL	2006	430	8514
Gross Gain on PDL %	72%	100%	97%

6.30 **Table 29** illustrates the above target of >45% on PDL was met by use classes E, B2 and B8 permissions across the borough for the monitoring year 01 April 2023-31 March 2024 (gross; i.e. not including losses in **Table 28**) to ensure best use of land across the borough. **Local Indicator BD4: Total Amount of Floorspace for 'Town Centre Uses' within defined Town Centre boundaries**



**Objective:** To provide good quality employment land to contribute to strategic and local requirements

**Target:** Maintain overall amount of employment floorspace in the borough

Table 30: Permitted Floorspace for 'Town Centre Uses' in Town Centres and Outside Town Centres in the Tunbridge Wells Borough During Monitoring Year 01 April 2023 – 31 March 2024 (Source: TWBC Monitoring, 2024)

Data	E Class Uses
Town Centre Gross Gains (sqm)	221
Town Centre Gross Losses (sqm)	4989
Town Centre Net Change (sqm)	-4768
Outside Town Centre Gross Gains (sqm)	2564
Outside Town Centre Gross Losses (sqm)	7115
Outside Town Centre Net Change (sqm)	-4552
Total Gross Gains (sqm)	2785
Total Gross Losses (sqm)	12104
Net Change (sqm)	-9319

6.31 As **Table 30** illustrates, based on new permissions in the 01 April 2023 – 31 March 2024 monitoring year, there has been floorspace loss within the defined town centres equating to a net change of -4768sqm. A similar loss of 4552sqm was experienced outside of the town centres..

#### **Local Indicator BD5: Amount of employment land (B2, B8 and E) lost to residential development**

**Objective:** To provide good quality employment land to contribute to strategic and local requirements

**Target:** No target set, to be established through DPD

Table 31 - Employment Land Lost to Residential Based on Permissions During Monitoring Year 01 April 2023 – 31 March 2024 (Source: TWBC Monitoring, 2024)

Data	Area (sqm)
Residential to Employment Gross Permissions	24
Employment to Residential Gross Permissions	6739
Net Loss of Employment Land to Residential	-6715

6.32 From **Table 31**, in the 2023/24 monitoring year the amount of employment land lost to residential is recorded at 6739sqm, decreasing from 10688sqm in the 2022/23 monitoring year. The Article 4 Directions will be important in managing any further loss of employment land across the borough. Regard should also be given to the [Sevenoaks and Tunbridge Wells Economic Needs Study 2016](#) that was produced to inform the Submission Local Plan.

## Core Policy 8: Retail, Leisure & Community Facilities Provision

### Local Indicator CP8a: Retention of Community Services

**Objective:** To resist the loss of community facilities and provide additional facilities as necessary

**Targets:** No net loss of community facilities in neighbourhood centres and village centres

6.33 As part of a review of Centres across the borough, several changes are being proposed to Neighbourhood and Village Centres in the Submission Local Plan (as proposed to be modified through main modifications). These can be seen in **Table 32**.

Table 32: Proposed Changes to Centres in Tunbridge Wells Borough

Centres	Status in Submission Local Plan	Reason
<b>Primary Regional Town Centre</b>		
Royal Tunbridge Wells	Retained	Facilities still present and area still acting as a Primary Regional Town Centre
<b>Town Centre</b>		
Cranbrook	Retained	Facilities still present and area still acting as a Town Centre
Paddock Wood	Retained	Facilities still present and area still acting as a Town Centre
Southborough	Retained	Facilities still present and area still acting as a Town Centre
<b>Rural Service Centre</b>		
Hawkhurst	Retained	Facilities still present and area still acting as a Rural Service Centre
<b>Neighbourhood Centre</b>		
Broadmead	Removed	Limited facilities now present at Broadmead centre
Hawkenbury	Retained	Facilities still present and area still acting as a Neighbourhood Centre
High Brooms	Retained	Facilities still present and area still acting as a Neighbourhood Centre
North Southborough	Retained	Facilities still present and area still acting as a Neighbourhood Centre
Rusthall	Removed	Redefined as a Village Settlement as facilities still present
Sherwood	Retained	Facilities still present and area still acting as a Neighbourhood Centre
Showfields	Retained	Facilities still present and area still acting as a Neighbourhood Centre
Silverdale	Retained	Facilities still present and area still acting as a Neighbourhood Centre
St Barnabas	Retained	Facilities still present and area still acting as a Neighbourhood Centre
St John's	Retained	Facilities still present and area still acting as a Neighbourhood Centre

<b>Centres</b>	<b>Status in Submission Local Plan</b>	<b>Reason</b>
St Peter's	Retained	Facilities still present and area still acting as a Neighbourhood Centre
Knights Wood	New	Area deemed to be serving as a Neighbourhood centre within new Knights Wood development
Within Paddock Wood including land in east Capel	New	New neighbourhood centres will be designated as part of the extension of Paddock Wood and east Capel, which is expected to include a village centre, as well as a number of smaller neighbourhood centres, to be defined through the masterplanning process and the resultant Supplementary Planning Document.
<b>Village Settlements (previously Village Centres)</b>		
Benenden	Retained	Facilities still present and area still acting as a Village Settlement
Bidborough	Retained	Facilities still present and area still acting as a Village Settlement
Brenchley	Retained	Facilities still present and area still acting as a Village Settlement
Five Oak Green	Retained	Facilities still present and area still acting as a Village Settlement
Frittenden	Retained	Facilities still present and area still acting as a Village Settlement
Hawkhurst (The Moor)	Removed	Now has relatively few services which are consolidated in the settlement centre itself
Horsmonden	Retained	Facilities still present and area still acting as a Village Settlement
Iden Green	LBD Removed	Limits to Built Development (LBD) removed from settlement due to limited facilities and transport links, therefore the Village Settlement boundary (as designated by LBD) has also been removed
Kilndown	LBD Removed	Limits to Built Development removed from settlement due to limited facilities and transport links, therefore the Village Settlement boundary (as designated by LBD) has also been removed
Lamberhurst	Retained	Facilities still present and area still acting as a Village Settlement
Langton Green	Retained	Facilities still present and area still acting as a Village Settlement
Matfield	Retained	Facilities still present and area still acting as a Village Settlement
Pembury	Retained	Facilities still present and area still acting as a Village Settlement
Rusthall	New	Facilities present and area acting as a Village Settlement (redefined from Neighbourhood Centre)
Sandhurst	Retained	Facilities still present and area still acting as a Village Settlement
Sissinghurst	Retained	Facilities still present and area still acting as a Village Settlement

Centres	Status in Submission Local Plan	Reason
Speldhurst	Retained	Facilities still present and area still acting as a Village Settlement

- 6.34 As shown in **Table 32**, there have been some changes to Neighbourhood and Village Centres across the borough since they were designated through the 2006 Local Plan, while no changes have been proposed to Primary Regional Town Centre, Town Centres, and Rural Service Centre. Notably, the Submission Local Plan has renamed Village Centres to Village Settlements, as there are no defined village ‘centres’ as such. Village Settlements are defined by the Limits to Built Development boundary.
- 6.35 With regard to losses/gains, while the Submission Local Plan proposes the removal of two neighbourhood centre designations and 3 Village Settlements designations, there are 2 new defined Neighbourhood Centres proposed and 1 new Village Settlement proposed, reflecting the development strategy set out within the Submission local Plan and updated within the [January 2024 Local Plan Development Strategy Topic Paper](#).

#### **Local Indicator CP8b: Amount/Retention/Provision of Recreation Open Space**

**Objective:** To provide, retain and, where necessary, improve a range of leisure, recreational and cultural facilities

**Targets:** Retention/provision of adequate open space

- 6.36 As part of the evidence base produced to support the new Local Plan, the Borough Council commissioned an evidence base document that assesses explores the provision of Open Space available across the borough. The data provided within this report will act as a baseline for future monitoring of Open Space provision across the borough ([view the Open Space Study](#)).

#### **Local Indicator CP8c: Amount of New Retail Floorspace Provided**

**Objective:** To provide new retail and leisure facilities according to the approach set out in the Core Strategy.

**Targets:** Bolstering of net comparison floorspace throughout the plan period using existing and proposed stores within existing centres in the adopted retail hierarchy

- 6.37 A number of sites have been allocated in the Site Allocations Local Plan (2016) to meet the retail need, including a proposed scheme at Royal Victoria Place and through the redevelopment of the former cinema site, both in Royal Tunbridge Wells. The level and locations of retail need have been subsequently reviewed through new retail and leisure studies as part of the emerging Local Plan (see [Core Documents list](#)). Following the updated evidence base the Submission Local Plan

proposes employment development on site allocations to meet the updated identified level of retail need.

- 6.38 Core Strategy policy (CP8) provided an original target of 26,500sqm of net comparison floorspace by 2017, as per the 2006 Retail Study. This target was subject to revisions if 'a different need is identified through a future Retail Study'. Since then, the Retail Study has been updated (February 2021), in which it did not identify any capacity (either quantitative or qualitative) for additional comparison floorspace over the plan period. The study stated that floorspace capacity should be achieved through the bolstering of existing or proposed stores within existing centres in the adopted retail hierarchy, hence the target has been amended within this report.

### Local Indicator CP8d: Completion of Infrastructure Projects

**Targets:** Completion of key specific projects

Table 33: Completion of Key Infrastructure Projects (Source: TWBC, 2024)

District General Hospital	Complete
Completion of allocations for children's play spaces	Provided as part of relevant schemes

### Local Indicator LS4: Royal Tunbridge Wells Town Centre Uses within the Primary Shopping Areas

Table 34: Royal Tunbridge Wells Town Centre Uses (Source: TWBC, 2019 and number of vacant units updated in 2023)

Character Area	A1 (%)	Non A1 (%)	Target Non A1 (%)	Total Number of Vacant Units	% of Total Units
1 – Royal Victoria Place/Market Square/Ely Court	No longer monitored	No longer monitored	No longer monitored	No longer monitored	No longer monitored
2 – Calverley Road (West)	80%	20%	15%	6	18%
3 – Monson Road/Camden Road	69%	31%	15%	11	12%
4 – Calverley Road (East)	66%	34%	30%	8	27%
5 – Grosvenor Road/Goods Station Road	77%	23%	30%	2	6%
6 – Mount Pleasant Road (North)	42%	58%	40%	1	4%
7 – Mount Pleasant Road (North)	64%	36%	40%	7	16%
8 – Vale Road/Grove Hill Road	62%	38%	40%	1	4%
9 – High Street/Castle Street/Chapel Place	66%	34%	45%	7	6%
10 – The Pantiles/Union Square	64%	36%	45%	4	8%

\*Following adoption of the emerging Local Plan this will be changed to monitoring of class E uses.

- 6.39 **Table 34** shows the percentage of each Character Area Frontage falling within Use Class A1 (retail shops). This is based on data obtained by the Council for the 2018/19 monitoring year. This shows that 4 of the character areas exceed the Local Plan 2006 threshold for their respective areas. It is noted this policy is dated from 2006 and the Use Classes Order changed in 2020 to introduce Use Class E (commercial, business and services). This new use class covers the former use classes A1 (shops), A2 (financial and professional), A3 (restaurants and cafés) as well as parts of D1 (non-residential institutions) and D2 (assembly and leisure). As such the percentage of non-A1 uses within the Primary Shopping Area is no longer relevant as an indicator of the success of the policy and the retention of A1 use classes. However, the Council has recently carried out monitoring within the Primary Shopping area and has recorded the number of vacant units which has been updated in Table 34 above. As at 2023, the number of vacant units within Royal Tunbridge Wells Town Centre has risen from previous years, with Calverley Road (East) having experienced the highest vacancy rate of 27%.
- 6.40 The Submission Local Plan sets out a more flexible approach to the consideration of uses within both the Primary Shopping Area and the wider Town Centre which has been informed by the [Tunbridge Wells Retail, Commercial Leisure & Town Centre Uses Study Update](#) (February, 2021) , which was commissioned to aid preparation of the new Local Plan. This includes Town Centre health checks carried out in August 2020 of all the key centres (i.e., Royal Tunbridge Wells, Paddock Wood, Southborough, Cranbrook, and Hawkhurst) which has considered the health of the key centres within the borough, including the diversity of uses, vacant street level property, retailer representation, pedestrian flows etc.
- 6.41 Additionally, the Council has recently embarked on the preparation of the Royal Tunbridge Wells Town Centre Plan. The Town Centre Plan will be a land use planning document – a Local Plan specific for the town centre area, comprising of a vision, strategy, masterplan and planning policies for the town centre to ensure its long-term prosperity and success (it will be a separate document to the main Local Plan).
- 6.42 A Town Centre Working Group has been established to oversee and input to the production of the plan, including Council Members, the Royal Tunbridge Wells Town Forum, Kent County Council, Royal Tunbridge Wells Together, Creative Tunbridge Wells, a youth representative and TWBC officers. Consultants LDA Design were commissioned to carry out a ‘Town Centre Study’ which has been used to inform the issues and options first draft document, the Draft Royal Tunbridge Wells Town Centre Plan – Vision 2040, which was consulted on between February-April 2024. A further full draft plan is being produced and further public consultation will be carried out. The timetable for the production and adoption of the Royal Tunbridge Wells Town Centre Plan is set out in the LDS.

# Commentary

## Core Policy 1: Delivery of Development

- 6.43 Performance has been strong during the monitoring year in terms of the percentage of dwellings built within the defined Limits of Built Development. The target, derived from the earlier Core Strategy, is 65% yet the achieved percentage was significantly higher at 78.4%. The proportion of new housing developments being built on previously developed land is currently 35.7%, which is notably lower than the target. It should be noted that this target is no longer realistic in the context of the far higher (more than double) local housing need target derived from the Government's 'Standard Method', which requires substantial greenfield sites to be identified. Additionally, there are proposed greenfield allocations in the SLP coming forward ahead of adoption of the new LP. Therefore, the target is proposed to change in the Submission Local Plan to achieving the Council's annualised windfall sites allowance (expected to be delivered primarily on brownfield and urban land), rather than a percentage of development built within the Limits to Built Development (see **Appendix 1**).
- 6.44 Overall, the policy, in conjunction with the Housing Provision policy CP6 (see below), is clearly delivering the scale of housebuilding sought by the Core Strategy.
- 6.45 The main issue with regard to the housing target in the Core Strategy is that it is now itself out-of-date. This is because, as per the Planning Practice Guidance (PPG, 2019: [see Housing Supply and Delivery; Paragraph: 003 Reference ID: 68-003-20190722](#)), '*where strategic policies are more than 5 years old, or have been reviewed and found in need of updating, local housing need calculated using the standard method should be used in place of the housing requirement*'. Hence, while housing delivery is successful in relation to the Core Strategy's targets, the Standard Method approach for identifying need therefore provides the starting point for looking at provision in the emerging Local Plan. This is the approach toward calculating housing need taken by the Council within the emerging Local Plan (i.e., using the standard method of calculating housing need). Further and up-to-date details can be found in the [January 2024 Local Plan Development Strategy Topic Paper Addendum](#).

## Core Policy 2: Green Belt

- 6.46 The Core Strategy gives high regard to the protection of Green Belt. Monitoring records shows that only 18 residential schemes were permitted in the Green Belt during the period 01 April 2023 to 31 March 2024. All except one of these applications were redevelopments/conversions of existing brownfield sites/on previously development land where it was considered that the proposals were in accordance with NPPF Green Belt policy and there has been no deviation from the Local Plan.



- 6.47 In relation to the allocated Green Belt sites (SALP allocations AL/GB 1, AL/GB 2 and AL/GB 3), it is noted that all three identified sites have now been completed. Of the sites identified to fulfil the long-term land reserve (SALP allocation AL/GB 4), only Culverden Down has seen development on part of the site. The Metropolitan Green Belt boundary should be drawn with the long-term future of towns and villages in mind, with a view to safeguarding land between the built up area and countryside which may be required to meet longer term development needs. For this purpose, the Core Strategy designates areas of Rural Fringe. (see [Green Belt, Rural Fringe and Limits to Built Development](#))

### Core Policy 3: Transport Infrastructure

- 6.48 This promotes key transport projects and measures (aside from accessible development locations), to promote sustainable transport, notably through the adoption of travel plans. It is noted that the A21 Tonbridge to Pembury dualling has been completed and is now fully operational. Works to link North Farm Estate to the improved A21 have also been completed, providing good strategic access.
- 6.49 In relation to Park and Ride, the further work commissioned (completed June 2018) found that the proposed site facility at Woodsgate Corner in Pembury was not financially viable without considerable subsidy, so is not currently being pursued. Notwithstanding this, the publication of a 2019 '[Transport Strategy Review Context and Way Forward](#)' report demonstrates a continuing overall commitment by the Borough Council to take a proactive role in transport matters. It is noted that the Woodsgate Corner site at Pembury is proposed in the Submission Local Plan to be allocated for specialist housing for older people and others with care needs (up to 80 C3 extra care units or up to 120 C2 residential care home/nursing care units).
- 6.50 Development Management practice, supported by Kent County Council Highways, is to secure travel plans for larger development schemes.

### Core Policy 4: Environment

- 6.51 Local indicators focus on biodiversity; these show that SSSIs are generally in satisfactory or improving condition. While reviews of ecological designations are only periodic, the Council has produced a comprehensive report on the state of the borough's biodiversity resources (see [Biodiversity Evidence Base](#)). It also shows that the Council is an early implementer of the new national approach to achieving net gains in biodiversity, and which is built upon through Policy EN 9 in the new Local Plan. The Council intends to adopt the new Local Plan in March-May 2025 as set out in section 3 of this document and in the Council's most recent [Local Development Scheme \(LDS\)](#) (March 2025). The LDS March 2025 also sets out the Council's intention to produce a Biodiversity Net Gain SPD following adoption of the Local Plan to provide further guidance on Policy EN 9 and the implementation of Biodiversity Net Gain within the Borough.. Additionally, the Council has published its Biodiversity Report – First Consideration setting out the Council's first



considerations on meeting the Biodiversity Duty introduced under the Environment Act 2021 (see the Council's [Biodiversity Duty webpage](#)).

- 6.52 The rich historic environment continues to be closely monitored to ensure its conservation.

## Core Policy 5: Sustainability

- 6.53 This policy has a number of threads. Where data is available, it gives positive results. It shows regard has generally been had to the Environment Agency's comments on planning applications that may impact on flood risk. Recognising that flood risk is a particularly important issue in parts of the borough, the Council has also commissioned a [Level 1 and 2 Strategic Flood Risk Assessment](#) (2019), which has been published online as part of the emerging Local Plan's evidence base.
- 6.54 Requirements for renewable energy generation set out in the Core Strategy have been carried forward through the adopted Renewable Energy Supplementary Planning Document ([see Supplementary Planning Documents](#)) initially published in 2007 and updated in 2019, and are now well established in Development Management practice. Both the number of sites producing renewable energy and the amount of generation continue to increase.
- 6.55 The [Tunbridge Wells Air Quality Annual Status Report \(2024\)](#) shows general improvements in air quality across a number of metrics. Most notably is the continued decrease in NO<sub>2</sub> levels along the A26 resulting in it being compliant with air quality objectives for a number of years. This had led to the A26 AQMA being revoked. The Hawkhurst AQMA remains in place but 2023 monitoring saw a notable decrease compared to 2022 monitoring.
- 6.56 Looking forward, monitoring of sustainability issues can be further developed (see Section 7).

## Core Policy 6: Housing Provision

- 6.57 Actual housing completions are reported under Core Policy 1, while the Council's latest [Five-Year Housing Land Supply Statement \(along with the accompanying addendum following publication of the NPPF 2024\)](#), covering the period 1 April 2023 to 31 March 2024, shows that there is now a supply of 3.9 years against the Council's required five-year supply requirement. The Council can therefore not demonstrate the required five-year supply housing land supply, although, delivery has well exceeded the adopted Core Strategy target.
- 6.58 Achieving fewer dwellings per annum than the Standard Method target may also have further implications for future housing land supply requirements (namely the buffers to be applied to the requirement) based on the new Housing Delivery Test (HDT). In accordance with paragraph 79 of the [NPPF](#) (2024), if delivery over the past 3 recorded years falls below 85% of the housing requirement, a 20% buffer is required for the five-year housing land supply requirement.

- 6.59 The latest HDT results (MHCLG, 2024: see [Housing Delivery Test: 2023 Measurement](#)), covering the period 01 April 2020 – 31 March 2023, indicate that Tunbridge Wells had delivered 94% against this requirement, and is therefore required to produce a Housing Action Plan but does not need to apply any further buffers to its housing land supply position. The Council intends, and continues, to encourage and support the development industry in the borough, with the action plan to set out the actions that it will take to increase delivery. More significantly, the Council is progressing the Submission Local Plan which will bring forward additional site allocations for residential development that will aim to meet the Standard Method housing target and any appropriate buffer.
- 6.60 In relation to Gypsy and Traveller pitches, the outstanding need for pitches will be met primarily through expansion, intensification, and/or regularisation of existing sites, a new site allocation, extant planning permissions, and windfall sites. The Council has provided further details in the [Five-Year Gypsy and Traveller Supply Statement](#), which calculates a current 3.24-year supply of pitches under the ethnic definition (which the Council will assess future need against given the broadened definition in the Planning Policy for Traveller Sites 2024 policy paper).
- 6.61 The proportion of new homes built on previously developed land, being 37.2%, against a target of 65% has been commented on under CP1. The Council continues to provide and maximise brownfield and urban housing potential through Local Plan allocations and any suitable windfall developments.
- 6.62 Affordable housing provided across the borough exceeded the target of 70 units per year (and on average over the period 2006/07-2023/24), although it is noted that affordability has decreased in recent years as evidenced by the increasing affordability ratio for the borough. This is considered in the Submission Local Plan affordable housing policy.
- 6.63 It is worth also noting that over 67% of housing schemes completed in 2023/24 were built at densities of less than 30 dwellings per hectare. The potential for more, higher density schemes (primarily in accessible, urban/brownfield locations) is considered as part of the new Local Plan.

## Core Policy 7: Employment Provision

- 6.64 The business indicators generally show positive trends. The recent increases in unemployment are a concern, although, this reflects national and regional trends, and must be considered in the context of the Covid pandemic. The need to continue to provide a good mix of strategic and local business sites and premises is clearly important in supporting employment opportunities across the borough. While there have been considerable losses of office space to residential dwellings in previous years, partly due to changes to Permitted Development Rights in relation to commercial to residential uses, this needs to be taken into account when determining windfall allowances. It is however noted that there are still gross completions which provides an indication of continued demand for employment land and premises. Additionally, the Council has served a number of Article 4 Directions

on existing office premises across Royal Tunbridge Wells Town Centre and the wider urban area where appropriate, in order to protect the existing office stock.

- 6.65 The tourism sector is important locally, with increases in the number of new hotel bedrooms. Further information is in the [Hotel Capacity Study](#) (2017) on the Council's website.

## **Core Policy 8: Retail, Leisure and Community Facilities Provision**

- 6.66 Of particular note are the national and local structural changes in relation to retailing patterns exacerbated by the Covid pandemic and the resultant changes in the borough's centres, including the retail and commercial mix and vacancies coupled with the demand for more flexible space and residential uses. Alongside this, the Council has updated its evidence base in relation to town centres and retailing to reflect such changes and emerging patterns and national policy including the impact of permitted rights and changes to the Use Classes order. This has been considered in the context of the development of the spatial strategy for the new Local Plan.
- 6.67 National trends in retail floorspace as referred to above, have been reflected locally, with a clear need to provide realistic forecasts of likely floorspace requirements moving forward as identified and recommended within the updated evidence base.

## 7.0 Updating and Refinement of Monitoring Frameworks

- 7.1 Key to effective monitoring is the establishment of a baseline from which future monitoring activities can assess the performance of Local Plan policies.
- 7.2 **Appendix 1** details the proposed monitoring indicators for the Submission Local Plan, including whether this information is currently readily available to the Council and also who will be responsible for monitoring specific indicators.
- 7.3 The new monitoring framework was consulted on through the Draft Local Plan Regulation 18 Consultation between September and November 2019, although, has since been revised for the Pre-Submission Local Plan consultation held between March and June 2021. This revised monitoring framework is reproduced in **Appendix 1**. This revision has considered comments and feedback received through the consultation.
- 7.4 In addition, the 2016 Sustainability Appraisal (SA/SEA) Scoping Report for the draft Local Plan identified 19 issues deemed pertinent to the borough that span the social, environmental and economic pillars of sustainable development. Therefore, the proposed SA/SEA monitoring framework is also set out, in **Appendix 2**, as a basis for future monitoring of key sustainability issues.

# Appendix 1: Submission Local Plan Monitoring Framework (as proposed to be modified through main modifications)

Policy No.	Policy	Target	Indicator	Source
<b>Strategic Policies</b>				
STR 1	The Development Strategy	To maintain at least a 5 Year Housing Land Supply	Number of years housing land supply at 31 March of each year	Tunbridge Wells Borough Council (TWBC)
		At least 85% of annual housing requirement built	Housing completions by a) Parish and b) borough	TWBC
		An annual increase in Local Jobs	Employment/Unemployment Figures	Kent County Council (KCC)
		New development permitted within Limits to Built Development	Number of (and percentage of total borough wide) additional housing units permitted on non-allocated sites within LBD	TWBC
STR 2	Place Shaping and Design	Support for policy at appeal	65% or more appeal decisions support TWBC conclusion on Policy STR 2	TWBC/PINS
STR 3	Brownfield Land	To meet the Council's annualised windfall contribution	Number of dwellings completed on windfall sites (mostly brownfield) as of 31 March of each year	TWBC
STR 4	Ensuring Comprehensive Development	Enabling policy with no specific target but progress to be regularly monitored	Enabling policy with no specific target but progress to be regularly monitored	N/A
STR 5	Infrastructure and Connectivity	Education; sufficient school places	Ratio of applicants per school place (borough wide)	KCC
		Connectivity; increased broadband coverage across the borough	Broadband Coverage (borough wide)	KCC

Policy No.	Policy	Target	Indicator	Source
STR 6	Transport and Parking	Improved transportation provision across the borough	Proportion of new houses permitted within 800m of a bus stop within year	TWBC
		Improved parking provision across the borough	Number of off-street public car parking spaces within Borough as of 31st March of year	TWBC
STR 7	Climate Change	Support for policy at appeal	65% or more appeal decisions support TWBC conclusion on Policy STR 7 (if relevant to appeal)	TWBC/PINS
STR 8	Conserving and enhancing the natural, built, and historic environment	Support for policy at appeal	65% or more appeal decisions support TWBC conclusion on Policy STR 8 (if relevant to appeal)	TWBC/PINS
STR 9	Green Belt	Protect Green Belt from inappropriate development	65% or more appeal decisions support TWBC conclusion on Policy STR 9 (if relevant to appeal)	TWBC/PINS
STR 10	Neighbourhood Plans	Neighbourhood Plans successful at examination	Number and percentage of Neighbourhood Plans progressed to referendum	TWBC
<b>Place Shaping Policies (Strategic)</b>				
STR/RTW 1	The Strategy for Royal Tunbridge Wells	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/RTW 2	The Strategy for Royal Tunbridge Wells Town Centre	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC

Policy No.	Policy	Target	Indicator	Source
STR/SO 1	The Strategy for Southborough	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/SS 1	The Strategy for Paddock Wood and East Capel	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/SS 2	The Strategy for Paddock Wood Town Centre	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/SS 3	The Strategy for Tudeley Village	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC

Policy No.	Policy	Target	Indicator	Source
STR/PW 1	The Strategy for the Parish of Paddock Wood	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/CA 1	The Strategy for Capel Parish	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/CRS 1	The Strategy for Cranbrook and Sissinghurst Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/HA 1	The Strategy for Hawkhurst Parish	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/BE 1	The Strategy for Benenden Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/BI 1	The Strategy for Bidborough Parish	Delivery of identified infrastructure	Key infrastructure provided	TWBC



Policy No.	Policy	Target	Indicator	Source
PSTR/BM 1	The Strategy for Brencley and Matfield Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/FR 1	The Strategy for Frittenden Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/GO 1	The Strategy for Goudhurst Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/HO 1	The Strategy for Horsmonden Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/LA 1	The Strategy for Lamberhurst Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/PE 1	The Strategy for Pembury Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/RU 1	The Strategy for Rusthall Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/SA 1	The Strategy for Sandhurst Parish	Residential development in line with policy target	Housing Completions	TWBC

Policy No.	Policy	Target	Indicator	Source
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/SP 1	The Strategy for Speldhurst Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
Environment and Design				
EN 1	Sustainable Design	Rejection of unsustainable design in planning applications	65% or more appeal decisions support TWBC conclusion on policy EN 1 (if relevant to appeal)	TWBC/PINS
EN 2	Sustainable Design Standards	Attainment of required score for relevant standard e.g. BREEAM	Grading of energy performance certificates	TWBC
EN 3	Climate Change Mitigation and Adaptation	Target Emission Rate 10% below Building Regulation requirement through 'fabric first' approach and a further 15% total energy reduction via renewable energy generating technology for major developments	Energy Calculations	TWBC
		Adherence to policy EN 3	65% or more appeal decisions support TWBC conclusion on policy EN 3 (if relevant to appeal)	TWBC/PINS
EN 4	<u>The Historic Environment, including heritage assets</u>	Protect historic environment <b>and heritage assets</b>	65% or more appeal decisions support TWBC conclusion on policy EN 4 (if relevant to appeal)	TWBC/PINS
			<b><u>Number of listed buildings 'At Risk' as of 31 March of each year</u></b>	<b><u>TWBC/Historic England</u></b>
EN 5	Heritage Assets	Protect heritage assets	Number of Listed Buildings "At Risk" as of 31 March of each year	TWBC/Historic England
		Protect heritage assets	65% or more appeal decisions support TWBC conclusion on policy EN 5 (if relevant to appeal)	TWBC/PINS

Policy No.	Policy	Target	Indicator	Source
EN 6	Shop Fronts	High standard of shop front design and support of policy EN 6 at appeal	65% or more appeal decisions support TWBC conclusion on policy EN 6 (if relevant to appeal)	TWBC/PINS
EN 7	Advertisements	High standard of advertisement design and support of policy EN 7 at appeal	65% or more appeal decisions support TWBC conclusion on policy EN 7 (if relevant to appeal)	TWBC/PINS
EN 8	Outdoor Lighting and Dark Skies	Maintain current level of lighting in rural areas	No deterioration in dark skies mapping outside allocated areas	Campaign to Protect Rural England (CPRE)
<b>Natural Environment</b>				
EN 9	Biodiversity Net Gain	Net gains in biodiversity in developments	Number of biodiversity units lost or gained as part of major developments	TWBC/KMBRC/KNP
EN 10	Protection of Designated Sites and Habitats	No deterioration in condition of SSSIs	SSSI condition monitoring	Natural England
		Maintain percentage of land cover of designated sites	Monitoring of coverage of designated nature conservation sites	TWBC/KMBRC
EN 11	Ashdown Forest Special Protection Area and Special Area of Conservation	Achieve targets set out in the Strategic Access Management and Monitoring Strategies (SAMMS) projects	Implementation and monitoring of SAMMS projects	SAMMS Partnership
EN 12	Trees, Woodlands, Hedges, and Development	Strong protection of trees and hedges	65% or more appeals related to TPO works and protected and protected hedgerows dismissed	TWBC/PINS
EN 13	Ancient Woodland and Veteran Trees	Retention of Ancient Woodland and support of policy EN 13 at appeal	65% or more appeal decisions support TWBC conclusion on policy EN 13 (if relevant to appeal)	TWBC/PINS
EN 14	Green, Grey, and Blue Infrastructure	Increase in managed Green Infrastructure (GI)	Area of land controlled under Landscape and Ecology Management Plans (LEMPs)	TWBC
EN 15	Local Green Space	No loss of Local Green Space (LGS)	Quantity of LGS across the borough	TWBC
EN 16	Landscape Within the Built Environment	Retention of character of defined area and support of policy EN 16 at appeal	65% or more appeal decisions support TWBC conclusion on policy EN 16 (if relevant to appeal)	TWBC/PINS

Policy No.	Policy	Target	Indicator	Source
EN 17	Arcadian Areas	Protect the distinctive character of Arcadian areas and support of policy EN 17 at appeal	65% or more appeal decisions support TWBC conclusion on policy EN 17 (if relevant to appeal)	TWBC/PINS
EN 18	Rural Landscape	Protection of rural landscape	65% or more appeal decisions support TWBC conclusion on policy EN 18 (if relevant to appeal)	TWBC/PINS
EN 19	High Weald Area of Outstanding Natural Beauty (AONB) (now known as High Weald National Landscape)	Retention of essential character of High Weald AONB and support of policy EN 19 at appeal	65% or more appeal decisions support TWBC conclusion on policy EN 19 (if relevant to appeal)	TWBC/PINS
			Monitoring of the AONB Management Plan	High Weald AONB Unit
EN 20	Agricultural Land	Retention of 'best and most versatile' agricultural land	Hectares of 'best and most versatile' land which would be lost as a result of large-scale development on sites greater than 20 hectares	TWBC
<b>Air, Water, Noise, and Land</b>				
EN 21	Air Quality	Continued reduction in air pollution	Pollutant levels at key locations	Kent Air
EN 22	Air Quality Management Areas (AQMA)	Air quality below the level warranting an AQMA	Pollutant levels within AQMA	Kent Air
EN 23	Biomass Technology	N/A enabling policy	Number of biomass schemes permitted	TWBC
EN 24	Water Supply, Quality and Conservation	Support EA advice on flood risk and drainage matters	Measures within state of water in Kent reports	Environment Agency (EA)
		Water use at 110lpppd	Water use calculations	TWBC
EN 25	Flood Risk	Support EA advice on flood risk and drainage matters	Measures within state of water in Kent reports	Environment Agency (EA)
EN 26	Sustainable Drainage	Support EA advice on flood risk and drainage matters	Measures within state of water in Kent reports	Environment Agency (EA)
EN 27	Noise	Retention of tranquil areas	Tranquillity/noise maps	CPRE/Department for Environment, Food & Rural Affairs (DEFRA)

Policy No.	Policy	Target	Indicator	Source
EN 28	Land Contamination	Proper regard to land contamination	65% or more appeal decisions support TWBC conclusion on policy EN 28 (if relevant to appeal)	TWBC/PINS
<b>Delivery of Housing</b>				
H 1	Housing Mix	Periodic review of approved schemes in terms of proportion of dwellings of smaller 1-2 bed dwellings	To establish the proportion of smaller units	TWBC specific review  TWBC Affordable Housing Government Returns
H 2	Housing Density	Effective use of available land having regard to local character	Net density of major residential developments	TWBC specific review
H 3	Affordable Housing	60% of affordable housing to be social rent	The tenure mix of individual sites	Planning records  TWBC Affordable Housing Government Returns
H 4	Estate Regeneration	Housing to meet local needs through estate regeneration	Net change in affordable housing units	Planning records  TWBC Affordable Housing Government Returns
H 5	Rural Exception Sites	At least 1 rural exception site to be approved every 5 years	Dwellings approved on rural exception sites	TWBC
<b>Different Types of Housing Delivery</b>				
H 6	Housing for Older People and People with Disabilities	To approve at least one specialised housing scheme every 2 years.	Additional yearly provision of specialised housing.	TWBC
H 7	Rural Workers' Dwellings	This is a permission policy. Target not applicable.	The number of rural workers dwellings approved	TWBC
H 8	Self-Build and Custom Housebuilding	To meet policy requirement on identified major site allocations	Proportion of dwellings on permitted schemes of identified major site allocations that are self/custom build	TWBC
H 9	Gypsies and Travellers	To meet the identified need of Gypsies and Travellers within the borough	The number of (net) additional Gypsy and Traveller pitches approved	TWBC

Policy No.	Policy	Target	Indicator	Source
H 10	Replacement dwellings outside the Limits to Built Development	Policy Support of Policy H 10 at appeal	65% or more appeal decisions support TWBC conclusion on policy H 10 (if relevant to appeal)	TWBC/PINS
H 11	Residential extensions, alterations, outbuildings, and annexes	Policy Support of Policy H 11 at appeal	65% or more appeal decisions support TWBC conclusion on policy H 11 (if relevant to appeal)	TWBC/PINS
H 12	Extensions to residential curtilages (domestic gardens) outside the Limits to Built Development	Policy Support of Policy H 12 at appeal	65% or more appeal decisions support TWBC conclusion on policy H 12 (if relevant to appeal)	TWBC/PINS
<b>Employment Provision</b>				
ED 1	The Key Employment Areas	Provision of new business floorspace	Floorspace of new build developments through permissions	TWBC
ED 2	Retention of existing employment sites and buildings	No net loss of business floorspace where well located and attractive to the market	Number of planning permissions for reuse or redevelopment of business (B class) sites for housing	TWBC
ED 3	Digital communications and Fibre to the Premises (FTTP)	Improved coverage of high-speed broadband across the borough	Broadband Coverage (borough wide)	KCC
ED 4	Rural Diversification	N/A - enabling policy	Number and type of changes of use of rural buildings	TWBC
ED 5	Conversion of Rural Buildings outside the Limits to Built Development	Net increase in business floorspace in converted rural buildings	Planning Records	TWBC
ED 6	Commercial and private recreational (including equestrian) uses in the countryside	Policy compliant equestrian development and support of policy ED 6 at appeal	65% or more appeal decisions support TWBC conclusion on policy ED6 (if relevant to appeal)	TWBC/PINS
ED 7	Retention of existing, and promotion of new, tourist accommodation and attractions	No net loss of tourism of sites or floorspace where well located and attractive to the market	65% or more appeal decisions support TWBC conclusion on policy ED7 (if relevant to appeal)	TWBC

Policy No.	Policy	Target	Indicator	Source
<b>Town, Rural Service, Neighbourhood, and Village Centres</b>				
ED 8	Town, Rural Service and Neighbourhood Centres, and Village Settlements Hierarchy	Hierarchy identified by policy but without specific targets, so no indicators identified		
ED 9	Defined Town and Rural Service Centres	Retain commercial function of Town and Rural Service Centres	Retail and commercial floorspace permitted (net)	TWBC
ED 10	Sequential Test and Local Impact Test	Retain retail function of Town and Rural Service Centres	Retail floorspace permitted (net) above the impact threshold outside of defined centres	TWBC
ED 11	Primary Shopping Areas and Retail Frontages	Retain commercial function of Town and Rural Service Centres	Retail and commercial floorspace permitted (net) above the impact threshold outside of defined centres	TWBC
ED 12	Retention of local services and facilities	No net loss of village shops and services	Planning application/appeal records for retail and service uses (Class A and Class D)	TWBC
<b>Transport and Parking</b>				
TP 1	Transport Assessments, Travel Plans, and Mitigation	Major developments supported by a Transport Assessment and Travel Plan	Percentage of relevant applications where Transport Assessment and Travel Plan secured	TWBC
TP 2	Transport Design and Accessibility	Policy compliance and support of policy TP 2 at appeal	65% or more appeal decisions support TWBC conclusion on policy TP 2 (if relevant to appeal)	TWBC/PINS
TP 3	Parking Standards	Application of parking standards and 65% support of policy TP 3 at appeal	65% or more appeal decisions support TWBC conclusion on policy TP 3 (if relevant to appeal)	TWBC/PINS
TP 4	Public Car Parks	No net loss of public car parking spaces	Number of off-street public car parking spaces within borough as of 31 March each year	TWBC
TP 5	Safeguarding Railway Land	No development permitted to prejudice railway routes and support of policy TP 5 at appeal	65% or more appeal decisions support TWBC conclusion on policy TP 5 (if relevant to appeal)	TWBC/PINS

Policy No.	Policy	Target	Indicator	Source
TP 6	Safeguarding Roads	No development permitted to prejudice safeguarded routes and support of policy TP 6 at appeal	65% or more appeal decisions support TWBC conclusion on policy TP 6 (if relevant to appeal)	TWBC/PINS
<b>Open Space, Sport, and Recreation</b>				
OSSR 1	Retention of Open Space	No net loss of identified open space areas or facilities and support of policy OSSR 1 at appeal	65% or more appeal decisions support TWBC conclusion on policy OSSR 1 (if relevant to appeal)	TWBC/PINS
OSSR 2	The Provision of Publicly Accessible Open Space and Recreation	Residential development to provide Open space in line with standards	Developments above open space threshold (20 dwellings) permitted with on-site open space provision	TWBC



# Appendix 2: Submission Local Plan Sustainability Appraisal Monitoring Framework

SA Topic	SA Objective	Possible Monitoring Indicator	Source
Air	1. Reduce air pollution	Pollutant levels at key locations in the borough	Kent Air online database
Biodiversity	2. Protect and enhance biodiversity and the natural environment	<p>Number of developments generating adverse effects on sites recognised for biodiversity value (including local sites as well as Sites of Special Scientific Interest (SSSIs))</p> <p>Number of developments generating biodiversity enhancement including GI</p> <p>Deterioration in condition of SSSIs.</p> <p>Reduction in percentage cover of sites designated for nature conservation</p> <p>Biodiversity units lost or gained as a result of major development</p>	TWBC/ Natural England/TWBC/KMBRC
Business Growth	3. Encourage business growth and competitiveness	Floor space targets for new Local Plan.	TWBC

SA Topic	SA Objective	Possible Monitoring Indicator	Source
Climate Change & Energy	4.Reduce carbon footprint and adapt to predicted changes	Attainment of carbon reduction targets Grading of Energy Performance Certificates. Number of EV car registrations. Number of renewable energy schemes.	TWBC/KCC
Deprivation	5.Reduce poverty and assist with regeneration	3 yearly Indices of Multiple Deprivation (IMD) Report.	KCC Research and Intelligence Monthly Bulletin (deprivation and poverty)
Education	6.Improve educational attainment and enhance the skills base	Ratio of applicants to school places.	KCC Education Department
Employment	7.Facilitate and support employment opportunities	Monthly unemployment records.	KCC Research and Intelligence Monthly Bulletin (economy and employment)
Equality	8.Increase social mobility and inclusion	Number of accessible new homes	TWBC
Health	9.Improve health and wellbeing, and reduce health inequalities	3 yearly Indices of Multiple Deprivation (IMD) Report.	KCC Research and Intelligence Monthly Bulletin (public health)
Heritage	10.Preserve and enhance historical and cultural heritage assets	Number of designated heritage assets in the Borough. Number of Listed Buildings 'At Risk'.	TWBC

SA Topic	SA Objective	Possible Monitoring Indicator	Source
Housing	11.Provide sufficient housing to meet identified needs	5 year Housing Land Supply Housing Delivery Test	TWBC
Land use	12.Protect soils, and reuse previously developed land and buildings	MGB Allocation Summary Brownfield register	TWBC
Landscape	13.Protect and enhance landscape and townscape	Majors permitted per year in the AONB (now known as National Landscape) Monitoring of the AONB (National Landscape) Management Plan.	TWBC
Noise	14.Reduce noise pollution	Tranquillity maps Noise maps	CPRE DEFRA
Resources	15.Reduce the impact of resource consumption	% of relevant applications where demolition is avoided % of relevant applications where materials are sourced responsibly Safeguarding of mineral and waste assets	TWBC/KCC
Services and facilities	16.Improve access to and range of key services and facilities	Postcodes with superfast broadband. Distance from development to services and facilities	TWBC

<b>SA Topic</b>	<b>SA Objective</b>	<b>Possible Monitoring Indicator</b>	<b>Source</b>
Travel	17.Improve travel choice and reduce the need to travel by private vehicle	% of relevant applications where a Travel Plan is secured.	TWBC
Waste	18.Reduce waste generation and disposal	Household waste (kg/person) Household waste diverted from landfill (%)	TWBC Contracts Team
Water	19.Manage flood risk and conserve, protect and enhance water resources	Various metrics within 'State of Water in Kent' report. Water Use calculations	EA/TWBC