

Tunbridge Wells Borough Council

# **Consultation Statement for Submission Local Plan (Part 2 of 2)**

**Summaries of Main Issues Raised at Regulation 19**

October 2021

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## Introduction

1. This document provides a summary of the main issues raised in the representations made to Tunbridge Wells Borough Council's Pre-Submission Local Plan which was published on 26 March 2021 to allow for representations to be made over a 10-week period, which closed at 5.00pm on Friday 4 June 2021.
2. In total, some 650 organisations and individuals duly responded, submitting a total of 2,084 representations on different parts of the Local Plan. Multiple representations came mainly from organisations and development interests.
3. The full text of all individual representations can be accessed via the Council's online [consultation portal](#).

## Distribution of representations

4. Representations have been recorded against the part of the Local Plan to which they relate. This is provided at Appendix 1 of this Consultation Statement (Part 2).
5. The Planning Inspectorate will also be provided with:
  - A schedule of all individual representations set out in document order
  - A schedule of all individual representations set out in representor order
  - A schedule of representorsThese lists will be published in the Local Plan section of the Council's website.
6. The policies that attracted most representations were those relating to site allocations. The strategic sites – Paddock Wood including land at east Capel, and the proposed new settlement, "Tudeley Village" – collectively received most representations, and being fairly evenly split between both locations when representations on the strategy for Paddock Wood Town Centre are included.
7. Royal Tunbridge Wells (RTW) policies also received a significant number of representations, as did those in Benenden Parish, most notably objections to the two allocations at Benenden Hospital. At RTW, representations were spread across more sites, with Land at Caenwood Farm and at the Garden Centre both receiving c30 representations. For other parishes, there were over 50 representations for policies in Hawkhurst, Cranbrook and Sissinghurst and Pembury.
8. The strategic (STR) policies in Section 4 attracted a host of representations – nearly 300 in total – with the development strategy itself receiving over 100.

9. Collectively, the 28 Environment policies in the Development Management Policies chapter also received over 200 representations, but with no topic standing out well above others. Housing policies also attracted a sizeable number of representations – 90 – but again well spread across its (12) policies.

## Approach

10. All representations have been reviewed.
11. Summaries of the main issues raised have been prepared for each Section and, in the case of Sections 5: Place Shaping Policies and 6: Development Management Policies, for each chapter of the Pre-Submission Local Plan, using the same structure as the Pre-Submission Local Plan.
12. There are also summaries relating to the Habitats Regulations Assessment (HRA) and the Sustainability Appraisal (SA) of the Local Plan. In addition, although not relating to a specific part of the Local Plan, a summary of main issues relating to matters of legal compliance, including the 'Duty to Cooperate' (DtC) has been compiled, essentially to assist the examination process.
13. Publication of a "summary of main issues" is a requirement of regulation 22(c)(v) of The Town and Country Planning (Local Plan) (England) Regulations. The requirements are not further defined – and there is no requirement to set out how representations have been taken into account at this stage (unlike at the earlier, Regulation 18, stage).
14. Notwithstanding the above, the Council has invested time in producing what it regards as an appropriate level of detail to assist the Inspector gain an early understanding of issues that are likely to need addressing in the examination. Also, while not a legal requirement, brief responses are provided in relation to the main issues it has identified, to further assist the examination in line with good practice.
15. While the summaries represent Officers' best efforts to fairly and clearly identify the main issues, they should be regarded as guides only. They will, most likely, not cover every individual representation and are not a substitute for reading the full and comprehensive set of all duly made representations, the link to which is given above.
16. It is noted that representations received expressing support have, generally, not been highlighted.

## Overview of main issues

17. The “headline” issues evident from the review of representations are regarded as relating to the following matters:

### A. Meeting the Duty to Cooperate:

Although not a distinct part of the Local Plan, representations that question whether the Council has met the Duty to Cooperate (DtC), particularly in relation to wider housing needs, will (along with other aspects of legal compliance) be one of the first matters to be examined.

The most frequently raised points are whether the Council has cooperated appropriately with Sevenoaks District Council (SDC) (together with Tonbridge & Malling Borough Council (TMBC)) in relation to SDC’s apparent unmet housing needs. At the same time, there are some challenges as to whether TWBC has done as much as it could with adjacent Councils to deflect some housing need away from the Green Belt (and also the AONB) in the borough. There are also a significant number of representations challenging the consideration of impacts on the Tonbridge area, essentially from the strategic sites.

### B. The Development Strategy:

The overall development strategy for the borough lies at the heart of the Local Plan, so inevitably is a main issue. The representations suggest that there will be several aspects to its examination:

*I. Is there a need and is there capacity to accommodate a greater amount of development through the Plan?*

This relates to challenges about meeting wider needs, use of the “capped” ‘standard method’ figure, potential build-out delays, etc. from many development interests.

*II. Is the development strategy, including the scale of development proposed justified having regard particularly to national policies for the Green Belt and Areas of Outstanding Natural Beauty (AONB)?*

A number of local bodies, groups and individuals consider that there isn’t the justification, or ‘exceptional circumstances’, for the removal of large amount of Green Belt or those major developments located in the AONB.

Objections to the strategic sites are most prominent in seeking a reduced level of development, but they also are central to the debate on the distribution of development:

*III. Is the development strategy sustainable, with particular regard to the proposals for the strategic, transformational growth of Paddock Wood and a new village (based on garden settlement principles) having regard to reasonable alternatives?*

This essentially challenges the justification for pursuing the chosen development strategy, both in terms of the options available to the Council and the particular merits, and demerits, of the growth locations. The robustness of the Sustainability Appraisal and the potential for brownfield development are likely to form part of this testing, as may employment provisions.

C. Place shaping chapters:

Given the significant contribution that the strategic sites make to overall housing supply, the challenges to the appropriateness and deliverability are seen as a main issue in their own right:

*IV. Are the strategic sites proposals, as set out in Policies STR/SS1 and STR/SS3, appropriate, including in terms of loss of Green Belt, infrastructure requirements and mitigations and delivery programme?*

There are significant levels of challenge to the strategies and related allocations for other areas, as noted earlier, although it is likely that the issues at Benenden parish may be largely resolved if the Neighbourhood Plan is made before the Local Plan examination. The objections made to proposed site allocations and the adequacy of supporting infrastructure, and in relation to omission sites, all relate to their respective strategies; hence, the main issue, in broad terms, is:

*V. Are the place shaping strategies across the borough as a whole robust?*

D. Development Management Policies:

Given the number and breadth of these policies and their critical role in setting out how the Council will consider future planning applications, some of the more influential or sensitive topics that have drawn multiple representations, especially where they are from national bodies, may be identified as main issues. These may include the approaches in policies on sustainable design/standards and wider climate change matters, heritage assets, biodiversity net gain, affordable housing, housing for older people, and traveller sites provision. In broad terms the diverse issues raised may be seen as relating to:

*I. Whether the Development Management Policies are consistent with national policy and reflect local circumstances?*

## **Consideration and conclusions**

18. Following the review of the representations received, an assessment has been made of their merits and whether they raise substantive issues which indicate that the Local Plan is not sound and should not be submitted, notwithstanding the resolution to do so.

19. At the same time, consideration has been given of any relevant changes in circumstance during or since the Regulation 19 consultation. This includes changes to national policy including the new NPPF (July 2021), relevant decisions made on planning applications/appeals, the positive outcome of examinations of neighbourhood plans in the borough (Lamberhurst, Benenden and Goudhurst), the proposed closure of the High Weald Academy in Cranbrook, and progress of neighbouring authorities' local plans.
20. It is evident from the Council's brief responses to the respective 'summaries of main issues', as set out in the Summaries of Main Issues, that there is no need for modifications to be made to the Pre-Submission version of the Local Plan that was published and consulted upon under Regulation 19 (excepting some of a minor nature – which will be identified alongside the Submission Local Plan, for transparency).
21. Hence, and also taking account of continued dialogues in relation to strategic matters (which are separately reported in the submission version of the Duty to Cooperate Statement), it is concluded that the Local Plan is sound and that the legal and procedural requirements have been met.
22. In particular, the Council's assessment is that the Local Plan's vision, overall development strategy, area strategies and site allocations, as well as the thematic policies, are sound, being *positively prepared, justified*, in terms of drawing on a proportionate evidence, *effective*, with high regard to strategic matters and deliverability, and *consistent with national policy*, with clear reasoning where different national policy objectives have had to be balanced.

# Summaries of Main Issues

# A. Legal Compliance and Duty to Cooperate

**Notes:**

1. *This table highlights representations that claim a failure of legal compliance and/or of the ‘duty to cooperate’ either as a representation on the Local Plan as a whole and as part of a representation on a specific part or policy of the Local Plan. They do not appear as a grouping in the index of representations but are drawn together to assist the Inspector to identify related matters and issues for examination.*
2. *Generally, the table does not identify where representations indicate a failure to comply with aspects of the NPPF, as this is a soundness matter; such arguments are identified in the context of the particular policy under consideration, as set out on subsequent Summary pages.*
3. *Separate summaries are provided in relation to the undertaking of the Habitats Regulations Assessment and the Sustainability Appraisal (on following sheets).*
4. *The main issues arising from representations which refer to legal compliance in relation to the choice of development strategy, including the mix of larger and smaller sites, are identified as part of the summary on Policy STR1 – Development Strategy.*

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
Duty to Cooperate (DtC) regarding meeting wider housing needs	1. A number of developers regard Tunbridge Wells Borough Council (TWBC) as failing its DtC as it is not meeting wider housing needs, notably currently unmet needs from Sevenoaks DC (SDC), in relation to which both SDC and Tonbridge & Malling BC (TMBC) have failed the DtC at examination.	TWBC is notably different from TMBC in that it has both recognised and considered potential unmet housing needs from SDC, tested it via its SA/SEA and has continued to engage with SDC to seek to understand and take on board its position. This is set out in its updated DtC Statement. Moreover, TWBC has sought to maximise sustainable development potential, not limited by local needs, which may help meet wider needs, subject to the outcome of the Local Plan examination and ongoing monitoring.	No changes proposed
	2. In addition to the identified unmet housing need of SDC (highlighted above), some	TWBC has been in regular contact with all adjoining councils and, excepting SDC’s earlier	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>developers add that there is no recognition of the potential for unmet housing needs from other adjacent authorities, including WDC.</p> <p>3. Some developers also regard the scope to meet higher housing figures as not having been adequately tested</p>	<p>request, none has advised of an unmet need. This is set out in See DtC Statement and most recent Statements of Common Ground (SoCGs) with each LPA.</p> <p>Higher housing growth has been properly tested, through both the Sustainability and SHELAA processes. This is addressed further in relation to representations on Policy STR 1: Development Strategy.</p>	No changes proposed
DtC regarding adjoining areas' capacity to meet local housing needs	TWBC has not sufficiently challenged Maidstone BC's or Ashford BC's capacity to accommodate some of TWBC housing needs - notably from some local bodies and groups, which it should do given TWBC's constraints.	TWBC has both reviewed emerging Local Plans and specifically sought assistance from neighbouring councils in meeting housing needs that would otherwise involve the loss of Green Belt or some major developments in the AONB, as set out in the DtC Statement.	No changes proposed
DtC regarding strategic sites proposals	<p>1. There is considerable concern, notably from local bodies, groups and individuals, regarding a lack of (and lack of evidence of) early or continuous engagement with other councils, principally TMBC, in relation to the strategic sites proposals. There has been inadequate consideration of infrastructure impacts on the TMBC and wider area, including traffic congestion, rail capacity, air quality, schools and downstream flooding.</p> <p>2. Local bodies, groups and individuals often raise specific concerns over cooperation on traffic impacts, including the adequacy of traffic</p>	<p>This is not accepted, as it can be seen from the Council's up-to-date Duty to Cooperate Statement that there has been considerable engagement with TMBC over a sustained period. Furthermore, there are SoCGs with TMBC and Network Rail.</p> <p><i>[Further consideration is given to the particular issues raised, which are essentially in connection with the strategic sites proposals, in Section 5.]</i></p> <p>Ongoing discussions with KCC (as local highway authority), Highways England (now National Highways) and TMBC have focused on traffic matters, as is evident from the Council's latest DtC Statement. The traffic modelling has taken</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>modelling and cumulative impacts of TMBC and MBC proposals.</p> <p>3. Some local residents raise unclear engagement with KCC re. cumulative impacts with sand/gravel extraction on traffic and flooding.</p>	<p>account of wider growth and has also been informed by the discussions with the highway authorities.</p> <p>Consideration has been given to nearby extraction, discussed with KCC, and taken into account, as appropriate.</p>	<p>No changes proposed</p>
<p>Evidence of cooperation, including coverage of Statements of Common Ground (SoCGs)</p>	<p>Criticisms in terms of the evidence of cooperation with several bodies and the absence of some up-to-date SoCGs have been variously raised by developers, local groups and individuals, notably:</p> <ul style="list-style-type: none"> <li>• there is no SoCG with KCC</li> <li>• the SoCG with TMBC is dated</li> <li>• there is no evidence of cooperation with Network Rail, notably re. Paddock Wood and Tudeley</li> <li>• there is no evidence of cooperation with Southern Water</li> <li>• there is no evidence of cooperation with London Boroughs</li> <li>• there has been a lack of strategic working on common issues, notably Green Belt</li> <li>• in combination effects on Ashdown Forest have not been sufficiently considered</li> </ul>	<p>Liaison with the bodies mentioned is shown in the Council’s DtC Statement, updated for submission. In addition, recent SoCGs have now been agreed with KCC, TMBC as have ones with Network Rail and Southern Water, together with the Environment Agency and Natural England. There is a working draft with SDC and a final SoCG is expected to be submitted in due course. Further detail can be found in the DtC Statement.</p> <p>No unmet housing need requests have been received from London Boroughs. Also, the NPPF now emphasises use of the standard method, as well as seeking greater contributions from cities.</p> <p>The Council’s consultants reviewed other Green Belt studies as part of their work and is considered robust. While the SDC Inspector questioned its approach to Green Belt review, the fact that it is being revisited provides an opportunity for a more consistent approach, which this Council would support. However, this does not detract from the Council’s own evidence and, detailed studies.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
		SoCGs are in place for Ashdown Forest SAC and SPA and flow from extensive joint working between all the relevant Councils and Natural England	
Climate change obligations	The Local Plan does not contribute to addressing climate change, as required by s19(1A) of the PCP Act	<p>For reference, Section 19A states:  <i>Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.</i></p> <p>An explanation of how the Local Plan achieves this can be read in the supporting text to Policy STR 7 (Climate Change). This policy details how effective strategic planning, proactive policy on climate change mitigation and adaptation, and partner engagement, would be utilised to ensure legal climate with the both the Planning and Compulsory Purchase Act 2004 and the Climate Change Act 2008 (amended in 2019 to set targets for net zero emissions).  <i>[NB A summary of representations on Policy STR 7 is set out under Section 4 of the Local Plan below.]</i></p>	No changes proposed
Propriety of decision-making	1. The Council's decision to move to Regulation 19 was without benefit of some significant supporting documents	The Local Plan and the SA/SEA were both part of the agenda papers for the Council, while Members also had access to the supporting studies, or at least advanced drafts of them.	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	2. The Council did not publish evidence studies in a timely manner to allow residents to raise objections	All Local Plan documents, including supporting documents were published by the start of the 10-week consultation period, with commissioned studies published at least 2 weeks before that.	No changes proposed
Public consultation	<p>1. <u>Inadequate consultation, with limited access to information and debate in the pandemic</u>, variously with reference to the lack of exhibitions at Reg 19, a related breach of SCI (para. 1.7, 1.9-1.12 and Section 2 of the SCI) and s149 of the Equalities Act (re age, disability, rurality), currency of the SCI; also, some technical issues with accessing documents and Hadlow Estate Masterplan and Delivery Strategy not on TWBC website.</p> <p>2. Strategy does not reflect public consultation responses and lack of effective engagement, notably re proposals in Capel parish, contrary to SCI para 1.12 re. meeting local aspirations.</p>	<p>A Written Ministerial Statement (19-01-21) set out the importance of work continuing to advance Local Plans. The Council updated its SCI to take account of the COVID pandemic in October 2020.</p> <p>The Council believes that it met both its SCI commitments, and relevant regulations. It produced a virtual exhibition, undertook Facebook events and made arrangements for Local Plan documents to be viewed in person, as well as directly notifying all households via its 'Local' magazine. Access issues were addressed as soon as raised, while the external document referred to was not part of the Council's evidence base, although the work is referred to in the Strategic Sites Topic Paper. Full details are set out in the Consultation Statement that accompanies the submitted Plan.</p> <p>It is appreciated that there is local opposition to plans for strategic growth in Capel parish, with substantive objections presented in subsequent sections of this report. However, while noting the benefits of community involvement (in 1.12), the SCI also acknowledges that it may be difficult to find solutions that satisfy all. It nonetheless has carefully considered all consultation responses.</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
Plan period	Plan period should be extended: a) By a year, as likely not be 15 years from adoption b) Should cover 30 years, as [draft] NPPF	a) It is expected that adoption will be before April 2023, which would give 15 years to March 2038 – see updated LDS. b) The Local Plan benefits from the transitional arrangements under the new NPPF. Also, the new settlement masterplanning work relates to the full period of development beyond the plan period.	No changes proposed.
Maps	1. Key Diagram unclear and inadequately shows the proposed new settlement, nor the regeneration of Paddock Wood town centre.  2. Designations outside inset map areas not shown.	These issues are addressed in response to the wider range of representations on Policy STR1, which references the Key Diagram.  <i>[In essence, Local Plan maps show all new proposals sufficiently for consultation, while some clarity improvements are being made.]</i>	No changes proposed [ <i>but see subsequent responses on specific mapping</i> ]
Superseded policies	Policies to be replaced are not identified, so it is not possible to comment on the suitability of proposed 'replacement policies'	This is not accepted, as Local Plan paragraph 1.4 states that it replaces the saved policies of the Local Plan 2006, Core Strategy 2010, and the Site Allocations Local Plan 2016.  <i>[This is also recorded under STR1 representations.]</i>	No changes proposed.

## B.Habitats Regulations Assessments (HRA)

### Notes:

1. The HRA attracted very few representations.

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
<p>HRA and related policies, especially Policy EN 11</p>	<p>1. The appropriate assessment within the Regulation 19 HRA fails to justify the conclusion of no adverse effect, and hence Policies EN 11, STR 1 and ED 1 that rely on the conclusions of the HRA are not justified and cannot be taken forward into the new plan. This is due to a lack of evidence to support the effectiveness of the proposed mitigation/avoidance measures comprising SANG and SAMM.</p> <p>Also, TWBC’s mitigation/avoidance measures are only intended to address the impact of recreational pressure from development within 7km of the SPA, but data contained within the HRA indicates that a large proportion (80%) of visitors to the SPA from TWBC live outside this 7 km zone indicating that visitors from development beyond this distance could increase the current pressure and result in an adverse effect.</p> <p>The 2016 visitor survey relied upon by the HRA, which identified that 3% of the total number of dog walkers visiting the SPA, 3% of the total number of frequent visitors and 5% of the total number of visitors interviewed as coming from TWB, cannot be considered as insignificant. With around 1,500 new dwellings being proposed for Royal</p>	<p>In terms of effectiveness of SANG and SAMM, there is considerable evidence from the Thames Basin Heaths area in particular (this being the area where the SANG and SAMM approach was first devised approximately a decade ago) for it being an effective mitigation approach for recreational pressure. The most recent Visitor Access Patterns on the Thames Basin Heaths Report (2018, EPR on behalf of Natural England) showed a statistical decrease in visitation to the SPA despite a concurrent increase in housing within 5km of the SPA (the core catchment of that SPA), confirming the effectiveness of the solution. As a result, this is now a standard approach to addressing recreational pressure issues on European sites across England.</p> <p>In determining the core catchment within which financial contributions will be sought to address recreational pressure it is common to use the 75<sup>th</sup> percentile (i.e. the zone within which 75% of resident visitors to a European site derive) as the cut-off point.</p> <p>Based on the last published visitor survey of the Ashdown Forest SAC, the 7km zone is more precautionary than this, capturing c. 81% of local visitors. It is never the intention for mitigation</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>Tunbridge Wells under Policy STR/RTW 1, plus further dwellings arising from intensification and windfalls, based upon the findings of the visitor survey, it is highly likely that a proportion of these new residents will visit the SPA and potentially contribute to an adverse effect.</p> <p>2. In contrast, Natural England welcome the incorporation of its Regulation 18 advice to align policy EN 11 ‘Ashdown Forest Special Protection Area and Special Area of Conservation’ with the established SANG/SAMM strategic approach to avoiding adverse effect on the integrity of Ashdown Forest SPA and SAC from recreational disturbance.</p>	<p>strategies for European sites to collect funds from every potential future visitor; the competent authorities for Ashdown Forest (including Natural England) are confident that, if the zone within which at least 75% of visitors derive is captured (81% in the case of Ashdown Forest), sufficient funds will be raised (or SANG delivered) to address the entire ‘in combination’ recreational pressure issue, irrespective of where the actual visitor lives.</p> <p>Noted.</p>	<p>No changes proposed</p>
<p>Cumulative effects</p>	<p>Several points are raised by a respondent in relation to the consideration of cumulative effects:</p> <p>a) It is not demonstrated that the plan (in combination with other plans and projects) will have no adverse effect on site integrity, as there are no public statements from Natural England or neighbouring Councils (including Wealden District Council) that concur with the TWBC assessment that the impact of development in Tunbridge Wells Borough (in combination with development in other local authority areas) will not adversely affect the integrity of Ashdown Forest SAC through nitrogen deposition.</p>	<p>None of the authorities surrounding Ashdown Forest submitted a response to the Regulation 19 Local Plan consultation indicating they disagree with the conclusion of the Habitats Regulations Assessment. Natural England have submitted a response which clearly indicates they do agree with the Habitats Regulations Assessment.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>b) It is noted that Wealden District Council have since started their local plan again and have not yet made any decisions about the distribution of development.</p> <p>c) Also, the HRA undertaken by AECOM for TWBC has found that ‘the in-combination’ nitrogen deposition at a roadside belt of heathland would be nugatory, being a little above zero. Clearly this conclusion must be given some attention given the long history of air quality concerns relating to the Ashdown Forest and it is very surprising that AECOM have not offered helpful explanation. Furthermore, we have not seen any expert (nor Natural England) comment on the outcome of the air quality assessment.</p>	<p>Since Local Plans are rarely produced on the same timescale, it is necessary for the ‘in combination’ assessment to make a suitable allowance for growth in other authorities where adopted Local Plans with site allocations are not available. The methodology for doing this was agreed with the Ashdown Forest Working Group (which comprises all the local authorities around Ashdown Forest and Natural England) and is documented in the Air Quality Impact Assessment contained in Appendix 3 of the HRA.</p> <p>A full explanation of the modelling method and results, including the justification for a conclusion of No Adverse Effect on Integrity based on the modelled results is given in Appendix 3 of the HRA report.</p> <p>In summary, the reasons are as follows in paragraph 3.2.29 of Appendix 3 of the HRA:</p> <ol style="list-style-type: none"> <li>1. <i>‘Air quality within 200m of the roadside in 2038 is forecast to be significantly better than in 2017 notwithstanding the precautionary assumptions made about both growth and improvements in vehicle emissions factors;</i></li> <li>2. <i>NOx concentrations at heathland within 200m of the A26 and A275 are expected to be below the critical level by 2038;</i></li> <li>3. <i>Nitrogen deposition rates and ammonia concentrations will continue to exceed the critical load or level due to existing sources but the potential for vegetation recovery in more</i></li> </ol>	

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
		<p><i>than 99% of heathland in the SAC will be unaffected by local traffic growth;</i></p> <p>4. <i>The remainder is a narrow roadside belt that may experience a subtle difference with all planned housing and employment growth, consisting primarily of a slight difference in percentage grass cover and species richness, but even here the reduction in nitrogen deposition, and potential for vegetation recovery, will still be approximately 80% of that which would be expected without housing and employment growth;</i></p> <p>5. <i>The contribution of Tunbridge Wells Local Plan to the ‘in combination’ deposition for those nearest areas of heathland is nugatory, being a little above zero. This is relevant since in European Court of Justice Case C-258/11 Advocate-General Sharpston stated at paragraph 48 of her Opinion that: ‘the requirement for an effect to be ‘significant’ exists in order to lay down a de minimis threshold. Plans and projects that have no appreciable effect on the site can therefore be excluded. If all plans and projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill’; and</i></p> <p>6. <i>Natural England have confirmed that nitrogen deposition from traffic is not preventing the site from achieving its conservation objectives, but rather the principal issue is lack of management. For example, a review of the</i></p>	

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>d) There does not appear to have been a meeting of the Ashdown Forest Working Group, which the Inspector to the Wealden Local Plan noted was formed to address in-combination effects after the ‘Wealden Judgement’ in a robust and cooperative manner.</p> <p>e) Assuming modelling is correct, it seems that the question is whether the uncertainties associated with the failure to adopt the Wealden Local Plan should be taken into account in the assessment of likely significant effect. It is puzzling that uncertainties associated with development in the Wealden District (which is more likely to have a local ‘journey to work’ impact on traffic flows on the roads in question) is not addressed in the assessment, at least qualitatively.</p> <p>f) The conclusion that the impact will be limited to a retardation of improvement in nitrogen deposition, given that this will only relate to 0.06% of the</p>	<p><i>Natural England condition assessment on a unit by unit basis clearly indicates that historic (and in many cases current) inadequate management is the reason why only 20% of Ashdown Forest SAC is currently in a favourable condition’.</i></p> <p>It is noted that Natural England has agreed the HRA.</p> <p>The Council has participated in all meetings of the Ashdown Forest Working Group on Air Quality since its inception and is a signatory to the SoCG for that Group and its continued support for that group is set out in the SoCG between TWBC and Wealden DC. It has met in 2019, 2020 and 2021. Full details are set out the Duty to Cooperate Statement.</p> <p>A suitable allowance for growth in other authorities including Wealden has been made and takes account of the stage each authority has reached in the Plan making process. The methodology for doing this was agreed with the Ashdown Forest Working Group (which comprises all the local authorities around Ashdown Forest and Natural England) and is documented in the Air Quality Impact Assessment contained in Appendix 3 of the HRA.</p> <p>The approach to air quality Appropriate Assessment as documented in Appendix 3 of the Regulation 19 HRA report is very similar to that undertaken by AECOM for the adopted South Downs Local Plan</p>	

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>heathland of the SAC in roadside areas and will have a very small botanical effect, may not be sufficiently cautious given conservation importance of the site, uncertainties relating to the rate of air quality improvement, and the location of future development.</p> <p>g) The Inspector should be satisfied that Natural England and neighbouring Councils (including Wealden District Council) concur with the TWBC assessment that the impact of development in Tunbridge Wells Borough (in combination with development in other local authority areas) will not adversely affect the integrity of Ashdown Forest SAC through nitrogen deposition.</p>	<p>(as are its conclusions) and which was deemed sufficient to justify a conclusion of no adverse effect on integrity by both Natural England and the Local Plan Inspector.</p> <p>AECOM represented Tunbridge Wells Borough Council, South Downs National Park Authority and Lewes District Council on air quality matters relating to Ashdown Forest SAC/SPA at the Examination of the withdrawn Wealden Local Plan and our analysis along with that of Natural England was a key factor in the Inspector’s decision at that Examination that Wealden District Council had erred in concluding that an adverse effect on the integrity of the SAC/SPA would arise from in combination traffic growth.</p>	

## C. Sustainability Appraisal

### Notes:

1. A total of a little over 400 representations were made, although this includes a number of identical responses, notably in relation to Benenden.
2. Many comments registered against the Sustainability Appraisal were not SA specific, but simply disagree with proposed development, or had concerns for housing affordability or the adequacy of infrastructure.
3. No comments were received from the statutory environmental bodies of the Environment Agency or Historic England.

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
Choice of Growth Strategy (Scale and Distribution)	<ol style="list-style-type: none"> <li>1. Respondents felt it unclear why some growth strategy options were favoured over others.</li> <li>2. A summary or qualitative assessment of the benefits and disbenefits findings for each growth strategy would have been helpful.</li> <li>3. Respondents suggested Growth Strategies 10 (Uncapped) and 11 (Uncapped and Unmet) need more in-depth assessment and further explanation for dismissal. There was also a challenge about whether the additional 63 dwellings per annum (1,260 dwellings across the plan period) from Growth Strategy 10 would need to be solely in the AONB.</li> <li>4. Clarity is required on why some growth strategies were considered only at the final stages (e.g. GS7 – proportional to services and GS8 – Service and AONB) for consideration by the Local Plan. Work on strategic sites was already underway when these were considered</li> </ol>	<p>An explanation given in SA paragraphs 6.2.4 – 6.2.17.</p> <p>Explanations for scores for each growth strategy are contained in Tables 13 – 25. Further summary felt unnecessary.</p> <p>All growth strategies were assessed consistently having regard to whole range of SA objectives. The Sustainability Appraisals and explanations given for choices should be seen in context of more detailed work undertaken by the SHEELA. With regard to the challenge about option 10, the SA simply states that a high proportion of development would need to be in the AONB.</p> <p>Some refined strategy options were duly considered in response to comments at the Regulation 18 stage. All options were considered/reconsidered at the Regulation 19 stage, reflective of the iterative SA process.</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>suggesting assessment was flawed and no t influenced the strategy.</p> <p>5. A further option for assessment was suggested in which a 20% buffer is added onto the Local Housing Need i.e. 814 dwellings per annum</p> <p>6. Respondents felt there was generally too much development and in particular disagreed with the strategic sites for reasons such as inadequate existing infrastructure, loss of greenfield sites, and unacceptable loss of Green Belt and AONB.</p> <p>7. Some scoring queries for some strategies:</p> <p>i. Climate change score for GS2 and GS13 not accurate</p> <p>ii. Heritage score for GS2 should be positive</p> <p>iii. Query over whether building new houses in AONB will address imbalance in house prices as suggested in Table 14.</p> <p>iv. Land use and landscape scores too low for GS2 (AONB Unit)</p>	<p>This option is not considered to be distinctly different from Growth Strategies 10 (741 dpa) and 11 (853 dpa).</p> <p>The SA takes account of environmental impacts and availability of some infrastructure, and then balances these with other objectives. The relative benefits of growth strategy options were compared, and the most preferable option taken forward in the Local Plan.</p> <p>GS13 is very similar score of - (compared with -/-- for GS2) due to balance of implementing strong energy policies and reducing transport-related carbon</p> <p>The score for GS2 is slightly improved on GS13 but impacts are still expected. See explanation in Table 14.</p> <p>The fact that house prices are sensitive to the balance of supply and demand is considered to be a reasonable assumption.</p> <p>Scores are considered consistent with application of the SA scoring methodology outlined in section 4.3 of the SA.</p> <p>In this context, the phrase 'not significantly' was intended to mean that the scores were not vastly</p>	<p>No changes proposed</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
	v. Query as to why the water objective scores for GS2 are not identical to GS13, as the commentary box for GS explains the score is not significantly affected by the reduction in growth.	different. The score for GS13 is mixed reflecting the large quanta of development and betterment of flood issues at Paddock Wood and Five Oak Green, and enhancement policies for other major sites in the AONB.	No changes proposed
<b>Choice of Strategic Site Location</b>	<p>1. There were objections to the choice of Tudeley as the Garden Settlement location based on landscape impacts (including on the adjacent AONB) where there are alternatives that have less impacts upon landscape.</p> <p>2. It was felt that there was inconsistency in ruling out Frittenden and Horsmonden re. transport when compared with Tudeley.</p> <p>3. Arguments were presented for Blantyre House and Castle Hill being more appropriate alternatives than Tudeley. This included alternative scores being determined in which the alternatives come out more positively overall.</p> <p>4. Concern that scores for Paddock Wood Strategic Site growth options are significantly different. Comments that option 5 is equally as viable as option 2.</p>	<p>The balance of positives and negatives for Tudeley and alternative sites was considered (see Table 27) and this prompted pursuing Tudeley further. The site is not in the AONB and the setting has been considered. Tudeley was considered the more sustainable location.</p> <p>The location of Tudeley provides more scope for better transport links than other locations.</p> <p>The scoring methodology is robust and explained in section 4.3. Table 27 provide explanation for why these alternatives were not deemed reasonable. The submitted alternative assessments have been reviewed and the SA assessments are still considered appropriate.</p> <p>Option 2 had the best range of scores overall, including for objectives of business growth, equality, services and water.</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>
<b>SA Methodology</b>	1. Some respondents raised concerns that there was limited explanation of how scores were applied and particularly the use of the decision-making criteria; also, site and parish	The assessments have drawn on decision-making criteria for each objective and these criteria were applied consistently and informed the final scores. A professional judgement was made on each of the	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>commentaries do not provide in depth explanations (especially for RTW, and more generally for why some sites allocated and some rejected).</p> <p>2. Challenge that not enough weight appears to have been afforded to environmental assets such as the AONB (including by Natural England) in contrast to NPPF paragraphs 8, 11b and 32 – especially in scores for Growth Strategies 2 (No AONB Majors) and 13 (PSLP).</p> <p>3. Concerns were raised about the robustness of the SA method including double counting in objectives (such overlap between business growth and employment, or health deprivation and economic deprivation), missing aspects such as tourism, countryside access, carbon sequestration in soils.</p> <p>4. Further explanation is needed on the findings of the HRA (PSLP_2071). For example, para 3.2.8 needs further detail (Natural England).</p> <p>5. Query over whether the temporary or permanent nature of effects has been adequately considered; e.g. short, medium and long-term SA scores should be provided, and clarified, for Tudeley to reflect gradual infrastructure provision.</p>	<p>decision-making criteria, and the written overview of the scoring highlights the key points and is regarded as sufficient explanation.</p> <p>A weighting system was applied when assigning scores as explained in paragraph 4.3.8 and Appendix B. Within this, the AONB designation was weighted highly in decision-making criteria for landscape objective.</p> <p>The SA methodology was agreed with statutory consultees at the Scoping stage. (see decision making criteria in Appendix B which illustrates the differences between objectives). Tourism is considered under the landscape objective in relation to woodland (see decision making criteria on page 289) and also in the Services Objective. Soil carbon GIS was analysed.</p> <p>Further explanation has been provided (see SoCG with NE), although it is agreed with NE that this does not affect the SA of options or the relevant Local Plan policy.</p> <p>The nature of effects was considered in line with Schedule 2 of the SEA Regulations (see paragraph 4.3.8). Variations over time are not considered significant in relation to overall effects of the plan.</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>Yes – See Table of Minor Mods.</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>6. With regard to para 8.1.3 and the filtering method used for sites, a table showing all sites and how they were rejected or taken forward would be useful.</p>	<p>This information is contained within the SHEELA and the SA has informed site assessments for reasonable alternatives.</p>	<p>No changes proposed</p>
<p><b>Specific Site Issues</b></p>	<p>1. <b>Royal Tunbridge Wells</b></p> <p>a. Site 99 (Pembury Road). Disagreement with site not being allocated. Numerous evidence reports submitted. Query over air, climate, heritage, landscape, land use, noise and transport scores.</p> <p>b. Site 434 (Tutty’s Farm). Disagreement with site not being allocated due to biodiversity, heritage, landscape and land use scores being inaccurate.</p> <p>c. Sites 138-140 (Knights Park). Disagreement with site not being allocated. Query over business, climate, deprivation, land use, landscape, services and water scores.</p> <p>d. Site 100/30 (Caenwood area including reference to AL/SO 1 and AL/RTW 5). Disagreement with allocation and positive scores applied to allocation.</p> <p>e. Site 137 (Spratsbrook). Disagreement with allocation AL/RTW 16. Challenge that developer interest influence scores.</p>	<p><b>Royal Tunbridge Wells</b></p> <p>Site was not allocated due to particularly severe effects (no change from Reg 18 stage). Evidence reports reviewed, but the SA assessment is consisted accurate in relation to queries raised.</p> <p>Site 434: Criticism and suggestions have been reviewed, and the SA assessment is consisted accurate in relations to queries raised.</p> <p>The suggested scores were reviewed. However, the SA assessment is consisted accurate in relation to queries raised.</p> <p>The SA methodology was followed. The allocation is only a small part of the wider site and was scored on this basis. The wider site (site 30) scores more negatively (Appendix F).</p> <p>Scoring is independent of developer interest.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>f. General disagreement with scoring consistency across numerous RTW sites.</p> <p>g. General agreement with various sites that have not been allocated in RTW.</p> <p>2. <b>Southborough</b> – no main issues</p> <p>3. <b>Paddock Wood</b> (see above re strategic sites)</p> <p>4. <b>Capel</b> Site 11 (Whetsted Rd). Disagreement with site not being allocated. Scores for business, land use, landscape, noise and water disputed.</p> <p>5. <b>Cranbrook and Sissinghurst</b></p> <p>a. Site 120 (Mill Lane). Disagreement with site not being allocated. Suggest scores are positive enough to allow an allocation.</p> <p>b. Site 430 (Turnden Farm). AL/CRS 3. Disagreement with allocation. Landscape impacts too severe.</p> <p>6. <b>Hawkhurst</b> Site 52 (Streatly). Disagreement with site not being allocated. Query over biodiversity score alteration following Reg 18 consultation.</p>	<p>The SA methodology as set out in section 4.3 has been consistently followed.</p> <p>N/A</p> <p><b>Southborough</b> – no main issues</p> <p><b>Paddock Wood</b> (see above re strategic sites)</p> <p><b>Capel</b> The SA methodology as set out in section 4.3 has been consistently followed.</p> <p><b>Cranbrook and Sissinghurst</b> Site 120: AONB Setting Analysis Report (2020) caused landscape/ heritage scores to worsen. Likewise, 2020 Grassland Study and biodiversity score. Site no longer suitable.</p> <p>The SA methodology as set out on in section 4.3 has been consistently followed. The Landscape score does show negative impacts, but, aside from potential mitigation measures, this is balanced against other factors.</p> <p><b>Hawkhurst</b></p>	<p>N/A</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>7. <b>Benenden</b> A number of similar representations submitted covering: Disagree with findings, commentary and allocations for sites e.g. opinion that SA wording “lack of services, facilities and travel options for all sites” is an inaccurate statement; query whether Tenterden primary is a viable choice re. education objective, comparison with 2006 SA, justification for hospital over LS8 and LS21, concern that sites were allocated before the SA undertaken.</p> <p>8. <b>Brenchley and Matfield</b> a. General query as to why Matfield was considered for allocations over Brenchley.  b. Query regarding the education scores as the school is not within safe active travel distance</p> <p>9. <b>Frittenden</b> – no main issues</p> <p>10. <b>Goudhurst</b> a. Site DCP_3 (Blantyre House). Disagreement with site not being allocated.</p> <p>11. <b>Horsmonden</b> a. Concern that provision of a new village hall has not been considered during the assessments.</p>	<p>Site 52. Biodiversity score downgraded slightly from neutral to 0/- to take account of advice from the AONB Unit.</p> <p><b>Benenden</b> The SA methodology as set out in section 4.3 has been consistently followed. It is also noted that, since these representations were received, the Benenden NDP (including identical allocations) and supported by an SEA coming to similar conclusions, has undergone Examination and has been supported by the independent Examiner.</p> <p><b>Brenchley and Matfield</b> Explanation given on page 168 re. why suitable RAs in Brenchley were not considered suitable (see SHEELA).</p> <p>This aspect is considered in service/facilities objective as one of the nine key services.</p> <p><b>Frittenden</b> – no main issues</p> <p><b>Goudhurst</b> See Table 27 which explains that this site was not considered a reasonable alternative due to its scale and location.</p> <p><b>Horsmonden</b></p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p> <p>N/A</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>b. Opinion that the SA for Horsmonden needs to better consider historic rural lanes and ancient woodland. Also, an opposing opinion that the landscape score was too negative.</p> <p>12. <b>Lamberhurst</b> – no main issues</p> <p>13. <b>Pembury</b></p> <p>a. Site 354 (Stone Court Farm). Disagreement with site not being allocated especially regarding landscape impacts.</p> <p>b. General query about the positive education and land use scores for Pembury sites. Perception that development densities are too low.</p> <p>14. <b>Rusthall</b> – no main issues</p> <p>15. <b>Sandhurst</b></p> <p>a. Site 149/227 (Rye Road). AL/SA 1. Concern about accuracy of education, employment and air scores.</p> <p>16. <b>Speldhurst</b> – no main issues</p>	<p>It is noted that a new village hall was put forward and has been positively assessed at both Reg 18 and 19 stages.</p> <p>The SA methodology as set out on in section 4.3 has been consistently followed.</p> <p><b>Lamberhurst</b> – no main issues</p> <p><b>Pembury</b> Landscape score follows SA methodology which has regard to Council's commissioned LVIA work.</p> <p>Current education capacity is low due to recent expansion of the primary school. SA methodology has been followed for land use. Low development densities are considered in Pembury Site Allocation Section 6.</p> <p><b>Rusthall</b> – no main issues</p> <p><b>Sandhurst</b> The SA methodology as set out on in section 4.3 has been consistently followed.</p> <p><b>Speldhurst</b> – no main issues</p>	<p>N/A</p> <p>No changes proposed</p> <p>N/A</p> <p>No changes proposed</p> <p>N/A</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
<b>DM policies</b>	<p><b>Environment and Design</b></p> <ol style="list-style-type: none"> <li>Challenge that scores for EN2 are too positive.</li> <li>Query regarding why the existing core strategy policy for EN3 scores better for air than the preferred policy.</li> </ol> <p><b>Natural Environment</b> – no main issues</p> <p><b>Air, Water, Noise, and Land</b> – no main issues</p> <p><b>Delivery of Housing</b></p> <ol style="list-style-type: none"> <li>Suggest environmental objective scores for policy H2 should be negative as facilitating housing is not compatible with environmental protection.</li> <li>Challenge that the policy description for Option 3 of H3 is inaccurate.</li> <li>Query Equality score for H3 and H6, and deprivation for H3, reasoning not being clear.</li> </ol> <p><b>Types of Housing Delivery</b></p> <ol style="list-style-type: none"> <li>SA Table 112 shows preference for intensification of existing sites (Option 1).</li> </ol>	<p><b>Environment and Design</b></p> <p>The SA methodology as set out on in section 4.3 has been consistently followed.</p> <p>The existing Core Strategy policy includes a wider remit that the new focussed policy. Issues of air quality are considered elsewhere in the new Local Plan and are not scored as part of EN3.</p> <p><b>Natural Environment</b> – no main issues</p> <p><b>Air, Water, Noise, and Land</b> – no main issues</p> <p><b>Delivery of Housing</b></p> <p>New development sensitively designed and appropriately located can be compatible with environmental policy, as reflected in its wording.</p> <p>The percentages for brownfield (which should be 30%, not 40%) have been mistyped, while it is not clear that Option 3, done for contributions from 1-9 dwellings (as Draft LP), was found to be the same if applied to 6-9 dwellings, as currently.</p> <p>The SA methodology as set out on in section 4.3 has been consistently followed.</p> <p><b>Types of Housing Delivery</b></p> <p>The assessment is for the focus of additional pitches on existing sites, complemented by two</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p> <p>Yes – See Table of Minor Mods</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>However, this approach conflicts with policy H9 and STR/SS1 which propose additional new locations for pitches</p> <p>7. H8 – The commentary explains certain areas have high needs for self-build and custom housebuilding. It is not clear why this is. Options 2 or 3 appear to be best.</p> <p><b>Employment Provision</b> – no main issues</p> <p><b>Town, Rural Service, Neighbourhood and Village Centres</b> – no main issues</p> <p><b>Transport and Parking</b> – no main issues</p> <p><b>Open Space, Sport and Recreation</b> – no main issues</p>	<p>small sites – each of three pitches – in order to meet the overall need.</p> <p>The scoring draws upon the information contained within the self-build register and council’s consultants.</p> <p><b>Employment Provision</b> – no main issues</p> <p><b>Town, Rural Service, Neighbourhood and Village Centres</b> – no main issues</p> <p><b>Transport and Parking</b> – no main issues</p> <p><b>Open Space, Sport and Recreation</b> – no main issues</p>	<p>No changes proposed</p>

## Section 1: Introduction

### Notes:

2. *This Section attracted few (less than 15) representations.*
3. *Representations relating to text on 'Relationship with other strategies' are noted below, but their substantive points are addressed in the overall Legal compliance/Duty to Cooperate summary above.*
4. *Representations relating to the Plan period are included here, as it is set out at paragraph 1.1 (although also appear in the earlier Legal compliance/Duty to Cooperate summary).*

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
<b>Neighbourhood Development Plans</b>	No mention is made of those NDPs in progress - (one NDP group).	The progress of NDPs is fluid. It is recognised that updating may be necessary prior to adoption. The existing text is considered to reflect the status of 'made' NDPs as part of the development plan, whilst directing the reader to the Neighbourhood Plans page of the website for an up-to-date overall position.	No changes proposed (note: the text at paragraphs 1.9 and 1.10 will need to be amended prior to adoption, if there are, by then, further NDPs 'made').
<b>Plan period</b>	Plan period should be extended: c) By a year, as likely not be 15 years from adoption  d) Should cover 30 years, as [then draft] NPPF (incl. from a few developers)	It is expected that adoption will be before April 2023, which would give 15 years to March 2038.  The Local Plan benefits from transitional arrangements under the new NPPF. Also, the new settlement masterplanning work relates to the full period of development beyond the plan period.	No changes proposed to plan period, but update Figure 1 and paragraph 1.13 to reflect current programme.
<b>The Local Plan Process</b>	Rather than as stated in paragraph 1.20, the comments made by local residents in the previous	It is appreciated that there is local opposition to plans for strategic growth in Capel parish, with	No changes proposed.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Issues and Options and Draft Local Plan consultations have been ignored - (incl. a local body, groups, and residents, primarily in relation to proposals for strategic growth).	substantive objections presented in subsequent sections of this report. However, while noting the benefits of community involvement (in 1.12), the SCI also acknowledges that it may be difficult to find solutions that satisfy all. The Council has nonetheless carefully considered all consultation responses, as set out in its respective Consultation Statements.	
<b>Relationship with other strategies</b>	<ol style="list-style-type: none"> <li>1. It is noted Sevenoaks DC and Tonbridge &amp; Malling BC have failed under the Duty to Cooperate DtC and this is likely to happen to TWBC given insufficient evidence in DtC Statement about addressing unmet housing need - (several representations).</li> <li>2. Sevenoaks BC confirms DtC engagement has been constructive, active, and on-going and looks forward to further engagement and the production of a Statement of Common Ground.</li> </ol>	These and other representations on the DtC are presented, and responded to, in the earlier Legal Compliance/Duty to Cooperate summary.	
<b>Evidence base</b>	Some criticisms that the evidence base is insufficient to support the growth strategy, including in relation to Green Belt, HRA and SA, as well as highways evidence, including highway modelling. A few representations are specific to the impact of the pandemic and the shift to radically different ways of working, which may result in long term changes in where people live and work and how they use infrastructure, with a consequent need to scenario test these behavioural changes. – (incl. groups and individuals, and KCC re highways).	<p>The Local Plan has been informed by a range of studies, including three stages of Green Belt Studies, an HRA and a SA/SEA that have been iterative and undertaken in line with good practice.</p> <p>Trends have been reviewed, with the Retail and Town Centre Study updated in 2020 in response to pandemic, while sensitivity testing of the transport modelling has recently been carried out, in consultation with Highways England and KCC, as local highway authority.</p>	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>

## Section 2: Setting the Scene

### Notes:

1. Only a few representations (less than 15) were made against this section, with most relating to how issues/challenges are addressed in the Local Plan, rather than highlighting additional ones. These are identified and responded in relation to the development strategy (policy STR1) and/or the relevant Place Shaping chapters.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>Settlements of the borough</b>	<p>The identification of Hawkhurst (in paragraph 2.4) as a ‘rural service centre’, rather than a village, is challenged (by a few individuals).</p> <p><i>[Representations relating to Paddock Wood, which challenge its growth, are dealt with under policies STR1 and STR/SS1.]</i></p>	The paragraph highlights that Hawkhurst functions as a rural service centre, which is consistent with the findings of the Settlement Role and Function Study.	No changes proposed.
<b>Demographics and Housing</b>	<p>Queries are raised about housing numbers being higher than the population forecasts in Table 1, as well as the extent and implications of high house prices, the need for small scale housing sites and housing for older people. (incl. from several individuals)</p>	Housing numbers are derived from the Government’s ‘standard method’ and includes an uplift to increase access to housing, which is not included in population forecast. The affordability of housing and need for different types of housing are duly highlighted in Section 2 (key issues, challenges and opportunities) and addressed in subsequent sections of the Local Plan.	No changes proposed.
<b>Infrastructure</b>	<p><i>[Representations relating to infrastructure capacity at Paddock Wood are dealt with under policy STR/SS1.]</i></p>		No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
<b>Environment</b>	<i>[Representations relating to the impact of development proposals in terms of loss of countryside, habitats and Green Belt, as well as flood risk, especially in relation to Paddock Wood, are dealt with under policies STR1 and STR/SS1.]</i>		No changes proposed.
<b>Transport</b>	<i>[Representations relating to how a number of transport issues are addressed, including PROWs, traffic at Paddock Wood and Hawkhurst, and air quality, are dealt with in the respective chapters.]</i>		No changes proposed.
<b>Economy</b>	Brexit and the pandemic need to be considered.  <i>[Representations relating to employment provision at Paddock Wood are dealt with under the Strategic Sites and Paddock Wood chapters.]</i>	The implications of the Covid pandemic are recognised as an issue, and further considered in the Economic Development Topic Paper and updated Retail, Commercial Leisure and Town Centre Study.	No changes proposed.

## Section 3: Vision and Objectives

### Notes:

1. In total, there were 43 representations against the Vision and Strategic Objectives section
2. Representations which argue that certain proposals do not align with the Vision or Strategic Objectives are considered in relation to the relevant part of the Local Plan where the proposal sits, rather than here.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>Vision</b>			
Currency of the Vision	The evidence base outdated (does not account for pandemic and high street decline) - (incl. a few individuals).	The Vision is a long-term direction of travel. Trends have been reviewed, with the Retail and Town Centre Study updated in 2020 in response to pandemic, while sensitivity testing of the transport modelling has recently been carried out, in consultation with Highways England and KCC, as local highway authority.	No changes proposed.
Regard to development needs	More emphasis sought on meeting boroughwide needs to be included within the vision - (a developer).	The Vision establishes a direction of travel rather than specific targets. In any event, growth in new homes and access to housing are covered, reinforced by the first two strategic objectives	No changes proposed.
Level of attention to Plan sub-areas	More attention should be given to particular areas, including aspects of RTW, including its Town Centre, and rural areas, including Cranbrook and Sissinghurst and Tudeley - (incl. from a few groups and individuals).	An appropriate balance is struck between borough-wide and local ambitions within a readable Vision. Also, further attention is given to local strategies in Section 5, on a Parish basis and for RTW, with a “sub-strategy” for the town centre and a proposed Area Local Plan.	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
<b>Strategic Objectives</b>			
<u>Objective 2 – Housing supply</u>	There is not enough emphasis on boosting the supply on <i>all</i> forms of housing (currently only includes affordable), in conflict with the NPPF to positively seek opportunities to meet development needs - (from developers).	Objective 1 seeks development to meeting housing (and other) needs, so is regarded as appropriately covered.	No changes proposed.
<u>Objective 8 - Environment</u>	Objective does not fully recognise the needs to protect and enhance the built and natural environment and deficiencies of existing infrastructure, including traffic, parking, and infrastructure in relation to heritage - (from local group).	The Objective provides a suitable framework for a range of impacts on the environment. Also, Objective 5 relates specifically to infrastructure.	No changes proposed.
<u>Additional Objective – Density</u>	There should be reference to building at a density which makes efficient use of land, as required in NPPF - (from local group).	Ambitions relate to meeting needs and promoting high quality design, as set out in Objectives 1, 2 and 4. A density policy flowing from these is set out in Section 6 (Policy H2).	No changes proposed.
<u>Additional Objective – Health</u>	Further emphasis should be given to promoting healthy lifestyles, tackling poor air quality and the regeneration of town centres, to ensure Plan is positively prepared in line with NPPF - (a developer).	These issues are already adequately covered by Objectives 1, 3, 5 and 7 and carried forward by policies relating to air quality, town centres, economic development, and open space, sport and recreation.	No changes proposed.

## Section 4: The Development Strategy and Strategic Policies

### 4.1 Policy STR 1 – The Development Strategy

#### Notes:

1. *In total, there were nearly 100 representations on Policy STR1.*
2. *Where representations are specific to the scale of housing development in a particular village, such as Benenden, these are contained in the relevant chapter in Section 5.*
3. *Where a representation is made to Policy STR1 in the context of a representation relating to the inclusion or non-inclusion of a specific site, the main issues raised regarding the overall development strategy are highlighted here, while the specific site issues are dealt with under the relevant settlement/parish in Section 5 – Place Shaping.*
4. *Where an increased housing requirement is sought in association with a representation promoting a longer Plan period, this is noted below, but the issue of the Plan period is addressed in relation to Section 1: Introduction.*
5. *Main issues raised about the Limits to Built Development (LBD) in a particular location are considered in relation to the relevant Place Shaping strategy in Section 5, while generic representations on the use of LDBs are considered below.*

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>The overall level of growth should be reduced</b>	<p>Representations, mainly from local bodies, groups and environmental interests as well as local residents, have sought reduced levels of housing growth, highlighting a range of points, notably relating to the actual method and the capacity for growth:</p> <p>1. <u>The Standard Method housing need figure is unreliable:</u></p> <ul style="list-style-type: none"> <li>• it is substantially more than current population projections, with the ONS projections based on 2018 data showing a slowdown in population</li> </ul>	<p>It is appreciated that meeting housing need, as identified by the standard method, is not an absolute requirement, but it is found that it can be met, following the proper assessment of opportunities and application of the appropriate planning balances.</p> <p>The current NPPF sets out a clear expectation of using the standard method to identify housing need. Also, the Council's Housing Needs Assessment Topic Paper considers its</p>	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>growth, which would mean a significant reduction in the number of houses needing to be built;</p> <ul style="list-style-type: none"> <li>• the current Standard Method is recognised as needing review;</li> <li>• the pandemic and Brexit are not reflected, but may have significant effects on the future population of the borough, including on international in-migration;</li> <li>• housing need may also reduce locally due to the Government’s objective of ‘levelling up’ the rest of the country with the South-East.</li> </ul> <p>2. <u>The over-supply of housing (8.6%) against the identified ‘need’ is unnecessary and damaging:</u></p> <ul style="list-style-type: none"> <li>• inclusion of the buffer means that some particularly damaging developments are left in, when they could have been omitted to the benefit of the environment, communities impacted, and the Borough as a whole.</li> <li>• a “buffer” is not needed to contribute further to meeting housing needs (as stated in the Housing Supply and Trajectory Topic Paper for Sevenoaks, as its Local Plan has been found unsound so any assumptions about their potential housing shortfall are unreliable.</li> </ul> <p>3. <u>Such growth is incompatible with environmental assets:</u> Identifying development needs is only the</p>	<p>appropriateness, in the light of a recent (December 2020) ‘Review of Local Housing Needs’, which considers the issues raised.</p> <p>The “buffer”, being the potential over-supply over the plan period relative to the identified need, firstly reflects the outcomes of site assessments of suitability for development, also having regard to the need for a sufficient supply and mix of sites over the plan period and on a rolling 5-year basis.</p> <p>The scale of the buffer is considered appropriate, and prudent, in light of the overall scale of growth, the level of risk of slippage (with allowance for the high contributions to supply from the strategic sites) as well as environmental constraints, in order to ensure that, once adopted, development is “plan-led”.</p> <p>The “starting point” role of housing need is appreciated, as noted above, as is the</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>starting point and must be balanced against the constraints of being a borough with significant environmental and heritage assets, notably Green Belt and AONB coverage. (This was stated on 16th December 2020 by the [then] Minister of Housing, Communities and Local Government, Robert Jenrick.); the borough does not have the capacity to meet its housing targets without significant harm to these, which are protected under the planning system.</p> <p>4. <u>The level of growth relies on the inappropriate loss of Green Belt</u>: paragraph 11 of the NPPF provides for the Council to not meet local housing needs where it would harm the Green Belt; exceptional circumstances for the release of Green Belt are not demonstrated.</p> <p>5. <u>The growth is incompatible with conserving and enhancing the High Weald AONB</u>: major developments are not appropriate; insufficient consideration is given to the impact of the development strategy on the AONB, but also the impact on the significant areas of land which lie within its setting.</p> <p>6. <u>Some development should be provided for in neighbouring areas</u>: there are criticisms that the Council has not fulfilled its Duty to Cooperate, which could have the reduced the scale of</p>	<p>importance of the Green Belt and AONB designations, in line with NPPF paragraph 11.</p> <p>The Council has been very assiduous in assessing impacts of potential sites on these designations, with the benefit of expert advice, as set out in in its Development Strategy Topic Paper and supporting SHELAA.</p> <p>Careful consideration has been given to meeting development needs without de-designating any Green Belt in line with the NPPF, as well as evaluating the contribution of Green Belt areas to its purposes. This is set out in its Development Strategy Topic Paper and supporting Green Belt Studies.</p> <p>The Council attaches considerable weight to the conservation and enhancement of the High Weald AONB, but believes that, while development should be limited, there are exceptional circumstances for the few ‘major’ developments proposed. This is supported by LVIA’s and by a Setting Analysis Report.</p> <p>The Council did, in fact, investigate opportunities of meeting some of its housing need in neighbouring areas, but this potential was not evident, requiring the Council to determine the</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	development required, especially the new settlement at Tudeley Village.	extent to which it can meet its own housing need, as well as potential unmet housing need. Its actions are set out in its most recent Duty to Cooperate Statement.	
<b>The overall level of growth should be increased</b>	<p>Representations from development interests have variously sought increased provision for housing, with reference to the following:</p> <ol style="list-style-type: none"> <li>1. <u>Housing provision should meet the uncapped need</u> <ul style="list-style-type: none"> <li>• the 40% cap applied in the Standard Method reduces the number generated but does not reduce the need itself;</li> <li>• the PPG encourages LPAs to address the uncapped need at the earliest opportunity;</li> <li>• it would ensure that the authority is actively seeking to address the very significant and worsening affordability issues in the borough (as shown by the high median workplace-based ratio);</li> <li>• the Council’s Sustainability Appraisal shows that the Borough could accommodate its uncapped housing need, and that the overall impact of uncapped housing growth (growth strategies 10 &amp; 11) would be similar to that of the Pre-Submission Local Plan;</li> <li>• the Housing Needs Topic Paper notes that meeting uncapped level of need is achievable in housing market terms.</li> </ul> </li> </ol>	<p>Firstly, it is appreciated that the uncapped need has increased somewhat using the latest affordability data, from 741 to 765 dpa. However, this does not change the Council’s assessment, supported by its ‘Review of Local Housing Needs’, which considers that there are not “exceptional circumstances” that justify an alternative approach.</p> <p>As regards the consideration in the Sustainability Appraisal, it is noted that the higher growth strategies score highly negatively in relation to the Landscape objective and relatively poorly in relation to several other objectives.</p> <p>In response to the last bullet point, this shows that the housing market in itself should not</p>	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>2. <u>Specific provision should be made to contribute towards the unmet housing needs in adjoining authorities:</u></p> <ul style="list-style-type: none"> <li>• there is a general concern regarding the degree to which the Council has complied with the duty to cooperate given the failure of its West Kent neighbours in seeking to meet wider housing needs;</li> <li>• there is unmet need arising from Sevenoaks to which insufficient regard has been given in terms of determining whether any of that need can be met within the Borough</li> <li>• meeting the uncapped Standard Method figure would go some way to addressing Sevenoaks unmet need of circa 2,000 dwellings;</li> <li>• there is the potential that the unmet housing need figure may increase as Sevenoaks will now have to reconsider their housing need, as will adjoining authorities;</li> </ul> <p>3. <u>Further housing provision should be made in order to maintain an adequate buffer against potential future non-delivery from identified sites/sources of supply:</u></p>	<p>frustrate the level of housing growth set out in Table 4 of the Local Plan.</p> <p>The Council has actively considered the potential to meet any unmet housing needs throughout preparation of the Local Plan, as demonstrated in its most recent Duty to Cooperate Statement.</p> <p>This has included regular liaison with the other “West Kent” councils - Sevenoaks (SDC) and Tonbridge &amp; Malling (TMBC). It is evident that, as SDC (and TMBC) has to revisit its housing capacities through new Local Plans, so the basis of the request to help address its housing need has fallen away. Notwithstanding this, this Council has been positive in advising that the housing supply “buffer” in its Local Plan, which has been included on a precautionary basis to ensure that its own housing needs will be met even in the event of some slippage in its trajectory, may contribute to meeting wider housing needs, if monitoring shows that identified sites and windfall allowances are being delivered as anticipated.</p> <p>There is already considered to be a healthy level of supply relative to the identified housing need, being equivalent to 8.6% of overall need and 14.6% of the need to be met from allocations (as noted in the supporting text to Policy STR1),</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<ul style="list-style-type: none"> <li>• there are particular concerns regarding the housing trajectory due to high reliance on the strategic sites,</li> <li>• build out rates to not accord with Lichfields 2020 research document – ‘Start to Finish’ - which identifies that the average time taken from outline decision notice to first dwelling completion is 3 years on sites of 500+ homes and, for larger scale sites (2,000+ homes), it estimates an average 8.4 years from validation of the first planning application to the first dwelling being completed.</li> <li>• reference is made to a letter from the Inspector Roger Clews to the North Essex Authorities (15 May 2020) (IED/022) who found no local evidence to depart from the evidence on likely delivery rates at the proposed GCs provided by ‘Start to Finish’s’ (para. 174 IED/022); also, that “In general terms, it is reasonable to assume that the planning approval process would allow housing delivery at any GC to start within four or five years from the adoption date of the plan (or plan revision) which establishes the GC in principle.” (Para 176 of IED/022);</li> <li>• the trajectory for Tudeley Village, delivering 150 dwellings per annum from 2025/26, considered over-optimistic;</li> <li>• for the Paddock Wood extension, the average build out rate of 333 dpa is over double the average rate for larger schemes identified in Lichfields’ research (estimated 160 dpa for a</li> </ul>	<p>readily capable of compensating for any delays in sites being built out.</p> <p>The timing of development on the strategic sites is addressed more fully in the Strategic Sites Topic Paper. Further details are also provided in the signed Statements of Common Grounds with the key site promoters.</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>scheme of 2,000+ dwellings), while there is no confirmation of how many housebuilders (which would increase the build-out rate) will deliver this site, or evidence of comparable sites to support such a significant departure</p> <ul style="list-style-type: none"> <li>• a 10% buffer/non-delivery rate should be reinstated to ensure a robust evidence base;</li> <li>• a 20% buffer over the requirement is suggested to ensure necessary flexibility in the event of any unexpected delays in delivery;</li> <li>• the need for a further buffer to housing supply can also be considered an exceptional circumstance to support further Green Belt release (as concluded recently in Compton Parish Council &amp; Ors v Guildford Borough Council &amp; Ors);</li> <li>• more smaller sites that can come forward in the first five years within alternative settlements are advocated by some developers to offset likely slippage.</li> </ul> <p><i>[An increased housing target associated with a view that Local Plan should look ahead an extra year is considered under Section 1 above.]</i></p>	<p>As stated above, the Local Plan’s strategy is already prudent in providing an appropriate buffer, while it is also noted that that there is no NPPF requirement for the provision of a buffer and, hence, no expectations of its size.</p> <p>Noted, but it is not justified to make further incursion into the Green Belt, having regard to the contribution of areas of Green Belt to its purposes and what is already considered to be an adequate buffer.</p> <p>The role of small sites in meeting housing need is considered further in relation to the actual development strategy below, while it is evident that such sites already make a significant contribution to supply, including in the early part of the plan period.</p>	
<p><b>General objections relating to designated areas</b></p>	<p>1. It is not appropriate to plan for large development and new settlements on Green Belt land or on (or adjacent to) AONB land.</p>	<p>It is agreed that both contexts require exceptional circumstances to be demonstrated, but it is believed that there are situations where these tests are met, as set out in the Council’s Development Strategy Topic Paper and supporting studies.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>2. There is a concern with the Council’s approach to the scale of the Green Belt release vs that of AONB land, and that housing proposed on Green Belt land at Tudeley may be disbursed across the wider extent of non-Green Belt areas in a manner that is not major development and not requiring an exceptional circumstances test to be met, taking into account AONB constraints, due to an over-estimation of harm to the AONB, and under-estimation of the impact of Green Belt release.</p>	<p>The Council’s approach has followed the policy guidance set out in the NPPF and PPG in respect of both designations.</p> <p>Opportunities to meet development needs without Green Belt releases have been properly investigated (and has not met those needs in full), but it is believed that all suitable opportunities for non-major developments outside the Green Belt are being put forward, both within and outside the AONB.</p>	
<p><b>Loss of Green Belt land</b></p>	<p>There are many objections to Green Belt releases, notably to accommodate development for the new garden settlement of Tudeley Village and as part of the expansion of Paddock Wood:</p> <ol style="list-style-type: none"> <li>1. Tudeley Village together with the expansion of Paddock Wood in this direction would destroy large swathes of Green Belt, undermining its effectiveness in checking unrestricted sprawl of this large built-up area and result in neighbouring towns merging, weakening its purposes.</li> <li>2. There is concern that there is no intention to designate additional land as replacement.</li> <li>3. While a case could be made for releasing some Green Belt land in line with NPPF guidance, it is</li> </ol>	<p>Evidence in support of the Green Belt releases (and of non-releases) is contained mainly in the Council’s Development Strategy Topic Paper and supporting Green Belt Studies.</p> <p>The effectiveness of the remaining Green Belt in terms of purposes, including in relation to preventing coalescence, following the strategic sites’ development, is set out in Green Belt Study Stage 3.</p> <p>This has been considered as part of the Green Belt study referred to above, but new Green Belt is not found to be justified.</p> <p>Reference is made to the above-mentioned studies, as well as the Council’s SHELAA and</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>not considered that the evidence exists to justify the scale currently proposed within the plan, and all reasonable alternatives assessed.</p> <p>4. The strategy should consider the potential for the provision of a new settlement outside of the Green Belt, or at least minimise the amount of land that needs to be taken out of the Green Belt.</p> <p>5. Questioning whether the loss of Green Belt land around Royal Tunbridge Wells for residential purposes has exceptional circumstances when scope seems to exist for densification of certain allocations and redevelopment within the LBD of the existing town and in other settlements.</p> <p>6. Road improvements, in particular the currently “off-line” Five Oak Green bypass, will also have an impact on the Green Belt.</p> <p>7. Some developers argue that there is scope for the development of other sites in the Green Belt, including around RTW and Five Oak Green.</p>	<p>its Brownfield and Urban Land Topic Paper, which contain the justifications required to meet the NPPF tests.</p> <p>Options for new and (transformative) expansion of settlements outside of the Green Belt have been considered, as set out in the Sustainability Appraisal and the SHELAA.</p> <p>The prospects for redevelopment within the built-up areas have been carefully considered and an increased, but still realistic, allowance has been made for this. Green Belt releases around RTW take account of their contribution to its purposes.</p> <p>Noted. This has been considered as part of the Council’s relevant assessments.</p> <p>Site-specific proposals for omission sites are reviewed in the respective Place-Shaping chapters.</p>	
<b>Adverse impacts on the AONB</b>	<p>There are general objections to developments, especially major developments, in the AONB, in addition to site-specific representations:</p> <p>1. Major development site allocations within the High Weald AONB are not consistent with national policy with regard to conserving and</p>	<p>It is fully appreciated that major development requires exceptional circumstances, but in a relatively few cases, these has then found to</p>	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>enhancing the landscape and scenic beauty within the AONB;</p> <p>2. Major site allocations within the AONB, including at Cranbrook and Hawkhurst, are not justified because it has been demonstrated that they are deliverable without resulting in an adverse impact on the High Weald AONB, considered against reasonable alternatives.</p> <p>3. Alternatively, it is considered that policies should sensitively consider non-major development within the AONB and on any rural and edge of settlement sites in line with LVIAs, the High Weald Management Plan (2019-2024) and a landscape-led approach.</p> <p>4. Major development in the AONB cannot be justified because sites are in poor condition, have fewer AONB components or where attempts will be made to enhance retained parts of the AONB on or near the site. (Natural England)</p> <p>5. Concerns that the Landscape and Visual Impact Assessments (LVIAs) of potential allocation sites in the AONB downgrades impacts, are imprecise and inconsistent.</p>	<p>exist, as set out in the Development Strategy Topic Paper.</p> <p>Careful consideration has been given to the relevant tests in the NPPF relating to the need for exceptional circumstances, but for the proposed allocations, these are found to be met. It is also noted that the Council has found that many more proposals are unacceptable. In all cases, any harm is given great weight in the planning balance, but it is not a “veto”.</p> <p>Non-major development proposals, including potential reductions in scale of the major developments, have been fully considered, and all suitable opportunities put forward. There are strong reasons for the proposed major site allocations.</p> <p>It is appreciated that the value of the AONB is designation-wide, as recognised in the LVIAs, but it is also evident that certain developments in certain locations will have a greater impact on the AONB, having regard to its defining features.</p> <p>This is not accepted. They are robust, independent studies (which have resulted in sites no longer being proposed in some cases), in line with professional standards.</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>6. Development interests conversely argue that exceptional circumstances exist to justify some major development in the AONB in terms of the large proportion of the District that is covered by the AONB designation and the need for housing, particularly affordable housing.</p> <p>7. There is significant pressure from development in the setting of the AONB, particularly at Tudeley Village and Paddock Wood/East Capel.</p>	<p>The need for affordable housing has been part of the balance of considerations alongside the importance of conserving and enhancing the AONB. Individual site submissions have all been duly assessed, as set out in the SHELAA. (See also summaries for Place Shaping chapters below.)</p> <p>Noted. This has been specifically considered – see commissioned Setting Analysis Report.</p>	
<p><b>Provision of windfall allowance</b></p>	<p>There are objections arguing both that the windfall allowance is too small and too large, the main respective points being:</p> <p>1. <u>The allowance for ‘windfall’ (i.e. non-allocated) sites is understated</u>: it has not reflected the recent changes in legislation that promotes the change of use of urban sites to residential, in addition, to the significant opportunity from the amount of vacant commercial space (offices, shops, etc.) which has become apparent with the changing environment following the pandemic;</p> <p>2. <u>The windfall allowance is unreliable</u>:</p> <ul style="list-style-type: none"> <li>• whilst changes to permitted development rights, notably office to residential conversions, are accepted as helping sustain windfall rates for the short term, it is questioned whether the increased reliance on this source is justified</li> </ul>	<p>Land use, policy and legislative changes in relation urban sites and particularly commercial uses have been ongoing, and further trends have been anticipated. The degree to which these trends will be affected by the pandemic in the longer term will be monitored, but the allowances are regarded as realistic at the present time.</p> <p>The windfall allowances reflect the clear evidence and analysis set out in its Brownfield and Urban Land Topic Paper.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>over the long term, and that the allowance should be reduced;</p> <ul style="list-style-type: none"> <li>there is no compelling evidence, as required by the NPPF, to include windfalls in the 5-year HLS.</li> </ul> <p>3. <u>Sites with less than 10 units should have been considered for allocation</u>: these would cumulatively make a notable contribution.</p>	<p>It is noted that the allowance for small site windfalls is moderated further for the latter part of the plan period.</p> <p>Small sites of less than 10 dwellings are taken into account and recognised as making a significant contribution to housing supply, both through current planning permissions and future windfall sites, for which a robust allowance is made.</p>	
<b>Density of developments</b>	<p><u>The Local Plan does not appear to maximise the density of housing:</u></p> <ul style="list-style-type: none"> <li>maximising density is required by the NPPF, but appears to quite low;</li> <li>all development should be built at higher densities than low suburban development densities of 30dph, so that greenfield, including Green Belt, land take is kept to an absolute minimum;</li> <li>.the average density for the urban extension at Paddock Wood of 35-38dph would be very low and fall below the expectations set out in the draft National Design Code.</li> </ul>	<p>Housing site capacities seek to make effective use of urban and previously developed (brownfield) land, having due regard to relevant Plan policies, which can mean that densities are variable depending on their location and setting, as well as site characteristics and features. The site densities proposed within the Strategic Sites are considered appropriate for this location as established from the detailed masterplan work done for both settlements; please see response tables to Policies STR/SS1 and STR/SS3.</p>	No changes proposed
<b>Strategy should relate more to settlement hierarchy</b>	<p><u>Growth should relate to the most sustainable locations across the borough, particularly Royal Tunbridge Wells (RTW) and Southborough, as well as other settlements, such as Cranbrook and</u></p>	<p>Regard has been paid to the role and function of settlements, as assessed through the related Study. This is reflected by the scoring against related sustainability objectives in the Sustainability Appraisal. However, regard must</p>	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p><u>Hawkhurst, ranked highly in the Role and Function Study:</u></p> <ul style="list-style-type: none"> <li>the distribution of allocations bears no relationship to the Council’s Settlement role and Function Study (February 2021), and there is no clear reason for its strategy;</li> <li>it is acknowledged that the Plan limits the growth capacity at RTW based on the constraints posed by the surrounding AONB and Green Belt, but it is considered that further capacity can be accommodated sustainably at RTW and Southborough (and less at Paddock Wood) to address existing challenges faced in the main urban area;</li> <li>Policy STR 1 should identify a clear hierarchy of settlements and growth areas to guide the apportionment of housing and explain how each one will play a part in delivering the Plan’s development strategy;</li> </ul>	<p>also be paid to other sustainability factors, which affect the suitability of locations and sites for development.</p> <p>The amount of growth at RTW has increased subsequent to the Regulation 18 stage, following further assessment of opportunities, but is limited by various constraints including Green Belt and AONB impacts, as is Southborough.</p> <p>The extent of growth at Cranbrook and Hawkhurst is considered to be consistent with their respective roles and AONB settings.</p> <p>Policy STR1 properly provides a clear indication of the distribution of development across the borough, and it is not necessary or appropriate to revert to a simple hierarchical approach.</p>	
<p><b>Strategy should provide for more growth in rural areas</b></p>	<p><u>A number of landowner and developer interests have variously argued there is further scope for greater development in rural settlements:</u></p> <ul style="list-style-type: none"> <li>it would help in meeting local housing need, reduce the risk of the non-delivery of housing by providing a range of smaller sites in different locations, and make more effective use of and help sustain existing infrastructure;</li> <li>additional development could be proposed to support and enhance existing settlements, rather</li> </ul>	<p>It is considered that the potential of rural settlements to contribute to meeting housing needs in a sustainable way has been fully achieved, as set out in broad terms in the Council’s Development Strategy Topic Paper and, in relation to individual sites, through its SHELAA.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>than create new ones, including strategic growth at the main locations of Pembury, Hawkhurst and Cranbrook consistent with their role as important service centres, and at Five Oak Green;</p> <ul style="list-style-type: none"> <li>• greater contributions by Sissinghurst, Horsmonden and the non-AONB rural settlements should be highlighted to reasonably maximise the contribution of areas outside the AONB toward meeting development needs.</li> <li>• more dispersal to other towns and villages would also improve the geographical balance of housing provision which is overwhelmingly focussed on the western part of the borough and reduce risk of market saturation;</li> <li>• the threshold for there being a need to develop in the AONB is patently met;</li> <li>• it would avoid the need to include a new settlement at Tudeley Village;</li> <li>• it is suggested that smaller scale developments should be provided for in each village (for example 100 homes per village).</li> </ul>	<p>The proposed development strategy provides a geographical spread of development, as illustrated on the Key Diagram.</p> <p>Cranbrook, Hawkhurst and Pembury all have significant levels of proposed growth, consistent with both their roles and their environmental constraints. Five Oak Green is not proposed for growth, notably due to the focus on nearby strategic developments.</p> <p>Horsmonden also has a relatively high level of growth, which acknowledges its less constrained location. Sissinghurst has some identified growth, but assessment of many submitted sites through the SHELAA has shown only limited suitable sites.</p> <p>The 'Review of Local Housing Needs' study considers that the development strategy is deliverable in housing market terms, having regard to its focus in the west of the borough.</p>	
<b>Strategy should have regard to climate change, pollution and air quality</b>	<p>New development should be sited in locations well supported by, or that will support, sustainable transport, while the strategy fails to take into account national policy on improving air quality and reducing green-house gas emissions, and that the Climate Emergency and public health will be worsened as a result of deteriorated air quality.</p>	<p>The development strategy has regard to the wider environmental effects of growth, notably through the sustainability appraisal (SA) of options; it focuses on settlements that have, or will provide, at least local services.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		The SA has also informed the formulation of policies designed to mitigate the impacts of development on climate change and air quality.	
<b>Provision of smaller sites</b>	It is considered that the development strategy fails to meet its 10% NPPF target for small – medium sites (being only 5.2%, including those allocations with planning permission) and that a suggested small sites policy be added into the Local Plan.	This analysis is partial, only relating to allocations. If all sites with planning permission are included, the figure is 15.2%, and 26% if account is also taken of the anticipated contribution from small windfall sites. This is set out on p57 of the Council’s Housing Supply and Trajectory Topic Paper.	No changes proposed
<b>Inclusion of Strategic Sites</b>	<p>There have been various general objections to the inclusion of strategic sites in the strategy.</p> <p><i>[NB Representations about the choice of strategic locations - Paddock Wood expansion and a new settlement at Tudeley - are presented under ‘Choice of Strategic Sites’ below, while representations about the individual allocations are contained in the summary for the Strategic sites chapter in Section 5.]</i></p> <ol style="list-style-type: none"> <li>1. Inadequate consideration has been given to all alternative options ahead of creating a garden settlement on the Green Belt.</li> <li>2. A larger number of smaller sites would more reliably meet housing delivery than developing strategic sites which require longer lead-in and build-out times than stated.</li> </ol>	<p>The evolution of the development strategy to include provision for the strategic expansion of Paddock Wood (including extending into the adjacent Capel parish) and for a new garden settlement at ‘Tudeley Village’ is set out in the Development Strategy Topic Paper.</p> <p>The consideration of options without either or both strategic sites is also undertaken as part of the Sustainability Appraisal.</p> <p>These documents show that the borough would fall well short of meeting its local housing needs though sustainable development without the establishment of strategic growth locations.</p>	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>3. Developing the fringes of existing settlements with access to local amenities would be better for a growing older generation; also, replacing the garden settlement with genuinely deliverable sites, capable of providing affordable housing, would be an appropriate remedy to ensure affordable housing is delivered.</p> <p>4. More emphasis should be placed on available alternative brownfield sites to avoid need for new settlements such as Tudeley Village, with ample brownfield land to meet the (reduced) housing need being provided by the closure of shops, and the reduction in office-working, as well as scope for actions to release underused housing stock. (A local group submitted a list of PDL sites.)</p> <p>5. By seeking to retain existing well-located employment land and premises, inadequate consideration has evidently been given to releasing them to housing before meeting housing needs in Paddock Wood and Tudeley.</p>	<p>Strategic sites are considered to offer at least as much potential for the inclusion of housing to meet the needs of different sections of the population, including housing for older people and affordable housing. This is confirmed through viability appraisals.</p> <p>Brownfield site opportunities have been reviewed (including the list of submitted sites, which were considered in the preparation of the Brownfield and Urban Land Topic Paper and did not yield any suitable, available and achievable sites for allocation in this Local Plan). All suitable sites are either proposed to be allocated or taken into account in determining (increased) windfall allowances, as set out in the Brownfield and Urban Land Topic Paper. Allowances reflect ongoing trends in actual land use change, as well as related policy and legislative provisions, particularly in terms of commercial uses.</p> <p>This is not accepted. The strategy seeks to maintain and improve the balance between homes and jobs across the borough. Where appropriate, consistent with the proposed policy approach, there are instances where the residential reuse of commercial site is proposed through the Local Plan.</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>Choice of strategic sites</b>	<p>Objections to the choice of the strategic sites' allocations related more to Tudeley Village proposal, but sometimes to both proposals, notably in relation to alternative locations that were being suggested or promoted (<i>which are also highlighted in relation to the relevant settlement in Section 5 below</i>).</p> <ol style="list-style-type: none"> <li>1. There is a disproportionate level of growth concentrated in one area, which is inequitable, puts high strain on local infrastructure and constrains delivery in terms of built-out rates.</li> <li>2. Alternative locations/sites for a new settlement are favoured, variously including <ul style="list-style-type: none"> <li>• Castle Hill to the north of Royal Tunbridge Wells (RTW)</li> <li>• Other sites in the A21 corridor, notably around the eastern side of RTW</li> <li>• Horsmonden</li> <li>• Frittenden</li> </ul> </li> <li>3. Both options raise considerable issues of either extensive development on the floodplain and/or impacts on downstream flooding.</li> </ol>	<p>The consideration of options for strategic sites locations has been undertaken as part of the Sustainability Appraisal. This work has also informed the further consideration through the SHELAA.</p> <p>The higher level of growth in the western part of the borough reflects a range of planning considerations. The 'Review of Local Housing Needs' study considers that the development strategy is deliverable in housing market terms, while the Infrastructure Delivery Plan and supporting masterplanning work demonstrates the deliverability of requisite infrastructure.</p> <p>These alternatives have all been considered, but have various major issues in respect of suitability, availability and/or achievability that make them inappropriate. Details are contained in the Sustainability Appraisal and the SHELAA.</p> <p>Flood risk concerns have been thoroughly investigated and, rather than worsening the current situation, the developments will lead to "betterment" in flood risk management.</p>	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>Use of Limits to Built Development (LBDs)</b>	<p>Some, often rural, development interests seek alternatives to the policy on the use of LBDs:</p> <ol style="list-style-type: none"> <li data-bbox="432 368 1144 568">1. Mirroring the early strategy with a stringent restriction of development beyond the LBD is likely to result in similar failure to the Core Strategy in terms of housing delivery. Instead, a mechanism is needed to ensure a consistent level of housing can be brought forward at all times.</li> <li data-bbox="432 743 1144 1310">2. Policy STR 1 should offer greater flexibility for windfall development on brownfield sites outside LBDs (given heavy reliance on strategic sites, general undersupply of housing and that the NPPF encourages development of brownfield land), by the following additions to the end of criteria 2 and 9:  <i>'Where there is a housing need, or housing delivery is falling below the required housing supply, windfall development will be supported on brownfield sites outside of the Limits to Built Development'</i>.  and suggested additions to criterion 8:  <i>'limit development within the High Weald Area of Outstanding Natural Beauty to that which can be accommodated whilst still conserving its key characteristics, this being mostly small-scale</i></li> </ol>	<p>The LBDs are policy lines drawn around the 'main' built up area of a sustainable settlement. These have proved effective regarding housing delivery, which has in fact on average exceeded the Core Strategy housing target of 300 dwellings per annum. The Council is confident that the housing requirement will be met within the framework of LBDs, which have been amended to incorporate the new allocations, as well as provide for an additional supply "buffer".</p> <p>The appropriateness of development in the countryside is already set out under Policy STR3 - Brownfield Land, of which criterion 3, relating to brownfield sites outside defined LBDs, is of particular relevance. It is not considered necessary to amend the broad approaches in the stated parts of Policy STR 1 as suggested.</p> <p>In relation to development in the AONB, it is also noted that there is no basis for determining that "small-scale" equates to 20 dwellings, as it is case specific.</p>	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p><i>(less than 20 homes), only promoting larger proposals where exceptional circumstances are demonstrated <u>and/or where development is on brownfield land;</u></i></p> <p>3. A (non-AONB or Green Belt) landowner proposes an additional policy criterion to Policy STR 1: <i>Safeguard substantial previously developed sites that are located in the Countryside but outside of the Green Belt or High Weald AONB for future development, where such development will make an important contribution to meeting the development needs of the Borough over the whole of the Plan period and can demonstrate through a site wide masterplan that there will be no material or adverse effect on the character and amenities of the surrounding area, including an assessment against criteria 3. of Policy STR3 Brownfield Land.</i></p>	<p>This extension to the policy is not considered appropriate. The currently proposed policy wording is regarded as consistent with the NPPF and local circumstances, as set out in the Brownfield and Urban Land Topic Paper.</p> <p>Also, it is neither necessary nor appropriate to “safeguard” land to meet development needs within the plan period, both because its availability is not certain and because it would be wrong to presume suitability for housing. Rather, any such proposals would be properly considered on their merits in the context of the prevailing Local Plan and circumstances at the time.</p>	
<p><b>Provision of employment sites</b></p>	<p>There have been several, varied representations relating to the need for, role and phasing of employment sites:</p> <p>a) the roles of the two sites at Paddock Wood is not clear, nor how they will be phased and whether the Longfield Road, Royal Tunbridge Wells (RTW) allocation would undermine demand for the Paddock Wood sites, or vice-versa;</p>	<p>The approach to employment land is supported by an Economic needs Study and other studies, the findings of which are brought together in the Economic Development Topic Paper.</p> <p>The respective policies provide an appropriate land use planning framework for the development of the sites, but it is not prescriptive on marketing approaches. The separation of the Paddock Wood sites from that at Longfield Road</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>b) as employment allocations at Paddock Wood and Longfield Road, Tunbridge Wells are not in town centres, it should be demonstrated why the office element could not be accommodated in the relevant centres;</p> <p>c) major employment development is being promoted in the AONB at land north of Longfield Way, (whereas housing is not), notwithstanding opportunities which could address employment needs outside of both the Green Belt and AONB at Paddock Wood;</p> <p>d) there is concern that the Sevenoaks and Tunbridge Wells Economic Needs Study was prepared nearly 5 years ago, before the Covid pandemic, changes to the Use Class Order, and the Sevenoaks Local Plan being found unsound; nor does it align with the Local Plan period;</p>	<p>in RTW, with differing catchments and, potentially, markets is expected to enable all to progress during the Plan period.</p> <p>The Longfield Road allocation has already been tested, and approved, through the planning application process. The Paddock Wood allocations will be further developed through the preparation of an SPD. The land promoters for the Paddock Wood allocations form part of the SSWG and it is expected that these will be delivered over the plan period.</p> <p>As noted above, the employment allocation at Longfield Road has already been tested via a planning application. It is considered, and accepted, that there are fewer options for strategically significant employment development than there are for housing, which is an important factor when considering Green Belt exceptional circumstances.</p> <p>The Economic Needs Study has been reviewed in the light of more recent circumstances, as set out in the Economic Development Topic Paper, including bringing it up-to-date in terms of the plan period.</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>e) it is unclear how the floorspace estimate is derived, the justification for preferring the upper end of the range and “over-allocation” of land;</p> <p>f) greater emphasis should be placed on the optimisation of previously developed land to contribute to meeting employment needs;</p> <p>g) the Local Plan should be capable of accommodating a foodstore that can compete effectively with the existing larger-format supermarkets in terms of its size, range of goods sold and car parking facilities, if necessary outside of the Town Centre.</p>	<p>The strategy is to improve the relationship between local job opportunities and housing, which is manifest in part in the proposed employment allocations; in addition, it is considered prudent to incorporate a good degree of flexibility in employment allocations to provide capacity for meeting a range of business needs.</p> <p>It is agreed that most existing business areas and sites continue to support the local economy and provide valuable job opportunities. This is reflected in Employment policies. However, both growth and the need for new accommodation bring about a need to supplement existing sites.</p> <p>Drawing on the most recent evidence base study, it is expected that the need for future convenience goods expenditure can be met from within the existing town centre and other retail centres.</p>	
<b>Capacity of existing and delivery of improved highways infrastructure</b>	<p><u>Various concerns about the capacity of existing highways infrastructure and the potential and timing of proposed improvements to deliver the strategy:</u></p> <ul style="list-style-type: none"> <li>the funding and delivery timetable of transport infrastructure in the IDP is relatively vague;</li> </ul>	<p>The overall transport infrastructure requirements have stemmed from discussions with the relevant highway authorities, which have also been consulted on iterations of the Infrastructure Delivery Plan.</p> <p>Further, more specific highways work has been undertaken as part of the masterplanning work</p>	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<ul style="list-style-type: none"> <li>• the significant infrastructure may prove highly vulnerable to obstacles to delivery, particularly given the Borough’s environmental constraints;</li> <li>• ‘critical’ schemes will not be implemented until beyond year 10 of the plan period will lead to an increase in traffic congestion in locality;</li> <li>• housing development should be phased for delivery when the A21 and A228 improvements are realised, and housing trajectory tailored to their implementation;</li> <li>• questioning of assumptions in the traffic modelling and of capacity of A21 and A228;</li> <li>• inadequate public transport options for new settlement as part of the strategy</li> </ul>	<p>for the strategic sites, as highlighted to in the Strategic Sites Topic Paper.</p> <p>Further sensitivity testing of the traffic modelling has been undertaken.</p>	
<b>Key Diagram and Policies Map</b>	<p>1. <u>Key Diagram</u>: There is criticism of the Key Diagram from a Town Council, in several respects:</p> <p>a) it is difficult to read and interpret due to low resolution;</p> <p>b) it is missing important designations such as Flood Zone 2;</p> <p>c) constraints, notably Flood Zones should be shown in neighbouring authorities to give a</p>	<p>While the Key Diagram is regarded as sufficiently clear to fulfil its purpose of illustrating the overall development strategy, it is accepted that the text could be clearer and the resolution improved.</p> <p>It is not considered necessary to show Flood Zone 2; moreover, it would be very difficult to differentiate between the zones at this scale, while development is most vulnerable in Flood Zone 3.</p> <p>While designations and proposals outside of the borough are relevant to plan-making, it is</p>	Yes - Improve resolution and clarity of the Key Diagram

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>more realistic and strategic view of the extent of the flood risk facing the north of the borough and the locations where TWBC is proposing the majority of its strategic growth;</p> <p>d) it should include the existing settlements and proposed growth for the areas in the neighbouring authorities given the extent of cross-boundary strategic matters that TWBC has with its neighbours;</p> <p>e) .references to ‘on-line’ and ‘off-line’ road improvements are unclear, as not terms used in the NPPF or in the Glossary;</p> <p>f) there are no railway stations shown on the Key Diagram;</p> <p>g) there is no indication of the proposals for the regeneration of Paddock Wood Town Centre;</p> <p>h) it does not identify Tudeley as a New Village, but simply shows growth and where the Green Belt is proposed for removal.</p> <p>2. <u>Policies Map</u>: does not fully set out what changes to the Policies Map would result from adoption of</p>	<p>expected that policy mapping is limited to the Local Plan area to avoid potential confusion.</p> <p>See above response.</p> <p>The nature of the respective on-line and off-line improvements are described in the Local Plan as well as being shown on the Key Diagram.</p> <p>It is not considered necessary to show railway stations, as there are no strategic proposals for them.</p> <p>The strategy for Paddock Wood town centre is set out through Policy STR/SS2. A Framework Masterplan SPD will be prepared which will set out the strategic vision for the town centre over the plan period.</p> <p>The wholly new settlement of “Tudeley Village” is highlighted on the Key Diagram, while it is very clearly set out in the Local Plan document.</p> <p>The extent of areas covered by policies are evident from respective Local Plan maps.</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>the Local Plan, as areas of the borough outside of the Inset Map areas covering settlements show no designations. Unless TWBC can demonstrate that it has shown all the changes to the policies that would result from the adoption of the plan, it has failed to comply with its SCI and regulations.</p>	<p>However, it is accepted that the Policies Map relies in part on extant Local Plans (notably for safeguarded road and rail routes) and the detail on plans within the Local Plan. An “interactive” Policies Map, in line with the Government’s digital agenda, will be prepared to help present a comprehensive policy coverage, as well as a schedule showing where existing policies with a spatial expression are being retained, amended or deleted.</p>	
<p><b>Housing land supply</b></p>	<p>Maintenance of a five-year housing land supply is queried; notably, the inclusion of outline consents (especially the land at Brick Kiln Farm) and the presentation of figures). It is suggested that the trajectory places those allocations that are now within its commitments within the commitments part of their trajectory table/ annotated the table to show this was the case – rather than have a ‘0’ against them, as this is somewhat confusing.</p>	<p>The housing trajectory presents the best estimate of the timing of all proposals, including both sites with planning permission and (generally not currently permitted) allocated sites, drawing on advice from promoters, including where sites have the benefit of outline permission, and the methodology set out in the Housing Supply and Trajectory Topic Paper.</p>	<p>No changes proposed</p>

## 4.2 Policy STR 2 – Place Shaping and Design

### Notes:

1. Some 10-15 representations were received on Policy STR 2.
2. There were a number of representations made in relation to STR2 which were objections to certain allocations, including those at Benenden Hospital Site, which are dealt with under Section 5 – Place Shaping and not included in the table below.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
STR 2 - Environment	The Environment Agency (EA) supports the policy but suggest it should include a clear definition of the climate change adaptation methods and design principles in relation to green, grey and blue corridors.	STR2 sets out design principles, which are elaborated in subsequent policies, including Policy EN3 Climate Change Mitigation and STR7 (Climate Change), both of which contain the measures of mitigation to climate change in more detail. Similarly, Policy EN14 elaborates on design principles underpinning green, grey, and blue corridors.	No changes proposed
STR 2 - Dark Skies	Reference should be made at point 9 to dark skies	This point is elaborated properly in Policy EN8 – Outdoor Lighting and Dark Skies.	No changes proposed
STR2 - Density	Reference should be made to optimise the use of land by increasing the density of development. All development should be built at higher than low suburban development densities of 30 dph.	This issue is appropriately addressed under strategic policy STR 3 – Brownfield Land and in relation to Development Management policy H 2 – Housing Density.	No changes proposed
STR 2 - Design	1. Absence of NDP Design Guides or High Weald AONB Design Guide	1. Design principles are further developed in Policy EN 1 – Sustainable Design, which refers to a design guide checklist. Design guidance within NDPs is part of the development plan itself, while AONB guidance is highlighted in	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	2. Policy should be encompassed within EN1	relation to the High Weald AONB policy, EN 19.  2. EN1 is detailed and elaborates on the Strategic Policy. STR2 sets out principles of how to apply EN1.	
STR 2 - Health	Health inequalities should be better addressed through reference of greater evidence base, including Kent Joint Strategic Needs Assessment.	TWBC has had regard to this insofar as it relates to land use planning matters. The Local Plan looks to help address health inequalities through its Development Management Policies, including in relation to accessible housing, health infrastructure, access to open space, and protection and enhancement of employment opportunities.	No changes proposed
STR 2 - Built environment	There is a lack of cohesion and clear strategy for public realm streets and open space. The design principles do not follow established best practice placemaking principles.	Regard to the public realm is highlighted in part 2 of the policy, with well-founded principles which are further elaborated in policy EN 1.	No changes proposed

### 4.3 Policy STR 3 – Brownfield Land

**Notes:**

1. There were 15 representations made in relation to policy STR 3, including several in support, from Royal Tunbridge Wells Town Forum, several developers and a number of individuals.
2. Where reference is made to policy STR 3 in the context of a representation on a specific site allocation rather than the strategic policy wording itself, this is dealt with under Section 5 – Place Shaping and not included in the table below.
3. Where representations have been made regarding making the optimal use of brownfield land, these are dealt with under Policy STR 1.
4. A local group submitted a list of additional brownfield sites to support an alternative development strategy without the need for strategic development in Capel Parish, which is considered in relation to representations on Policy STR1 above.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>Policy STR 3 – Phasing</b>	The policy should emphasise that brownfield sites should be built out before greenfield sites, specifically sites in the Green Belt.	A clear need has been established for greenfield sites to complement brownfield sites to achieve the housing trajectory. While early brownfield site developments are supported, a “brownfield first” policy test would undermine the ability to deliver the Local Plan’s housing requirement and maintain a continuity of supply.	No changes proposed
<b>Policy STR 3 – Brownfield sites in the countryside</b>	A few landowners/developers consider the policy too restrictive in its position on the redevelopment of brownfield land outside settlement boundaries, only emphasising the optimal use of brownfield land within close proximity to the ‘Defined Town and Rural Service Centres’, arguing that it won’t encourage making as much use as possible of PDL land elsewhere; hence it should be worded to be more accommodating of brownfield land outside settlement boundaries. Specific proposals	The policy has been written to be consistent with the NPPF by making efficient use of brownfield land while taking into account opportunities and constraints, such as location, surrounding character and environment. A fuller background is contained in the Brownfield and Urban Land Topic Paper.  Maintaining and enhancing the vitality of rural communities, as well as promoting sustainable	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>are that “<i>sufficient</i>” rather than “<i>first</i>” <i>consideration is given to the re-use of existing buildings, including any suitable extensions</i>, at criterion 3a; also, that criterion 3c in relation to residential developments is amended to remove reference to “<i>... and there is, or the development will provide, safe access by foot, cycling, or public transport for a high proportion of trips;</i>”</p> <p><i>[NB The owners of Blantyre House have sought amendments to Policy STR 1 as a means of safeguarding substantial previously developed sites that are located in the countryside outside of the Green Belt or High Weald AONB for future development with a suitably cross-reference here.]</i></p>	<p>travel and making effective use of existing buildings/infrastructure are also important elements of national policy and of the local strategy, such that the suggested policy amendments are not supported.</p> <p>The scope of the provision is wider than suggested as it relates to proximity to all settlements with LBDs, not only higher order settlements.</p> <p><i>[The suggested policy STR1 amendments are considered under Policy STR 1 above.]</i></p>	

## 4.4 Policy STR 4 - Ensuring Comprehensive Development

**Notes:**

1. A total of 18 comments received *in relation to this policy*.
2. *Where reference is made to policy STR 4 in the context of a representation on a specific site allocation rather than the Strategic policy wording itself, this is dealt with under Section 5 – Place Shaping and not included in the table below.*

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<p><b>Policy STR 4 – Ensuring Comprehensive Development</b></p>	<p>1. Some developers state that the wording is not sufficiently clear and robust to ensure and support comprehensive project delivery and suggest that the Council should commit to facilitating the process of land equalisation agreements in the absence of agreement between the affected stakeholders. A specific proposal is the insertion of the following paragraph <i>“Where sites have several land use elements or are in multiple ownerships, developers should be invited to form their own collaboration agreement or alternative mechanism for the equal sharing of costs. Should this not occur, TWBC will facilitate this process”</i>. Others suggest that “equalisation agreements” should be used to ensure that there is a suitable mechanism to facilitate comprehensive development.</p> <p>2. Various development interests have questioned the impact of the need for SPD production, and for CPOs, on the timetable for delivering</p>	<p>The policy sets out the guiding principles for comprehensive development. The most appropriate means of securing a comprehensive approach is considered further in relation to each relevant site allocation in the respective Place Shaping chapters.</p> <p>The supporting text already highlights the needs for mechanism for securing collaboration (paragraph 4.74), later adding that <i>“it is entirely reasonable to expect a joint approach by respective promoters of a site ...”</i>. (paragraph 4.78). Paragraph states that <i>“Different means of ensuring a comprehensive approach exist and will be case specific.”</i></p> <p>In the circumstances, it is not considered necessary to specify a particular type of arrangement within the Local Plan, although the</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>comprehensive developments, which may impact the housing delivery trajectory and increase the need for a wider range of housing sites to provide a different type, scale and location suitable for development by small and medium builders.</p> <p>3. In relation to the delivery of Tudeley Village, the promoter considers that an SPD is unnecessary due to it all being in single ownership. Conversely, a local group opposed to Tudeley Village states that the policy does not provide sufficient details to ensure comprehensive planning of the new settlement.</p>	<p>suggestions are positive and options to consider by developers in order to meet the policy requirements.</p> <p>Noted, but due account has been taken in both the undertaking of detailed masterplanning work and in relation to the housing trajectory of these factors.</p> <p>Also, SPDs are considered particularly important in delivering the growth on garden settlement principles They will be delivered in close conjunction with the key site promoters.</p> <p>Policies STR/SS1 and STR/SS3 provide the main policy references; please refer to the responses to these policies for more information on this issue. The need for the SPD is set out in the Strategic Sites Topic Paper, with details of the production of an SPD, which will provide the means to ensure effective delivery of all elements, in the Local Development Scheme.</p> <p>Masterplanning work to date identifies all the key infrastructure has all be identified and the Viability Assessment confirms this is deliverable. Statements of Common Ground are being put in</p>	

Policy/Topic area	Main issues	TWBC Response	<i>Changes – Yes/No</i>
		place with the developers to further enshrine comprehensive approach.	

## 4.5 Policy STR 5 - Infrastructure and Connectivity

### Notes:

1. The total number of representations recorded against Policy STR5 is 28.
2. Where reference is made to Policy STR 5 or its supporting text in the context of a representation on a specific site allocation, such as in terms of the availability of infrastructure to support it, rather than the Strategic policy wording itself, this is dealt with under Section 5 – Place Shaping and not included in the table below.
3. Additionally, the Infrastructure Delivery Plan, provides the detail of the infrastructure that is required to support the growth proposed in the Local Plan.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>Community, public and social services</b>	KCC request additional wording to require community buildings to be designed and built to be inclusive of all users – dementia friendly, catering area, toilets/changing facilities for severely disabled.	It is considered that such issues are overly specific to be included in the Local Plan and would be covered by other legislation. Furthermore, Policy EN 1 – Sustainable Design, provides an extensive list of design guidance documents, which cover issues such as accessibility for all types of development.	No changes proposed
<b>Health</b>	Concern over siting of new GP practice in Paddock Wood, if sited in the west, will be unsustainable for those in the east to access.	TWBC has been in close dialogue with NHS Kent Commissioning Group throughout the production of the Local Plan. Specific Paddock Wood details are dealt with in Section 5 of the Local Plan.	No changes proposed
<b>Waste and recycling</b>	<u>Waste</u> - KCC require new waste facility to support the planned growth – timescale changed from 10 to five years. PSLP and evidence base should be updated to reflect this.	Policy STR5 details the need for this infrastructure item and the IDP has been updated to reflect the revised timeframe. As per the SoCG, TWBC will continue to liaise with KCC on this matter.	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
<b>Water</b>	Current wording unsuitable to include as a policy, as issue is adequately covered in Policies EN 25 and EN 26.	Noted – STR5 sets the context for infrastructure provision within the borough over the Plan period including for water infrastructure.	No changes proposed
<b>Sport and recreation</b>	The sport and recreation section of the policy does not account for equestrians.	The policy refers generally to formal and informal sport and recreation provision to be provided. It does not specify individual sports and activities within either the supporting text or the policy. Policies TP 2- Transport Design and Accessibility and STR 6 - Transport and Parking seek to ensure that bridleways are safeguarded and enhanced.	No changes proposed
<b>Delivery of infrastructure</b>	<ol style="list-style-type: none"> <li>1. Tudeley Village – delivery and timetable for Tudeley are not identified within the PSLP.</li> <li>2. Benenden AL/BE 3 and 4 – include provision of playgrounds, sports facilities and tennis courts - concern that developers will not provide as part of new development.</li> </ol>	<p>The trigger points for the delivery of the infrastructure in relation to the Strategic Sites has not been determined at this stage. This will be agreed with the relevant statutory consultees. Please see Section 5 of the Local Plan for specific details in relation to Tudeley Village.</p> <p>The supporting text to and Policy STR 5 confirms the requirement for new or improved infrastructure to be provided to support the growth proposed in a timely way. The detail of how this will be achieved is set out within criteria 1-7 of STR5. Additionally, settlement/parish specific requirements are detailed within the overarching strategic place shaping policy for particular settlements and specific requirements within individual policies, including for Benenden.</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>Transport/ Highways</b>	<ol style="list-style-type: none"> <li>1. Little infrastructure is proposed to mitigate impact of development of Pembury, Capel and PW, particularly in relation to congestion.</li> <li>2. <u>Colts Hill Bypass</u> – funding will not be secured if developments do not receive planning permission. Also querying definition of ‘medium’ timeframe.</li> <li>3. <u>Impact on highways</u> – the planned highways infrastructure is not capable of supporting the level of growth earmarked for the proposed strategic allocations within Paddock Wood and Capel Parish.</li> </ol>	<p>The Local Plan is supported by the IDP which sets out the infrastructure required to support growth. Please see Section 5 of the Local Plan for specific details in relation to Pembury, PW and Capel as well as the Strategic Sites Infrastructure Plan.</p> <p>The detailed infrastructure projects are set out within the IDP (including costing, funding and timescales) and the Strategic Sites Infrastructure Plan. Refer to the Strategic Sites policies within Section 5 of the Local Plan and Policy STR 6 - Transport and Parking.</p> <p>The transport evidence base which supports the Local Plan is considered to be robust and is reflected within the IDP. Please see also Section 5 of the Local Plan for specific details in relation to Paddock Wood and Capel.</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>
<b>General</b>	<ol style="list-style-type: none"> <li>1. There are too many unknowns around costing of infrastructure, what, when and how will it be provided.</li> <li>2. Query whether sufficient coverage of social infrastructure and its contribution to social, environmental and economic sustainability.</li> </ol>	<p>The detail of the infrastructure that is required to support the growth in the Local Plan is set out within the IDP. Its Infrastructure Schedule included in Appendix 1 provides details of the infrastructure required including indicative costs, timing and delivery body as well as funding position where known.</p> <p>The IDP, which is a supporting document to the Local Plan, provides the council’s approach to the provision of infrastructure. This refers to and is also referred to in the supporting text to Policy STR 5, as comprising of ‘Physical’, ‘Community’ and ‘Green’ infrastructure.</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>3. The supporting text should set out who is securing the infrastructure contribution (e.g. KCC for education etc).</p> <p>4. The infrastructure requirements for parishes are inconsistent, for instance B&amp;M may only have small housing allocation but will be impacted by development in PW/Capel/Horsmonden and Pembury.</p> <p>5. Concern over inconsistent infrastructure requirements for development of land at Paddock Wood within the IDP, the Strategic Sites Masterplan study and wording of SS STR/SS 1 and STR/PW 1</p> <p>6. Infrastructure betterment of existing infrastructure is required.</p>	<p>This includes ‘social infrastructure’ insofar as it relates to land use matters.</p> <p>Paragraph 4.94 of the Local Plan refers to the IDP and makes reference to its purpose in setting out how the infrastructure required will be delivered and the mechanisms used to ensure the timely delivery of infrastructure. Criteria 1 of STR 5 further sets out that infrastructure required to support new development will be agreed by the council and the relevant service provider. Further details are provided in the IDP.</p> <p>The IDP sets out the infrastructure requirements across the whole borough over the Plan period. The ‘Infrastructure Schedule’ at Appendix 1 provides the detail at settlement/parish level and also Borough wide and cross boundary infrastructure. This information has been arrived at through detailed discussions and consultation with the relevant service providers taking into account their forecasts of needs and catchment area/practice planning etc.</p> <p>It is noted that there are currently some minor inconsistencies between the IDP and the Infrastructure framework for the Strategic Sites. It is the intention that the IDP will be updated before the submission of the Local Plan in order to correct any inconsistencies between the documents.</p> <p>The IDP sets out the existing and planned infrastructure across the borough. It then also</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p> <p>No</p>



## 4.6 Policy STR 6 - Transport and Parking

### Notes:

1. Nearly 30 representations have been submitted on this policy.
2. Where reference is made to Policy STR 6 in the context of a representation on a specific site allocation rather than the policy wording itself, this is dealt with under Section 5 – Place Shaping and not included in the table below.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
General Comments on the Transport Strategy	<ol style="list-style-type: none"> <li>1. The policy is likely to have limited impact on the use of roads by either petrol or electric cars, even with enhanced public transport, so needs a strategic highways plan.</li> <li>2. Unclear who will pay for improvements and hence their deliverability is questioned.</li> <li>3. No reference to Road Freight, despite Kent residents/businesses reliant on this industry, with a lack of lorry parking facilities and places for drivers to take breaks in the borough.</li> </ol>	<p>The continued use of private cars is recognised and provided for, whilst also promoting active travel/public transport. Highway improvements needed to accommodate growth are proposed as part of the Local Plan, in line with KCC's transport plan.</p> <p>New transport infrastructure will be funded by developers. The trigger points for the delivery will be determined with KCC Highways.</p> <p>A need for new facilities has not been identified by the highway authorities, while proposals for improvements to existing facilities would be considered positively against relevant policies.</p>	No changes proposed
<b>Active travel and modal shift</b>	<ol style="list-style-type: none"> <li>1. Significant elements of the strategy and transport mitigation measures are uncertain, such that the apparent underlying</li> </ol>	The level of modal shift and range of mitigation measures to deliver it have been reviewed with National Highways and KCC.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>presumption that there will be a modal shift away from car use is questioned; in any event, total car traffic will increase.</p> <p>2. Need for improved interconnectivity by providing safe cycle and walking routes within communities and with connections to nearby settlements.</p> <p>3. Detail of the scale of opportunities for active travel, especially in urban areas, is lacking.</p> <p>4. Rural lanes should have lower speed limits to encourage active travel in more rural areas.</p> <p>5. Horse riding should also be listed as active travel and promoted by upgrading public rights of ways to bridleways/restricted byways.</p>	<p>Highway infrastructure required to support growth has been assessed and measures are set out in the Infrastructure Delivery Plan (IDP).</p> <p>Reference is made to the Local Cycling and Walking Infrastructure Plan (LCWIP) , as well as the wider infrastructure proposals outlined within the IDP(with particular reference to the wider local walking/cycling network).Linkages will also promoted through the application of Policy TP2 (Transport Design and Accessibility).</p> <p>Detailed work will be undertaken to progress active travel routes, building upon the principles in the LCWIP in due course.</p> <p>This is a matter for KCC as the local highway authority, but it is noted that the LCWIP includes proposals for a number of ‘Quiet Lanes’ including lower speed limits.</p> <p>The policy makes it clear that active travel will be prioritised, including through enhancing PROWs (including bridleways and byways) for users of non-motorised transport. The general upgrading existing routes is more a matter for KCC’s Public Rights of Way team.</p>	
<b>Transport modelling and strategy for the</b>	<p>1. Insufficient attention to cross-border traffic movements and impacts, notably on Tonbridge, (including the town centre),</p>	<p>The Transport Assessment has considered wider impacts of overall traffic growth both in and beyond the borough, and the Council is working</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>strategic sites, including potential for active travel</b>	<p>Golden Green, East Peckham and other communities. beyond where public transport improvements are proposed.</p> <p>2. Questioning of assumptions in the transport modelling evidence work, including on commuting, and need to test significant modal shift through sustainable transport measures prior to determining major infrastructure intervention.</p> <p>3. Key junctions on the A228, as well as various junctions on the B2017 and the A26, will be over-capacity, while mitigation is not comprehensive and does not cover Yalding.</p> <p>4. Tudeley cannot offer sustainable transport; it is remote, there are no plans to build a new rail station and will inevitably be car dependent., as residents will travel to shop, for school, to receive medical care, and go to work; also, the primary school not included in</p>	<p>closely with KCC/NH and has engaged with neighbouring Councils, including through the Strategic Sites Working Group.</p> <p>The transport evidence base is considered to be sound, although further sensitivity testing is being carried out in response to requests from KCC/NH. The transport evidence proposes measures that promote modal shift and, where relevant, infrastructural improvements to the highway network. Both KCC/NH have given their commitment to continue to work with TWBC to finalise and agree the further sensitivity testing. Outcomes will be reflected in further SoCG with both KCC/NH. The basis of the modal shift is reflected in the Strategic Sites Masterplanning and Infrastructure Study, drawing on the LCWIP.</p> <p>The transport modelling carried out, and further sensitivity testing, identified where there is a need to provide mitigation and this will be elaborated upon, including delivery mechanisms, as part of the SPDs and individual proposals.</p> <p>As noted above, the relevant policies require an active travel focus for the new community, and the policy for Tudeley Village (STR/SS3) requires full consideration of permeable sustainable transport links. Within the associated infrastructure framework, contributions are set aside for a rapid bus services too. Sustainable</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>first phases, and secondary school phased later.</p> <p>5. Considerable concerns over suggested highway restrictions to:</p> <p>a) Maidstone Road Railway Bridge, and associated closure of Commercial Road to all vehicular traffic, except buses, as proposed at paragraph 4.12 of the Local Cycling and Walking Infrastructure Plan (LCWIP); and</p>	<p>movement links will be developed through the SPDs and planning applications on the site. See Response to Policy STR/SS3</p> <p>a) The masterplanning, as set out in the Strategic Sites and Masterplanning Study and the LCWIP, has identified that a “bus gate” over the Maidstone Road <u>may</u>, as part of a package of other transport improvements, be a suitable approach to allow an electric hopper bus to safely and conveniently link the various parts of the town to the town centre, together with safe and attractive walking and cycling links. This is reflected by one of the requirements of the planning policy (STR/SS1 – pages 145-7) 2, which states that development should “<i>provide new and improved bus connections to directly link the planned new residential areas with Paddock Wood town centre and the employment areas to the north of the railway line. The use of bus gates should be considered</i>”.</p> <p>There may be alternative means by which the integrated, forward looking, and accessible transport options can be delivered, with a bus gate across the bridge being an option. Further work will be undertaken, including through SPDs to look at and develop these options further. There will be engagement with residents and the public in the formation of these SPDs including</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>b) Hartlake Road, as recommended in the Council's Transport Assessment Report, and its impacts on access to services and other roads.</p> <p>6. No detailed plans for public footpaths/segregated cycleways.</p> <p>7. No provision for highways improvements to mitigate against these effects of additional movements on rural lanes, including in Brenchley &amp; Matfield.</p>	<p>the town centre SPD. This will include proposals for Commercial Road, and improvements to various elements of the public realm.</p> <p>b) This is a mitigation measure to manage traffic flows effectively following further development, the impacts of which have been modelled and should be considered as part of the overall approach to transport mitigation.</p> <p>The LCWIP provides a framework for such schemes, which will be refined through the SPDs.</p> <p>The Transport Assessment identifies the main locations where capacity issues are likely, but it is acknowledged that there may be increased traffic on other roads.</p>	
<b>Public transport</b>	<p>1. Policy maps should be updated to clearly show the full extent of proposed works and safeguarded land and at a comparable scale if the works are divided across a number of inset maps.</p> <p>2. A rapid bus service serving the strategic sites is unrealistic; it is not clear if bus operators</p>	<p>The locations of major improvements are indicative at this time and will be refined through the SPDs for the strategic sites. It is noted that the Policies Map is being published in an interactive form to help identify the scope of broader policies.</p> <p>The Strategic Sites Masterplanning and Infrastructure Study provides for a bus link to the settlement and assigns costs to this accordingly.</p>	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>support it; whether it is commercially viable in the long-term;</p> <p>3. Query whether “rapid” means “regular” or “frequent” in relation to bus links.</p> <p>4. Within context of Paddock Wood, there should be a commitment by the Council to work with National Rail to cross the rail line to enhance north-south connectivity.</p> <p>5. It is questioned whether Network Rail have any commitment to station infrastructure improvements.</p>	<p>TWBC is also working closely with KCC public transport team in delivering this.</p> <p>TWBC is engaging with KCC public transport but it is agreed that detail will be determined through SPDs and at planning application stage. The intention for effective bus services, the details to be developed.</p> <p>This crossing is set out in Policy STR/SS1 -see Summary for that policy and the signed Statement of Common Ground with Network Rail.</p> <p>Please see Statement of Common Ground with Network Rail.</p>	
<b>Highways network</b>	<p>1. A228 Colts Hill Bypass is regarded as necessary to mitigate impacts, as it is a longstanding scheme, and has a poor safety record.</p> <p>2. Proposed bypass works will cause traffic disruption in the area, notably on A228/B2017/B2160 and various country lanes.</p> <p>3. Funding unclear for bypasses, whether there is any public funding, and apportionments,</p>	<p>Part off-line, part on-line improvements will be required to mitigate impact of strategic growth at Paddock Wood/Capel. The full off-line A228 scheme, although not required, is to remain safeguarded as a long-term option.</p> <p>Noted. As part of any planning application, a construction management plan will be required which will set out measures which seek to minimise this as far as possible.</p> <p>Please see response Table to Policies STR/SS1 and STR/SS3.</p>	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>with various developers querying the link to developments in Paddock Wood, with some suggesting that the Local Plan should make it clear that the Five Oak Green Bypass relates only to Tudeley Village and not new development at Paddock Wood.</p> <p>4. Concerns that the route of both proposed bypasses is not agreed, with variations between different consultants plans on routes and position of junctions.</p> <p>5. Little information provided about environmental effects of proposed highway improvements, including loss of Green Belt, light pollution, and impact on AONB setting</p> <p>6. Some querying of whether the A21 dualling from Kippings Cross to Lamberhurst is needed to support new development; also, conversely, whether its safeguarding is justified given it is not in a programme.</p> <p>7. The proposal (in paragraph 2,c,iii) to build a new roundabout on the A264 at junction with Halls Hole Road and Blackhurst Lane would be ineffective in reducing motor traffic congestion, but increase rat-running along Halls Hole Road and Cornford Lane, rather</p>	<p>Further work is being undertaken to understand trigger points for delivery on key items of infrastructure, and discussions taking place with stakeholders such as Homes England on funding/loan opportunities to bridge the gap of S106 monies.</p> <p>TWBC and KCC are also working together with promoters on the delivery of the identified transport infrastructure. The precise location and detailed design of the Five Oak Green bypass has not been determined.</p> <p>This will be subject to a proper Environment Impact Assessment and any necessary mitigation incorporated.</p> <p>While not required to mitigate growth proposed in the Local Plan, the A21 Kippings Cross to Lamberhurst route is being safeguarded, as it (and the A228 Colts Hill Bypass) remains a long-term cross-district priority in the Kent County Council Transport Plan 2016-2031).</p> <p>It is accepted that the primary focus should be on improving the existing main road network in the area, rather than encouraging traffic onto Halls Hole Road. Traffic issues in this area are acknowledged, and that support should be given to potential road/junction improvement schemes</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>than encourage active travel, as well as being detrimental to the n character of Pembury Road (A264) a well as the lanes; also, it would be a substantial, unjustified cost.</p> <p>8. The proposal at paragraph 2c fails to ensure mitigation of the impact of the several developments within the Plan on the urban centre of Royal Tunbridge Wells.</p> <p>9. Alternative options are available which would direct development to the most sustainable settlement (i.e. Tunbridge Wells) and which are in sustainable locations, such as land to the north and south of High Woods Lane (Mouseden Farm).</p> <p>10. Civic Association bypass scheme of 1945, with the noted relief roads, needs to be considered as part of the Local Plan (as included within the “Draft Consultation Response on behalf of the Tunbridge Wells Town Forum” (March 2013)). This ring road would enhance Tunbridge Wells from many perspectives.</p>	<p>that improve traffic flows along Pembury Road/A264 as well as adjoining roads, including Halls Hole Road and Blackhurst Lane.</p> <p>Policy STR/RTW 2 also outlines the framework for the provision of a Royal Tunbridge Wells Town Centre Area Local Plan, which includes a number of transport initiatives. Improved flows on radial roads should benefit the town centre, while further consideration to movement in and around the centre will form part of the scope of the Area Plan.</p> <p>Suitable sites are allocated in RTW and other sustainable settlements, as well as effectively promoting and providing for brownfield development opportunities. Strategic growth proposals at Paddock Wood and Tudeley also promote a modal shift.</p> <p>This scheme was assessed but dismissed at an early stage for a range of deliverability, feasibility and impact reasons. Please see Reference 8 of Table 27 (Garden settlement and urban extension location options considered by this SA) on page 87 of the Sustainability Appraisal and site reference 384 (page 189 of the Site Assessment Sheets for Royal Tunbridge Wells) in the SHELAA.</p>	

Policy/Topic area	Main issues	TWBC Response	<i>Changes – Yes/No</i>

## 4.7 Policy STR 7 - Climate Change

### Notes:

1. Where reference is made to Policy STR 7 in the context of a representation on a specific site allocation, rather than the STR 7 policy wording itself, this is dealt with under Section 5 – Place Shaping and not included in the table below.
2. There were some 24 representations on this policy, spread across a number of aspects.

Policy/Topic area	Main issues	TWBC Response	Changes (Yes/No)
<b>Policy ambition</b>	1. Concerns that achieving net zero emission by 2030 across the borough is very ambitious especially through emission reductions. Likewise, concern that Policy STR 7 does not encompass the urgency required to address climate change and does not meet NPPF paragraph 148 requirement for ‘radical reductions’ in emissions.	A five-year review is in place to ensure policies are still appropriate as time goes on. ‘Zero net emissions’ is a corporate target and responsibility for achieving it does not fall entirely upon planning. Also, it is probable that the target will be achieved through a combination of offsetting and emission reductions. In any event, the target is more ambitious than the equivalent targets laid out by the Climate Change Act 2008 (net zero emissions by 2050).	No changes proposed
	2. There is a lack of specific targets in the policy.	STR 7 references the Council’s ultimate target of net zero emissions by 2030. More specific targets are contained in the Development Management Policies.	No changes proposed
	3. Challenge that the policy wording “all development will recognise the climate emergency” is not possible when development has been allocated to settlements such as Benenden and Horsmonden where private car	Recognition of the climate emergency does not relate solely to transport issues. It is noted that there are also national targets to phase in electric vehicles to consider.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes (Yes/No)
	<p>use is relied upon to reach employment and services/facilities.</p> <p>4. Policy needs more detail on protecting ecological services e.g. protection of water catchments upstream to reduce flooding</p>	<p>Such detail is not considered appropriate in a strategic climate change policy, while ecology is addressed strategically in Policy STR 8 and in more detail in policies in the Environment chapter.</p>	<p>No changes proposed</p>
<p><b>Suggestions for policy improvement</b></p>	<p>Concerns that the policy could go further and some suggestions for altering the wording. These included:</p> <p>a) Part 2 should include the caveat that decentralised heating/cooling networks should only be considered for development where there are supportive feasibility studies.</p> <p>b) Reference needed to how climate change will impact farming and need to adapt new crops and practices, and possible need for new bore holes/new reservoirs to support irrigation.</p> <p>c) Policy should mention flooding and how significant flood risks will be addressed. Present wording is inadequate.</p>	<p>Policy already includes the wording of ‘will be given particular consideration’. Feasibility studies are considered to be inherent to this consideration.</p> <p>Planning has limited influence over farming practices and boreholes. Reservoir capacity is under the control of South East Water and explained within the latest Water Resources Management Plan.</p> <p>Flood risk is an important issue for the Local Plan and will be affected by climate change. Indeed, it is already highlighted in Policy STR 5 relating to infrastructure. While managing flooding is already covered in the supporting text, it is agreed that it would be assist the reader to include additional references to closely connected development management policies such as flood risk, as below:</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>New text proposed after (outside) the Policy box, as opposite.</p>

Policy/Topic area	Main issues	TWBC Response	Changes (Yes/No)
	<p>d) Policy lacks sufficient detail especially regarding the strategic sites and how emissions will be reduced.</p> <p>e) The policy does not mention monitoring of emissions.</p> <p>f) Policy does not include emissions caused by the construction of new dwellings.</p> <p>g) Section 4 should include residents or members of the environmental community.</p>	<p><i>'In addition to the aspects listed above, a number of relevant development management policies should also be referred to. These include EN3 for matters relating to energy reduction and climate change adaptation, EN14 for provision of green infrastructure, and EN25 for detail on how flood risks will be addressed. In addition, EN1 and EN2 provide information on how sustainable design should be approached.'</i></p> <p>Strategic policies are intended to set out general direction and ambition rather than the finer detail of development management.</p> <p>Monitoring details are provided in Chapter 7 of the Local Plan.</p> <p>Construction related emissions are considered within the sustainable design standards required by policy EN2.</p> <p>These groups are adequately represented within the list provided within the policy.</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>
<b>Policy conflict</b>	<p>1. Challenge raised that the Local Plan is too dependent upon road building and that this conflicts with the climate change ambition and that active travel is given lower priority.</p> <p>2. Proposals for strategic sites do not abide by the principles laid out in this policy, counter to the</p>	<p>The Local Plan preferred development strategy is considered to provide the best balance between the environmental, economic and social needs of the borough.</p> <p>Matters of legal compliance are dealt with in the relevant summary of main issues. STR 7 reflects</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes (Yes/No)
	<p>expectations of S19 (1A) of the Planning and Compulsory Purchase Act 2004 (<i>'Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change'</i>).</p> <p>3. Strategy does not have direct quantifiable links to the Paris Agreement or Climate Change Act. Numerical calculations are required. A carbon footprinting exercise should be undertaken to determine baseline emissions, emissions resulting from the chosen growth strategy and a list of actions and dates to meet targets.</p>	<p>the development plan as a whole, rather than the specifics of the strategic site allocations. <i>[See Strategic Sites section for consideration of specific issues.]</i></p> <p>Matters of legislative compliance are dealt with in the relevant summary of main issues. A consideration of climate change was undertaken by the Sustainability Appraisal when assessing the merits of various growth strategies. Planning forms one aspect of the route to net zero and borough-wide carbon foot printing has been undertaken at corporate level.</p>	<p>No changes proposed</p>

## 4.8 Policy STR 8 - Conserving and Enhancing the Natural, Built, and Historic Environment

### Notes:

1. There were 19 representations from individuals and organisations on this policy
2. Where reference is made to Policy STR 8 in the context of a representation on a specific site allocation, or omission site, rather than the Strategic policy wording itself, this is dealt with under Section 5 – Place Shaping and not included in the table below. This applies to several responses received in relation to Tudeley and East Capel, Benenden and, at Royal Tunbridge Wells, for Spratsbrook and Castle Hill, submitted under Policy STR8.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>Scope of policy</b>	Climate change and tackling the biodiversity crisis must be addressed together. CPRE believes the Plan doesn't do this, so is unsound as it is not justified or consistent with national policy	The significance of climate change is recognised by the preceding Climate Change strategic policy, while this policy focuses natural environment and biodiversity matters, with other strategic policies focusing on other aspects, such as transport. The Local Plan should be read as a whole, and is considered to be consistent with national policy; furthermore, it looks forward to emerging guidance and legislation e.g. Biodiversity Net Gain	No changes proposed
<b>Habitats</b>	The Environment Agency recommends that reference is made to the conservation and enhancement of Priority River Habitats, which widely occur in the district. Also, that reference is made to green-blue (not just green) infrastructure in criterion 6.	It is not felt to be appropriate to pick out one type of priority habitat when we have many. 'Green Infrastructure' (GI) is the more general term but elaborated upon to cover blue in policy. This is consistent with the NPPF use of the terms.	No changes proposed

## 4.9 Policy STR 9 - Green Belt

**Notes:**

1. A total of some 30-35 representations have been recorded against this policy from individuals and organisations, with most relating to the consideration of alternatives to Green Belt release, often with reference to the evidence base and ‘exceptional circumstances’.
2. Where reference is made to Policy STR 9 in the context of a representation on a specific site allocation or in relation to a site omission, rather than being relevant to the strategic policy wording itself, these are dealt with under Section 5 – Place Shaping and not included in the table below

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<p><b>Alternatives to Green Belt release</b></p>	<p>Need to consider all options before contemplating removal of Green Belt land. Insufficient consideration of alternatives/sites, such as:</p> <ul style="list-style-type: none"> <li>• Other brownfield sites, including RTW town centre</li> <li>• Use of higher densities</li> <li>• Edge of settlement locations</li> <li>• Other locations with less constraints (e.g. Horsmonden, Frittenden) or more sustainable sites with better transport connections e.g. Pembury or Castle Hill</li> <li>• Sites in other less constrained authorities such as Maidstone and Ashford</li> </ul> <p>As a consequence, a number of these representations state that the proposed strategic allocation for Tudeley Village and land at east Capel should be removed from the Plan.</p>	<p>The Council has considered alternative sites and alternative strategies for delivering growth, taking into account the issues raised and believes that the evidence supports the proposed release of the Green Belt in the locations proposed and that the Green Belt release is fully justified.</p> <p><i>[There is further consideration of representations on alternative development strategies in relation to main issues on Policy STR 1.]</i></p>	<p>No changes proposed</p>

<b>Exceptional circumstances</b>	Insufficient evidence of exceptional circumstances/justification to support extent of Green Belt release, notably in relation to the Strategic Sites (STR/SS 1 and STR/SS 3) and draft allocations at RTW AL/RTW5 (Caenwood) and AL/RTW16 (Spratsbrook), but should the Inspector be minded to include these allocations, they should remain in the Green Belt.	The consideration of exceptional circumstances is set out in Section I of the Development Strategy Topic Paper, which is regarded as providing sufficient evidence. The land to be released from the Green Belt is only that required for the areas of built development with landscape buffers retained in the Green Belt.	No changes proposed
<b>Green Belt Study</b>	Disagree/concerns with findings of Green Belt Studies e.g. Stage 3 Study indicates that the loss of Green Belt at Tudeley Village and land east of Capel will result in high impact/level of harm, and should not be released.	The Council considers that the Green Belt studies are correct and provides support to the proposed GB release.	No changes proposed
<b>Coalescence/urban sprawl</b>	Increased urban sprawl and risk of Tudeley Village merging with other nearby settlements such as Paddock Wood, Five Oak Green and Tonbridge	Green Belt studies include specific consideration of these issues. They find that the remaining Green Belt will still be effective in maintaining effective separation between settlements.	No changes proposed
<b>Compensatory measures</b>	No details of compensatory measures to make up for loss of Green Belt land; it should be made clear in site allocations to be released from Green Belt what specific improvements will be required over/above normal development management criteria.	Measures for the enhancements to the Green Belt are highlighted in the relevant site allocation policies and, in addition, for the strategic sites, they will be refined through the Masterplanning and SPDs processes.	No changes proposed
<b>Improvements where Green Belt is proposed to be released</b>	A local body is concerned that the policy states “ <i>The Council will seek improvements to the environmental quality and accessibility of the surrounding Green Belt from all relevant development within the Green Belt</i> ”, but it is not clear whether it is intended to apply only to future	Policy STR9 is clear that improvements are required for land to be released from the Green Belt in the Plan “ <i>The areas of Green Belt released are set out in the relevant place shaping policies and include requirements to secure improvements to the environmental</i>	No changes proposed

	removals from the Green Belt or also to land which is being removed as part of this Local Plan to accommodate current allocations have been made under the Plan – needs clarification, as could be inconsistent with national policy	<i>quality and accessibility of the surrounding Green Belt</i> and that for any further applications for development within the Green Belt “the Council will seek improvements to the environmental quality and accessibility of the surrounding Green Belt from all relevant development.”	
<b>Replacement Green Belt</b>	The lack, or only minimal amount of replacement Green Belt is criticised by some.	The Council has only added additional Green Belt where boundaries are being rationalised; and on considering the case for replacement Green Belt, has concluded, based on consultants’ advice in the State 3 Green Belt Study, that currently “ <i>circumstances do not exist to justify such an approach and so no replacement Green Belt is currently proposed</i> ” (Section I para 6.205 Development Strategy Topic Paper)	No changes proposed
<b>Working with other Authorities</b>	Lack of evidence that TWBC has engaged with other Local Authorities about their capacity to meet unmet need before considering GB release.	Evidence of ongoing DtC engagement with other authorities is provided in an updated DtC Statement to accompany submission.	No changes proposed
<b>Loss of wildlife/open space</b>	The loss of such a large area of Green Belt land will result in the significant loss of features important for biodiversity and geodiversity and open recreation space	Sites released from the Green Belt will be subject to the policies in the Local Plan which make proper provision for the protection of wildlife and recreation open space, requiring protection and enhancement of Green Infrastructure and net gains for biodiversity.	No changes proposed
<b>Safeguarding approach to Colebrook House</b>	A rural amenity group objects to safeguarding of Colebrook House, as draft allocation for 10,000sqm B1, B2, B8 use has been dropped	NPPF paragraph 143c expects LPAs to safeguard land to meet longer-term development needs where necessary. Although not required	No changes proposed

	<p>and, given the Plan allocates 25.8ha employment land to ensure at least 14ha is developed, release of more land from the Green Belt at this stage is premature.</p> <p><i>NB The site promoter considers the site should be allocated for development now rather than safeguarded for the future – see Omission Sites list below.]</i></p>	<p>over the plan period, this site was previously identified (at Regulation 18 stage) as being well located in relation to the strategic road network and main urban areas. Given the importance of providing for economic growth over the longer-term and limited potentially suitable sites, it is considered appropriate to include the release now to save a further review in the future.</p>	
<b>Impact of Green Belt on different types of development</b>	<p>The policy (and other policies) should set out how planning applications for re-use of buildings, replacement buildings, extensions, infilling/redevelopment of PDL sites, changes of use, agricultural land, equine development and development for outdoor sport and recreation will be assessed in relation to Green Belt interests. A specific proposal is that permitted development rights will be removed for sites washed over by Green Belt.</p>	<p>National policy and guidance provide a strong framework for considering Green Belt impacts for developments, while subsequent Development Management policies add some further detail, where necessary. Local Plan policies are to be read as a whole, and in conjunction with national policy.</p> <p>The removal of PD rights would have to be justified on a site-by-site basis and cannot be applied as a blanket approach to the Green Belt.</p>	No changes proposed
<b>Omission Sites</b>	<p><i>The removal of a number of sites from the Green Belt (and their allocation for development) is sought, as listed below for information. Summaries of them, and their consideration, are in the relevant area chapter in Section 5 below.</i></p> <p><u>Tunbridge Wells</u></p> <ul style="list-style-type: none"> <li>• Colebrook Park</li> <li>• Mouseden Farm, Hawkenbury (land to north and south of High Woods Lane)</li> <li>• Tutty's Farm, Hawkenbury</li> <li>• Land east of Sandown Park</li> <li>• Land at Sandown Park, North Pembury Road</li> </ul>	<p><u>For information</u> – It can be seen from subsequent summaries that all these sites, including supporting work, have been considered, but on the basis of the evidence submitted and other evidence available to the Council, it is concluded that their release from the Green Belt is not justified and/or there are other planning reasons why the site is not considered suitable for allocation.</p>	No changes proposed

	<ul style="list-style-type: none"> <li>• <i>Caenwood, Speldhurst Road</i></li> </ul> <p><u>Capel Parish</u></p> <ul style="list-style-type: none"> <li>• <i>Castle Hill</i></li> <li>• <i>Land South of Appletree and Devils Wood</i></li> <li>• <i>Finches Farm, Five Oak Green</i></li> <li>• <i>Land at Tolhurst Road, Five Oak Green</i></li> <li>• <i>Land at Whetsted Road</i></li> </ul> <p><u>Pembury</u></p> <ul style="list-style-type: none"> <li>• <i>Stonecourt Farm, Stonecourt Lane</i></li> <li>• <i>Land to the north east of Tonbridge Road</i></li> <li>• <i>Saltmans Meadow, south of A21</i></li> </ul> <p><u>Rusthall</u></p> <ul style="list-style-type: none"> <li>• <i>Tunbridge Wells Golf Course</i></li> <li>• <i>Home Farm, Lower Green Road</i></li> </ul> <p><u>Speldhurst</u></p> <ul style="list-style-type: none"> <li>• <i>Land at High View, Langton Road, Langton Green</i></li> <li>• <i>Milford House, Penshurst Road, Speldhurst</i></li> </ul>		
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## 4.10 Policy STR 10 - Neighbourhood Plans

### Notes:

1. 6 representations were received on Policy STR10.
2. There were a number of representations made in relation to STR10 which were objections to certain allocations, including those at the Benenden Hospital Site, which are dealt with under Section 5 – Place Shaping and not included in the table below.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>Neighbourhood planning in unparished areas</b>	Although generally supportive of the Policy, Royal Tunbridge Wells Town Forum question its application in unparished areas.	The policy applies to all neighbourhood plans, while the supporting text at paragraph 4.134 briefly outlines the process for unparished areas, in line with Part 3 ‘Neighbourhood Forums’ of the Neighbourhood Planning (General) Regulations.	No changes proposed
<b>Adoption of Benenden NDP Policies</b>	Concern is raised over the site allocation policies in Benenden, and it is argued that because the Benenden Neighbourhood Plan (BNP) will be made and form part of the development plan before the Local Plan is adopted, its site allocation policies will not have been subject to the same rigorous examination as other policies within the Local Plan.	The BNP was subject to an Independent Examination that included a one-day Hearing specifically focussed on the proposed site allocation policies at Benenden Hospital, and in the Examiner’s final report he confirmed that he is satisfied that Benenden Parish Council has adopted a robust and objective assessment of the sites. The presumption that that the examination of proposed site allocations is less rigorous for a neighbourhood plan is not accepted; moreover, the legal tests have been met for the BNP, such that (subject to a referendum), it would not be appropriate to effectively review the Examiner’s very recent findings through the Local Plan examination.	No changes proposed

## Section 5: Place Shaping

### 5.1 Royal Tunbridge Wells

#### Notes:

1. This table summarises duly made representations. A separate table is provided at the end which provides a summary of main issues raised in late representations.
2. The total number of representations recorded against the Royal Tunbridge Wells chapter is 183.

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
Policy STR/RTW 1 – The Strategy for RTW	1. <u>Development Strategy</u> - Spatial strategy for the borough is not reflective of the growth strategy set out within the SA and there should be more development at RTW being the Main Urban Area and most sustainable settlement within the borough.	The basis of the Development Strategy is set out within Section 4 of the Local Plan and the Development Strategy Topic Paper (March 2021), drawing on the reasonable alternatives considered within the SA. The town has a number of constraints to its growth.	No changes proposed
	2. <u>Green Belt and AONB</u> - Objections to development affecting Green Belt and AONB, especially when could more be achieved through intensification of PDL sites within the LBD of RTW.	The Development Strategy Topic Paper sets out, at section 6 (l), the exceptional circumstances for Green Belt releases, with Appendix 1 providing an individual assessment of the relevant sites. This is supported by the Green Belt studies, which also consider replacement. The Topic Paper also justified developments in the AONB, with major development sites supported by detailed LVIAs. The potential of PDL sites has	No changes proposed

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>3. <u>Heritage</u> - Policy places too much emphasis on redevelopment and intensification rather than conservation which could be harmful to the Conservation Area.</p> <p>4. <u>Public Rights of Way</u> - KCC consider that there should be reference to the PRow network, the Rights of Way Improvement Plan (RWIP) and the Local Cycling and Walking Infrastructure Plan (LCWIP) within this policy, which all have a significant role in the connectivity between facilities across the town.</p> <p>5. <u>Over-development</u> – Local residents consider that too much development is proposed in the St Johns areas, and in the Broadwater area, without supporting infrastructure.</p>	<p>been considered in the Brownfield and Urban Land Topic Paper.</p> <p>Policy STR/RTW 1 at criteria 3 makes reference to the intensification of uses/sites whilst still protecting the town’s important character and heritage. Additionally, a number of policy cross references are made below policy STR/RTW 1 and include Policy STR 8: Conserving and Enhancing the Natural, Built and Historic Environment. Policies EN 4 – Historic Environment and EN 5 – Heritage Assets should also be added to the list of policy cross references.</p> <p>Policy STR/RTW 1 sets out at point 8 the approach to active travel including reference to the LCWIP. The ROWIP is specifically mentioned in the IDP. It is not necessary to reference all background documents in the Policy</p> <p>Assessments of sites considered for development at Royal Tunbridge Wells are set out in the SHELAA supporting document. Additionally, the IDP sets out the infrastructure that is required to support the growth set out within the Local Plan, taking into account existing and planned infrastructure and any capacity issues, through liaison with a range of infrastructure providers.</p>	<p>Yes - Add policies EN 4 and EN 5 to the list of policies cross referenced under Policy STR/RTW 1. No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>6. <u>Leisure</u> - Leisure development and definition of 'leisure' is not clear with no quantum defined for leisure uses and preference for new leisure development within the KEA's.</p> <p>7. <u>Allocations</u> - The Tunbridge Wells Town Forum and others object to allocations AL/RTW5 - Caenwood and AL/RTW16 – Spratsbrook, notably due to loss of Green Belt and impact on AONB. There is also an objection to the safeguarding of land at Colebrooke House due to its location within the Green Belt and the AONB.</p> <p>8. <u>Highways and Transport</u> – There are some objections to the proposal for a new roundabout on the A264 at the junction with Halls Hole Road and Blackhurst Lane and consider it would not reduce congestion.</p>	<p>Noted – Leisure comprises a range of different uses and there is no set definition or quantum requirement set within the NPPF for 'Leisure' uses. The Council's Retail and Leisure Study (2017) and Tunbridge Wells Retail, Leisure and Town Centre Uses Study Update (2021) sets out the Council's approach to the provision of 'leisure' uses. The Council's strategy towards leisure provision is clear and is set out within the Local Plan as a whole – see also responses to Policies ED 1 – ED 12 as well as the Council's Economic Development Topic Paper.</p> <p>See responses under AL/RTW5 and AL/RTW16. The rationale behind the safeguarding of Colebrooke House is set out within the Economic Development Topic Paper at paragraphs 4.35-4.38.</p> <p>The scheme for the Halls Hole Road/A264 Pembury Road/Blackhurst Lane junction improvement (roundabout scheme) is detailed in the IDP as a critical scheme. It has been identified as a highway mitigation measure necessary to support the growth proposed in the Local Plan through the detailed transport assessment work.</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>9. <u>Health Infrastructure</u> – Objection to the strategic reference to the allocation of land for a new health centre at Policy AL/RTW 15 – Land at Showfields</p>	<p>Policy STR/RTW 1 refers at criteria 14 to the 2 sites that include allocations for new medical centres within Royal Tunbridge Wells. This is considered appropriate in terms of the identification of key infrastructure within the strategic policy. See also response to AL/RTW 15.</p>	<p>No changes proposed</p>
<p><b>Policy STR/RTW 2 – The Strategy for RTW Town Centre</b></p>	<p>1. <u>Increased residential in the town centre</u> – While there is strong support for the development of a Town Centre Area Plan from several bodies, there are also representations that it could have more residential capacity on PDL sites and consider the current allowance for 150-200 dwellings is too low.</p> <p>2. <u>Historic Environment</u> - Reference to the '<i>Redevelopment of the Listed civic complex and the Great Hall Car Park</i>' is unsound in Conservation Area terms – should be 'enhancement' and should make reference to refurbishment of vacant properties, as well as new for residential development. Also, should refer to 'suitable' public art.</p> <p>3. <u>Policy ineffective</u> – There is some concern that the policy is ineffective, as it fails to reflect the urgency of the need to plan comprehensively</p>	<p>150-200 new residential dwellings within the town centre area is considered to be appropriate, which is in addition to sites that already have planning permission, notably the large former cinema site. However, this figure will be reviewed through the work on the Town Centre Area Plan and feed in to the 5-year review of the Local Plan, as necessary.</p> <p>Criteria 2 of Policy STR/RTW 2 sets out the requirement for securing the future vitality and viability of the town centre whilst respecting and enhancing the town's distinct heritage and cultural assets. Additionally, policy STR 8 – Conserving and Enhancing the Natural, Built and Historic Environment applies as well as DM policies EN 4 – Historic Environment and EN 5 – Heritage Assets.</p> <p>The need to plan comprehensively for the town centre is fully reflected within Policy STR/RTW 2 and the early programme for this work is set out</p>	<p>No changes proposed</p> <p>Add Policies EN 4 and EN 5 to the list of policies cross referenced under the policy. No changes proposed</p> <p>Yes – to refer to linkage in the</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>for the town centre, in particular the civic buildings and the adjacent cinema site which just refers to the current failed planning consent for the site.</p> <p>4. <u>Town Centre boundary and key sites</u> – A site promoter supports the reinstatement of land at Montacute Gardens under Policy AL/RTW10 but consider that Montacute Gardens should be included within the Town Centre boundary and that this site, along with the Auction House, should be included in the list of key sites/area for change within the Policy.</p>	<p>within the LDS. The civic complex and the cinema site are included within the list of 'key sites' considered key to the realisation of this strategy.</p> <p>It is not considered appropriate to include Montacute Gardens or the Auction House in the list of sites key to the realisation of the town centre strategy. The sites listed are large complex sites that are key in terms of uses and legibility within the town centre, whereas the sites suggested are relatively small. Although the site lies outside the defined Town Centre, it is immediately adjacent to it and paragraph 5.70 refers to this. The supporting text at paragraph 5.71 may be amended to highlight linkages between the town centre and the surrounding area, as below:  <i>'Pedestrian access to the site is from the existing access road and pedestrian linkages between the site and the surrounding area and to the town centre should be explored'</i>. (see policy AL/RT10 below)</p>	<p>supporting text, as presented opposite.</p>
<p><b>Policy AL/RTW 1 – Former Cinema Site</b></p>	<p>1. <u>Policy is ineffective</u> - The Civic Society consider that the policy just reflects the existing consent for the site and is ineffective.</p>	<p>Acknowledgement of the existing planning consent on the site is considered appropriate, although development has not commenced. If a further planning application is submitted, it would be considered against the policy which allows for a mixed-use development accommodating a mix of uses on this prominent town centre site.</p>	<p>No changes proposed</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>2. <u>Southern Water Infrastructure</u> - SW state that its underground infrastructure crosses this site which needs to be considered in detailed site layout – amended wording suggested.</p>	<p>Additionally, this site is listed among the 'Key Sites' identified to be included within the Town Centre Area Plan and its role and linkages with the wider town centre will be considered through the Town Centre Area Plan.</p> <p>Criteria 11 of the policy refers to layout and upsizing as suggested by SW. Cross referencing below the Policy should refer to Development Management Policy EN 24 – Water Supply, Quality and Conservation.</p> <p><i>[Note: This site has planning permission for mixed use redevelopment comprising 3,039 sqm retail uses (A1/A2), 1,895 restaurant use (A3), 1,049 (D2) and 99 dwellings (C3), car and cycle parking, highway works and public realm (17/02262). A Minor Material Amendment was approved in 2019].</i></p>	<p>Yes - Add Policy EN 24 to the list of policies, listed below Policy AL/RTW 1</p>
<p><b>Policy AL/RTW 2 – Land at the Auction House, Linden Park</b></p>	<p><u>Car parking</u> - A concern over potential loss of car parking within this area.</p>	<p><i>[Note: This site has planning permission for Change of use of the Auction House (sui generis) to flexible Class E (commercial, business and service) use (excluding uses falling within E c(iii) (any other service which is appropriate in a commercial, business and service locality) and f) (creche and day nurseries) (21/01487/FULL).]</i></p>	<p>No changes proposed</p>
<p><b>Policy AL/RTW 3 – Land at Lifestyle Ford</b></p>	<p><u>Southern Water Infrastructure</u> - SW state that its underground infrastructure crosses this site which needs to be considered in detailed site layout – amended wording suggested</p>	<p>Cross referencing below the Policy should refer to Development Management Policy EN 24 – Water Supply, Quality and Conservation, which adequately deals with this issue.</p>	<p>Yes - Add Policy EN 24 to the list of policies listed</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
			below Policy AL/RTW 3
<b>Policy AL/RTW 4 – Land at 36-46 St Johns Road</b>	<u>Southern Water Infrastructure</u> - SW state that its underground infrastructure crosses this site which needs to be considered in detailed site layout – amended wording suggested.	Cross referencing below the Policy should refer to Development Management Policy EN 24 – Water Supply, Quality and Conservation, which adequately deals with this issue. <i>[Note: This site has planning permission for demolition of existing buildings and structures and construction of 3 new buildings comprising 89 units to provide accommodation for older people, car parking storage, landscape strategy and access (17/00731/FULL)]</i>	Add Policy EN 24 to the list of policies listed below Policy AL/RTW 4
<b>Policy AL/RTW 5 – Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm</b>	Representations have been received on this allocation, including from Southborough Town Council, local residents’ and environmental groups, a number of individuals, and the site promoters, covering: 1. <u>Highways and Traffic</u> – Concerns over the impact on traffic in an area which is already congested and the impact on air quality on the A26 which is already an AQMA and the Speldhurst Road Junction, as well as impact on parking for existing residents. 2. <u>Parking</u> – Concern over loss of existing parking for local residents on both sides of Speldhurst Road.	Vehicular access and any required mitigation works are to be informed by a Transport Assessment, as set out in the policy. Impact on the local road network would also form a consideration of the Transport Assessment. Criteria 1-5 of the policy detail a range of transport measures, which should be considered as part of any proposals for the site. The Local Plan should be read as a whole and references to other policies are cross referenced under Policy AL/RTW 5. Policies EN 21 – Air Quality and EN 22 – Air Quality Management Areas may be added to the list.  Criteria 2 of Policy AL/RTW 5, refers to the provision of an appropriate level of parking for existing residents within the site itself and this will	Add Policies EN 21 and EN 22 to the list of policies cross referenced under Policy AL/RTW 5.  No changes proposed

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>3. <u>Green Belt</u> - A number of bodies consider that the site continues to serve all five purposes of the Green Belt and exceptional circumstances for release are not fully evidenced and justified; also, development would have negative impact on the remaining Green Belt.</p> <p>4. <u>Alternatives</u> - There are other reasonable alternatives to this site within the urban fabric of RTW – the Council should progress work on the Town Centre Area Plan and properly assess all PDL sites and provide capacity for these before releasing Green Belt.</p>	<p>need to be considered as part of any development proposals for the site.</p> <p>The Development Strategy Topic Paper sets out at section 6 (I) the exceptional circumstances for Green Belt releases, with Appendix 1 providing an individual assessment of the relevant sites. This is supported by the Green Belt studies. Compensatory measures are set out in this report and the site allocation policy.</p> <p>All of the sites considered for allocation within RTW are set out within the SHELAA and all reasonable alternatives have also been considered through the Sustainability Appraisal. The Development Strategy Topic Paper sets out, at section 6 (I), exceptional circumstances for Green Belt releases, with Appendix 1 providing an individual assessment of the relevant sites. This is supported by the Green Belt studies. The potential of PDL sites has been considered in the Brownfield and urban Land Topic Paper. Its findings are reflected I the overall development strategy (at Policy STR 1) and complemented by Policy STR/RTW 1 (part 2), which allows for redevelopment and intensification of allocated sites and other windfall development inside the defined LBD. Policy STR/RTW 2 – Royal Tunbridge Wells Town Centre, sets out the framework for a Town Centre Area Plan which at</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>5. <u>Southern Water Infrastructure</u> - SW state that proposals for 100 dwellings at this site would generate the need of reinforcement of the wastewater network in order to provide additional capacity and have suggested additional wording should be added to the policy criteria.</p> <p>6. <u>Limited consultation</u> – The site was not in the Reg 18 Plan, so no previous opportunity to comment and the information not available until a late stage. Also, compromised by complicated process for viewing information.</p> <p>7. <u>Landscape</u> - Impact on surrounding landscape and views and the AONB</p> <p>8. <u>Environment</u> – Impact on wildlife and biodiversity. Also concern with regard to Ancient Woodland, hedges and trees,</p>	<p>criteria 8 encourages increased residential development within the town centre.</p> <p>Policy EN 24 – Water Supply, Quality and Conservation is cross referenced below Policy AL/RTW 5 – Heritage Assets and adequately deals with this issue.</p> <p>The site was indeed incorporated into the Reg. 19 Pre-Submission Local Plan, following further work after consideration of Reg 18 comments. The required consultation was carried out. <i>[See also 'Legal Compliance and Duty to Cooperate summary.]</i></p> <p>The site itself does not fall within the AONB. Criteria 9 of the policy refers to the future long-term management of the pasture and woodland to be retained for landscape and ecological mitigation, while criteria 10 requires the layout and design of the development to be informed by a landscape and visual impact assessment to ensure the surrounding landscape is taken into account in any scheme design.</p> <p>Criteria 8 of the policy refers to extensive green infrastructure, criteria 9 refers to long-term management of pasture and woodland for</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p> <p>Yes - Cross reference Policy EN 9:</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>especially those along Speldhurst Road which screen the site and any loss should only be for the access into the site.</p> <p>9. <u>Residential amenity</u> – Impact on surrounding residential properties along Reynolds Lane and Speldhurst Road</p> <p>10. <u>Site Capacity</u> – The site promoter considers that the capacity should be increased to 110 dwellings, while others have put forward that the site area could be reduced and development could be at a higher density, so still achieve the same number of units on a smaller site area.</p> <p>11. <u>Site boundary/Mapping</u> –</p> <p>a. Representor raises the issue that a house in private ownership is included within the site boundary and the text refers to the fact that there are no buildings within the boundary of the site which is factually incorrect.</p>	<p>ecological mitigation and criterion 10 refers to protection of existing hedgerows and mature trees on site. Additionally, DM policies EN 12 – Trees, Woodland, Hedges and Development, EN 13 – Ancient Woodland and Veteran Trees and EN 14 - Green, Grey and Blue Infrastructure will apply and are cross referenced below the policy. EN 9 Biodiversity Net Gain may be added.</p> <p>Criteria 10 of Policy AL/RTW 5 ensures that the design and layout protect residential amenity. Also, any development proposals will be considered against other Local Plan policies which are cross referenced below the policy, including Policy EN 1 – Sustainable Design, which includes residential amenity factors.</p> <p>The site capacity has been considered in light of the context/constraints of the site and is considered to be an appropriate density.</p> <p>It is proposed to re-draw the line around the existing property, which is in private ownership and has been confirmed by the agent to not be included within the site boundary. This does not impact on the site or the proposed allocation.</p>	<p>Biodiversity Net Gain below the policy.</p> <p>No changes proposed</p> <p>No changes propose</p> <p>Minor mapping amendment proposed</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>b. Discrepancy between site area size between the Local Plan and the SHELAA.</p> <p>12. <u>Site Suitability</u> – Site was previously considered not appropriate for allocation at Regulation 18 stage, but at Regulation 19 stage was considered appropriate – query the reason for change in stance.</p>	<p>The difference between the Local Plan and the SHELAA relates to the size of the ‘developable area’ i.e. the site that remains after the buffer/compensation area is allowed for and the overall site size. Regarding the site area in the SHELAA and the area to be released from the Green Belt at AL/RTW 5, the total site area is 7.40 hectares, of which 5.611 hectares is to be released from the Green Belt (as identified in Table 6 of the PSLP on page 67). The majority of this 5.611 hectares is proposed for built development, with a relatively small area of the site’s landscape and open space buffer also proposed for Green Belt release. This is because any Green Belt release must follow logical/natural boundaries (such as hedgerows), hence the small overlap.</p> <p>The SHELAA which supported the Regulation 18 Local Plan considered the Caenwood site in its entirety and considered it to not be suitable. However, on reviewing the updated evidence, including the Green Belt Study Stage 3, it was considered that the northern eastern section of the site could be suitable for release from the Green Belt subject to appropriate mitigation which is reflected in the SHELAA which supports the Regulation 19 Local Plan and Policy AL/RTW 5.</p> <p>Paragraphs 6.31/6.32 of Housing Supply and</p>	<p>No changes proposed</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>13. <u>5% Custom Build Provision</u> – Concern from site promoter about requirement for self-build and custom housebuilding plots, seeking it amended to refer to TWBC evidence confirming need.</p> <p><i>Note - Inclusion of wider site – Site promoter supports this allocation and are proposing the wider Caenwood site is suitable for allocation and could deliver up to 280 units in total as well as an area of wider public open space.</i></p>	<p>Trajectory Topic Paper provide the justification for the requirement on these sites based on current assessments of need and areas of demand. See Omission sites below.</p>	<p>No changes proposed</p>
<p><b>Policy AL/RTW 6 – Land at 202 and 230 Upper Grosvenor Road</b></p>	<ol style="list-style-type: none"> <li>1. <u>Over-development of site</u> – relating to too high density/height and scale of development and impact on residential amenity/overlooking.</li> <li>2. <u>Environment</u> - Concern over boundary treatment and boundary trees including those with TPO's, impact on ecology, biodiversity and impact on greenspace and local neighbourhood.</li> <li>3. Noise disturbance, air and light pollution and impact on residential amenity.</li> </ol>	<p>The site is a PDL site within the LBD of RTW. Criteria 4 and 5 of AL/RTW 6 refers to having regard to the amenities of existing properties and any planning application will need to comply with the DM policies in relation to design etc, particularly Policy EN 1.</p> <p>As above, but notably, criteria 4,5, 7 and 9 have regard to the existing mature trees on the site, the boundaries and layout and on-site amenity, green space and landscaping. It is considered that it would be appropriate to also refer to Policy EN 9 – Biodiversity Net Gain in the list of policies cross referenced below Policy AL/RTW 6.</p> <p>Criteria 7 of Policy AL/RTW 6 sets out the requirement for an acoustic assessment and appropriate mitigation measures. The Local Plan should be read as a whole and any proposals will</p>	<p>No changes proposed</p> <p>Refer to Policy EN 9 in the list of policies referenced below Policy AL/RTW 6.</p> <p>Add Policies EN 21 and EN 27 to the list of policies</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>4. <u>Highways/Transport</u> – Concerns have been raised with regard to safe access (including emergency access), road safety and insufficient parking for the proposed development.</p>	<p>need to also comply with DM Policy EN 21 – Air Quality and EN2 27 – Noise. Additionally, these policies should be added to the policies cross referenced below Policy AL/RTW 6.</p> <p>4.Criteria 1 and 2 of Policy AL/RTW 6 provide the approach to safe vehicular, pedestrian and cycle access to the site and the requirement for sustainable and active transport measures for this sustainable site within the LBD of RTW.  <i>[Note: Planning application currently being considered for this site – Outline for 44 apartments (Access, Appearance, Layout and Scale not reserved)- 21/00460/OUT.]</i></p>	<p>cross referenced below Policy AL/ RTW 6.</p> <p>No changes proposed</p>
<p><b>Policy AL/RTW 7 – Land at former Gas Works, Sandhurst Road</b></p>	<p>1. <u>Southern Water infrastructure</u> - SW state that the local sewerage infrastructure to the site has limited capacity to accommodate the proposed development and reinforcement of the wastewater network is required to create additional capacity. SW's underground infrastructure also crosses the site. It suggests a wording change to the policy to deal with this</p> <p>2. <u>Parking</u> - The site promoter wants flexibility over the parking standards applied, as the site is in a sustainable location and this would help achieve maximum development densities. Suggested amended wording is provided.</p>	<p>Cross referencing below the policy already refers to Policy EN 24 – Water Supply, Quality and Conservation, which adequately deals with this issue.</p> <p>Noted and can be addressed through detailed discussions in relation to a planning application. Amended wording is not considered necessary.</p>	<p>No changes proposed</p> <p>No changes proposed.</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
<b>Policy AL/RTW 8 – TN2 Centre and adjacent land, Greggs Wood Rd.</b>	No main issues raised	N/A	No changes proposed
<b>Policy AL/RTW 9 – Land at Beechwood Sacred Heart School</b>	No main issues identified	N/A <i>[Note: This site has planning permission for development within the curtilage of Beechwood Sacred Heart School for a 69 bed care home, new access and associated facilities (16/07697/FULL)]</i>	No changes proposed
<b>Policy AL/RTW 10 – Montacute Gardens</b>	<p>1. <u>Town Centre boundary</u> – The site promoters consider the site should be included within the Town Centre boundary/car park should be included in the site and policy should include a mix of uses</p> <p>2. <u>Southern Water Infrastructure</u> - SW state that its underground infrastructure crosses this site which needs to be considered in detailed site layout – amended wording suggested.</p>	<p>Although the site lies outside the defined Town Centre, it is immediately adjacent to it. The supporting text at paragraph 5.71 will be expanded upon to refer to this and ensure linkages between the town centre and the surrounding area, as below: <i>‘Pedestrian access to the site is from the existing access road and pedestrian linkages between the site and the surrounding area and to the town centre should be explored’.</i></p> <p>An additional cross reference below the Policy to Development Management Policy EN 24 – Water Supply, Quality and Conservation would adequately deal with this issue. <i>[Note: Part of this site has planning permission for the erection of nine two-bedroom apartments (20/00191/FULL)]</i></p>	<p>Yes - Add reference to linkages from the site to the surrounding area at paragraph 5.71 as opposite.</p> <p>Yes - Add Policy EN 24 to the list of policies below Policy AL/RTW 1.</p>

<b>Policy/Topic Area</b>	<b>Main Issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
<b>Policy AL/RTW 11 – Former Plant and Tool Hire</b>	<u>Southern Water Infrastructure</u> - SW state that its underground infrastructure crosses this site which needs to be considered in detailed site layout – amended wording suggested.	The cross referencing below the policy refers to Policy EN 24 which adequately deals with this issue.	No changes proposed
<b>Policy AL/RTW 12 – Land at Tunbridge Wells Engineering Centre</b>	<p>1. <u>Distribution of Development</u> - Concern in relation to amount of development within the south side of the town and impact on infrastructure, particularly transport.</p> <p>2. <u>Southern Water infrastructure</u> - SW state that its underground infrastructure crosses this site which needs to be considered in detailed site layout – amended wording suggested</p>	<p>The approach to formulating the development strategy for the Local Plan is set out clearly within Section 4 of the Local Plan. The detail of the sites considered for development at Royal Tunbridge Wells is considered within the SHELAA, one of the supporting documents to the Local Plan. Additionally, the IDP sets out the infrastructure that is required to support the growth set out within the Local Plan, taking into account existing and planned infrastructure and any capacity issues through liaison with a range of infrastructure providers.</p> <p>Cross referencing below the Policy should refer to Development Management Policy EN24 – Water Supply, Quality and Conservation, which will adequately deal with this issue.</p>	<p>No changes proposed</p> <p>Yes - Add Policy EN 24 to the list of policies below Policy AL/RTW 12.</p>
<b>Policy AL/RTW 13 – Turners Pie Factory, Broadwater Lane</b>	1. <u>Southern Water Infrastructure</u> - SW state that its underground infrastructure crosses this site which needs to be considered in detailed site layout – amended wording suggested	Cross referencing below the Policy should refer to Development Management Policy EN 24 – Water Supply, Quality and Conservation, which adequately deals with this issue.	Yes - Add Policy EN 24 to the list of policies below Policy AL/RTW 13.

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
<b>Policy AL/RTW 14 – Land at Tunbridge Wells Garden Centre, Eridge Road</b>	<ol style="list-style-type: none"> <li>1. <u>Southern Water Infrastructure</u> –SW state that its underground infrastructure crosses this site which needs to be considered in detailed site layout.</li> <li>2. <u>Green Belt</u> - Objections to the removal of the site from the Green Belt and queries over whether adequate compensatory measures proposed through the policy.</li> <li>3. <u>Highways and Traffic</u> - Highways matters including impacts on traffic and pedestrian safety. The existing access to the site is on a dangerous bend with no footpath/cycle path. Additional volume of use will exacerbate this. A secondary access to the site is not considered feasible.</li> <li>4. <u>Environment</u> – Impacts on the biodiversity of Tunbridge Wells Common and loss of biodiversity on the site. Loss of trees.</li> </ol>	<p>Cross referencing below the Policy refers to Development Management Policy EN 24 – Water Supply, Quality and Conservation, which adequately deals with this issue</p> <p>The Development Strategy Topic Paper (March 2021) sets out at section 6 (I) the exceptional circumstances for Green Belt releases, with Appendix 1 providing an individual assessment of the relevant sites. This is supported by the Green Belt studies, which also consider replacement. Criteria in the policy deal with a range of compensatory measures and include provision for green corridors, appropriate buffers and the setting of Tunbridge Wells and Rusthall Common.</p> <p>Vehicular access and any required mitigation works are to be informed by a Transport Assessment, as set out in the policy. Impact on the local road network would also form a consideration of the Transport Assessment. Criteria 1-4 of Policy AL/RTW 14 detail a range of transport measures, which should be considered as part of any development proposals for the site.</p> <p>Site allocations have been informed by evidence from the Biodiversity Evidence Base 2021. DM policies EN 9 – Biodiversity Net Gain and EN 10 – Protection of designated sites and habitats will also apply. This may be referred to.</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p> <p>Add Policy EN 9 to the list of policies to be cross referenced</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>5. <u>Built environment and heritage</u> - Impacts on heritage, including the setting of the RTW Conservation Area, the Tunbridge Wells Common and the topography of the site.</p> <p>6. <u>Flooding</u> – site partly within Flood Zone 3 and concern over surface water flooding that occurs at the lower end of Hungershall Park, High Rocks Lane and Cabbage Stalk Lane. The site also suffers from flooding from foul water sewers.</p> <p>7. <u>Use of site</u> – Site promoter supports the policy in regard to the expansion of the garden centre and residential development, however objects to the removal of the previously identified (Reg-18 Draft LP) inclusion of convenience retail on this site. Findings of the Retail, Leisure and Town Centre uses study indicate that further convenience provision is required and this site is well placed to meet this need.</p>	<p>Protection for heritage assets is covered by DM policy EN 5 – Heritage Assets. Policies EN 5 and EN 10 are cross referenced below Policy AL/RTW 14 and Policy EN 9 should be added.</p> <p>The site allocations have been informed by the Level 1 SFRA. Proposals for new development should contribute to an overall flood risk reduction in line with DM policies EN 24 – Water Supply, Quality and Conservation, EN 25 – Flood Risk and EN 26 – Sustainable Drainage – these policies are all cross referenced below this Policy. Additionally, criteria 9 of the policy refers to a site-specific flood risk assessment to be prepared in support of any proposals.</p> <p>The removal of the convenience retail element of the allocation is based on evidence from the Retail, Commercial, Leisure and Town Centre Uses Study Update 2021. In reviewing the approach to retail and town centres through the above study, this site is not considered to be a town centre location and the Council’s policy approach is to support Royal Tunbridge Wells Town Centre first and therefore an allocation for further convenience retail development at this site is not considered appropriate in policy terms.</p>	<p>below Policy AL/RTW 14.</p> <p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
		The study does not consider that there is a need to allocate a site for further convenience retail within the Local Plan.	
<b>Policy AL/RTW 15 – Land at Showfields Road and Rowan Tree Road</b>	<ol style="list-style-type: none"> <li>1. <u>Health and community uses</u> - The CCG note the statement regarding a new medical centre in Policy AL/RTW 15 as an opportunity to inform the planning for primary medical care services in Tunbridge Wells. However the site promoter, although supports the inclusion of community facilities on the site, queries whether the requirement for a new medical centre is aspirational rather than based on any known local operator requirements.</li> <li>2. <u>Housing numbers and policy detail</u> – The site promoter supports the allocation, however considers that should be a flexible range of housing numbers and have made a number of other suggested amendments to the policy.</li> <li>3. <u>Water Infrastructure</u> - SW state that there is a need to reinforce their infrastructure to respond to the development and the layout and phasing of development should reflect this. Revised wording is suggested in the policy.</li> <li>4. <u>Land Use Mix</u> - A Community Trust have raised concerns over the policy and the quantum of residential development</li> </ol>	<p>Noted – TWBC will continue to engage with the CCG on this matter and explore this opportunity for the provision of a new healthcare facility in this location. It is considered that the re-provision and enhancement of community uses as part of any re-development for this site is key. Discussions with relevant service providers will be required in line with the requirements of criteria 1 of Policy AL/RTW 15.</p> <p>The Policy states ‘approximately 155 additional dwellings’, which allows some flexibility.</p> <p>Policy EN 24 – Water Supply, Quality and Conservation adequately deals with this issue and is cross referenced below Policy AL/RTW 15.</p> <p>4.The Policy does seek to provide a comprehensive development including the re-provision, enhancement and improvement of the</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p> <p>Yes - Additional wording to</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>proposed as well as importance of existing community uses– no account has been taken of their previous comments as a landowning stakeholder. A number of suggested recommendations are suggested for the policy to ensure the future use of the community facilities and residential numbers and layout of the site.</p>	<p>existing community facilities as set out within criteria 1 of Policy AL/RTW 15. The detailed suggestions provided by the Trust are considered too detailed for a Local Plan policy and would be considered as part of a detailed planning application for the site, with relevant DM policies cross referenced below the policy. However greater emphasis may be given within the supporting text at paragraph 5.98, as follows: <i>'The area is part of a defined Neighbourhood Centre, which occupies a prominent position on the corner of Showfields Road and Rowan Tree Road, and benefits from a range of existing community uses and facilities, which should be retained and enhanced and form an integral part of any redevelopment. It is an area that...'</i></p>	<p>be added to paragraph 5.98, as opposite.</p>
<p><b>Policy AL/RTW 16 – Land to the west of Eridge Road at Spratsbrook Farm</b></p>	<p>Representations including from Natural England, local groups, and individuals have made the following points.</p> <ol style="list-style-type: none"> <li>1. <u>Approach to 'major development' in the AONB and landscape</u> – NE note that TWBC has defined the allocation as major development within the AONB in its Development Strategy Topic Paper, although only part of the site is in the AONB itself. It considers that the site should be approached sensitively using a landscape-led approach. Concern from others that the site would be very visible and Impact the surrounding area.</li> </ol>	<p>The impacts of the development on the setting of the AONB were assessed in the Landscape and Visual Impact Assessment. Criteria 6 and 7 set out the requirements in terms of landscape and visual impact which must be considered as part of any development. Cross referencing below the policy refers to the relevant DM policies which also be applied. It is agreed with NE that this does not represent 'major development' in the AONB.</p>	<p>No changes proposed</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>2. <u>Green Belt</u> – No exceptional circumstances to justify the removal of the land from the Green Belt (CPRE) have been demonstrated.</p> <p>3. <u>Housing Numbers</u> –The site promoters support the allocation but consider that the site could achieve 170 dwellings to maximise the capacity of the site, while CPRE consider that if the site is to be developed, the projected densities are too low for sites which are immediately adjacent to the LBD.</p> <p>4. <u>% Custom Build Provision</u> – Concern from the site promoter about the requirement for self-build and custom housebuilding plots, seeking the policy to be amended to refer to TWBC evidence confirming need.</p> <p>5. <u>Environment</u> - Concern about the site’s location adjacent to High Woods ASNW and that there should be an appropriate buffer, as well as comments on the biodiversity and ecology of the site.</p>	<p>The Development Strategy Topic Paper sets out at section 6 (l) the exceptional circumstances for Green Belt releases, with Appendix 1 providing an individual assessment of the relevant sites. This is supported by the Green Belt studies.</p> <p>The number of dwellings proposed on the site has been informed by a Landscape and Visual Impact Assessment which assessed the landscape sensitivity of the site, including impacts on the setting of the AONB and the impact on the important heritage assets of the site. The proposed site density is reflective of this.</p> <p>Paragraphs 6.31/6.32 of the Housing Supply and Trajectory Topic Paper provide the justification for the requirement on these sites based on current assessments of need.</p> <p>Providing a suitable buffer to Ancient Woodland is adequately covered by DM policies EN 12 – Trees, Woodland, Hedges and Development and EN 13 – Ancient Woodland and Veteran Trees, which are both cross referred below Policy AL/RTW 16. Site allocations have been informed by evidence from the Biodiversity Evidence Base 2021. Criteria 5-7 set out relevant considerations, including impact on trees and criteria 9 requires provision of natural green space. DM policies EN</p>	<p>No changes proposed</p> <p>No changes proposed.</p> <p>No changes proposed</p> <p>Add Policy EN 9 – Biodiversity Net Gain to the list of policies cross referenced below Policy AL/RTW 16.</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>6. <u>Highways and Traffic</u> – Unsustainable level of traffic on the surrounding road network, including but not limited to, Eridge Road. Increase in noise. Decrease in air quality.</p> <p>7. <u>Heritage</u> – Impact on heritage assets and their setting, including Scheduled Ancient Monument and areas of archaeological potential within the site, and adjacent Conservation Area and listed buildings.</p> <p>8. <u>Agricultural Land</u> – Query with regard to the agricultural classification of the site – it is a</p>	<p>9 – Biodiversity Net Gain and EN 10 – Protection of designated sites and habitats will also apply. Policy EN 10 is cross referenced below policy AL/RTW 16 and EN 9 should be added to the list.</p> <p>Vehicular access and any required mitigation works are to be informed by a Transport Assessment, as set out in the policy. Impact on the local road network would also form a consideration of the Transport Assessment. Criteria 1-4 of Policy AL/RTW 16 detail a range of transport measures, which should be considered as part of any development proposals for the site. The Local Plan should be read as a whole and DM policies which should be referred to as part of any development are cross referenced below the policy. Add Policy EN 21 -Air Quality to the list of policies.</p> <p>Safeguarding measures for heritage assets have been considered and criteria 8 of the Policy details the requirements to be considered as part of any application, including a detailed historic landscape and archaeological assessment. DM policies EN 4 – Historic Environment and EN 5 – Heritage Assets should be applied which are cross referenced below Policy AL/RTW 16.</p> <p>The SHELAA is correct in recording the site as being grade 4 agricultural land based on the Provisional Agricultural Land Classification from</p>	<p>Add Policy EN 21 to the list of policies cross referenced below Policy AL/RTW 16.</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>mix of 3 and 3a but it is recorded as grade 4 in the SHELAA.</p>	<p>Natural England. Whilst the comments contend a higher value this would not affect the results in the SHELAA as the land to be built on is not 'Best and Most Versatile'.</p>	
<p><b>Policy AL/RTW 17 – Land adjacent to Longfield Road</b></p>	<p>1. <u>AONB</u> – Natural England recognises that the site has planning permission, but still object to it as a site allocation, as it is major development within the AONB. Notwithstanding this, NE wish to work with TWBC to help ensure the best possible outcome for the AONB and the environment.</p> <p>2. <u>Ancient Woodland</u> - Woodland Trust previously expressed concerns about a number of areas of Ancient Woodland affected by this site – most have been addressed but still have concerns about impact on 'Kings Standing (previously unnamed) ASNW at TQ60734254. The site boundaries should be re-drawn to exclude Kings Standing from land allocated for development and a 50-metre buffer should be maintained between development and the Ancient Woodland.</p> <p><i>[Note: Inclusion of Colebrooke Park – A site promoter considers that the Council should not just rely on AL/RTW17 to meet the employment need over the plan period, but that Land at Colebrooke Park should also be allocated (rather than</i></p>	<p>Noted and TWBC are committed to working with Natural England as set out within the SoCG.</p> <p>This site has planning permission and as part of this the Ancient Woodland and appropriate buffer was considered as part of the application process – provision of a 50-metre buffer is not justified and a suitable buffer to Ancient Woodland is adequately covered by DM polices EN 12 – Trees, woodland, hedges and development and EN 13 – Ancient Woodland and Veteran Trees.</p> <p><i>[Note: This site has Outline planning permission for the development of up to 74,000sqm GEA of floorspace within Use Classes B1and B8 including creation of a new vehicular and pedestrian site access, cycle way, landscaping, ancillary café and associated works – 19/02267/OUT]]</i></p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<i>safeguarded) for employment development, as it provides a different offer to RTW17 and would be more positive. – see Omission Sites below.]</i>		
<b>Policy AL/RTW 18 – Land at the North Farm landfill Site, North Farm Lane</b>	<ol style="list-style-type: none"> <li data-bbox="533 371 1151 571">1. <u>Definition of Leisure and mix of uses</u> - Objection to the open-ended nature of the current wording regarding the mix of uses permitted for this site and in particular 'Leisure' – no definition of what is meant by leisure is provided and is too vague.</li> <li data-bbox="533 842 1151 1010">2. <u>Environment</u> - The EA consider that this location contains or borders ordinary watercourses that would benefit from establishing no-development buffer zones of at least 5m.</li> </ol>	<p data-bbox="1184 371 1827 770">Leisure comprises a range of different uses and there is no set definition or quantum requirement set within the NPPF for 'Leisure' per se. The Council's Retail and Leisure Study (2017) and Tunbridge Wells Retail, Leisure and Town Centre Uses Study Update (2021) sets out the Council's approach to the provision of 'leisure' uses. The Council's strategy towards leisure provision is clear and is set out within the Local Plan as a whole – see also responses to Policies ED 1 – ED 12 as well as the Council's Economic Development Topic Paper - March 2021.</p> <p data-bbox="1184 842 1827 1114">Policy EN 24 – Water Supply, Quality and Conservation, highlights the importance of water and required development provides adequate protection. Consequently, it is considered that a change as suggested to the policy is not justified or necessary. A cross reference should be provided to Policy EN 24 – below Policy AL/RTW18.</p>	<p data-bbox="1861 371 2029 435">No changes proposed</p> <p data-bbox="1861 842 2029 1042">Yes - Add cross reference to Policy EN 24 below Policy AL/RTW 18.</p>
<b>Policy AL/RTW 19 – Land to the north of Hawkenbury</b>	<ol style="list-style-type: none"> <li data-bbox="533 1153 1151 1313">1. <u>Sports Hub Approach</u> – Concern in relation to the sports hub approach from a number of individuals. The Tunbridge Wells Football Club support the idea of a local hub but not a stadium in this location and</li> </ol>	<p data-bbox="1184 1153 1827 1281">The justification for the sports hub approach and the location identified is set out within the 'Site Options Analysis – Tunbridge Wells Borough Council Sports Hub'. Discussions will be held</p>	<p data-bbox="1861 1153 2029 1217">No changes proposed</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
<b>Recreation Ground</b>	<p>concern over level of discussion from the Council with regards to moving from current stadium.</p> <p><u>2.</u> <u>Access, traffic impact and access</u> - Concern that the amount of people using the facility and parking required is underestimated – impact on local roads and the Hawkenbury Allotments.</p> <p><u>3.</u> <u>Deliverability of Site</u> – A developer with an option on the land question the deliverability of the site – The site is not in Council ownership, although the Council has granted two permissions on the site for recreational use with no attempts through a procedural mechanism to acquire the land. The permissions also do not include the provision of a new stadium which is a requirement of the policy. Developer has an option on land for residential along with wider site and could deliver both recreation and residential development across the wider site being promoted – refer to omission site below.</p> <p><u>4.</u> <u>Suitability</u>– querying the suitability of the site and evidence for the necessity or appropriateness of allocating the site for recreational purposes. Additionally, SHELAA states that it is suitable,</p>	<p>with the football club and other stakeholders as part of the development process.</p> <p>Criteria 2 of Policy AL/RTW 19 refers to the siting of an appropriate access and transport mitigation measures and criteria 4 refers to the provision of parking.</p> <p>It is acknowledged that the Council does not own the land proposed to be allocated at Hawkenbury under Policy AL/RTW 19, and the Council understands that it may be required to use Compulsory Purchase Order powers to acquire this land, although the intention would always be to reach agreement with the present landowner first. The Council has recent experience in the use of CPO, and it is recognised in Policy STR4 and paragraph 4.84 of the PSLP that these powers maybe used to achieve the Local Plan’s strategic objectives and development strategy.</p> <p>The evidence supporting the allocation of AL/RTW 19 is provided for within the Playing Pitch Strategy and the ‘Site Options Analysis – Tunbridge Wells Borough Council Sports Hub’ as well as the ‘Local Football Facility Plan’. The</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>sustainable and logical site for development and Bellway consider this to be for the built development that they are promoting as it is a document assessing land for housing and employment uses, rather than for recreation.</p> <p>5. <u>Environment</u> - Concern about impact on the local environment and the sites' location adjacent to High Woods ASNW and that there should be an appropriate buffer.</p>	<p>SHELAA makes it clear that the southern part of the site is considered to be suitable for sport and recreation use. Please also refer to 'Land to the north of Hawkenbury Recreation Ground' in Omission sites below.</p> <p>Providing a suitable buffer to Ancient Woodland is adequately covered by DM polices EN 12 – Trees, Woodland, Hedges and Development and EN 13 – Ancient Woodland and Veteran Trees. Criteria 6 and 7 of Policy AL/RTW 19 require the consideration of ancient woodland, landscape and ecology.</p> <p><i>Note – [This site has planning permission for change of use of land to expand the existing recreational facilities through the provision of additional sports pitches, together with associated access, car parking provision, 'ball stop' fencing, changing rooms and ground works (21/00300/FULL)]</i></p>	<p>No changes proposed</p>
<p><b>Policy AL/TRTW 20 – Land at Culverden Stadium</b></p>	<p>1. <u>AONB</u> - The allocation would have a negative impact on the landscape setting of the area, including views from the AONB.</p> <p>2. <u>Deliverability</u> - Consider alongside AL/RTW 19 above, as the site can't be released until the new sports hub at Hawkenbury is delivered.</p>	<p>The site has been assessed through the SHELAA process and no potential harm to the setting of the AONB has been identified.</p> <p>It is recognised that the delivery of the sports hub at Hawkenbury and redevelopment of the existing sports sites are interlinked and is and will be recognised in the delivery strategy for these sites.</p>	<p>No changes proposed</p> <p>No changes proposed</p>

<b>Policy/Topic Area</b>	<b>Main Issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	3. <u>Environment</u> - The Woodland Trust have expressed concern about the sites' location adjacent to High Woods ASNW and that there should be an appropriate buffer.	Criteria 5 of Policy AL/RTW 20 sets out the requirement for an ancient woodland buffer to the north and eastern boundaries of the site. Additionally, providing a suitable buffer to Ancient Woodland is adequately covered by DM policies EN 12 – Trees, Woodland, Hedges and Development and EN 13 – Ancient Woodland and Veteran Trees.	No changes proposed
<b>Policy AL/RTW 21 – Land at Colebrook Sports Field, Liptrpas Lane</b>	1. <u>Deliverability</u> - Consider alongside AL/RTW 19 above as the site can't be released until the new sports hub at Hawkenbury is delivered.  2. <u>Southern Water Infrastructure</u> - SW state that its underground infrastructure crosses this site which needs to be considered in detailed site layout.	It is recognised that the delivery of the sports hub at Hawkenbury and redevelopment of the existing sports sites are interlinked and is and will be recognised in the delivery strategy for these sites.  Policy EN 24 – Water Supply, Quality and Conservation, adequately deals with this issue and is cross referenced below Policy AL/RTW 21.	No changes proposed  No changes proposed.
<b>Policy AL/RTW 22 – Land at Bayham Sports Field West</b>	1. <u>Deliverability</u> - Consider alongside AL/RTW 19 above as the site can't be released until the new sports hub at Hawkenbury is delivered.  2. <u>Transport/access</u> - Impact on infrastructure in this area and access concerns through crematorium.  3. <u>Environment</u> - Impacts on nature and biodiversity. The site is home to birds and wildlife.	It is recognised that the delivery of the sports hub at Hawkenbury and redevelopment of the existing sports sites are interlinked and is and will be recognised in the delivery strategy for these sites.  The provision for vehicular and pedestrian access is provided for within criteria 1 and 2 of Policy AL/RTW 22.  Site allocations have been informed by evidence from the Biodiversity Evidence Base 2021. DM policies EN 9 - Biodiversity Net Gain and EN 10 –	No changes proposed  No changes proposed  No changes proposed

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
		Protection of designated sites and habitats will also apply	
<b>Omission sites</b>			
Land at Caenwood Farm and Whitegates Farm, Reynolds Lane, Royal Tunbridge Wells. (Site 30 – excluding the area covered by Local Plan Allocation AL/RTW 5 – Site 100 and part of Site 30)	<ul style="list-style-type: none"> <li>Inclusion of the entire Caenwood site is sought for a residential allocation of up to 280 dwellings (mix of types), including open space and community facilities, park, woodland buffer etc.</li> <li>Proposes vehicular access to the site will be derived from two priority junctions with Speldhurst Road.</li> <li>Supporting report promoting inclusion of wider site with Technical Appendix on Transport and Access.</li> </ul>	<p>The site has been assessed through the SHELAA process and subsequent landscape and Green Belt work. It is a large site and in its entirety is not considered to be suitable for allocation due to the constraints evident in relation to the Green Belt, landscape, ecology and transport/highways. The entire Caenwood site is covered by two Green Belt parcels, the parcel to the west is considered to make a strong/relatively strong contribution to Green Belt purposes and would be considered to cause very high harm if released from the Green Belt and is not appropriate for release.</p> <p>As per allocation AL/RTW 5 above – the parcel to the east of the Caenwood site (Site 100 and part of site 30 – AL/RTW 5) is considered suitable for allocation as any harm resulting from the release of the Green Belt is assessed to be low to moderate.</p> <p>Given this the case put forward by the site promotor does not materially affect the findings of the site assessment work undertaken previously as part of the SHELAA.</p>	No changes proposed.
Tutty's Farm, Hawkenbury, Royal Tunbridge Wells, Kent.	<ul style="list-style-type: none"> <li>Inclusion of the site is sought for a residential allocation of up to 100 dwellings (mix of types).</li> </ul>	The site has been assessed through the SHELAA process and has been found unsuitable as a potential allocation. The supporting/technical information submitted by the site promotor has	No changes proposed

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
(Site 434)	<ul style="list-style-type: none"> <li>• The site is proposed to include open space and community facilities, and Multi-functional community facilities (HQ for TW Scouts and other groups) to meet exceptional circumstances test.</li> <li>• Supporting document submitted refers to Royal Tunbridge Wells being a sustainable settlement which should be taking a greater proportion of growth in the borough.</li> <li>• the site provides a logical extension to Hawkenbury.</li> <li>• Submission of a number of technical appendices including Illustrative masterplan/Green Belt review and landscape appraisal/transport technical note</li> </ul>	<p>been considered. The case put forward by the site promotor does not materially affect the findings of the site assessment work undertaken previously as part of the SHELAA.</p> <p>This greenfield site outside of the LBD is not considered to be a suitable site for allocation. The findings of the assessment indicate that the site is unsuitable as a potential allocation for reasons relating to the setting of the AONB, landscape, ecological and heritage. The case for exceptional circumstances is not considered justification for the release of land from the Green Belt.</p>	
Land at Sandown Park – (Site 114)	<ul style="list-style-type: none"> <li>• Inclusion of the site is sought for allocation for older people’s housing.</li> <li>• Supporting document setting out representation, including housing needs justification, insufficient allocated sites to meet older persons housing need and the Plan is overly reliant on extra care accommodation at the strategic sites which will not deliver until the end of the plan period</li> <li>• Number of appendices have also been submitted with the representation with background documents including – Transcript of SALP Examination/Judicial</li> </ul>	<p>The site has been assessed through the SHELAA process and it was found that the site is part of a larger Green Belt parcel - the release of which is considered would cause high harm if released from the Green Belt. It is also considered that it would harm the setting of the AONB. There are also highway concerns and significant concerns about potential impact on the landscape and settlement pattern.</p> <p>The Local Plan already provides for housing for older people through both policies and proposals, drawing on the Housing Needs Assessment Topic Paper and the Housing Supply and Trajectory Topic Paper.</p>	No changes proposed

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	review judgement 2017/previous SHELAA extracts/Joint Statement of Facts between Cooper Estates and TWBC 2004/Previous correspondence with TWBC.	In any event, it is not considered that the argument for further specialist housing outweighs the clear planning reasons against its development.	
Land at Sandown Park between Pembury Grange and A21, Royal Tunbridge Wells, Kent. (Site 411)	<ul style="list-style-type: none"> <li>• Inclusion of the site is sought for a residential allocation of up to 70-80 dwellings (mix of types).</li> <li>• Green Belt Assessment has been submitted which argues that the site has a low contribution to the 5 purposes of the GB.</li> <li>• Green Belt Study objection – it is considered that the site is similar to other allocations that are being released. (AL/RTW5, AL/RTW14 and AL/RTW16)</li> <li>• Propose that the RTW LBD is extended to include the site.</li> </ul>	The supporting/technical information submitted by the site promotor, including Green Belt matters has been considered. It is not considered that there are exceptional circumstances to justify release from the Green Belt or for the site to be allocated in the Local Plan. The SHELAA also identified concerns in relation to landscape and settlement pattern as well as concerns that this would result in coalescence of settlements (Royal Tunbridge Wells and Pembury) as well as highways concerns.	No changes proposed
Colebrooke House, Pembury Road, Capel, TN11 0QD (Site 101)	<ul style="list-style-type: none"> <li>• Inclusion of the site is sought for allocation (rather than safeguarding only) for a Business Park (11,750sqm employment space) with parkland campus setting with direct access onto the A21 via the Fairthorne junction.</li> <li>• Consider that the Council should not rely on one site (Land at Longfield Road) to deliver employment growth – the Local Plan should be planning more positively and include other sites that can provide range of employment offer.</li> </ul>	The site has been assessed through the SHELAA process and is not proposed for allocation in this Local Plan – it is however to be removed from the Green Belt to provide the opportunity for possible employment use in the longer term. The site is safeguarded for future economic uses and will be reviewed through a future Local Plan review. The case put forward by the site promotor does not materially affect the findings of the site assessment work undertaken previously as part of the SHELAA. The Local Plan is already seeking to plan positively in employment land terms by providing over the minimum requirement in order to provide a range and choice of sites and premises in line	No changes proposed

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
		with the recommendations within the Economic Needs Study.	
Land to the north of Hawkenbury Recreation Ground (Plot A) (Site 53 (Local Plan Allocation AL/RTW 19 (part site), overlaps with site 240)	<ul style="list-style-type: none"> <li>• Supporting documentation sets out the justification for consideration of the site to be allocated for residential and recreational uses - residential could be delivered on the northern part of the site and sports stadium on the southern part of site.</li> <li>• Bellway have an option on the land for residential development (quantum not specified).</li> <li>• Council cannot deliver the sports hub without the consent of the landowner and so currently undeliverable and the other sports strategy sites cannot come forward for housing without the new sports hub allocation.</li> <li>• The Plan proposes a disproportionately low level of new housing at Royal Tunbridge Wells despite the sustainability of this settlement, in comparison to other, less sustainable locations</li> <li>• SHELAA states that the site is suitable and so should be suitable for residential as well as recreation.</li> </ul>	<p>The justification for the sports hub approach and the location identified is set out within the 'Site Options Analysis – Tunbridge Wells Borough Council Sports Hub'. The evidence supporting the allocation of AL/RTW 19 is provided for within the Playing Pitch Strategy and the 'Site Options Analysis – Tunbridge Wells Borough Council Sports Hub' as well as the 'Local Football Facility Plan'.</p> <p>It is acknowledged that the Council does not own the land proposed to be allocated at Hawkenbury under Policy AL/RTW 19 – see response to this policy above.</p> <p>The basis for the level of new housing proposed around Royal Tunbridge Wells is set out within Section 4 of the Local Plan and the Development Strategy Topic Paper (March 2021) – it is acknowledged that the town has a number of constraints to its growth.</p> <p>The SHELAA makes it clear that the southern part of the site is considered to be suitable for sport and recreation use – it is not considered suitable for residential use.</p>	No changes proposed
Knights Park, Tunbridge Wells, TN2 3UW (Site references 138, 139, 140)	<ul style="list-style-type: none"> <li>• Objection to the non-inclusion of the site which was previously in the Regulation 18 Plan (Draft LP reference AL/RTW 15) for 'leisure' uses. No justification for its removal.</li> </ul>	The site has been assessed through the SHELAA process and has been found unsuitable as a potential allocation. The supporting information submitted by the site promotor has been considered.	No changes proposed

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<ul style="list-style-type: none"> <li>The definitive LBD boundary which runs along Knights Park’s (RTW) eastern extent is presently difficult to establish on the Policies Map due to the thickness of the red line. The proposed LBD appears to be too close to the rear elevations of the main leisure terrace and omits areas of the existing service yard and emergency escape routes. It is felt that the LBD should follow the route identified on the former Draft Local Plan Policy AL/RTW 15 Land at Knights Park allocation, to allow appropriate servicing space to the rear of the leisure development.</li> </ul>	<p>This site is identified as not being suitable for further commercial leisure use allocation as further growth within this area would detract from the ‘town centres first’ approach. It is not therefore considered suitable as a potential Local Plan allocation. Any development proposals coming forward for this site could be considered under existing development management policies reflecting its PDL status and location inside the LBD.</p> <p>The LBD surrounding Knights Park has been drawn in from the outer eastern boundaries to exclude any woodland/green open space. The service areas remain included.</p>	
<p>Logistics UK, Hermes House and land to the rear, St Johns Road, RTW Site reference – PSP_4</p>	<p>Site submission for consideration of site for residential development.</p> <ul style="list-style-type: none"> <li>Site currently comprises offices in employment use and land to the rear – in education use occupied by Logistics UK as their headquarters.</li> <li>Older office building and more modern extension (1980’s) although both dated and in need of significant upgrade to meet modern specifications.</li> <li>Intention to vacate current premises and relocate to appropriate premises within Tunbridge Wells.</li> <li>Site is 0.65 hectares and put forward for approximately 48 dwellings at 74 dph – mix of house types/size and provision of Affordable Housing.</li> </ul>	<p>This site and the supporting submission has been assessed through the SHELAA Addendum and although this site is identified as a sustainable mostly PDL site due to its location within the LBD, it is considered unsuitable as a potential site allocation due to its existing economic/education use on the site.</p> <p>This site is a PDL site in the LBD and is a sustainable site in this context. Due to its existing economic/education use on site, it is considered that it could come forward as a PDL windfall site subject to compliance with the relevant development management policies within the Local Plan.</p>	<p>No changes proposed</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
Mitsubishi Garage, 123 – 125, St James’ Road, RTW, TN1 2HG. Site reference – PSP_1	<p>Site submission for consideration of site for residential or residential and commercial mixed development (on the ground floor).</p> <ul style="list-style-type: none"> <li>• Site currently comprises a car dealership, which is due to close by June 2022.</li> <li>• A previously developed site within the LBD of Royal Tunbridge Wells in a sustainable location.</li> <li>• Site is 0.126 hectares and put forward for approximately 25 units.</li> </ul>	<p>This site and the supporting submission has been assessed through the SHELAA Addendum and although this site is identified as a sustainable PDL site due to its location within the LBD, it is considered unsuitable as a potential site allocation due to its existing economic use on the site.</p> <p>This site is a PDL site in the LBD and is a sustainable site in this context. Due to its existing economic use on site, it is considered that it could come forward as a PDL windfall site subject to compliance with the relevant development management policies within the Local Plan.</p>	No changes proposed
Land at Castle Hill Farm, Castle Hill Farm, Pembury Road, Capel TN11 0QG (Site 49, 62 and DPC7) Within Capel Parish, but in proximity to Main Urban Area of Royal Tunbridge Wells and Southborough.	<i>Note – This site, although is located in proximity to the Main Urban Area of Royal Tunbridge Wells and Southborough, falls within Capel Parish and is considered within the Capel section accordingly.</i>		

## 5.2 Southborough

### Notes:

1. This table summarises duly made representations. A separate table is provided at the end which provides a summary of main issues raised in late representations.
2. The total number of representations recorded against the Southborough chapter is 10.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>PSTR/SO 1: The Strategy for Southborough</b>	1. <u>Policies Map</u> - The Policies Map does not appear to separate the Southborough LBD from the RTW LBD. Also, Southborough boundary should be more clearly defined, and treated as an entire parished area to avoid confusion.	As noted at paragraph 5.132 the LBD of Southborough merges with that of RTW to the south and south east, and with Bidborough to the north. The LBD boundary cannot run through the main built-up area, only around the edge of it. The parish boundary is shown on the Inset Map, identifying the parished area. The Council is producing an interactive Policies Map for the borough alongside the submission of the Plan, which will be clearer.	No changes proposed
	2. <u>Hotel (AL/SO 2)</u> – There is concern over the non-inclusion of the hotel forming part of the strategy for Southborough	It is not considered necessary to include reference to Policy SO 2 within the Strategy for Southborough.	No changes proposed
	3. <u>Density of development</u> – CPRE question the density of AL/SO 1 and AL/SO 3, and why the SHELAA yield of AL/SO 3 does not account for the whole size of the site.	Allocation Policy AL/SO 1 has planning permission for 16 dwellings and is currently under construction which is reflected within Policy AL/SO 1. Allocation Policy AL/SO 3 and the wider site has been considered through the SHELAA and the outcomes of this assessment	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>4. <u>Environment</u> –</p> <p>a) There is concern that the Policy does not address air quality issues relating to A26;</p> <p>b) It is suggested that more heritage assets should be referenced in the Policy, including the Conservation Area, Ancient Woodland, Historic Parks and Gardens and wildlife designations.</p> <p>5. <u>Transport and Parking</u> STC stated that Pennington Road carpark should also be included within the Policies Map.</p> <p>6. <u>PRoW</u> – KCC would like reference to be made to developer contributions for providing active travel.</p>	<p>is included within the SHELAA under site reference DPC13.</p> <p>4.The Local Plan should be read as a whole. Policy EN 21 provides the policy context in relation to Air Quality and Policy EN 22 in relation to Air Quality Management Areas.</p> <p>Policies EN 4 – Historic Environment, EN 10 – Protection of designated sites and habitats and EN 13 – Ancient Woodland and Veteran Trees provide policy and guidance on these issues.</p> <p>The Pennington Road car park is in fact identified as a public car park to be retained under Policy TP4, but the mapping will be made clearer to show this better. To further aid clarity, an interactive map will be prepared showing all policies across the borough, to be published with the Submission Local Plan.</p> <p>Policy TP 2: Transport Design and Accessibility is cross referenced below Policy STR/SO 1, which details the approach towards provision of active travel, including improving connectivity and securing contributions for Public Rights of Way. Given that the Plan is taken as a whole, specific reference in the Policy is not necessary.</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>7. <u>Sports and Recreation</u> – STC question why reference to future enhancements is omitted in relation to the Local Sports Hub in Southborough, which is inconsistent with the approach used in AL/RTW 1 (point 15).</p>	<p>7.Criteria 3 of Policy STR/SO 1 identifies the existing Southborough Hub recreation area as a local sports hub as part of the sports strategy. Enhancements have recently been carried out at the Southborough Sports Hub.</p> <p>Criteria 6e of Policy STR/SO 1 – seeks developer contributions towards the recreation and sports provision at Hawkenbury (AL/RTW 19) and/or Land at and adjacent to Rusthall Recreation Ground, Southwood Road, Rusthall (AL/SP 2) as part of the Sports Strategy approach.</p>	<p>No changes proposed</p>
<p><b>AL/SO 1: Speldhurst Road former allotments (land between Bright Ridge and Speldhurst Road)</b></p>	<p><u>PRoW</u> - KCC have made comments on PRoW WS19A and WS22 and links should be referenced in the policy</p>	<p>Reference is made in the policy to footpaths and their wider connectivity to the existing footpath network. Specific references to footpath numbers are unnecessary.</p> <p><i>Note: This site has planning permission for the Erection of 16 dwellings, with associated cycle/bin store, landscaping, vehicular access and car parking (20/00872/REM, following Outline permission 18/02618/FULL)</i></p>	<p>No changes proposed</p>
<p><b>AL/SO 2: Land at Mabledon House</b></p>	<p>1. <u>Heritage</u> - Concern over the substantial alteration to the Grade II Listed mansion and the viability of such a scheme.</p>	<p>This is a sensitive site and the criteria within Policy AL/SO 2 reflect this, in particular criteria 3, 4, 5 and 6 which relate to the requirement for a heritage assessment, conservation plan and scheme for restoration, landscape and</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>2. <u>Scale of development</u> – The development proposed is too big and cause damage to the historic nature of the site and also concern that the site falls within both the AONB and Green Belt.</p> <p>3. <u>Relationship with Tonbridge &amp; Malling --</u> There is no evidence whether this development on the Council boundary has been discussed with TMBC.</p> <p>4. <u>Transport and Highways</u> – Potential for significant increase in car journeys needs further investigation as it has been underestimated in the transport evidence base. Should further consider the impact on the A26 due to increased car journeys.</p>	<p>ecological plans and ensuring public access to the heritage assets and historic park.</p> <p>As above, the criteria within Policy AL/SO 2 ensure the sensitive development of this site. Additionally, criteria 2 and 5 address any impacts in relation to the site's location within the AONB and Green Belt.</p> <p>The allocation of this site has been discussed with officers of Tonbridge and Malling Borough Council through regular DtC meetings where a range of issues have been discussed as well as other discussions specifically on this site.</p> <p>Criteria 2 of the policy requires that the provision of safe and acceptable access arrangements from the A26 for the proposed development should be informed by a highways assessment. Impact on the local road network would form part of the Transport Assessment and provisions made for any impacts mitigated by the development It also refers, at criteria 7, to contributions towards a cycle link to Tunbridge Wells, Southborough and Tonbridge to be explored.</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>AL/SO 3: Land at Baldwin's Lane, North Farm Road</b>	<u>Southern Water Infrastructure</u> - SW comment that underground infrastructure crosses this site - additional wording provided	<p>The cross referencing below the policy should refer to Development Management Policy EN 24 – Water Supply, Quality and Conservation, which adequately deals with this issue.</p> <p><i>Note: This site has planning permission for new residential development comprising 26 flats with associated vehicle parking (20/00881/FULL).</i></p>	Add Policy EN 24 to the list of policies below Policy AL/SO 3.

## 5.3 Strategic Sites

### 5.3.1 Policy STR/SS1: The Strategy for Paddock Wood, including Land at East Capel

**Notes:**

1. *There were 129 representations recorded against this policy.*
2. *Where representations are specific to the development strategy, inc. Green Belt release, and matters relating to housing trajectory, these are contained within the relevant chapters in Section 4- Strategic Policies.*
3. *Main issues relate to the scale of growth in this location, the transport impacts, flooding/ drainage issues, concerns over infrastructure delivery and impact on the natural and historic environment.*

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>Consultation</b>			
	<p>Capel Parish Council (CPC) considered there was a lack of proper engagement (esp. with elderly): Limited engagement with DLA during masterplanning (just one session and limited reps). CPC only allowed to send one rep and one NHP rep to SSWG (which in their view is wrongly P&amp;C) and outnumbered by developers.</p>	<p>TWBC regularly engaged with Capel Parish Council once it was determined that its most appropriate strategy was to direct growth to strategic sites within Capel parish; and in relation to its Neighbourhood Development Plan in a similar manner to other Neighbourhood Development Plan groups.</p> <p>To enable productive discussions, attendees from all representatives within the SSWG have been limited to one person.</p> <p>Further consultation will take place with the local community, including Capel PC and Paddock Wood Town Council on the progression of SPDs.</p>	<p>No changes proposed</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	A site promoter considers that to ensure delivery, ongoing discussions should also include developers; therefore, “and the developers” should be added to end of paragraph 5.191 i.e. “The delivery of this infrastructure should be through ongoing discussions with relevant stakeholders <b>and developers”</b>	This sentence refers to engagement with Stakeholders. It is not considered necessary to refer to developers after this as the reference to Stakeholders includes the site developers.	No changes proposed
<b>General Comments</b>			
	CPC deplores the fact the SPD not produced yet. Concern Plan is being pushed through.	Please refer to the Local Development Scheme. The role of SPDs is to supplement policy contained within the statutory development plan; it was always envisaged these would be prepared subsequent to the finalisation of the Reg. 19 version of the Local Plan.	No changes proposed.
	No consideration of the impact on existing residents.	The evidence base documents which underpin the Local Plan assesses the impact of the proposed growth on a variety of different factors such as highways. These documents identify mitigation measures where required which have been incorporated into the policy.	No changes proposed
	A landowner within the allocation is supportive of growth for PW; land is shown as part of “strategic landscape corridor” (map 28) concerns not logical approach to land use planning as PDL. Should accommodate new development.	The Structure Plan shown at Map 28 and referred to within the Policy is not a fixed blueprint. Instead, it identifies broad parameters to ensure development can be delivered in a holistic manner and with the garden settlement principles embedded.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		Detailed SPDs will be prepared for each Parcel as set out in the policy, and subsequent planning applications will be considered against the provisions of the statutory development plan and other material considerations, which include the existing use of the land.	
	One of the site promoters within the allocation refers to the policy stating that “approximately 3490-3590” dwellings will be provided – word approximately should be replaced with “between”- as intended to be a quantum range and will ensure more effective policy. This would allow detailed masterplanning work to test the capacity of the site.	These figures stem from the masterplanning work undertaken by DLA: Please see the Strategic Sites Masterplanning and Infrastructure Study. This is the quantum that is considered feasible given the site constraints, but this is not an upper limit and so the word “approximately” is considered appropriate.	No changes proposed
	One of the site promoters within the allocation considers the Limits to Built Development should be set through the Structure Plan not the development strategy as set out in policy.	The approach taking to the provisional Limits to Built development is set out in the Limits to Built Development Paper. The “Development Strategy” referred to in policy simply means what the strategy for this allocation is within the Local Plan.	No changes proposed
	One of the site promoters within the allocation considers the term Structure Plan is confusing and has a distinct meaning in planning parlance- replace with Masterplan, framework masterplan etc.	Noted. This is the term referred to in both the DLA Strategic Sites Masterplanning and Infrastructure Study and the Local Plan, and provides an appropriate term for a framework to guide the development of an area. Given Structure Plans in the old sense have now been revoked the use for this purpose does not seem to raise any confusion at this time.	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Residents and a local campaign group state there has been no Cumulative Impact Assessment on the effects of the developments across Capel, including the KCC gravel extraction or Environmental Impact Assessment.	The plan has been drafted with engagement with KCC Minerals Officer. Other evidence base documents, such as Transport, look at the cumulative effects of development across the borough.	No changes proposed
	An adjoining LPA supports the policy approach that proposals for piecemeal development will be resisted.	Comment of support.	No changes proposed
	A site promoter felt that some wording from within the policy re, SPDs should be moved into the supporting text to better explain how STR/SS1 fits in overall.	The text within the policy is considered appropriate to ensure it is effective.	No changes proposed
	The site promoters consider STR/SS1 is unnecessarily long, overly complex, repetitive, and most importantly does not provide certainty as to which part of the allocated development will be contributing to what element of infrastructure.	TWBC considers the approach to the policy is effective and clear. Please see Statements of Common Ground with site promoters. This allocation needs to be considered holistically.	No changes proposed
<b>General Infrastructure</b>			
	Over 30 local residents are concerned that there is a lack of infrastructure to deliver the growth, and this needs to be in place in advance. Given the majority will come from contributions from developers there is a risk they will never materialise. Reference to “may” needs to be removed for contributions. This offers a get out clause.	The infrastructure requirements to deliver the growth; not only to mitigate the harm, but to also deliver the growth on garden settlement principles has been identified, as set out in the Strategic Sites Masterplanning and Infrastructure Framework. These items have been costed and run through the	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		<p>Viability Assessment. No external funding is likely to be required.</p> <p>Further work is being undertaken to understand trigger points for delivery on key items of infrastructure, and discussions are taking place with stakeholders such as Homes England on funding/ loan opportunities to bridge the gap of S106 monies in advance of receipt.</p>	
	<p>Over 40 local residents consider that there are not enough schools, doctors' surgeries, dentists, etc; existing services already at capacity (Paddock Wood, Tonbridge and villages).</p>	<p>The infrastructure to accommodate the growth has been agreed with the relevant stakeholders (e.g. KCC Education, NHS CCG) as set out in the IDP and the Strategic Sites Masterplanning and Infrastructure Study.</p>	<p>No changes proposed</p>
	<p>Paddock Wood Town Council is concerned that there is no provision for Cemeteries within Local Plan.</p>	<p>c.5% of deaths on average require burial space. The Crematorium team at TWBC is aware of the growth planned within the borough and is currently of the view there is sufficient land within the Council's Crematorium for this growth. It works closely with other burial grounds and assists in finding additional land when required to meet a need.</p>	<p>No changes proposed</p>
	<p>Residents consider that infrastructure needs to be robust as developers will try to get additional houses retrospectively. TWBC needs to manage developers.</p>	<p>The policy makes clear reference to the provisions of the DLA Strategic Sites Masterplanning and Infrastructure Study which identifies the requisite infrastructure needed to deliver the growth. Any</p>	<p>No changes proposed</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
		development which comes forward will need to adhere to the provisions of this policy.	
	KCC considers developer contributions to the expansion of waste infrastructure should be included.	<p>The provision of waste infrastructure is identified in the strategic policy for infrastructure provision; Policy STR5 (see response table). This applies to all applications coming forward. Policy STR5 is referred to below the policy as an associated policy to STR/SS1.</p> <p>Waste infrastructure is not identified in any specific site allocation policy, and within STR/SS1 the reference to “other infrastructure” provision allows for contributions for waste infrastructure accordingly.</p> <p>Please see Statement of Common Ground with KCC.</p>	No changes proposed
	No existing police presence in PW and part-time fire services, no plans for an improved service with major town expansion.	Please see IDP for detail on emergency services.	No changes proposed
	The NHS CCG states that the infrastructure required to support an expanded settlement of this scale in the location proposed has been identified. This includes education provision, health facilities, and required drainage and utility services.	Noted.	No changes proposed
	A number of representations from residents and local groups stating the detail of infrastructure	The infrastructure requirements to deliver the growth; not only to mitigate the harm, but to also	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>delivery is unclear in terms of how it will be provided and phasing. Also, there uncertainty over funding opportunities.</p> <p>Key items of infrastructure required before new homes e.g. FOG Bypass, A228 works, pedestrian and cycle routes and bus network. Need funding by public purse and no mechanism to achieve this.</p>	<p>deliver the growth on garden settlement principles has been identified, as set out in the Strategic Sites Masterplanning and Infrastructure Framework. These items have been costed and run through the Viability Assessment. No external funding is likely to be required.</p> <p>Further work is being undertaken to understand trigger points for delivery on key items of infrastructure, and discussions taking place with stakeholders such as Homes England on funding/ loan opportunities to bridge the gap of S106 monies in advance of receipt.</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Plan relies entirely on deliverability of substantial infrastructure where the evidence base documents are inconsistent, contradictory and unrealistically optimistic. Evidence does not support extent of infrastructure interventions required to deliver sustainable development and the IDP does not effectively mitigate impacts of STR/SS1 and/or is commercially viable.</p> <p>TWBC hasn't set out key infrastructure projects to be delivered over plan period which therefore fails to comply with para. 20 of NPPF in Policy STR1 or STR 5. Lack of information on deliverability and viability. Some inconsistencies between IDP and viability figure e.g. Funding gap of £338,025 between Viability figure for flood risk, and that stated in IDP. Worst case scenario should be used for viability.</p>	<p>It is noted that there are some minor inconsistencies between the IDP and Strategic Sites Masterplanning and Infrastructure Document (The IDP is some cases rounds up). The IDP, which is a living document, will be updated ahead of examination.</p> <p>Notwithstanding this, the Strategic Sites Masterplanning and Infrastructure Document identifies all the required infrastructure to deliver the growth, as informed by discussions with key stakeholders. Costs have been assigned and run through the viability model in the Viability Assessment which underpins the Local Plan. This concludes that at this stage of the Plan process, the Council is as confident as it can be that these sites can be delivered without external funding.</p>	<p>Updates to IDP. No changes proposed</p>
	<p>Site promoters consider if CIL is introduced, this needs to be zero CIL for strategic sites given other infrastructure requirements to ensure deliverability. See also response to STR5</p>	<p>The Stage 1 viability assessment work to inform the Local Plan considered the potential to introduce CIL, with the Stage 2 work carrying forward assumptions made about potential levels of CIL and costs. However, at this time, the Council is not looking to adopt a CIL Charging Schedule for applications within the borough alongside this Local Plan. Should this change, the position regarding the strategic sites would need to be carefully considered given the infrastructure identified to be delivered by the strategic sites so they are delivered on garden settlement principles are significant. The production</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		of a CIL Charging Schedule would be subject to a detailed viability assessment accordingly, building on the work undertaken by Dixon Searle previously.	
	<p>A site promoter considers that the Plan needs to set out clearly what is required and ensure that is fair and reasonable for the infrastructure provided in line with the CIL 122 Regs. Greater clarification in plan on type infrastructure, how funded, which development pays for it</p> <p>Need a consistent approach to development being excluded from some contributions (e.g. full 40% affordable housing) if not viable.</p>	<p>The Strategic Sites Masterplanning and Infrastructure Study identifies the required infrastructure to accommodate the growth. Further work is being undertaken to understand trigger points for delivery on key items of infrastructure, and discussions taking place with stakeholders such as Homes England on funding/ loan opportunities to bridge the gap of S106 monies in advance of receipt.</p> <p>The policy refers to Policy H3 which allows in exceptional circumstances for a lower proportion of affordable housing to be provided for if not considered viable.</p>	No changes proposed
	The site promoters consider the reference to a potentially amended Strategic Sites Masterplanning and Infrastructure Study should be removed. They consider this is unclear and potentially allows for contributions which are not required in line with the CIL regs.	The Strategic Sites Masterplanning and Infrastructure Study includes an infrastructure framework which plays a role similar to the IDP; this may need to be updated if circumstances change and it is considered appropriate to do so. The policy wording facilitates appropriate flexibility in this regard.	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
<b>Utilities</b>			
	<ol style="list-style-type: none"> <li>1. From 2025, all developments need to be powered by electricity only. This will require investment in HV transmission lines and stepdown transformers, particularly with move toward EV charging infrastructure. All cables will need to be buried. There is no discussion about grid infrastructure or who pays for these or how construction will be phased.</li> <li>2. Unclear if gas will be supplied from Tonbridge, what route it will take, and what the impact will be on supplies.</li> <li>3. Unclear what renewable capacity will be generated on site.</li> <li>4. Unclear about broadband availability and disruption to surrounding areas. Carbon fibre networks not widely available to existing houses for rapid internet service which will deter anyone working from home and thus put further pressure on the need to commute with over-crowded trains.</li> </ol>	Please see IDP. Discussions with the utility providers regarding the growth proposed in the Borough has informed the IDP.	No changes proposed
<b>Education</b>			
	KCC states in its representations that the 2FE Primary school in Mascalls court farm site is required in part to also support the total growth	Noted, this has been granted planning permission and has been constructed.	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Two site promoters consider that evidence is needed from Education Authority on need for schools, and trigger dates understood.	The education provision identified for this allocation as set out in the IDP and Strategic Sites Masterplanning and Infrastructure Study has stemmed from discussions with KCC Education. Discussions on trigger points ongoing.	No changes proposed
	Local residents made representatives that the Plan makes no assessment of education and congestion costs or whether KCC can or will agree to fund new schools.  New schooling would have to be put in place early on but will not get funded until houses are sold. Existing schools in the area already oversubscribed.	TWBC is working closely with KCC Education to identify need and trigger points for new schools.  The broad location of the schools included within the plan have been assessed as part of the Transport Assessment.	No changes proposed
	Tudeley secondary school and expansion of small Capel primary school woefully inadequate. New secondary school not planned until Phase 4 (after 1,900 houses built). Children will need to be drive or bussed daily to either Tonbridge or Tunbridge Wells. Planned provision for nurseries is similarly inadequate.	The timing of the secondary school within Tudeley Village (which will also serve the growth at Paddock Wood and east Capel) has not yet been determined. The identification of this within Phase 4 of the Tudeley Village Masterplan is indicative at this stage. Further work will be undertaken in close discussion with KCC Education to determine this.	No changes proposed
<b>Healthcare</b>			
	The NHS CCG noted that whilst infrastructure has been identified, the delivery requirements for medical care provision need to be further developed. Facilities are needed in both Paddock Wood and Tudeley.	Noted. Discussions remain ongoing between the NHS CCG and TWBC. Further information being considered on trigger points for medial infrastructure. The NHS CCG also forms part of the SSWG.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>The Town Council has concerns over health provision, and this being located in a sustainable location.</p> <p>Concerns about capacity at Pembury hospital from additional residents.</p> <p>Concern that meeting healthcare needs will probably fall on to Tonbridge where medical facilities are already stretched.</p> <p>Plans envisage one new GP surgery, which is considered will be very busy and required 6-8 doctors plus support staff. If both developments proceed, there will be approximately 14,000 new residents requiring these services.</p>	<p>Discussions of health care provision informed with discussions with NHS CCG for Kent and Medway.</p>	<p>No changes proposed</p>
	<p>No care homes available</p>	<p>The policy requires the provision of extra care accommodation to be included within this allocation.</p>	<p>No changes proposed</p>
	<p>Two site promoters identify that the health centre and community hub could be co-located next to local centre, only mention next to sports centre</p>	<p>Agreed. There is flexibility within the policy over the most appropriate location for the health centre which is considered the most effective means of ensuring delivery. The location to be agreed with be determined through ongoing discussions with the CCG and through preparation of the SPDs for each parcel.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>Green Belt</b>			
	<p>There have been over 100 objections to development on Green Belt land. This includes from local residents, omission site promoters and local groups.</p> <p>They consider development on Green Belt land is unjustified: no exceptional circumstances demonstrated. It is questioned whether non-GB land has been explored fully.</p> <p>It will result in significant removals of GB causing harm, and creating corridor of development between PW and Tonbridge, merging settlements (particularly west PW which causes coalescence between PW and Whetsed, and PW and Five Oak Green).</p>	<p>Please see response the STR/1 for details on the Council's response to the exceptional circumstances which exist to remove land from the Green Belt.</p> <p>Please refer to the Green Belt Studies for information on the resultant harm of land to be released from the Green Belt and the Sustainability Appraisal.</p>	No changes proposed
	Not clear what the compensatory improvements might be (edged in blue on Map 27).	It is not considered necessary, or indeed, effective to identify the compensatory improvements within the Local Plan itself. This provides flexibility in delivery the sites. However, discussions with site promoters as set out in the Statements of Common Grounds identify a number of potential measures which provides the necessary comfort that this element of the policy will be delivered. It is anticipated that further details will be set out in subsequent SPDs.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	One of the site promoters suggests the requirement for compensatory improvements should be deleted, as other requirement of the plan do this; sports hub, retaining landscape, etc.	The inclusion of the policy requirement for compensatory improvements is an essential requirement for development in this location where land will be removed from the Green Belt and so the inclusion of this text is considered necessary.	No changes proposed
	A site promoter considers exceptional circumstances exist for Green Belt release; without which, development would be directed towards unsustainable lower tier settlements. Also considers the Green Belt studies robust. Release of western edge allows for a more robust edge to be defined. Dandara’s own GB report aligns with the Council’s. Exceptional circumstances include the provision of development in a sustainable location; flood betterment (which is only feasible through the site redevelopment) and 3) increased implementation of sustainable transport options. If you don’t exclude green belt land and extend further east of PW, the development would be less sustainable.	Comment of support.	No changes proposed
<b>Housing</b>			
	A number of omission site developers, along with local groups consider the housing trajectory for Strategic Sites over ambitious. Process to enable start on site including SPDs, will not allow trajectory to be met. Timetable will be hampered by ensuring mitigation , liaising with stakeholders and other LPAs.	The housing trajectory has been derived through discussions with the Site Promoters; please see signed Statements of Common Ground.  Please also see Housing Supply and Trajectory Topic Paper.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Applying Lichfields Start to Finish to PW would only amount to 1,890 dwellings within the Plan period and a shortfall of 3,750 dwellings. To meet shortfall of housing trajectory should allocate additional sites.		
	One of the site promoters considers the housing trajectory too conservative- suggest 350-390 more appropriate given 4 key house builders. At Knights Park (Dandara scheme in RTW) 70-100 dwellings have been delivered per annum. At Paddock Wood, Dandara expects to commence development 2025/26 and deliver 75-100 dwellings per annum.	Noted.	No changes proposed
	<p>A number of omission site developers, along with local groups consider the overreliance on housing towards Paddock Wood and Tudeley Village; result in a serious shortfall if not delivered. Local Plan isn't supported by work to show how site can be delivered in light of the site constraints.</p> <p>Also, over concentration of homes away from jobs and services to east and south of borough; will not attract people from within the borough just those outside (people who live and work in Cranbrook won't have houses to live in as too little housing planned in that location).</p> <p>Impact on local residents with overconcentration of homes in one part of the borough; focus should be on enhancing and investing into existing settlements/ and services not significant growth.</p>	<p>Please see Policy STR/SS! for response on development strategy in this location.</p> <p>The work undertaken as set out within the Strategic Sites Masterplanning and Infrastructure Study (as summarised in the Strategic Sites Topic Paper) provides comfort that these sites are deliverable. These new settlements will provide a large proportion of housing needs to meet the demand from future generations.</p> <p>The advantages of delivering housing growth through new/ extending settlements, are noted by the Government in the NPPF and allow for significant infrastructure and improvements to be provided to accommodate the growth.</p>	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Result in saturation of market, houses not selling in PW.	Four principal housebuilders are involved in delivering this allocation and they are confident in their approach and the trajectories as set out.	
	Around 25 residents raised concerns over Affordable housing; doubt over whether 40% affordable housing will be met; does not offer affordable prices for most residents in the local community; and being provided to residents outside of borough (Will attract people from London rather than locals. Won't be affordable for locals, and/or first-time buyers.).	The viability assessment undertaken to inform the Local Plan indicates that 40% affordable housing should be viable based on the range of assumptions known at this time. The affordable housing provision will include a fair proportion of social rent / intermediate housing to cater for all housing need.	No changes proposed
	A resident asked why the SHELAA report overlap sites 315 and 51? Site 51 deemed unsuitable by PINS due to flooding, should be acknowledged. Descriptions of two sites are inconsistent.	Within the SHELAA, different parcels of land are submitted through different submissions and these are assessed through each iteration.  Flooding has been comprehensively considered in the consideration of this land for allocation.	No changes proposed
	Land fronting Queen Street (recent permission) should be included in the allocation. Including it will ensure development in a comprehensive way. Land is included on map 27 but not others (inconsistent)	Land is included where it is available and considered suitable for inclusion within the allocation. Please see SHELAA for details on individual sites.	No changes proposed
	CPRE raised concerns that densities are too low (35-38dph); needs to be planned as an urban extension rather than remaining rural even after being built on. Higher density would require less	The proposed density is considered appropriate for this location; and has stemmed from the comprehensive masterplanning of this site as set out in the Strategic Sites Masterplanning and Infrastructure Framework.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>land take. Research by CPRE suggests that higher density, closer to urban cores perform better.</p> <p>One resident has responded concerned about the high-level density of development.</p>		
	<p>Two site promoters and the Town Council (along with some residents) raised an objection to proposed Gypsy and Traveller sites. Disagree with need for G&amp;T provision (see table 11 Policy H9). The site shown at Ledgers Work, Queen Street is unsuitable given location between existing residential properties.</p>	<p>The Council considers there is a need for Gypsy and Traveller sites to meet the need of a family within Paddock Wood.</p> <p>As set out in policy, the location is shown in broad terms.</p>	No changes proposed
	<p>One of the site promoters considers the location of extra care accommodation should be determined through masterplanning stage and through consultation with site promoters.</p>	<p>The location of the extra care accommodation has not been specified within the policy to provide sufficient flexibility in delivering the site. The Council notes through submissions to the Local Plan that there are a number of extra care providers who are seeking sites within the borough and the Council is confident this need can be delivered. The most appropriate location for the extra care accommodation will be determined through discussions between the Council and the site promoters, and further detail likely to be included within SPDs.</p>	No changes proposed
	<p>KCC considers extra or specialist care should go beyond older people and support those with learning/physical disabilities.</p>	<p>See response to Housing Policies.</p>	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Need to consider other housing development proposals in Maidstone borough (e.g. at Beltring adjoining Paddock Wood to the north). Cumulative effects not considered.	TWBC has engaged closely with MBC (and other adjoining LPAs). Please see signed Statements of Common Ground). Cumulative effects considered through the evidence base where required i.e. Transport Assessment.	No changes proposed
<b>Flooding/ SUDs</b>			
	<p>Over 100 responses were submitted raising concerns with building on flood plain. This includes representations from residents, local groups and parish/town councils. Concerns included:</p> <ul style="list-style-type: none"> <li>- removal of trees/vegetation and replacement with concrete, clay soil and low topographies.</li> <li>- Increased flooding (fluvial and surface) in recent years.</li> <li>- Properties built on flood plain will not be able to attain mortgages or insurance.</li> <li>- Incongruous with TWBC declaring a climate emergency. The Council has failed to prepare a suitable evidence base regarding flood risk in Paddock Wood.</li> </ul>	<p>The Council notes flooding is a big concern amongst local residents and local stakeholder groups, with over 100 comments objecting to the allocation on this basis.</p> <p>Flooding has been considered in detail for this allocation, and the issues are well understood. This includes work on the SFRA and detailed technical work which underpins the Structure Plan for growth in this location as set out in the Strategic Sites Masterplanning and Infrastructure Study. This work has included engagement with the EA, who in its response confirms it is comfortable with the allocation in this location subject to detailed site modelling work which would come forward at planning application stage.</p>	No changes proposed
	Concerns were also raised around a lack of robust assessment of flood risk from local groups and residents:	In terms of the presence of nitrates and phosphates in the River Medway, the Council understands Natural England may be looking at water quality in both the Rivers Medway and Swale; it is	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<ul style="list-style-type: none"> <li>-Dismiss Nitrate Vulnerable Zones (identified at Paddock Wood).</li> <li>-Building 60% of local plan of flood risk area is contradictory to para 155, does not meet sequential test (SA approach therefore flawed)</li> <li>- Emerging changes to NPPF which strengthens consideration of flood risk.</li> <li>- seeks to maximise vulnerability of the areas from flooding and makes area less resilient to climate change and more prone to its risk.</li> <li>-Cumulative effect on flooding as not been assessed i.e. T&amp;M development adding flows to Medway.</li> <li>- JBA mapping shows even with conveyance channels, increased flows will result outside the masterplan area and therefore run-off rates ‘better than greenfield rates’ is not demonstrated.</li> <li>- - Based on old data and does not fully consider impact of climate change. Updates to previous flood risk studies are required, e.g. Paddock Wood Flood Alleviation Study.</li> </ul>	<p>systematically doing that for all aquatic European sites. However, at this time the Council understands there are no plans to extend nutrient neutrality to the Medway Estuary. The general view up to now at least has been that while the North Kent estuaries are hypernutrified, the eutrophication (smothering macroalgal growth) that you get in the in other rivers do not happen because of a combination of lower water temperatures, high turbidity and stronger wave action. The Council will continue to monitor this in the usual way.</p> <p>The Level 1 and 2 SFRA provides a sequential assessment of all sites considered for development; please see the Development Strategy Topic Paper. This also considers cumulative effects as required.</p> <p>It is noted that the NPPF 2021 has made changes in relation to flood risk, and new guidance was issued by the EA on 20<sup>th</sup> July 2021. The SFRA and Masterplan modelling has used higher climate change allowances than are required by the latest guidance. The latest guidance potentially indicates that a +27% to +37% flow allowance need only be considered, so the +70% allowances tested to date will display more of a ‘worst-case’ prediction of flood extents and likely impacts of development.</p> <p>If it is deemed that the Upper End allowance needs to be considered, then, again, the current flood modelling has used a larger allowance than is</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		<p>necessary (+70% rather than +62%), and so again will display more of a worst-case prediction of flood extents and likely impacts of development.</p> <p>The EA is satisfied with the conclusions of the flood work in relation to Paddock Wood and East Capel; and further discussions on site specific flood mitigation will take place at planning application stage.</p>	
	<p>Local residents, groups and CPRE consider there is inadequate flood risk mitigation and concern over delivery.</p> <p>Masterplanning work is not sufficient in determining the deliverability of flood modelling. No detail and no costs therefore how is this factored into viability? Will this divert costs from other infrastructure.</p> <p>Proposed mitigation will have no effect on existing properties. Storage parcels to South of masterplan site in east Capel have been removed which would have greatly reduced the flows down the Tudeley Brook.</p> <p>How will TWBC ensure agencies will fulfil their duties when it comes to flooding. Unreasonable presumption that developers will for any flood mitigation measures.</p>	<p>The Council's evidence base in relation to flood risk and drainage is robust. The Stage 1 and 2 SFRA informed the strategy within the Local Plan, and considered all sites considered for development. The approach to the assessment of sites against the NPPF requirements is set out in detail in the Distribution of Development Topic Paper.</p> <p>In addition, JBA prepared a detailed flood modelling technical note to inform the Structure Plan for Paddock Wood and east Capel as set out in the Strategic Sites Masterplanning and Infrastructure Study. This sets out key flood risk infrastructure which needs to be provided and this has been costed and factored into the viability site, confirming deliverability. It has been demonstrated that appropriate infrastructure will provide betterment to existing residents in Paddock Wood, and this is an integral part of the policy which must be delivered.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Flood mitigation should be provided before development commences.</p> <p>No detailed standards/ design codes to make the development resilient to any flooding that may occur despite the flood storage/attenuation/mitigation measures (CPRE).</p> <p>Replacing historic functional floodplain with manmade storage facilities.</p> <p>Unclear to see how further flood defences could be formed given that most of flooding is caused by rainfall due to low absorption of the soil.</p>	<p>Further more detailed flood modelling will be considered at planning application stage, in the usual way. The EA has agreed with this approach as set out in its representations at Reg. 19 stage. It is anticipated that these will be reflected through Design Codes, along with other key matters of consideration such as scale, access and movement etc.</p> <p>TWBC liaise closely with the EA, Upper Medway Drainage Bard and Southern Water. All are members of the SSWG and discussions will remain ongoing on the delivery of the strategic sites.</p>	
	<p>Local residents, groups (inc. Town Council) and CPRE consider there are insufficient detail on betterment solutions/ wider sustainability benefits that outweigh flood risk. Provisions for mitigation are for new development not existing development.</p>	<p>The comprehensive flood risk work undertaken for the Council in its evidence base documents; as highlighted above, identifies some measures which will provide betterment in flood risk to Paddock Wood. Further details will be required to be considered at Planning application stage/ through SPDs; an approach agreed with the EA. The technical note which accompanies the masterplanning work supports this approach.</p>	<p>No changes proposed</p>
	<p>The landowner for Tudeley Brook Farm submitted reps identifying its land to play a key role in mitigating against flood risk.</p>	<p>This site forms part of the allocation for growth under STR/ SS1 (Paddock Wood and East Capel).</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Pg. 146 point 13: reference to "unless Exceptional Circumstances arise" should be removed as creates a "get out clause"	"Exceptional circumstances" sets a high bar for compliance; and its inclusion is not considered to provide an easy route for developers to not comply. Drainage is a key consideration in the acceptability of proposals within Paddock Wood and east Capel and will be scrutinised very closely at planning application stage.	No changes proposed
	The EA submitted a representation saying that once at detailed FRA stage, a development brief to identify flood mitigation is required that can meet and pass exception test.	Please see Statement of Common Ground between EA and TWBC.	No changes proposed
	Natural England supports approach to ensure development is a source of reduced flood risk. Policy requirement for SuDs and Green Infrastructure to be incorporated.	Part 13 of the policy relates to a drainage strategy and part 14 for green infrastructure. Also see Policies EN14 and EN26. Policy considered adequate in this respect.	No changes proposed
	KCC stated that the Drainage strategy policy should promote integration of drainage measures in open space for multi-functional benefits.  Recommend design codes/SPDs for allocation to promote sustainable drainage design with consideration given to water quantity, quality, amenity and biodiversity. Existing watercourses should be retained and maintained	Agree that further information on drainage strategy can be dealt with at SPD stage.	No changes proposed
	Para 5.184: Eldon Way is marshy and not suitable for residential development.	This land is not included within the Local Plan for development. If a scheme was to come forward flood risk and drainage would be considered in line	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		with the statutory development plan and relevant guidance.	
	Paddock Wood flooding from surface water not fluvial. Surface water flooding occurs when small pipes under roads get blocked. This will increase with additional development.	Surface water flooding is considered in the JBA technical notes which is appended to the Strategic Sites Masterplanning and Infrastructure Study.	No changes proposed
	Proposed employment areas have significantly fewer SuDS and Green/ Blue Strategic Landscape Corridors as proposed on northern side of Paddock Wood.	The key requirements of the Policy for Paddock Wood and east Capel equally apply to the northern parcel which includes the employment provision. Provision of green infrastructure, and delivery of SUDs will be key considerations in line with this policy, and policies EN14 and EN26. Further detail will be provided through the SPDs and at planning application stage.	No changes proposed
	Residents, local groups and local Parish Councils consider it unsustainable and ineffective to propose a high level of development in and around a settlement where there are recognised flooding issues without consideration of cross-border issues at the Local Plan stage. Not enough has been done to stop a knock-on effect to surrounding villages and parishes (Increased risk of flooding downstream to Tonbridge, Yalding, East Peckham, Golden Green, etc..	The Levels 1 and 2 SFRA consider flood risk to surrounding areas.	No changes proposed
	Suggestion of reservoir to collect flood water in wet months and supply water in dry months.	There is no identified requirement for a new reservoir to be provided to accommodate this	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		growth. However, the Wetland Park proposed on the north western side of Paddock Wood will be an occasionally used item of flood infrastructure for storage purposes, whilst being in recreational use in the meantime.	
<b>Drainage/ Water Supply</b>			
	<p>There were a number of representations from local groups and residents (c. 30 submissions) stating that the capacity of the foul sewage network should be established at this stage before the Local Plan is adopted.</p> <p>Significant new investment is required and should be detailed at this stage. Current pumping stations at capacity and no detail on new pumping stations and where sewage will be treated, and impact on stretched treatment plant in Tonbridge.</p> <p>No details of Waste Treatment works provision and how this will be delivered.</p>	<p>See Statement of Common Ground with Southern Water which sets out the discussions which have taken place; and the programme for securing works to the drainage infrastructure in its next Business Plan (AMP 8). Southern Water is part of the SSWG</p> <p>Land is safeguarded in Structure Plan for expansion of Waste Treatment works.</p>	No changes proposed
	Southern water stated that sewerage infrastructure has limited capacity to accommodate proposed development: not a constraint to development provided policy and conditions ensure occupation of development is phased to align with delivery of wastewater infrastructure.	See Statement of Common Ground between Southern Water and TWBC.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.</p> <p>Layout should be planned to ensure future access to existing water and/or wastewater infrastructure for maintenance and upsizing purposes.</p> <p>15 metre gap required between any residential units and the pumping stations on site for amenity reasons (noise/ vibration).</p> <p>Odour assessment required for applications for sensitive development within 500 metres of the waste treatment works (amenity grounds).</p>		
	<p>The land owner for land east of Transfesa Way confirms site can be used to increase capacity of expansion of waste water works. (but if no needed should be allowed to be used for Employment).</p>	<p>Noted.</p>	<p>No changes proposed</p>
	<p>SEW states it would need to supply bulk of water for site from north with new water treatment works, and increased transfer capacity. SEW will work with LPA and developers to ensure necessary infrastructure reinforcements is delivered ahead of occupation of development. It is important not to underestimate time required to deliver necessary infrastructure.</p>	<p>Noted.</p>	<p>No changes proposed</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Local residents and groups state there has been a reduction in fresh water supply; major investment from South-East Water and/or the developers required. Lack of detail- evidence needs to be provided that water can be provided.	Discussions with both Southern Water and South East Water have informed the strategy within the Local Plan, and their infrastructure requirements are set out in the IDP.	No changes proposed
<b>Climate Change</b>			
	Lack of provision for addressing impacts of climate change such as increased rainfall. Housing must be built using methods and materials at low or zero carbon input but there appear to be no clear guidelines for developers.	Policy EN2 sets out the targets for sustainable design standards and Policy EN3 relates to climate change mitigation and adaption.	No changes proposed
	One of the site promoters considers at Point 12; rest of text after EN 3 is superfluous and should be deleted.	This is considered appropriate for inclusion by TWBC.	No changes proposed
	Construction is a very polluting industry. Even with low carbon emissions, natural assets are carbon absorbing. Offsetting carbon with trees will take years to achieve.	It is noted that construction within this allocation will cause disruption and there will be impacts on the environment. The applications for significant housing growth are likely to be accompanied by Environmental Statements which assess the environmental impacts of the developments during the construction stage and identify key mitigation required to address this. Construction Environmental Management Plans will also be required as part of any planning application to identify ways to minimise impacts.	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Destruction of land is short-sighted and contrary to objectives that will likely be signed under Parish Agreement/G7/COP26.	The Development Strategy Topic Paper, clearly sets out the approach for determining the appropriate strategy for meeting our housing need, supported by the Sustainability Appraisal. The Council has sought the best strategy possible whilst keeping environmental impacts to a minimum so it can plan for the needs of the future generations.	No changes proposed
	No details of where renewable energy will come from.	See Policy EN3 which sets out requirements for carbon dioxide reduction using renewable sources. Details of potential sources will be considered through SPDs and in the consideration of planning applications.	No changes proposed
	Natural England: Point 5.227 would be stronger with references to national and local net zero carbon commitments and the climate emergency.	Noted, but considered unnecessary given existing cross-reference to other Development Management policies, which should be read alongside.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Fail to see how to achieve zero and low carbon energy with increase in cars on road. Increased local congestion will increase carbon footprint. Proposal will not contribute positively to TWBC being carbon neutral in 2030.</p> <p>Loss of suitable farmland will result in increased importing of food increasing emissions.</p> <p>Concerns about ground shrinkage from Climate change. Clay soil, impacting foundations and subsidence from drying soil.</p>	<p>The Development Strategy Topic Paper, sets out clearly the approach for determining the appropriate strategy for meeting our housing need, supported by the Sustainability Appraisal. The Council has sought the best strategy possible whilst keeping environmental impacts to a minimum so it can plan for the needs of the future generations.</p> <p>Southern Water / EA is aware of the topography of the ground, and that this causes infiltration issues. It is exploring this as part of the DWMP.</p>	<p>No changes proposed</p>
<b>Green Space</b>			
	<p>Loss of open green space, amenity, and number of tranquil footpaths through arable land. Residents will have little space left to walk and enjoy nature. There are insufficient green spaces, and development in areas such as Foal Hurst Wood will make these overcrowded.</p> <p>Local residents consider that there has been no recognition of importance of green space for residents -area north of railway west of Maidstone Rd / fields around PW are popular for walkers. Proposed development needs to improve this.</p> <p>KCC considers it is important to ensure there is an adequate supply of open space, with measures to protect and provide access to existing and new green spaces.</p>	<p>The proposed growth around Paddock Wood and east Capel will be delivered on garden settlement principles. Green space has been fully considered in the development of the Structure Plan and green infrastructure will be a key consideration in the assessment of schemes for each of the key parcels. On the western side a new Wetlands park is proposed to provide recreational amenity for existing residents.</p> <p>Improvements to existing public rights of way will also result from the development; the eastern parcel will bring the Hop Pickers Line back into use and enhancements to existing PROWs are likely to be a key elements of the compensatory improvements to</p>	<p>No changes proposed</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
		the Green Belt for land to the west, which will be removed from the Green Belt.	
	The British Horse Riding Society considers the Wetlands Park should be opened to horse riders to improve recreational facilities.	Noted. This will be considered through the preparation of the SPD for the western parcel.	No changes proposed
<b>Landscape Impact/ AONB</b>			
	Local residents and groups, along with an omission site promoter, raise concerns over the significant and adverse impact of proposals on setting of AONB (and Green Belt), and negative impact on environment, urban sprawl (from Tonbridge to Paddock Wood). Will be hard to mitigate. See Save Capel JFA environmental Report which concludes the development will have a harmful effect on landscape character and openness of the High Weald AONB and Green Belt, which will be hard to mitigate	The Strategic Sites Masterplanning and Infrastructure Report has taken into consideration the Council's evidence base documents on landscape and the Green Belt. These include potential mitigation for the sites that is to be incorporated so that new development relates well to the existing environment, minimises adverse effects and provides significant enhancements and these have been taken into consideration within the report. The Council remains convinced that the allocations are fully justified.	No changes proposed
	PWTC considers the evidence on landscaping disproportionate with too much focus on AONB sites. Paddock Wood is assessed like RTW and Southborough , Tudeley Village is not assessed.	The landscape quality of the AONB is afforded great weight in the NPPF and so rightly it has been the subject of appropriate studies.	No changes proposed
	A site promoter supports provisions within the AONB report and the necessary mitigation measures to minimise impact on setting of AONB.	Noted.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Initial masterplanning work LVIA which supports this approach.		
	A number of residents and local groups (c. 30, along with CPRE) are against the removal of many hectares of economically viable, arable farmland/agricultural land. Self-sufficiency is needed rather than importing food, particularly post-Brexit. Has poorer performing agricultural land been explored?	The Sustainability Appraisal considers various elements of the sites, including the quality of agricultural land, in determining which sites to progress towards allocation. Please see the Sustainability Appraisal and Development Strategy Topic Paper for further detail.	No changes proposed
	Section 5.231 refers to orchards; there are none in the area.	The land around Paddock Wood includes Orchards.	No changes proposed
	<p>Natural England considers Development needs to be sensitively designed, using landscape-led approach informed by AONB Masterplan.</p> <p>Environmental net gains integral part of policy.</p> <p>The SPD should be adopted before planning permission for new development is granted.</p>	Noted. Policies within the plan facilitate this position.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Residents and the Woodland Trust are concerned that the development will result in the loss of Ancient Woodland/trees/scenic landscape. Need to protect and managed in sustainable way.</p> <p>The Woodland Trust welcomes 25m buffer zone around Ancient Woodland but due to size of development larger buffer is required. Concern over inclusion of Whetsted Woods in Masterplan, and impact of infrastructure routes such as Five Oak Green bypass on Ancient Woodland.</p>	<p>The Ancient Woodland within the allocation has been fully considered in the preparation of the Structure Plan as set out in the Strategic Sites Masterplanning and Infrastructure Framework. This will be protected in line with Policy EN13 and the guidance within the NPPF. This policy will also apply to the consideration of planning applications for any new road infrastructure.</p>	<p>No changes proposed</p>
	<p>Development will harm views in and out of historic settlements.</p>	<p>The Landscape Sensitivity Assessment of additional settlements in Tunbridge Wells, Paddock Wood, Horsmonden, Hawkhurst, Cranbrook takes account of the visual context for the settlement and the importance of and effects on views will be covered by the more detailed landscape and Visual Impact assessments that are required by Policy.</p>	<p>No changes proposed</p>
	<p>Concerns with light pollution from development, not clear if street lighting is required on bypasses and cycle routes.</p>	<p>A lighting strategy will be fully considered in the progression of planning applications on the site, and detailed in SPDs, to ensure an appropriate balance between minimising light pollution and maintaining safety. In line with the garden settlement principles the Council is working towards innovative lighting solutions. Any lighting will need to conform with Policy EN8 Outdoor Lighting and Dark Skies.</p>	<p>No changes proposed</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Considered that the Plan is contradictory to policy EN18 (Rural Landscape). Unclear and no evidence produced how policy EN18 relates or supports the strategic site policies. Plans will result in unsympathetic change to important rural lanes and will not conserve or enhance the rural landscape.	The rural lanes which run through the allocation have been considered as part of the masterplanning work set out within the Strategic Sites Masterplanning and Infrastructure Study. The nature of the growth will mean there is significant change to the existing landscape but the impact on the rural lanes have been considered in the masterplanning work, and will be considered through detailed design and planning application stage in line with the statutory tests.	No changes proposed
<b>Biodiversity</b>			
	Residents and a local group do not consider the Plan demonstrates that the development will any way manage, conserve nor enhance biodiversity through net gain. See SC report on Biodiversity. Council studies on ecology not comprehensive.	Please see Biodiversity evidence base Topic Paper for detail of the comprehensive information the Council used to inform the Local Plan process.  Biodiversity net gain is required through Policy EN 10, which requires further detail studies to demonstrate a minimum 10% net gain in biodiversity. Further information on how this will be achieved is set out within the Statement of Common Grounds with the key site promoters; and will be set out through SPDs. It is not considered necessary to stipulate how this will be achieved through policy as flexibility should be maintained in this regard.	No changes proposed
	A number of residents and CPC object to loss of space for wildlife/ endangered species. Little mitigation identified. Wetlands as proposed in East	The Council has determined its development strategy by seeking to direct its housing development to the most sustainable locations. Ecological surveys will be required to accompany	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Capel are no alternative to field and woodland fauna and flora.	planning applications, and mitigation measures put in place.	
	Habitat and movement will be severely restricted at Whetsted Wood which is vital to wildlife.	The Ancient Woodland within the allocation has been fully considered in the preparation of the Structure Plan as set out in the Strategic Sites Masterplanning and Infrastructure Framework. This will be protected in line with Policy EN13 and the guidance within the NPPF. Policy EN 10 will also apply.	No changes proposed
	Increase in pets (cats and dogs) resulting from development will disturb local wildlife.	The effects of domestic pets on wildlife are taken into consideration as part of ecological assessments and mitigation proposals and where necessary are secured by condition/legal agreement.	No changes proposed
<b>Heritage</b>			
	Both CPC and PWTC, along with local residents consider the Plan has failed to adequately assess the impact on heritage assets and their setting, with no assessment in line with NPPF requirements. For example no ref. to 1&2 Eastland Cottages and plan hasn't taken into account Badsell Manor, Mile Oak Hamlet. Grade II listed houses will be surrounded by new developments, essentially ruining the outlook over historic farmland.  Masterplan lacks detail on heritage matters.	The Strategic Sites Masterplanning and Infrastructure Study considered the heritage assets within and in close proximity to the area planned for growth; and responded to these accordingly within the Structure Plan. This took on board the conclusions of heritage reports prepared by the site promoters which were provided as evidence base documents.  Further detail will be progressed through SPDs, and planning applications will be determined in line with the statutory tests relating to heritage assets.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Tudeley/Capel are typical Low Weald hamlets recognised as retaining vernacular character and local distinctiveness. Proposal will impact on this character and visually impact on setting of these historic settlements.</p> <p>See Save Capel Heritage Report.</p>	<p>The Council note Historic England is satisfied with the heritage evidence base to the Local Plan.</p>	
	<p>Dandara’s Heritage works concludes impact on Badsell manor group of heritage assets can be effectively mitigated through the masterplanning and any harm would be at the lower end of the less that substantial. This should be weighed against the significant benefits the scheme would bring.</p>	<p>Noted. As mentioned above, when it comes to planning applications these will be considered against the statutory tests for developments affecting a heritage asset.</p>	<p>No changes proposed</p>
	<p>CPC and a local group consider the proposals do not recognise the historic nature of Capel parish as a settlement distinct from PW. Strategy makes no mention of heritage protection or enhancement. Para 5.154 refers twice to “the town”. Capel is not part of Paddock Wood Town.</p>	<p>The proposals for growth around Paddock wood and east Capel seek to integrate the settlement within the existing town of Paddock Wood, so the expanded settlement becomes a garden settlement.</p> <p>Policies EN4 and EN5 relate to the Historic Environment and Heritage Assets which will be applicable to any development; further the council must take into consideration the Planning (Listed Buildings and Conservation Areas) Act 1990.</p>	<p>No changes proposed</p>
	<p>Lack of assessment of historic Hop Pickers Line. Concerns from residents that this is not being retained in the development.</p>	<p>The policy specifically requires the integration of the Hop Pickers Line as part of the redevelopment of the eastern parcel (Part 9). Detail on how this will</p>	<p>No changes proposed</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
		come forward and be integrated with the developed through SPDs and at planning application stage.	
	Little heritage left due to granted permissions, retain what little is left for future generations.	The proposed developments will be to consider the heritage assets in line with Policies EN4 and EN5 and the statutory tests.	No changes proposed
<b>Access and Movement</b>			
	CPRE supports schemes for walking and cycling and note that existing train facility in PW. Off road cycle routes need to be created, otherwise people will not cycle.	Modal shift away from the private car forms a key consideration in the masterplanning of land at Paddock Wood and east Capel. The Strategic Sites Masterplanning and Infrastructure Study has taken into consideration the recommendations of the Council's LCWIP and sets out the broad network of pedestrian/ cycle and bus routes within the Structure Plan. Sustainable movement links will be developed through the SPDs and planning applications on the site, and a key policy requirement for schemes coming forward.	No changes proposed
	A site promoter: Part 2(h) of the policy makes reference to being able to access strategic settlements by foot or by bike. It disagrees that this is certain based on masterplan and should include the words “where possible, practical and appropriate”.	The policy makes it clear that travel routes/ links through the new settlements are integral to the development and a fundamental element to the settlement being delivered on garden settlement principles. It is considered that such links are essential to making development acceptable.	No changes proposed
	The site promoters on land to the west of Paddock Wood argue that the railway crossing within western parcel is aspirational and not required. Need to	See Statements of Common Ground between TWBC and Network Rail, TWBC and Dandara, and TWBC and Crest Nicholson.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	ensure its inclusion passes the CIL 122 tests. If included, onus needs to be on Council not individual developers to cross rail line. Suggested wording to part 2(i) of policy	Amendments are sought to the policy requirement for this link (part 2(i)) so it makes clear that the delivery of this is subject to agreement with Network Rail and will be delivered by the Council. TWBC accepts delivery is dependent on third party support and is engaging positively with Network Rail in this regard. TWBC disagrees that changes are required to the policy as the provision of this connection is an important element for development in this location; the policy requirement should be firm in this regard. TWBC also does not consider it precludes development coming forward on the land controlled by Crest Nicholson or Dandara if negotiations with Network Rail become protracted, nor does it stipulate that Crest Nicholson or Dandara, or indeed the Council, should deliver this.	
	A site promoter considers the bus routes as shown are deliverable but policy should make clear that the detail will be determined at detailed design stage.	TWBC is engaging with KCC public transport but it is agreed that detail will be determined through SPDs and at planning application stage. Notwithstanding this, it is not considered necessary to amend the policy.	No changes proposed
	A site promoter and the Town Council supports LCWIP principles (Dandara confirms it can accommodate on site.)	Noted.	No changes proposed
	Not realistic to expect people to cycle on dangerous roads or in poor weather or to use public transport.	Full consideration to improved cycle links forms part of the Council's LCWIP; the principles of which have	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Cycle lane from PW to Tonbridge would be beneficial.	been taken into consideration in the formulation of the Strategic Sites Masterplanning and Infrastructure Study. The policy requires cycle links, and it is anticipated that further detail will be dealt with through SPDs and at planning application stage.	
	Two site promoters consider the bus routes shown on Map 28 should be the subject of a safeguarding policy to make clear that this land needs to be safeguarded for this purpose to deliver the strategic allocations.	The routes are shown in indicative terms on the Policies Map which is considered sufficient to demonstrate the intention for new road links as set out through this policy, and the policy requires this as part of an application. Further, the Council's commitment to use CPO powers if required is set out in the Policy.	
<b>Transport</b>			
	Proposed allocations at Tudeley Village, East Capel and Paddock Wood, either in isolation or cumulatively, will result in cumulative residual impacts on the road network which are severe, and unacceptable impacts on highway safety. Planning permission will not be granted therefore as will fail the NPPF test. A large number of residents (over 60 submissions) and local groups raised concerns over the increase traffic will cause increased congestion on already congested roads, increased air pollution, road safety issues.	The Transport Assessment has been supplemented with additional sensitivity testing by Sweco. The transport evidence proposes measures that promote modal shift and, where relevant, infrastructural improvements to the highway network. Both KCC/NH have given their commitment to continue to work with TWBC to finalise and agree the further sensitivity testing. Outcomes will be reflected in further SoCG with both KCC/NH.	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Two site promoters consider the cost of delivering the Five Oak Green Bypass relates to delivery of Tudeley Village, not Paddock Wood. This needs to be made clearer in the policy. Whilst acknowledged that PW may need to make a proportional contribution the policy, as worded the policy suggests it is required for PW. See also STR/6.</p>	<p>The supporting text at 5.190 is clear on the position. Notwithstanding the general principle that the overall strategic growth warrants the highway and related improvements along the A228 and Five Oak Green Bypass, highway modelling shows that the growth at Tudeley Village (and to a more limited extent that at Paddock Wood and east Capel) would increase traffic through Five Oak Green. The Five Oak Green bypass is largely required to alleviate issues caused by strategic development at Tudeley Village and the viability assessment shows that this can be delivered wholly by the Tudeley Village Garden Settlement. The improvements to the A228 should factor in connections to the Five Oak Green bypass on delivery.</p> <p>The assignment of contributions will be further refined through the SPDs and the inclusion within policy is considered appropriate at this time.</p>	<p>No changes proposed</p>
	<p>Colts Hill bypass requires all developments to come forward which presents a risk, as if one site doesn't come forward, funding not secured.</p> <p>Unclear how funding will be secured for this in medium term against housing trajectory.</p> <p>Concern funds for phase 2 of Colts Hill bypass from KCC will not be made available. Delivery uncertain, and queries over funding, especially if KCC and TWBC disagree.</p>	<p>The evidence base to the Local supports the delivery of the allocation. TWBC is discussing the delivery of this infrastructure with Homes England in terms of forward funding. TWBC and KCC are also working together on the delivery of the identified mitigation.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>A site promoter requires further evidence that Colts Hill Bypass is needed and directly related to growth around PW (CIL 122 Regs). Information needed on how costs will be apportioned, and the promoter supports the Council seeking funding bids to aid delivery.</p> <p>Also seeking clarification as to why Colts Hill improvements were incorporated into the Paddock Wood scenarios of the Local Plan in first instance. In line with NPPF, sustainable modes should be applied first. Unclear whether the TA looks at the whole of the CH off-line work or the part on/ off-line works advocated through the plan.</p>	<p>The transport evidence base documents, along with the Strategic Sites Masterplanning and Infrastructure Plan identifies the Phase 1 Colts Hill Bypass scheme is required to accommodate the growth planned. This is in addition to the clear modal shift being sought through the development.</p>	<p>No changes proposed</p>
	<p>Residents and local groups state that no significant proposal for public transport, and how it will be funded. Existing bus service is extremely irregular and expensive. This will increase car trips and new residents will not be able to walk to essential services and infrastructure.</p>	<p>The Strategic Sites Masterplanning and Infrastructure Study provides for a bus link through the settlement and assigns costs to this accordingly. TWBC is also working closely with KCC public transport team in delivering this allocation.</p>	<p>No changes proposed</p>
	<p>Residents and local groups note that Network rail is at capacity now; concerns no capacity for additional commuters, along with insufficient parking at station (both PW and Tonbridge).</p>	<p>Please see Statement of Common Ground with Network Rail. Network Rail has confirmed there is capacity for the growth along this rail line.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		New cycle parking provision at both Tonbridge and Paddock Wood railway station is included within the Infrastructure Framework for the Strategic Sites.	
	Bus network centred around travel to and from Paddock Wood town centre and railway station may not be economically viable enough to develop and sustain a regular enough service with long enough operating hours to significantly reduce car journeys.	This infrastructure has been identified and money assigned. Discussions with KCC Public Transport team is underway in terms of delivering this in an appropriate manner.	No changes proposed
	<p>A number of queries have been raised regarding TA from local residents and groups:</p> <ol style="list-style-type: none"> <li>1. Have housing developments been modelled against origin and destination traffic criteria to establish extent of spare capacity on existing highway (1)?</li> <li>2. Increased traffic via Matfield/Brenchley to get to A21. The provided figure of 3% increase from development is flawed (Stantec report 6.6.2) (2)</li> <li>3. Cross Borough traffic movements have not been considered (YPC).</li> <li>4. Colts Hill bypass will increase traffic to Yalding Parish (YPC)</li> <li>5. Inaccurate / optimistic assumptions</li> <li>6. Cumulative impact not included for developments in TMBC and MBD</li> <li>7. Highway modelling based on delivery of key infrastructure when timeframes for delivery</li> </ol>	<p>The Transport Assessment has been supplemented with additional sensitivity testing by Sweco. The transport evidence proposes measures that promote modal shift and, where relevant, infrastructural improvements to the highway network. Both KCC/NH have given their commitment to continue to work with TWBC to finalise and agree the further sensitivity testing. Outcomes will be reflected in further SoCG with both KCC/NH.</p> <p>In respect to funding, the trajectory of delivery and associated funding has been factored into the viability assessment for Strategic Sites.</p> <p>Both KCC/NH have accepted the use of pre-COVID survey data.</p>	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>based on funding being available is unknown.</p> <p>8. Out-of-date data is being used in assessing traffic (due to COVID changes) (3)</p>		
	<p>A number of concerns from local groups and residents over mitigation:</p> <ol style="list-style-type: none"> <li>1. No road improvements proposed (other than Five Oak Green bypass).</li> <li>2. Concerns with highway safety with increased road usage.</li> <li>3. No traffic wardens to monitor parking on double yellow lines and double parking.</li> <li>4. The two junctions on the A228, the ‘Hop Farm’ roundabout and the Branbridges Road/Boyle Way roundabout, have both been assessed as being over capacity and yet mitigation is only proposed for one of them (YPC).</li> <li>5. No consideration/ mitigation for surrounding parishes- concern over traffic to West Peckham for example.</li> <li>6. Due to inaccurate assumptions in TA, mitigation not sufficient and queries over deliverability.</li> <li>7. Some roads still remain 101-102% over capacity with mitigation and so development cannot be effectively mitigated.</li> <li>8. Insufficient mitigation to assist in congestion at Tonbridge which is already an issue.</li> </ol>	<p>The Transport Assessment has been supplemented with additional sensitivity testing by Sweco. The transport evidence proposes measures that promote modal shift and, where relevant, infrastructural improvements to the highway network. Both KCC/NH have given their commitment to continue to work with TWBC to finalise and agree the further sensitivity testing. Outcomes will be reflected in further SoCG with both KCC/NH.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>9. Unclear how many of the infrastructure interventions identified as necessary for Tudeley Village are not also necessary for East Capel/Paddock Wood e.g. B2017 (west and Five Oak Green). This means that NPPF para 108 cannot be demonstrated as problems will still exist</p> <p>10. Works proposed on B2017/ Hartlake bridge are not enough to cope with increase in traffic in this location. Conflict between widening B2017 and protecting orchards as mentioned in SS Topic Paper</p> <p>11. Limited options for traffic management around the area. Many roads narrow and unable to be widened due to flood management ditches and railway bridges. Network Rail confirmed they will not be widening bridges to support more road traffic</p> <p>12.</p>		
	<p>Local groups state that TWBC transport evidence base has significant inconsistencies between reports which claim to be assessing the same matters (Stantec Access and Movement Report for Paddock Wood/East Capel and Tudeley Village and the SQW report as to the extent of internal and external movements).</p> <p>The allocation and timing of infrastructure between Masterplanning Report, the Stantec Study and the Sweco Study and the Viability Assessment are so great as to render the Viability Assessment otiose.</p>	<p>The Sweco report forms the transport evidence base document to the Local Plan.</p> <p>Stantec advised DLA in transport matters for the Strategic Sites Masterplanning and Infrastructure Study, and liaised closely with Sweco in the assessment and strategy around the Strategic Sites.</p> <p>The mitigation measures identified through the transport work has been identified in the infrastructure schedule which forms part of the</p>	<p>No changes proposed</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
		Strategic Sites and infrastructure study which has been subject to the viability assessment.	
	Five Oak Green bypass will have negative environmental impact and impact school.  One representation suggested waiting until after development to assess situation and if needed.	The precise location and detailed design of the Five Oak Green bypass has not been determined. This will be subject to a full Environment Impact Assessment and any necessary mitigation incorporated.	No changes proposed
	Parking: Insufficient provision for visitor parking.  Lack of parking will increase parking on surrounding roads. Further increasing congestion.	Parking standards for the strategic sites to be agreed with KCC on a bespoke manner and set out in SPDs.	No changes proposed
	Delivery of Phase 2 Colts Hill and whether this will be held back due to Five Oak Green bypass.	Both the delivery of the Five Oak Green bypass and Colts Hill bypass have been identified, costed and run through the viability model.	No changes proposed
	Concern over road safety with increase traffic (increase in accidents since Mascalls).	Road safety has formed a consideration in the Transport Assessment.	
	HGV traffic concerns from construction and cumulatively with impacts from Quarry: road infrastructure is rural and narrow and therefore unsuitable for HGVs. New quarrying will create 120 HGV movements per day on A228.	HGV movements during and after construction will be considered through the planning application stage and any associated Environmental Statement. Appropriate mitigation will be put in place.	No changes proposed
	Details required on how to align the delivery of transport mitigations with the delivery of housing.	Details over delivery are being considered by TWBC at this current time. Discussions with Home England	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	FOG Bypass, A228 Bypass, and complete network of pedestrian/cycle routes and bus routes should be completed before occupation of development. Considered this should be advance-funded by public purse. No mechanism identified to explain how this will be achieve, nor is there a commitment by TWBC that the public purse will be made available to cover shortfall in infrastructure early in plan period.	are taking place to understand if funding is available as bridging loans to deliver the infrastructure.	
	Significant increased demand for local school places will increase traffic issues during dropping off and collection times.	The traffic associated with the proposed schools have been factored into the Transport Assessment.	No changes proposed
	The site promoter of land at Lucks lane raises an objection to proposals for Lucks Lane to be converted in its entirety to a pedestrian/cycle route. The existing Lucks Lane/Maidstone Road junction should be retained as the main access point for the Swatlands Farm site.	This is not a requirement of the Local Plan. Notwithstanding this, Lucks Lane is a rural lane, and if this can be retained for pedestrian and cycle use only, meeting the sustainability objectives for the growth around Paddock Wood and encouraging a modal shift, this would be the Council's preference. However, it is recognised in highway terms this may not be appropriate and this will be discussed with all parties through the preparation of an SPD/ determination of a planning application.	No changes proposed
	Limited public transport facilities, and therefore not a sustainable location.	The development strategy identifies why this location is appropriate in transport terms. The policy facilitates a town wide network of paths to the railway station and beyond, along with a bus link. It is considered a very sustainable location.	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
<b>Commercial</b>			
	Two site promoters consider that the planning applications which include commercial provision should be subject to a retail impact assessment to demonstrate that there will be no significant adverse impact on Paddock Wood town centre.	The NPPF stipulates that the application of the retail tests (Sequential and Impact) only apply to applications outside of a defined centre. The Council is looking to allocate around 2,000 sqm of floorspace across the allocation, in line with the recommendations of the Nexus Retail Study.	No changes proposed.
	CPRE notes that the garden settlement will contribute to the opportunity for ambitious investment into the PW town centre. Is that development expected to make financial contribution to the Paddock Wood town centre regeneration plan or is this simply based upon the expectation of increased economic activity for PW businesses?	At this stage, no contributions are expected from the planning applications for growth within this allocation to contribute to the town centre regeneration; these schemes already have a fairly significant infrastructure expectation. However, the economic growth is expected to provide a stimulus to investment into the town; and the Council will continue to explore funding opportunities when available.	No changes proposed
	Provision for additional supermarket is required.	The conclusions of the Nexus Retail study has been considered in the Policy requirement for commercial floorspace. Each parcel is expected to deliver a neighbourhood centre to meet top up shopping needs; and the policy allows for the provision of a medium size foodstore within the north western parcel if demand allows.	No changes proposed
	The 2000 sqm requirement for local centres doesn't include amount of land needed therefore how does it tally to 2016 employment study?	The 2000 sqm floorspace figure has been derived from the Retail Study prepared by Nexus.	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	A site promoter comments that the approach to local centre shouldn't be based on a specific quantum but should be focused on colocation of uses, open spaces, transport interchanges etc. not fixed by boundaries so that they become stagnant and obsolete but fluid.	The floorspace stated in the policy is a guide which is considered necessary to ensure the neighbourhood centres serve a local need and do not detract from the vitality and viability of Paddock Wood town centre. Notwithstanding this, the policy is sufficiently flexible to enable site promoters to consider the best approach to how this can be delivered to serve a local need and the Council would anticipate further details to be considered through SPD and at planning application stage.	No changes proposed
	One of the site promoters supports neighbourhood centre in its parcel for good place making but who will deliver.	See Statement of Common Ground between TWBC and Dandara. It is expected that the site promoters will deliver the neighbourhood centres in their respective parcels.	No changes proposed
<b>Employment</b>			
	Insufficient planning for employment, TWBC not stimulating employment in PW areas. Concerns that wholesale/distribution and logistics sectors will continue to dominate employment provision in PW.	Land within the northern parcel is allocated for c. 11 ha of employment floorspace. This is being reflected through an expansion of Paddock Wood's Key Employment Area.  A mix of employment uses will be sought, through high quality schemes will good access to Paddock Wood town centre, railway station and surrounding residential areas, to attract a range of different employment uses.	No changes proposed
	Supports reducing car usage, with new employment.	Sustainable transport links to the employment areas from the town centre, railway station and	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
		surrounding residential areas are integral to the development of further employment uses as required by policy.	
	Not clear if viability work has been taken on board for the employment sites, but should be noted there are some constraints to developing land e.g. Biodiversity etc.	The viability assessment looked at the allocation as a whole, including other non-retail uses including retail.	No changes proposed
	Lack of detail in the policy on the amount of land required or the type of employment floorspace.	The supporting text to policy ED1 provides the relevant detail on quantum and type of floorspace. The land is designated as a KEA. The DLA Masterplanning work looked at capacity of employment sites. Further information will be set out in the SPD for the northern parcel.	No changes proposed
<b>Public Rights of Way</b>			
	The access to open countryside for residents living on Maidstone Road (north of RW) is being moved 20min walk away resulting in negative impact on wellbeing. No safe crossing of A228 for walkers at Tudeley Brook Bridge.	Pedestrian and cycle linkages form an integral part of the delivery of this site in line with the garden settlement principle, and this is reflected in the policy. This also includes the provision of safe access across the railway line.	No changes proposed
	Loss of panoramic views along Eastlands Lane (South).	It is noted that the landscape will significantly alter on the land around Paddock Wood. Landscaping evidence which underpins the Local Plan has been considered in the Structure Plan for the growth, and mitigation measures incorporated accordingly. This matter will be further developed through SPDs.	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	KCC considers the PRow network should be mentioned within this policy.	Noted. The Policy sets out in point 9 that the design of the scheme should provide good levels of permeability, including walking & cycling linkages. In addition, the supporting text to the Policy sets out cross reference to Policy TP 2: Transport Design and Accessibility which the approach for positive outcomes for PRowS, including improving connectivity and securing contributions. No change proposed.	No changes proposed
	British Horse Riding Society notes that there is no provision for new public bridleway or off-road horse-riding routes to compensate for the additional vehicular traffic.	This will be considered through SPDs and planning application stage.	No changes proposed
<b>Masterplanning</b>			
	Use of masterplanning does not provide the details now and it will all be provided later.	TWBC considers that the scope of the Masterplanning work undertaken to date is appropriate for this stage of the Local Plan process. It provides comfort that the allocation can provide the quantum of development envisaged; the infrastructure required to deliver the growth based on garden settlement principles and it can be delivered on viability grounds.	No changes proposed.
<b>Recent Development</b>			

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Concerns from local residents that mistakes from recent development (e.g. Mascalls) will occur again with Local Plan proposal (lack of infrastructure, flooding, sewage treatment, removal of trees). Local residents do not consider that infrastructure will be secured with three recent housing developments. Concerns it will happen again.	The Council has masterplanned the growth around Paddock Wood and east Capel, and has a comprehensive infrastructure framework to deliver the growth against garden settlement principles.	No changes proposed
	Need for 2/3 bed housing and affordable housing; already approved development did not help resolve this.	The policy requires a mix of housing types to be delivered on the site; and the mix of both market and affordable housing will be determined in close conjunction with the Council's housing department to determine the most appropriate mix.	No changes proposed
	The site promoters consider Part 3) housing mix, need to add after 40% "subject to viability or in accordance with H3" or further wording to tie the policy to H3.	The policy requires the delivery of 40% affordable housing "... in line with the requirements of Policy H3". This is considered sufficient.	No changes proposed
<b>Community Centre/ Sports Hub</b>			
	Two site promoters consider further information required re. k) and what it means by the provision of a community hub ad where will be positioned.	It is accepted by TWBC that a new community facility is required within Paddock Wood, and provision is made within the Strategic Settlement to provide this. The land at Memorial Field is included within the allocation, and the Council has resolved to grant planning permission (subject to SoS call in) for a facility in this location. However, flexibility over	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
		location is considered necessary in case this location is not bought forward.	
	Local residents raise objection to Memorial Field being allocated for new community centre. Ballot arranged by PWTC was that community centre at Memorial Park was inappropriate in proposed location. This has not been taken into account.	TWBC has granted planning permission for a community centre on land at Memorial.	No changes proposed
	PWTC and some residents consider the sports hub is in wrong location and will create additional congestion. Too far outside of PW for people to walk to. Land opposite Transfesa Road is more suitable as progressed historically by PW NHP	The form and location of the sports provision for the growth around Paddock Wood has been considered through the comprehensive masterplanning work for this allocation. The Strategic Sites Masterplanning and Infrastructure Framework sets out the options considered for the sports hub and its conclusions are endorsed by TWBC who considers the approach to combining the formal sports provision to the south west parcel is appropriate.	No changes proposed
	Supports swimming pool but no guarantees this will be provided.	The policy allows this to be provided, and the initial viability work demonstrates this is deliverable. The form of the sports provision on the site will be subject to ongoing discussions with the Council's sports and leisure department.	No changes proposed
	Two site promoters note that the population growth only yields need for half swimming pool, so additional funding needs to be investigated in line with CIL Regs.	The Council will only request contributions which meet the requirements of Part 122 CIL Regs. No changes are considered necessary to the policy.	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Inclusion of word “could” is unclear. Need to untangle what is proportionate in line with CIL 122 and what is aspiration for TW i.e. swimming pool.		
	<p>Dandara confirms land for sports hub is available if considered appropriate. In any event it can meet its on demand, and therefore up to the council to justify the need, provision, location, and public transport connections.</p> <p>Need to consider implications for Putlands. Is this better located and would investment instead be an option.</p> <p>Need specific mention to sports hub needing to form part of equalisation agreement and provision of land being Dandara’s share.</p>	<p>Please see Statement of Common Ground between TWBC and Dandara.</p> <p>The consideration of existing and future leisure provision is being considered by the Council’s Sports and Leisure department.</p>	No changes proposed
	CPC not consulted about sports hub being located in east Capel	The decision to locate the sports hub has been determined through the Strategic Sites Masterplanning and Infrastructure Study as identified above. Capel PC was involved in a consultation session on the plan, and the SSWG where updates were provided.	No changes proposed
<b>Quarry</b>			
	A local group notes that one condition on recent approval is that mineral extraction from other sites will have to be operated consecutively after the mineral extraction has been completed. Could	The policy highlights where mineral extraction may be an issue, and this has been discussed in close conjunction with the site promoters. Through early	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	cause significant delays to proposed phasing of housing and infrastructure.	engagement with KCC and the developers this should minimise any risk to delivery.	
	A site promoter considers a ref. should be added to “through a minerals assessment report” at point 11 of policy.	This is not considered necessarily. It may be that a mineral assessment report is not required through discussions with KCC Minerals.	No changes proposed
	Two site promoters consider it is an unsound requirement for developers to extract minerals. As such, reworded to say where “practical, viable and feasible to do so” in line with South Oxfordshire LP recent examination.	Policy DM7 of the Kent Minerals and Waste Local Plan 2013-30 (adopted 2020) deals with this and the development plan is read as a whole – no change proposed.	No changes proposed
<b>Amenity</b>			
	Additional noise and air pollution. Mud on roads; dust; distribution from development; roadwork all impacting residents; disruption for 15-20 years; impact on wellbeing.	The Council accepts growth at this scale will cause disruption for local residents. As part of any planning application, a construction management plan will be required which will set out measures which seek to minimise this as far as possible.	No changes proposed
	If light pollution is proposed to be mitigated by reducing lighting density throughout the settlement, this would no doubt lead to more crime as has been the case in other “Garden Settlements”.	A lighting strategy will be fully considered in the progression of planning applications on the site, and detailed in SPDs, to ensure an appropriate balance between minimising light pollution and maintaining safety. In line with the garden settlement principles the Council is working towards innovative lighting solutions will be considered.	No changes proposed
<b>Design</b>			

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	A site promoter for employment development mentions that need for DSE input should be proportionate to the scale and nature of scheme and the policy should reflect this. Input at both pre-app and post-submission stages for all applications within the SS1 masterplan area may not be necessary.	Design South East can play a valuable role in the consideration of applications and providing expert advice on delivering high quality schemes in this location. Panels can be tailored to the size of the scheme and the council considers it is an essential element of the delivery of exceptional quality schemes which it will be pushing for in this location.	No changes proposed
<b>Delivery and Infrastructure</b>			
	Two site promoters note that there are some inconsistencies with the IDP, Viability Assessment and Strategic Sites Infrastructure and Masterplanning Framework. A simple table of priorities would assist infrastructure delivery.	The Strategic Sites Masterplanning and Infrastructure Study identifies the required infrastructure to accommodate the growth. Further work is being undertaken to understand trigger points for delivery on key items of infrastructure.	No changes proposed.
	Two site promoters set out that SPDs should be bought forward in tandem with any future applications to ensure what is being proposed is deliverable and to ensure the housing trajectory can be met. Policy text should be amended to reflect this position, so the expectation is not that these are prepared ahead of application submission.	The Council agrees that SPDs will be produced through close liaison with the site promoters as they develop more detailed masterplan layouts for the site. No change is considered necessary however to the policy to reflect this; it does not say that these must be in place prior to applications being submitted.	No changes proposed.
	An omission site promoter says that possible use of CPO, SPD, the fact that both allocations will require significant input from multiple landownerships and rate of delivery will depend on market absorption rates brings into question the deliverability of the site.	Please see Strategic Sites Topic Paper.  The delivery of this allocation has been carefully masterplanned and considered. The infrastructure has all be identified and the Viability Assessment confirms this is deliverable.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	CPRE has concerns about delivery, if any of the parcel stalls, housing need would not be met.	The Council is working closely with the principal housebuilders and other key stakeholders to deliver the sites; through the SSWG for example. Please see s of Common Ground with the developers for further information.	
	PWTC considers there is a Lack of detail on equalisation brings deliverability into question.	This level of information is considered appropriate for this stage of the Local Plan process. TWBC is working closely with the site promoters to deliver the sites.	No changes proposed
	A site promoter considers making ref. to equalisation agreements is not a policy matter. Should simply say a consistent and transparent approach, liaising with each promoters.	TWBC considers reference to this is required in the policy for completeness.	No changes proposed
	<p>Some of the promoters within the allocation disagree over requirement for an SPD:</p> <ol style="list-style-type: none"> <li>1. Baarth Haus and Interleisure (garden centre site) consider a SPD is unnecessary and will delay delivery (BH in particular under tight timeframes to fund the relocation of its business).</li> <li>2. Crest is concerned that waiting for SPDs to be adopted may cause unnecessary delays in delivery, particularly given suggested timetables and amount of work required to</li> </ol>	<p>SPDs are considered an important element in delivering the growth against garden settlement principles and developing detail on a number of measures as set out in the policy. These will be delivered in close conjunction with the key site promoters, to reflect ongoing detailed technical studies which they will be carried out.</p> <p>Given the importance of the SPDs in delivering the sites it is considered that the text should remain within the policy.</p>	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>be undertaken. Text in policy should be removed to supporting text re. SPDs.</p> <p>3. Dandara: Committed to masterplan approach and SPD for Western parcel</p>		
	<p>A small site promoter considers there is a need to ensure all promoters work together in delivering the allocation. Charterhouse land is a key piece of the jigsaw in terms of delivering linkages or flood mitigation.</p> <p>Concerns over lack of mechanisms to support infrastructure provision. Its site can play a key role in delivering sustainable linkages and to ensure Garden settlement aspirations are achieved.</p>	<p>Agree that all site promoters need to continue to work together. TWBC will continue to facilitate such discussions.</p>	<p>No changes proposed</p>
	<p>A small site promoter considers it is wrong to leave detail over infrastructure deliverability to SPDs, as should be open to scrutiny at examination.</p>	<p>The infrastructure required to deliver the growth is set out in the Strategic Sites Masterplanning and Infrastructure Study. Additional work is required, and will be carried out imminently, on the trigger points for delivery of key items to help aid delivery expeditiously.</p>	<p>No changes proposed</p>
	<p>A resident does not consider that deliverability has been baselined against existing conditions.</p>	<p>The deliverability of the growth around Paddock Wood is assessed through the Strategic Sites Masterplanning and Infrastructure Study and the Viability Assessment, both evidence base documents to the Local Plan.</p>	<p>No changes proposed</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
<b>Garden Settlement Principles</b>			
	<p>PWTC considers the Ref. to Garden Settlement principles is unjustified. Question how these have been considered in evidence base.</p> <p>Questioned whether delivering garden settlement infrastructure measures have been considered in viability. No concrete measures for delivering garden settlement principles.</p>	See DLA Strategic Sites and Infrastructure Study. All infrastructure has been considered in the viability assessment.	No changes proposed
<b>Delivery: Site Promoters</b>			
	Baath Haas Supports inclusion within the STR/SS1 allocation for housing delivery. Confirms the site is available for delivery of housing. Also supports inclusion of employment area and exclusion of Hop Pickers Line from the employment area.	Noted. Support.	No changes proposed
	Chaterhouse Supports in principle STR/ SS1	Noted	No changes proposed
	The owners of Tudeley Brook Farm support Policy STR/SS1 and acknowledge the site they own will play a key role in the green/ blue corridor. However, feel the land needs to be sold to ensure the development is build out in a sustainable manner, and this should be stated in the policy. Too much emphasis on larger land owners and not the smaller land owners in evidence base document.	Noted. Tudeley Brook Farm form part of the SSWG.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>The owner of the garden centre site welcome the masterplanned approach to Paddock Wood and welcome the inclusion of employment uses within the growth area. Confirms garden centre site is deliverable for employment or retail purposes. But no ref to garden centre site in the policy of supporting text.</p>	<p>Minor Modification to Map 28. The garden centre site is in the wrong tone; to be amended to reflect the Policies Map.</p>	<p>Insert amended plan.</p>
	<p>Crest Nicholson agrees with evidence base that developing around Paddock Wood is a good sustainable option. Close to facilities, facilitates business growth, and can provide flood mitigation. Should allow a more flexible approach to allowing individual applications to come forward from those with diff land interests to ensure trajectory can respond to required flexibilities.</p>	<p>Support is noted.</p> <p>The policy makes clear that the Council anticipates separate planning applications coming forward reflective of different landownerships. No further change considered necessary</p>	<p>No changes proposed</p>
	<p>Dandara supports the approach STR/SS1, and the provision of housing, local centre and sports hub on land within its control. Confirm Dandara should be able to progress its application without Crest.</p> <p>Expects to deliver between 500-600 units, 17 ha NDA and 35-38 dph on its parcel of land.</p> <p>Taken a more detailed approach to flood modelling which has informed their emerging masterplan. Status of Structure Plan as guiding should be set</p>	<p>Noted. See Statement of Common Ground between Dandara and TWBC.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	out in policy. Need sufficiently flex to ensure it aligns.		
	The landowner east of Transfese Way supports inclusion of this land for employment uses within the Policy, and confirms land is available and deliverable over the plan period. The proposals will help to deliver additional high-quality employment in the manner envisaged, including a mix of employment types and sizes in order to support the balanced economic and employment. Vast majority of site outside Flood Zone 3, and around half is flood zone 2. Can also provide necessary linkages.	Noted.	No changes proposed
	Countryside Properties: In no longer proposing individual site allocations within STR/SS1, the allocation does not distinguish between the consented and implemented scheme at Church Farm, the additional potential development at Church Farm, and the wider Eastern Parcel. The additional phase of development for c.60 units should be specifically referenced in the Plan, policies map, and map 28. Considered that there should be an individual site allocation for Church Farm Phase 2 that is separate from the wider STR/SS1 Eastern Parcel, and therefore not subject to same requirements as greater areas of land outside current LBD boundaries.	Church Farm Phase 1 forms an allocation within the adopted Site Allocations DPD. Phase 2 goes above the threshold for the number of houses as set out in this policy and these additional units are only considered appropriate if it delivers the requirements as set out in the policy to meet the garden settlement criteria.	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
<b>“Off-Site” BNG Site Submission</b>			
	Land proposed north-west of Paddock Wood for potential offsetting/off-site biodiversity net gain contributions. Site located within wider extent of Stonecastle Farm Quarry. Strategic growth and consented development sites strengthen need to provide mitigation, compensation, and enhancement measures for biodiversity on or in close proximity to these sites.	Noted. TWBC preference is for on-site biodiversity contributions but will enter into discussions with Tarmac Trading Ltd to understand if this land can play a beneficial role in delivering biodiversity net gain over the plan period.	No changes proposed

### 5.3.2 Policy STR/SS2: The Strategy for Paddock Wood Town Centre

**Notes:**

1. There were 43 representations recorded against this policy.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>General Comments</b>			
	PWTC has commented that the approach to the policy requiring a SPD has stalled PWTC's desire to prepare a Neighbourhood Development Plan which has the town centre as its focus. The delay in providing initial DLA work on the town centre is responsible for this delay, and the approach to prepare a SPD is frustrating this process. NDP will carry more weight than an SPD when made so TWBC should be supporting the NDP process. Policy lacks detail and supporting evidence and should link to the NDP to provide that information.	<p>TWBC has sought to engage positively with PW NDP group when work on the Plan recommenced in 2020, and Troy Planning was appointed to drive this forward. TWBC engaged with Troy planning on the role and focus on the masterplan work, and to explain the work to be undertaken. Troy planning was also invited to the masterplanning workshop on behalf of the NDP group.</p> <p>The high-level masterplan work prepared for the town centre by DLA, was shared with the NDP at the earliest opportunity by way of a presentation direct to the group and PWTC. Further, representatives from both PWTC and its NDP group form part of the SSWG.</p>	No changes proposed
	PWTC agrees the growth presents an opportunity to enhance Paddock Wood town centre.	Noted.	No changes proposed
	DLA Town Centre Masterplan should have been made available for Reg.19 consultation.	This document is not an evidence base document to the Local Plan. Policy SS2 makes clear this will be developed as an SPD and timeframes are set out in LDS.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>PWTC comment that the Paddock Wood Economic Opportunities Report (SQW, December 2020) does not specifically comment on town centre, beyond referring to other evidence base documents.</p>	<p>The purpose of this Economic Opportunities Report is to support the preparation of the Structure Plan prepared for STR/SS1 and to inform the high-level masterplan prepared for Paddock Wood Town Centre. This report provides a review of the strategic and local economic context, property market, site-specific constraints, potential demand and wider economic trends in order to identify potential opportunities and 'directions of travel' in respect of the future development and growth of town centre and employment uses for Paddock Wood. It makes a number of recommendations for both the employment uses within the northern parcel of the allocation under STR/SS1 and the town centre policy STR/SS2.</p>	<p>No changes proposed</p>
	<p>The TW Retail, Commercial, Leisure &amp; Town Centre Uses Study Update (Nexus for TWBC, Feb 2021) primarily focused on Tunbridge Wells town centre. Study identified a number of issues for Paddock Wood town centre but does not expand upon this to provide recommendations as to actions or interventions that should take place (beyond establishing a quantum of new retail floorspace).</p>	<p>Section 8 (Recommendations and Site Allocation Assessments) of the Retail, Leisure and Town Centre Uses Study Update (2021) sets out the recommendations across the borough. Although emphasis is placed on RTW as the key centre within the borough, recommendations are also made in regard to other areas of the borough including at PW and Tudeley. Specifically, para's 8.10 and 8.11 and 8.25xv.</p> <p>Agreed the focus would be left to the Paddock Wood Town Centre Masterplan as set out in STR/SS2.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>While mentioned in the Strategic Sites Masterplanning and Infrastructure Main Report, the BarthHaas site is excluded from the town centre as defined on Inset Map 5 and Map 30. While recognised that the town centre is currently located wholly to the south of the railway, if BarthHaas were to relocate from existing premises, this would create a potential development site immediately north of the station. May be scope for an element of town centre uses on this site. Therefore may be appropriate to extend the town centre boundary to cover the BarthHaas site.</p>	<p>The town centre boundary was considered by TWBC at reg. 19 stage, and whether extending the land to the north of the railway station would be appropriate to facilitate development as set out by Barth Haas. However, given the fragility of town centres across the country, it was considered that retaining a tight town centre boundary would ensure traditional town centre uses would be directed towards the town centre in the first instance and provide a better opportunity for the investment to be to enhance its vitality and viability i.e. it would provide a better framework for the town centre to respond to the opportunities presented by the growth around Paddock Wood.</p> <p>The supporting text to Policy STR/ SS1 recognises the aspirations for the land around the Barth Haas site, to the north of the railway line. This land has been removed as a key employment site recognising the fact the council will encourage other uses if the opportunity prevails.</p>	<p>No changes proposed</p>
	<p>Tesco has stated that the Council's focus on commercial and community facilities, and enhanced public realm, is unrealistic given complex ownership, site constraints, and lack of viability. Council's own Viability Consultant previously advised that the current allocation was fundamentally unviable, even taking account of a modest number of dwellings.</p>	<p>The growth around Paddock Wood, through the allocation at Paddock Wood and east Capel (STR/SS1) provides a real opportunity for investment into Paddock Wood town centre and the council is firm in its belief that it is essential the Local Plan provides a framework for this. This will be master planned properly accordingly.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Tesco has noted that town centre masterplan is subject to feeding into the production of the four wider masterplans for surrounding areas. These are long-term, phased proposals which could take many years to come forward and therefore harm the town centre in the meantime. Expanding the area covered by the allocation is problematic and should instead be replaced with a series of smaller, more targeted allocation policies.		
	A number of residents have concerns with loss of retail in the town centre. Decisions being taken by PINs (Retirement Home) also causing concern	Policy STR/SS2 requires a Town Centre SPD to be prepared so development in the town centre is masterplanned and considered comprehensively. One of the key priorities for TWBC is to ensure Paddock Wood Town Centre is in a position to properly seize the opportunity presented to it through the growth planned, to enhance its vitality and viability, and the requirements of Policy STR/SS2 facilitate this.	No changes proposed
<b>Transport</b>			
	Over 50 representations were submitted from residents, Parish Councils, PWTC and Tom Tugendhat MP re. the LCWIP proposal which Tom blocks access to vehicles over the railway bridge (for buses/pedestrians/cyclists only) cutting half of PW from town centre. Concerns for access for	This was an issue of particular concern.  The masterplanning as set out in the Strategic Sites and Masterplanning Study, and the LCWIP, has identified that a “bus gate” over the Maidstone Road may, as part of a package of other transport	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>emergency vehicles, less mobile residents and HGV's using smaller unsuitable roads, longer alternative routes, rat runs. Will increase pollution/congestion.</p>	<p>improvements, be a suitable approach to allow an electric hopper bus to safely and conveniently link the various parts of the town to the town centre, together with safe and attractive walking and cycling links.</p> <p>This is reflected by one of the requirements of the planning policy (STR/SS1 – pages 145-7) 2, which states that development should “<i>provide new and improved bus connections to directly link the planned new residential areas with Paddock Wood town centre and the employment areas to the north of the railway line. The use of bus gates should be considered</i>”.</p> <p>There maybe alternative means by which the integrated, forward looking, and accessible transport options can be delivered, with a bus gate across the bridge being an option. Further work will be undertaken, including through SPDs to look at and develop these options further. There will be engagement with residents and the public in the formation of these SPDs including the town centre SPD. This will include proposals for Commercial Road, and improvements to various elements of the public realm.</p>	
	<p>The MP for Tonbridge has commented that no modelling which identifies the impact of proposed Maidstone Road closure on Tonbridge and Malling,</p>	<p>This is one option to be considered, as identified above. It has not been agreed and detailed around this unknown. If a decision is taken to proceed with</p>	<p>No changes proposed</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	which should be a pre-requisite before any changes are made.	this, full modelling will be considered and undertaken.	
	Loss of parking in PW centre will impact small business, and disabled drivers from accessing the town. More parking required for more houses.	A town centre masterplan will be prepared which fully considers the opportunities for growth within Paddock Wood town centre. Car parking will form a key consideration of this.	No changes proposed
	Where and how tall would multi-storey car parks be.	Details will be set out within the Town Centre SPD.	No changes proposed
	Road system in town centre needs improvement. Additional public parking and/or new public transport, New car parks should include cycle parking.	The LCWIP and Structure Plan provides options, which will be developed through the town centre SPD in conjunction with KCC.	No changes proposed
	Restricted access on Commercial Road will cause huge inconvenience to residents, particularly for disabled people.	Full details will be developed through the SPD which will be subject to public consultation and in conjunction with KCC.	No changes proposed
<b>Open Space</b>			
	KCC has stated that adequate supply of open space, with steps to protect and provide access to existing green spaces.	Noted.	No changes proposed
<b>Infrastructure</b>			
	KCC identified that developer contributions to the expansion of waste infrastructure should be included.	The provision of waste infrastructure is identified in the strategic policy for infrastructure provision; Policy STR5 (see response table). This applies to all applications coming forward, and waste infrastructure is not identified in any specific site	

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
		allocation policy. Instead, Policy STR5 is referred to below. This approach should also apply to the Strategic Sites (which includes in the infrastructure provision “other” as a catch-all).  Please see Statement of Common Ground with KCC.	
	Southern Water’s underground infrastructure crosses this site which needs to be taken into account when designing the site layout. Easements would be required, which may affect the site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.	Noted. See Statement of Common Ground between TWBC and Southern Water.	No changes proposed
<b>Access and Movement</b>			
	KCC note that the need for connectivity between the pedestrian and cycle network to local facilities and safe use of these sustainable transport opportunities.	Agree. Pedestrian and cycle links are key to the successful transformation of an expanded Paddock Wood into a garden settlement. This is reflected in part 4 of the Policy.	No changes proposed
<b>Local Economy</b>			
	Closing Commercial Road to traffic will have a detrimental effect on the retail businesses there. Considered greater enforcement on roadside parking would be a better option.	TWBC is aware KCC is considering options for Commercial Road. TWBC has reiterated its long-term plans for the preparation of a town centre SPD and is seeking to liaise closely with KCC over future plans for Commercial Road.	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	With the Maidstone bridge closed, people won't shop local as there won't be any vehicle access. The closure of Paddock Wood High Street (Commercial Road) to traffic apart from buses would destroy Paddock Wood's independent shops. People will still be dependent on cars, and walking/cycling is not practical for everyone.	See above comment re. closure of Maidstone Road railway bridge. This does not form part of the Local Plan.  The town centre SPD will seek to harness opportunities for investment into the town centre, resulting from the growth around Paddock Wood, to enhance its viability and vitality.	No changes proposed
	With the Churchill Retirement Home Development on Commercial Road, Paddock Wood is losing five existing shops with nowhere to build more.	A Town Centre SPD will be produced to help identify the opportunities to enhance the vitality and viability of Paddock Wood Town Centre.	No changes proposed

### 5.3.3 Policy STR/SS3: The Strategy for Tudeley Village

**Notes:**

1. There were 173 representations recorded against this policy.
2. Where representations are specific to the development strategy, inc. Green Belt release, and matters relating to housing trajectory, these are contained within the relevant chapters in Section 4- Strategic Policies.
3. Main issues relate to the scale of growth in this location, the transport impacts, flooding/ drainage issues, concerns over infrastructure delivery and impact on the natural and historic environment.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>Principle of Allocation</b>			
	The Hadlow Estate supports inclusion of allocation and the requirements for high quality layout, good permeability, and more sustainable modes of transport.	Noted.	No changes proposed
	Focus of the Plan should be on enhancing sustainability of Tudeley Village; not a new Garden Settlement.	The Development Strategy for the Borough determined Tudeley is the most sustainable and appropriate location for a garden settlement to accommodate a significant proportion of the Borough’s housing need. Please see Development Strategy Topic Paper and responses to Policy STR1.	No changes proposed
	Tudeley Village name is misrepresentative; development is the size of a town.	The Council considers Tudeley Village is an acceptable name for inclusion in the Plan at this stage.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Mapping error in relation to Maps 33 and 34- this shows Secondary school outside of TV boundary; map 32 shows this within.	Maps 33 and 24 are indicative plans drawn up by DLA prior to the finalisation of the settlement boundary. Given they are for illustrative purposes, no change is considered necessary.	
	Planning permission refused for extension to Poacher and Partridge Pub given green belt location. Hypocrisy? (ref. 18/01767/FULL).	<p>Every planning application is considered at the time of submission of the policies within the statutory development plan and other material considerations.</p> <p>The NPPF makes clear that it is appropriate to amend Green Belt boundaries through the Local Plan if exceptional circumstances exist.</p>	No changes proposed
	<p>An omission site promoter considers the location unsustainable- not accessible in in transport terms, lack of rail connectivity and active travel measures are insufficient / lacking detail to make location sustainable.</p> <p>Also, located too close to some towns e.g. Tonbridge, that they turn there for services instead of internalising trips. Yet, too far from Major Towns (e.g. RTW) to make sustainable transport options. Will result in a car dominated environment.</p>	<p>Please see Development Strategy Topic Paper and response table to Policy STR1.</p> <p>The Sustainability Assessment which determined that Tudeley Village was the most appropriate location for a garden settlement considered a number of criteria.</p> <p>Sustainable transport links are key to the policy to be delivered as part of the settlement. The development will also include a number of day-to-day uses to internalise trips accordingly.</p>	No changes proposed
	Building away from employment therefore pressure on surrounding infrastructure.	Employment uses will be incorporated within the new settlement. Further, sustainable transport links including a pedestrian and cycle link towards Tonbridge Railway station.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	The development will cause a division of communities between Capel, Tudeley, Paddock Wood and Tonbridge.	See Development Strategy Topic Paper and response table to STR/SS1.	No changes proposed
	No Cumulative Impact Assessment on the effects of the developments across Capel, including the KCC gravel extraction, two proposed bypasses, or other housing development proposals in Maidstone.	The evidence base documents where required look at the cumulative effects of development on developments in adjoining boroughs i.e. transport assessment.	No changes proposed
	Concern that additional housing will be added to the allocation at the 5-year review; concern stems from inclusion of wording within the policy relating to Tudeley Village securing a long-term option for the borough to deliver the needs of future generations.	It is accepted that the Tudeley Village garden settlement, as allocated in the plan will deliver around 2,800 homes. Of which, 2,100 will be delivered over the plan period the remaining c. 700 units beyond this.	No changes proposed
	Map 33 and 34 (pg.164) does not provide an explanation for the large purple circles. It is requested that these are clarified.	The large purple circles are identified on the legend as junction improvements.	No changes proposed
	Part of proposed site is safeguarded by KCC within KCC Kent Minerals and Waste Local Plan 2013-2030. No information on conflict between TV and mineral allocation.	Part 9) of the policy requires a mineral impact assessment to accompany a planning application.	No changes proposed
	Only benefit of the growth will be to Hadlow Estate who will profit from the development.	The proposed development will provide a high-quality new settlement, providing housing, a new secondary school a primary school and other	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		commercial and community facilities, delivered on garden settlement principles.	
	Previous/ current land uses (Iron works and farm sites) within the site boundary - thorough surveys of potential land contamination must take place before any works.	This will form a requirement of any planning application as set out in the council's validation checklist.	No changes proposed
	Disregard for existing residents who live within the site. Ownership of these houses not correctly identified/rectified on the plans. This is contrary to Section 61W of the 1990 Town & Country Planning Act.	This part of the Act refers to consultation for planning applications.	No changes proposed
	TWBC should have done more to help Capel progress a NDP given the proposals for strategic growth.	TWBC has engaged with Capel PC and Capel NDP Group regarding the NDP and offered assistance as it has done with other NDP groups across the borough.	No changes proposed
	Residents and an omission site promoter state that Para.72 of NPPF sets out that new settlements can be planned for, provided they are well located and supported by necessary infrastructure and facilities. In this case, the proposed village is not well located (being in the Green Belt) and requires significant infrastructure in the form of highway improvements and a new bypass around FOG to support/justify it.	<p>NB. This paragraph is now Para. 73 in the NPPF 2021.</p> <p>Para. 139 provides for exceptional circumstances to be identified to allow new Green Belt boundaries and notes specifically "new settlements" as being an example.</p> <p>The identified infrastructure required to support the growth of Tudeley Village as set out in the Strategic Sites Masterplanning and Infrastructure Study includes sustainable transport links. Further</p>	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		the new settlement provides services to allow for internalised trips.	
<b>Masterplan</b>			
	No evidence that technical reports have been considered in the preparation of the Masterplan.	The Tudeley Village Delivery Report is underpinned by various technical evidence base documents.	No changes proposed
	Master planners not local to the area nor to Kent so do not have a good understanding of the area.	The Masterplanners are national expert masterplanning consultants.	No changes proposed
	Concern regarding proposed communal space linked primarily with proposed Phase 3, impacting on existing properties and those paying respects at nearby graveyard due to noise and potentially antisocial behaviour.	The masterplan is not fixed and is subject to further development through an SPD. Such amenity details will be considered further at this stage and through the planning application process, and where required necessary mitigation identified.	No changes proposed
<b>Infrastructure</b>			
	A number of residents, local groups and an omission site promoter raised concerns that the development will not have adequate infrastructure to support the growth; and that the mitigation is so significant it will not be delivered. Required infrastructure includes the range of utility provision (electrical, water, gas etc). Over 60 representations were received from residents, local groups and the MP for Tonbridge that the development will place extra pressure on already stretched facilities (hospitals, social	The infrastructure required have been fully identified as set out in the Strategic Sites Masterplanning and Infrastructure Study. This has been informed through discussions with the relevant stakeholders.  This infrastructure has been fully itemised, and the costs run through the Viability model prepared by Dixon Searle. It is considered deliverable.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	services, doctors, elderly care, and dentists) in Paddock Wood but also particularly in Tonbridge.		
	TMBC notes that the masterplan anticipates delivery of new local service centres after phase 3, and new secondary school delivered even later. This will put pressure on infrastructure in Tonbridge in the short to medium term, which the Local Plan seeks to avoid. Therefore, how will these impacts be mitigated?	These phases have not yet been agreed. Work is currently being undertaken with the relevant stakeholders, such as KCC education, to determine the trigger points for delivery of key infrastructure.	No changes proposed
	Residents, local groups and omission site promoters suggest the Development Strategy and IDP lacks details and certainty on all the key elements required to ensure sustainable development can be delivered.	<p>Please see Strategic Sites Topic Paper.</p> <p>The delivery of this allocation has been carefully masterplanned and considered. The infrastructure has all be identified and the Viability Assessment confirms this is deliverable.</p> <p>The Council is working closely with the principal housebuilders and other key stakeholders to deliver the sites; through the SSWG for example. Please see s of Common Ground with the developers for further information.</p>	No changes proposed
	Costings/timelines outlined in the IDP are fragmented an unconvincing, with many items essential for settlement’s operation market only as ‘desirable’.	The Strategic Sites Masterplanning and Infrastructure Study identifies all the infrastructure required to deliver the new settlement on garden settlement principles. The requirements for the settlement to deliver these infrastructure requirements is clearly set out in the Policy (part 12).	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>The Hadlow Estate raised a query over Five Oak Green being delivered wholly by Tudeley Village. Secondary school will result in traffic from Paddock Wood and East Capel (STR/SS1) and these developments should also contribute. Reference to para. 5.190 of Plan should be amended to identify this.</p>	<p>No change considered necessary to this paragraph.</p>	<p>No changes proposed</p>
	<p>KCC and local residents note that developer contributions to the expansion of waste infrastructure should be included in policy. Concern that this additional cost have not been factored in.</p>	<p>The provision of waste infrastructure is identified in the strategic policy for infrastructure provision; Policy STR5 (see response table). This applies to all applications coming forward, and waste infrastructure is not identified in any specific site allocation policy. Instead, Policy STR5 is referred to below. This approach should also apply to the Strategic Sites (which includes in the infrastructure provision “other” as a catch all.</p> <p>Please see Statement of Common Ground with KCC.</p>	
	<p>Residents and local groups raise concern about how to ensure infrastructure is delivered ahead of housing. First six years housing projections are at the highest, but highway infrastructure deemed critical does not reach planning stage till year 10-15. How will infrastructure be funded? If through s106 how will any infrastructure be forward funded?</p>	<p>The infrastructure required to deliver the growth is set out in the Strategic Sites Masterplanning and Infrastructure Study. Additional work is required, and will be carried out imminently, on the trigger points for delivery of key items to help aid delivery expeditiously. Discussions taking place with stakeholders such as Homes England on funding/ loan opportunities to bridge the gap of S106 monies</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Huge risks to delivering infrastructure which relies on whole site and PW/EC coming forward and relies on contributions which may not materialise	<p>Please see Strategic Sites Topic Paper.</p> <p>The delivery of this allocation has been carefully masterplanned and considered. The infrastructure has all be identified and the Viability Assessment confirms this is deliverable.</p> <p>The Council is working closely with the principal housebuilders and other key stakeholders to deliver the sites; through the SSWG for example. Please see s of Common Ground with the developers for further information.</p>	No changes proposed
	<p>How will gas and electrical capacity be sourced? No details. Underestimated costs of utility provision</p> <p>Query of ability to provide mobile signal and impact this will have on service elsewhere? (Poor signal at present)</p>	See IDP and Strategic Sites Masterplanning and Infrastructure Study; both have been informed by discussions with key service providers.	No changes proposed
	Pressure on overstretched Police, Fire, and Ambulance services.	Please see IDP for information on Emergency Services.	No changes proposed
	Masterplan and SA clearly states that off-site infrastructure improvements will be required, but this has been changed to “there is a desire to provide”.	The Policy (part 15) makes clear the contributions required to facilitate the growth at Tudeley Village.	No changes proposed
<b>Green Belt</b>			

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Over 100 responses were received (from residents, local groups and parish and town councils and omission site promoters) in relation to the proposals resulting in unjustified and significant removals of Green Belt. It is considered that this will create a corridor of development and urban sprawl between PW and Tonbridge, settlements merging together, loss of openness.</p> <p>No exceptional circumstances set out to release Green Belt which will result in high harm.</p>	<p>Please see response the STR/1 for details on the Council’s response to the exceptional circumstances which exist to remove land from the Green Belt.</p> <p>Please refer to the Green Belt Studies for information on the resultant harm of land to be released from the Green Belt, Development Strategy Topic Paper (Section I) and the Sustainability Appraisal.</p>	<p>No changes proposed</p>
	<p>LUC Green Belt Report- no mention of Tudeley in report. Incomplete evidence base.</p>	<p>All proposed allocations in the Green Belt including Tudeley Garden Village have been fully assessed in the ‘Green Belt Study Stage Three: Assessment of Green Belt Allocations’ (LUC Nov 2020) and the release at Tudeley is also covered in the Development Strategy Topic Paper, section I.</p>	<p>No changes proposed</p>
	<p>Local residents and CPRE note that a Capel bypass/active travel routes will result in more greenbelt land disappearing. This amount to be developed on is not yet specified.</p>	<p>Full details of the Bypass route to be developed in due course. It is noted that the bypass will run across land within the Green Belt, but the Council considers that very special circumstances for this development are considered to exist.</p>	<p>No changes proposed</p>
	<p>Concern that the Council does not intend to designate additional land as replacement Green Belt.</p>	<p>The Council has considered the possibility of Green Belt replacement, in particular to areas around Paddock Wood, having regard to the</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		requirements of paragraph 135 of the NPPF as set out in the Development Strategy Topic Paper. This sets a very high bar for such proposals and it is currently considered that the circumstances do not exist to justify such an approach and so no replacement Green Belt is currently proposed. The decision to not designate further Green belt around Paddock Wood is supported by the Stage 3 Green Belt Study.	
	Details of compensatory improvements to Green Belt are unknown.	It is not considered necessary, or indeed, effective to identify the compensatory improvements within the Local Plan itself. This provides flexibility in delivery the sites. However, discussions with site promoters as set out in the Statements of Common Grounds identify a number of potential measures which provides the necessary comfort that this element of the policy will be delivered. It is anticipated that further details will be set out in subsequent SPDs.	No changes proposed
<b>Landscape</b>			
	Natural England considers the Policy should be strengthened to make a landscape led approach: <ul style="list-style-type: none"> <li>- Require LVIA and landscape capacity study</li> <li>- Strengthen wording on mitigation options</li> <li>- Require an overarching green infrastructure strategy</li> </ul>	The Council has considered these comments and has discussed them with NE and as set out in the SoCG with NE whilst the Council fully supports and agrees with the intention it is of the view that these matters are already adequately dealt with in the relevant policies and so no change is proposed.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Natural England welcomes principle 8, which commits to good quality green and blue infrastructure. However, it seeks that the wording is strengthened to show a clear commitment to delivering environmental net gains. Instead of ‘considers opportunities’, Natural England suggests wording that looks to embrace the opportunities by delivering environmental net gains should be used.</p> <p>Also, this strategic site allocation should be given particular consideration within TWBC’s upcoming SPD for Biodiversity Net Gain (EN 9). Sustainable Drainage Systems (SuDS) that maximise landscape and biodiversity value are prioritised and should be mentioned in the policy.</p>	<p>The Local Plan already sets out a strong commitment to biodiversity net gain, which is supported by natural England, at Policy EN9. For broader environmental matters, the existing wording is considered appropriately positive, recognising that development cannot be expected to deliver universal environmental gains. There is separate provision for achieving Biodiversity Net Gains.</p> <p>Noted, an agree that this proposal provides the opportunity for connected ecological networks as part of delivering biodiversity net gains. The Local Plan already contains a specific SuDS policy (EN 26), which is cross-referenced under the strategic sites policy as being particularly relevant to it. Further reference in the policy itself is considered unnecessary, and repetitive.</p>	<p>No changes proposed</p>
	<p>Natural England welcomes the point in paras 5.227 and 5.118 and suggest this would be stronger if it directly references national and local net-zero carbon commitments and the climate emergency.</p>	<p>Noted, but considered unnecessary given existing cross-reference to other Development Management policies, which should be read alongside.</p>	<p>No changes proposed</p>
	<p>Natural England considers LBDs should be landscape led with ecological considerations.</p>	<p>Noted. The Council’s approach for determining LBDs is set out in its Topic Paper on the subject. The masterplanning work is drawing/will draw upon ecological work, the findings of which will inform the final LBDs.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	No consideration of development on Rural Lanes-contrary to policy EN18.	The rural lanes which run through the allocation have been considered as part of the masterplanning work set out within the Hadlow Estate Delivery Strategy. The nature of the growth will mean there is significant change to the existing landscape but the impact on the rural lanes have been considered in the masterplanning work and will be considered through detailed design and planning application stage in line with the statutory tests.	No changes proposed
	No LVIA / Zone of Theoretical Visibility Maps has been prepared by TWBC to inform allocation therefore inadequate landscape sensitivity analysis. Adverse impact on Medway Valley. No analysis of landscape sensitivity. Locally exceptional landscape value not recognised.	The PSLP is supported by the Borough Landscape Character Area Assessment SPD and the AONB Setting Analysis Report which does consider landscape and visual matters.	No changes proposed
	TMBC considers the evidence for impact on landscape in vicinity of strategic sites and biodiversity is incomplete because the Landscape and Visual Impact Assessment only applies to sites located within the AONB. Should assess impact between Tonbridge and Tudeley	The Hadlow Estate Delivery Report has taken into consideration the Council's evidence base documents on landscape and the Green Belt. These include potential mitigation for the site that is to be incorporated so that new development relates well to the existing environment, minimises adverse effects and provides significant enhancements and these have been taking into consideration within the report. The Council remains convinced that the allocations are fully justified.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>The development will not respect the Low Weald countryside and will be an urban intrusion on this rural landscape. Hadlow Estate inexperience will not protect the character of this area. Policy Str/SS3 makes no attempt to protect the valued character and environment of the area.</p> <p>A Landscape Character Assessment has not been conducted as defined in NPPF, and requires enhancement and protection.</p>	<p>The Hadlow Estate has appointed a team of reputable consultants and part 7) of the policy sets out firm design considerations for any development to come forward to ensure that development meets with the policies in the plan as a whole including those for landscape and biodiversity.</p>	<p>No changes proposed</p>
	<p>A fair number of representations (c. 30) were submitted by local residents and resident groups, raising concerns over Loss of beautiful countryside, changing views, loss of woodland, hedgerows, meadows; negative impact on landscape. Contrary to other policies in the plan.</p>	<p>The Sustainability Appraisal considers various elements of the sites, including landscape consideration, in determining which sites to progress towards allocation. Please see the Sustainability Appraisal and Development Strategy Topic Paper for further detail.</p>	<p>No changes proposed</p>
	<p>Residents and local groups are concerned the development and associated infrastructure will impact (substantial harm) on neighbouring High Weald AONB, contrary to NPPF policy. No full consideration of views in.</p> <p>Settlement would be contrary to AONB Management Plan objectives R1 and R2 (impact on the B2017, a historic routeway) and objective OQ4 (impact on tranquillity).</p>	<p>The AONB Setting Analysis Report has considered the effects of development on the High Weald and its setting. Associated Infrastructure will be subject to further detailed assessments.</p>	<p>No changes proposed</p>
	<p>Increase in light pollution, loss of dark skies. If kept dark will increase crime.</p>	<p>A lighting strategy will be fully considered in the progression of planning applications on the site,</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		and detailed in SPDs, to ensure an appropriate balance between minimising light pollution and maintaining safety. In line with the garden settlement principles The Council is working towards innovative lighting solutions. Any lighting will need to conform with Policy EN8 Outdoor Lighting and Dark Skies.	
	Over 50 representations were submitted, mostly from residents by also CPRE and CPC, regarding the removal of many hectares of economically viable arable farmland (approximately 600 productive acres of grade 2 and 3 land). Self-sufficiency is needed rather than importing food esp. with Brexit. Has poorer performing agricultural land been explored?	The Sustainability Appraisal considers various elements of the sites, including the quality of agricultural land, in determining which sites to progress towards allocation. Please see the Sustainability Appraisal and Development Strategy Topic Paper for further detail.	No changes proposed
	Out of scale with development in the hamlet. Completely change the character of the area.	The Sustainability Appraisal considers various elements of the sites, including the character of the surrounding area, in determining which sites to progress towards allocation. Please see the Sustainability Appraisal and Development Strategy Topic Paper for further detail.	No changes proposed
<b>Housing</b>			
	A number of omission site promoters and residents consider Tudeley Village is not deliverable. The development plan should replace with smaller development sites. High risk approach as strategic sites will encounter delays meaning housing will	The delivery of this allocation has been carefully masterplanned and considered. The infrastructure has all be identified and the Viability Assessment confirms this is deliverable.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	not be delivered. Smaller sites could come forward in next four years to maintain housing supply.	The Council is working closely with the principal housebuilders for both strategic allocations and other key stakeholders to deliver the sites; through the SSWG for example. Please see Statement of Common Ground with the developer for further information.  See also response to STR1.	
	PWTC, resident groups and a number of omission site promoters consider there is inadequate evidence on housing trajectory. Over ambitious; need to allocate smaller sites.	See response to STR1 and also Statement of Common Ground with Hadlow Estate.	No changes proposed
	The Hadlow Estate confirms 2100 new homes can be delivered over plan period.	Noted	No changes proposed
	CPRE and some residents consider the proposed development does not make efficient use of land and needs to be of a higher density. Average density of just under 30dph is very low. Low density also locks in car use and doesn't encourage sustainable modes of transport.	The proposed density is considered appropriate for this location; and has stemmed from the comprehensive masterplanning of this site as set out in the Hadlow Estate Delivery Strategy.	No changes proposed
	Affordable housing at reduced rates of 20% below market value won't be affordable for locals in Tudeley, where average house prices are £715K (e.g. Poundbury more expensive than Dorchester).  To deliver affordable housing the council should become landlord and deliver council housing e.g.	See Response to STR1.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Goldsmith Street in Norwich. Too few references to social housing in the plan.</p> <p>Concerns that affordable housing be bought up by London Boroughs e.g. Croydon.</p>		
	<p>Not enough space physically within site boundary to accommodate 2800 homes.</p>	<p>The Hadlow Estate Delivery Strategy provides a masterplan which considers the key constraints and demonstrates that 2800 homes can be provided.</p>	<p>No changes proposed</p>
<b>Climate Change</b>			
	<p>Around 30 representations were received from residents, CPC and local groups stating that no provision for addressing impacts of climate change are included. Proposed development will add to global warming by adding more carbon emitting sources and reducing carbon sequestration of land and associated flora and fauna.</p> <p>Proposal will not contribute positively to TWBC being carbon neutral in 2030, will fail to meet this target. Also contrary to Environmental Bill and contrary to objectives being signed under the Paris Accord.</p> <p>Destruction of land is short sighted and contrary to objectives that will likely be signed under Parish Agreement/G7/COP26.</p>	<p>Policy EN2 sets out the targets for sustainable design standards and Policy EN3 relates to climate change mitigation and adaption.</p> <p>The Development Strategy Topic Paper sets out clearly the methodology in determining the appropriate strategy for meeting our housing need; along with the Sustainability Appraisal. The Council has sought the best strategy possible whilst keeping environmental impacts to a minimum so it can plan for the needs of the future generations</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Construction is a very polluting industry. Even with low carbon missions. Construction will also cause 15 years of negative impact on existing residents; traffic , noise, pollution etc.	It is noted that construction within this allocation will cause disruption and there will be impacts on the environment. The applications for significant housing growth are likely to be accompanied by Environmental Statements which assess the environmental impacts of the developments during the construction stage and identify key mitigation required to address this. Construction Environmental Management Plans will also be required as part of any planning application to identify ways to minimise impacts.	No changes proposed
	No details of where renewable energy will come from, or sufficient effort made to encourage mitigation and adaption to climate change.	See Policy EN3 which sets out requirements for carbon dioxide reduction using renewable sources. Details of potential sources will be considered through SPDs and in the consideration of planning applications.	No changes proposed
	Natural England - Point 5.227 – stronger references to local net zero carbon commitments and the climate emergency.	Noted, but considered unnecessary given existing cross-reference to other Development Management policies, which should be read alongside.	No changes proposed
	Increased pollution from, inter alia, increased cars and central heating boilers.	The Development Strategy Topic Paper sets out clearly the methodology in determining the appropriate strategy for meeting our housing need; along with the Sustainability Appraisal. The Council has sought the best strategy possible whilst keeping environmental impacts to a minimum so it can plan for the needs of the future generations.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	No air quality action plans and low emissions strategies, designed to offset the impact on air quality arising from new development.	Air Quality is considered through the sustainability appraisal. This will also be considered at planning application stage through the preparation of an Environmental Statement which will consider air quality specifically (and where required identify appropriate mitigation).	No changes proposed
<b>Biodiversity</b>			
	No provision for addressing biodiversity crisis nor how the development will manage, conserve or ensure net gain. Lack of detail in Hadlow Estate delivery report.  (nb. see Save Capel Biodiversity Report).	Please see Biodiversity evidence base Topic Paper for detail of the comprehensive information the Council used to inform the Local Plan process.  Biodiversity net gain is required through Policy EN 10 which requires further detailed studies to demonstrate a minimum of 10% net gain in biodiversity. Further information on how this will be achieved is set out within the Statement of Common Grounds with the key site promoters; and will be set out through SPDs. It is not considered necessary to stipulate how this will be achieved through policy as flexibility should be maintained in this regard.	No changes proposed
	Natural England request the inclusion of wording to embrace opportunities for environmental net gain, rather than ‘considers opportunities’.	This relates to 5.187 point 8. <b>“Green space:</b> generous, accessible, and good quality green and blue infrastructure that promotes health, wellbeing, and quality of life, and considers opportunities to deliver environmental gains such as biodiversity net gain and enhancements to natural capital” - No objection to the change proposed.	Yes – amend paragraph 5.187 point 8 to read: <b>Green space:</b> generous, accessible,

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
			and good quality green and blue infrastructure that promotes health, wellbeing, and quality of life, and considers <b>embraces</b> opportunities to deliver environmental gains such as biodiversity net gain and enhancements to natural capital;
	No ecological surveys to underpin allocation.	See the Councils Biodiversity Evidence base.	No changes proposed
	Impact on wildlife will impact food chain and ability to feed borough.	The Sustainability Appraisal considers various elements of the sites, including the quality of agricultural land, in determining which sites to progress towards allocation. Please see the Sustainability Appraisal and Development Strategy Topic Paper for further detail.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Over 60 representations were received from residents, CPC and local groups raising concern over the significant loss of trees, woodland and hedgerows (including veteran trees); loss of wildlife habitats. Wildlife, fertile soil, and high biodiversity scores undervalued in the Plan. No mitigation measures identified.	The Sustainability Appraisal considers various elements of the sites, including aspects of the landscape, in determining which sites to progress towards allocation. Please see the Sustainability Appraisal and Development Strategy Topic Paper for further detail. In addition, the illustrative masterplan shows how woodlands and trees will be protected in accordance with other policies in the PSLP.	No changes proposed
	The wetland at Tudeley should be classified as Fen/Marsh and Swamp under UK BAP Priority Habitats. Kent Habitat Survey show the environment at Tudeley, which needs to be surveyed and assessed before any decisions are made. There is no specific assessment of this area which is considered an omission.	See the Councils Biodiversity Evidence base. There is no Fen/Marsh within the allocation, but where new areas of habitat are created they may include these habitats.	No changes proposed
	Natural England : Use of SuDS that maximise landscape and biodiversity value should be included in the policy.	The Local Plan already contains a specific SuDS policy (EN 26), which is cross-referenced under the strategic sites policy as being particularly relevant to it. Further reference in the policy itself is considered unnecessary, and repetitive. These matters are considered to be already sufficiently addressed by existing wording and cross- No references to other Local Plan policies.	No changes proposed
	Natural England: Make clear that Green Infrastructure should be managed/maintained.	A GI strategy, with particular regard to garden settlement principles, will be integral to the SPD.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		There is already cross-reference in this policy to the GI policy (EN 14) which states that GI “ will need to be managed in the long term” further highlighting is considered unnecessary.	
	Increase in domestic pets will threaten flora and fauna.	The effects of domestic pets on wildlife is taken into consideration as part of ecological assessments and mitigation proposals and where necessary are secured by condition/legal agreement for planning applications on the site.	No changes proposed
	The Woodland Trust raise concern regarding inclusion of ancient woodland in this site, risking protection afforded to this vital habitat in the NPPF and reflected in policy EN13. Policy for biodiversity net gain and nature recovery cannot be delivered if irreplaceable ancient woodland is eroded. Considered that a greater than 25m buffer zone (50m) for ancient woodland is required to secure necessary legal protection. Redrawing of site boundaries recommended to exclude areas of ancient woodland.	The Ancient Woodland within the allocation has been fully considered in the preparation of the Hadlow Estate Delivery Plan. This will be protected in line with Policy EN13 and the guidance within the NPPF. Policy EN 10 will also apply. Retaining the woodland within the redline will ensure that it is included within future management plans to ensure that it is appropriately managed.	No changes proposed
<b>Green Space</b>			
	KCC considers there is adequate supply of open space, with steps to protect and provide access to existing green spaces.	Noted.	No changes proposed
	Over 30 submissions from local residents raised concerns over the loss of countryside for recreation and amenity; this loss not assessed.	The proposed will be delivered on garden settlement principles. Green space has been fully considered in the development of the Hadlow	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Impact on well-being (physical and mental). No recognition of the importance of Green Space. Covid-19 has highlighted how valuable green, open countryside is	Estate Delivery Plan and green infrastructure will be a key consideration in the assessment of the scheme.  Improvements to existing public rights of way will also result from the development and enhancements to existing PROWs are likely to be key elements of the compensatory improvements to the Green Belt for land to the west which will be removed from the Green Belt.	
	With quarries planned along the Medway linking up with those already there and on into Tonbridge, the whole area will become disused quarry lakes and houses, with no land in between.	The Sustainability Appraisal considers various elements of the sites, including the location of the existing quarry, in determining which sites to progress towards allocation. Please see the Sustainability Appraisal and Development Strategy Topic Paper for further detail.	No changes proposed
<b>Healthcare</b>			
	Has the impact on growth on medical facilities been considered; both in terms of Pembury Hospital and on GP provision	The NHS Clinical Commissioning Group is a member of the SSWG. TWBC has engaged with the CCG in determining the infrastructure requirements.  See Strategic Sites Masterplanning and Infrastructure Study and the IDP for detail.	No changes proposed
	The NHS CCG states that Infrastructure and delivery/timing requirements for additional primary medical care provision and infrastructure will need to be further developed. There is a need for facilities in both Paddock Wood and Tudeley.	Noted. Discussions remain ongoing between the NHS CCG and TWBC. Further information being considered on trigger points for medial infrastructure. The NHS CCG also forms part of the SSWG. Hadlow Estate has confirmed its desire	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Medical centre should be provided within Tudeley Village.	to provide a medical centre within the new settlement.	
<b>Commercial/ Employment</b>			
	Tudeley Village will not attract a food store as the catchment is too small; this will result in leakage of expenditure outside (and potentially outside of the borough) and increase traffic.	Both the conclusions of the Nexus Town Centre and Retail Study, and the Hadlow Estate Delivery Report, confirm there is capacity for retail provision within the new settlement.	No changes proposed
	Very little facilities or employment opportunities in the area. Council cannot have certainty that employment uses will be forthcoming in a manner which reflects housing delivery or those that uses will be sustainable in this inaccessible area over the longer term.	Employment uses are an integral part of developing a sustainable new settlement, in line with Garden Settlement Principles. The Policy requires employment uses to be provided; and the Hadlow Estate advises in its Delivery Strategy its intention to do so.	No changes proposed
	Cost to Tonbridge-based businesses (and others in the wider area) due to traffic issues may drive businesses from the area.	Transport issues have been fully addressed in the Transport Assessment prepared by Sweco.	No changes proposed
	CPRE say that Policy at 2(b) provides for main village and local centres, but not clear if these centres would deliver the number and type of jobs required for a high proportion of residents to work locally in an area where house prices are likely to be high. Likely this will just become a new dormitory town for London.	The Hadlow Estate Delivery Strategy sets out its approach to providing a sustainable settlement and encouraging internalisation of trips. It is accepted that the settlement will not be able to support employment uses for all its residents and this is factored into the transport assessment work.	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Concern from the Parish Council and another local group that the Plan will destroy rural enterprises, such as equestrian facilities at Bank Farm.	The Hadlow Estate has committed to seeking to find an alternative location for Bank Farm within its landholding, subject to planning.  Significant investment into Capel will have a long-term benefit in economic terms.	No changes proposed
	Concern from local residents and local resident groups that the loss of productive agricultural land, orchards and soft fruit will have a potential impact on the local economy.	The Sustainability Appraisal considers various elements of the sites, including the location of the existing agricultural land, in determining which sites to progress towards allocation. Please see the Sustainability Appraisal and Development Strategy Topic Paper for further detail.	No changes proposed
<b>Education</b>			
	KCC requests additional land to support expansion of Capel Primary to expand to two form entry.	Policy STR/CA1 confirms that the development strategy for Capel includes facilitating the expansion of Capel Primary School by 1FE.	
	Concerns about new school opposite Somerhill School. Increased traffic.	The secondary school is not proposed opposite Somerhill School; this original location was amended between the Reg. 18 and Reg. 19 versions of the Local Plan following feedback from the public, TMBC and KCC.	No changes proposed
	Proposed senior school will attract children from all over West Kent.	The Secondary School responds to the need generated by the growth around Paddock Wood, East Capel and Tudeley. However, children will be able to apply to the school against the criteria set	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		out by KCC, and places dictated in the normal way.	
	Development will increase demand for school places. Inadequate schools for children from the development. Resulting in large shortage of school places. Needs to be discussed with TMBC as this means even greater pressure on schools in Tonbridge and Tunbridge Well.	The provision for educational uses has been agreed through discussions with KCC Education. KCC education are a member of the SSWG.	No changes proposed
	KCC likely not going to invest in all these schools in one small area given pressures across rest of Kent and their own cash shortages. The Parish and Town Council, plus local residents, state that the funding for secondary school unclear. Will this be KCC? Reg 18 KCC response confirms need to be funded by Development. Appears no school built in Tudeley until phase 3 (1,000 houses), and the costings suggest that infrastructure will be paid for by S106s which will mean the houses will be built first putting an additional strain on the local community, facilities and the road infrastructure.	KCC has agreed the provision needed for education provision for the strategic sites. Schools will be funded through developer contributions as set out in the Strategic Sites Masterplanning and Infrastructure Study.  The phasing and delivery of the secondary school needs to be agreed with KCC.	No changes proposed
	Against provision of a secondary school in the parish	This need has been identified through discussions with KCC Education.	No changes proposed
<b>Transport</b>			

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Omission site promoters, local residents and the Tonbridge MP and TMBC suggest the TA is ineffective:</p> <ol style="list-style-type: none"> <li>1. Over optimistic transport assumptions (i.e. modal shift)</li> <li>2. Underestimated traffic trips; Plan uses out-of-date data regarding likely demands on local road network.</li> <li>3. No safety assessment of new junction for Five Oak Green bypass nr the primary school.</li> <li>4. impact on road westward towards the A26/B2017 roundabout has been underestimated</li> <li>5. The B2017 is already a dangerous road which will be made worse with an increase in traffic. There have been no surveys on traffic movement along this road.</li> </ol> <p>Transport Impact Severe and transport mitigation ineffective (See Motion Report). Severe highway impact means no prospect of granting planning permission in line with NPPF.</p>	<p>The Transport Assessment has been supplemented with additional sensitivity testing by Sweco, in close discussion with both KCC and National Highways. The transport evidence proposes measures that promote modal shift and, where relevant, infrastructural improvements to the highway network. Both KCC/NH have given their commitment to continue to work with TWBC to finalise and agree the further sensitivity testing. Outcomes will be reflected in further SoCG with both KCC/NH.</p> <p>The Five Oak Green junction will subject to detailed technical design work.</p>	<p>No changes proposed</p>
	<p>TMBC and local residents argue the Transport evidence base underpinning Local Plan is inconsistent, contradictory, and unrealistically optimistic. Lack of clarity regarding infrastructure interventions required to deliver a sustainable plan. Evidence does not take into account normal</p>	<p>The Transport Assessment considers the cumulative impact with adjoining authorities including Tonbridge and Malling BC.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>organic growth and planned proposals in Tonbridge &amp; Malling borough or other neighbouring authorities, therefore impacts on local highway network and local communities not adequately assessed. Mitigations proposed are insufficient to fully address impacts on Tonbridge (e.g. increased congestion; impact on air quality). Impacts beyond Tonbridge, Hadlow, Golden Green and East Peckham (e.g. north A228 to M20 and A26 towards Maidstone) should also be addressed.</p>		
	<p>From Stantec report, it is unclear where suggestions that 11% of residents will go to neighbouring Tonbridge and 20% traffic heading to Paddock Wood come from.</p>	<p>The SWECO Transport Assessment is the evidence base document to the Local Plan.</p> <p>Stantec advised DLA in transport matters for the Strategic Sites Masterplanning and Infrastructure Study, and liaised closely with Sweco in the assessment and strategy around the Strategic Sites. Any traffic assumptions applied in the evidence base are from the Sweco report.</p>	<p>No changes proposed</p>
	<p>Local residents and campaign groups suggest the mitigation is ineffective:</p> <ol style="list-style-type: none"> <li>1. Lack of necessary width and alignment improvements around town centre.</li> <li>2. 2 lanes in each direction needed around the B2017/ A26 roundabout.</li> </ol>	<p>The Transport Assessment has been supplemented with additional sensitivity testing by Sweco in close discussion with both KCC and National Highways.</p> <p>The transport evidence proposes measures that promote modal shift and, where relevant, infrastructural improvements to the highway</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Questioned whether the key highway routes to unlock the housing developments have been modelled against <i>origin &amp; destination</i> traffic criteria to establish the extent of spare capacity on the <i>existing</i> highway network	network. Both KCC/NH have given their commitment to continue to work with TWBC to finalise and agree the further sensitivity testing. Outcomes will be reflected in further SoCG with both KCC/NH.	
	<p>An omission site promoter and residents state that the mitigation only assesses Colts Hill Bypass and Five Oak Green Bypass and no other options. Not robust.</p> <p>Residents argue the bypass is not required. Traffic analysis has been based on faulty assumptions. Would not take traffic away on North/South routes to Tonbridge</p>	<p>The transport evidence base documents, along with the Strategic Sites Masterplanning and Infrastructure Plan identifies the Phase 1 Colts Hill Bypass scheme is required to accommodate the growth planned and both Paddock Wood and east Capel, and Tudeley Village. The Five Oak Green bypass is required to accommodate the growth at Tudeley Village. TWBC accepts these conclusions.</p> <p>This is in addition to the clear modal shift being sought through the development.</p>	No changes proposed
	Local residents and groups state that the B2017 unsuitable for commercial construction vehicles and Hartlake Road has a 7.5 tonne restriction. Road infrastructure is rural and narrow and therefore unsuitable, particularly for HGVs. New quarrying will also create 80-120 HGV movements per day on A228.Changes required to facilitate construction.	HGV movements during and after construction will be considered through the planning application stage and any associated Environmental Statement. Appropriate mitigation will be put in place.	No changes proposed
	Inconsistencies in transport evidence base – viability work therefore otiose.	The Sweco report forms the transport evidence base document to the Local Plan.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		<p>Stantec advised DLA in transport matters for the Strategic Sites Masterplanning and Infrastructure Study, and liaised closely with Sweco in the assessment and strategy around the Strategic Sites.</p> <p>The mitigation measures identified through the transport work has been identified in the infrastructure schedule which forms part of the Strategic Sites and infrastructure study which has been subject to the viability assessment.</p>	
	<p>TMBC and residents state that the plan has not considered cumulative impact with adjoining boroughs on transport and infrastructure. No proper modelling of impact of transport in Tonbridge or mitigation. Increase journey times for local schools for example.</p>	<p>Cumulative transport impacts have been considered as part of the Transport Assessment. These will also be considered at planning application stage through the preparation of a Environment Statement.</p>	<p>No changes proposed</p>
	<p>Local residents and groups, along with an omission site promoter argue that there is no detail on securing funding for Colts Hill Bypass or Five Oak Green Bypass. Mitigation wholly reliant on delivery of these key infrastructure items and prospects of delivery considered low. If these aren't delivered problems will be pushed to another part of the road network. Also proposed bypass assumes Colts Hill bypass will be in place, which has been agreed for over 20 years and not even scheduled. Therefore, it is questioned how likely the Five Oak Green bypass will be built.</p>	<p>The evidence base to the Local supports the delivery of the allocation. TWBC is discussing the delivery of this infrastructure with Homes England in terms of forward funding. TWBC and KCC are also working together on the delivery of the identified mitigation.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Capel PC and local residents state that Five Oak Green bypass will require loss of productive agricultural land, active green space, affect the setting of the AONB, and damage two designated rural lanes (Sychem Lane and Church Lane). Concern also of traffic pollution risk posed to Capel Primary School (plans include a roundabout opposite the school). Bypass would not solve traffic issues further westward along B2017. Plans seem under-developed and no proper assessment.</p> <p>No constraints study on flooding/ ancient woodland etc for delivery of Colts Hill Bypass</p>	<p>The precise location and detailed design of the Five Oak Green bypass has not been determined. This will be subject to a proper Environment Impact Assessment and any necessary mitigation incorporated.</p>	<p>No changes proposed</p>
	<p>All main roads are heavily trafficked already, especially in the morning and evening peak periods. Growth will exacerbate.</p>	<p>The Transport Assessment has been supplemented with additional sensitivity testing by Sweco in close discussion with both KCC and National Highways.</p> <p>The transport evidence proposes measures that promote modal shift and, where relevant, infrastructural improvements to the highway network. Both KCC/NH have given their commitment to continue to work with TWBC to finalise and agree the further sensitivity testing. Outcomes will be reflected in further SoCG with both KCC/NH.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Traffic going through Tonbridge is already an issue. Current infrastructure already insufficient and at capacity.</p>	<p>The Transport Assessment has been supplemented with additional sensitivity testing by Sweco in close discussion with both KCC and National Highways.</p> <p>The transport evidence proposes measures that promote modal shift and, where relevant, infrastructural improvements to the highway network. Both KCC/NH have given their commitment to continue to work with TWBC to finalise and agree the further sensitivity testing. Outcomes will be reflected in further SoCG with both KCC/NH.</p> <p>TMBC &amp; TWBC are committed to working together as set out in the SoCG, in relation to the impact on Tonbridge &amp; Malling Borough, including Tonbridge.</p>	<p>No changes proposed</p>
	<p>No significant proposal for public transport (and no station at Tudeley Village); will be heavily car reliant (despite focus on encouraging active travel initiatives and modal shift). Nature of Tudeley Village means most will commute out- adding pressure to road network. Bus services in Parish already insufficient.</p>	<p>The Strategic Sites Masterplanning and Infrastructure Study provides for a bus link to the settlement and assigns costs to this accordingly. TWBC is also working closely with KCC public transport team in delivering this allocation, and understand how the contributions can be assigned to provided an improved bus service in this location.</p>	<p>No changes proposed</p>
	<p>Around 60 respondents set out that they are concerned about increased pollution (air, light, noise). No details of how this will be managed. Bypass impact on local environment esp. pollution outside of Capel Primary School.</p>	<p>TWBC accepts growth at this scale will cause disruption for local residents, and this was a concern for over 50 respondents. As part of any planning application, a construction management plan will be required which will set out measures which seek to minimise this as far as possible.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Naive to consider electric vehicles will roll out as scheduled.		
	Insufficient provision for parking/visitor parking.	Parking details are not confirmed at this stage. Details to be provided through SPDs.	No changes proposed
	Over 70 respondents (residents, local resident groups and CPRE) state that there is no capacity on existing rail lines between Paddock Wood and Tonbridge; nor at railway stations (including car / cycle parking) for additional commuters (around 70 respondents were concerned about this).	Please see SoCG between Network Rail and TWBC.	No changes proposed
	Bypass between Colts Hill and Tudeley village would be better positioned north of the village from the new town at Tudeley to the A228 and East Capel. Same landowner, and service the Quarry.	This issue was considered as part of the Strategic Sites Masterplanning and Infrastructure Study and the option as set out in the Local Plan was considered the preferred option.	No changes proposed
	Plan does not say whether rail transport authorities would support or fund a new station at Tudeley.	See Statement of Common Ground between Network Rail and TWBC.	No changes proposed
	Local residents state there is a need for cooperation between TWBC/ Network Rail/ KCC/ Train operators. No evidence of this.	See Statements of Common Ground between TWBC and KCC, TWBC and Network Rail.	No changes proposed
	Local residents do not consider that Network Rail will approve or fund a station or the disruptive work required for bridges and tunnels. Not viable at present and therefore will not be built in this plan period.	See Statement of Common Ground between Network Rail and TWBC.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Policy does not include requirements for new railway at Tudeley, despite the text at 5.218 of draft Local Plan referring to the ‘opportunity’ for the provision of a station. Therefore, site considered wholly unsustainable. Existing public transport opportunities are limited.	Please see Strategic Sites Topic Paper. The Sustainability Appraisal does not consider a railway station in Tudeley in its assessment, which demonstrates that Tudeley Village is the most sustainable location.	No changes proposed
	Inclusion of station in masterplan misleading as Network Rail has confirmed it will not be delivered.	The Plan assumes this will not be delivered. However, Hadlow Estate wishes to safeguard this land for a station should Network Rail agree this can be provided in the future, beyond the plan period.	No changes proposed
	CPRE seeks reassurance that aspirations for a post-plan railway station serving Tudeley Village will not prevent/preclude improvements to the rail service envisaged in the Kent Rail Strategy 2021.	This is not being discussed at this time as Network Rail does not consider a railway station will be provided.	No changes proposed
	Development at both TV and PW will prevent any future rail link between Brighton and Tunbridge Wells, within the existing Paddock Wood to Strood Service.	This has not been raised as a consideration through discussions with Network Rail who has commented on the proposed growth and the impacts this will have on railway infrastructure.	No changes proposed
	TMBC encourages TWBC to continue to promote the opportunity for future provision with Network Rail and the rail operators and that this is revisited at first review of the Plan. Without a new railway station, undue pressure will be put on Tonbridge and Hildenborough stations, and TMBC members fear that car parks and rail services themselves will	Please see Statement of Common Ground between TWBC and Network Rail.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	be unable to cope with increased demand created by Tudeley in particular.		
	Construction of any transport mitigations likely to be disruptive and out of sync with delivery of housing. Need a delivery plan that is effective. Likely to need public purse to forward fun.	Further work is being undertaken to understand trigger points for delivery on key items of infrastructure, and discussions taking place with stakeholders such as Homes England on funding/ loan opportunities to bridge the gap of S106 monies.	No changes proposed
	Increase in traffic will have an impact on setting of AONB	The Council has carefully considered the effects of development both within and adjacent to the AONB and this is set out in the Development Strategy Topic Paper section H. The Council has sought to minimise the level of development within the AONB through reducing both the number of sites and the amount of development on the sites proposed to be allocated. This will in turn reduce the amount of traffic within the AONB. Of course traffic generated by new development outside the AONB is still likely to enter or pass close to the AONB for some journeys but this will have a lesser effect that if the development were located within the AONB. In addition the strategic sites that are potentially within the setting of the AONB are sustainably located, will be designed along garden settlement principles with new footpaths and cycleways and be provided with the necessary road infrastructure to help minimise traffic generation in general. Even if development were situated some distance from the AONB, or in	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		<p>another borough, the AONB and its settlements are an attractive destination for day trips and short visits and so will continue to draw people from a wide area for leisure and recreation.</p>	
	<p>Over 30 responded with concerns over proposals to close Hartlake Road, which will mean the traffic is only going to get worse (particularly on the A26) (respondents included Tom Tudendhat MP and TMBC). It is not clear how the new accesses and internal road layout will provide an alternative north-south route. Whereas, if Hartlake Road remained open after development, this road and lanes beyond it would be inadequate for the significant new traffic causing wide-reaching consequences.</p> <p>No modelling which identifies the impact of proposed Hartlake Road closure on Tonbridge and Malling, which should be a pre-requisite before any changes are made.</p> <p>Would also hamper access for residents at Golden Green.</p> <p>Unclear what the impact on the development would be if the expensive Hartlake Road scheme is not provided, including free-flowing movement within the site and community cohesion.</p>	<p>The Transport Assessment has been supplemented with additional sensitivity testing by Sweco in close discussion with both KCC and National Highways.</p> <p>The transport evidence proposes measures that promote modal shift and, where relevant, infrastructural improvements to the highway network. Both KCC/NH have given their commitment to continue to work with TWBC to finalise and agree the further sensitivity testing. Outcomes will be reflected in further SoCG with both KCC/NH.</p> <p>TMBC &amp; TWBC are committed to working together as set out in the SoCG, in relation to the impact on Tonbridge &amp; Malling Borough, including Tonbridge.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>A local Church notes that while plans for a cycle route/walkway between Tudeley Village and Tonbridge are welcomed, there is a need for a shuttle service between Five Oak Green and Tonbridge, ideally on its own dedicated route, to offset pressure of traffic along that section of the B2017.</p>	<p>Contributions towards an enhanced public bus route is included within the Strategic Sites Masterplanning and Infrastructure Framework.</p>	<p>No changes proposed</p>
	<p>Inadequate pedestrian and cycle measures; fail to deliver safe and suitable routes to ensure modal shift. No explanation of how safe cycling and walking access will be to Tonbridge and Tunbridge Wells. Distance from Five Oak Green to Tonbridge or Paddock Wood is approximately 5 miles. No commuter likely to cycle this at 7am or 7pm, in the winter, or a parent taking their young children to school. Topography also challenging. Currently no active travel infrastructure identified between the site and railway stations. Insufficient evidence to support this claim. Transport Connections maps indicate that inter-settlement cycle routes will align with existing roads. Given serious dangers of cycling on rural roads, if there is no off-road or segregated cycle provision, these will be of little use. Needs to be costed, funded proposals to provide better, largely off-road cycling routes, and for the Council to use its CPO powers to create them.</p>	<p>Please see LCWIP which has informed the policy position which places an emphasis on pedestrian and cycle links. This infrastructure is included within the Strategic Sites Masterplanning and Infrastructure Framework.</p>	<p>No changes proposed</p>
	<p>Policy makes no reference to rapid bus/transport link from Paddock Wood to Tonbridge (via</p>	<p>The Strategic Sites Masterplanning and Infrastructure Study provides for a bus link through</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Tudeley) nor does Map 32 (Tudeley Village Plan). No evidence to show that a regular walk-on service could be provided early on for the new settlement (funding inadequate), or whether the scale of development would support a service/ meet demand. Residents more likely to travel by car.	the settlement and assigns costs to this accordingly. TWBC is also working closely with KCC public transport team in delivering this allocation.	
	The four highway improvements in the IDP relating to highway connection to Tonbridge, all of which are assigned a priority of critical, are not specifically included in the policy and it is unclear whether these will be provided to support travel to Tonbridge.	This will be part of the mitigation addressed at planning application stage, and it is considered that the policy facilitates this effectively.	No changes proposed
	Plan provides for a six-form entry secondary school which will serve a wider catchment than the new settlement. It is unclear where pupils will come from or how they will travel to the new school.	The secondary school is identified to mitigate growth, predominantly at Paddock Wood and Tudeley and has been factored into the transport assessment work.	No changes proposed
	Plans refer to creating bus lanes and walk/cycle lanes. These will necessitate road works and widening at considerable cost to KCC. No indication that KCC will bear these costs, casting doubt on timing and viability.	Costs for the delivery of transport schemes are included within the Strategic Sites Masterplanning and Infrastructure Study. This has been assessed through the viability model.	No changes proposed
	Capel/PW plan proposes £5m on cycling routes and improvements while Tudeley plan proposes £17.5m. This investment makes big assumptions about the take up of cycling by 14,000 new	The LCWIP is a detailed evidence base document which has informed the Local Plan process, as has the Strategic Sites Masterplanning and Infrastructure Study. These have specifically	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	residents which is likely to be overoptimistic given the demographics.	considered cycling infrastructure potential and costings.	
	TMBC note the inclusion of cross-boundary walking and cycle routes from Tudeley (and associated with Mabledon House policy) is a welcome contribution towards more sustainable means of transport, but concerns remain that this together with the proposed additional bus services will not result in the anticipated modal shift from private car use of 10%. Further evidence needed.	This modal shift has been accepted by KCC and NH for new development here.	No changes proposed
	Isolated site with limited transport connectivity. No sustainable transport provision. People will continue to rely on private cars.	Provision of sustainable transport links; pedestrian and cycle, are key to the delivery of this settlement. Appropriate infrastructure identified within the Strategic Sites Masterplanning and Infrastructure Framework accordingly.	No changes proposed
	Large roundabout proposed at junction of Hartlake Road and Tudeley Road/Crockhurst Street, and suggested widening of B2017 between Tonbridge and two proposed junctions on wester/southern sides of Tudeley will likely require some land from adjoining plot 440. No consultation about these proposals has taken place with the owners.	Discussions with landowners for highway mitigation will commence once the plan is adopted and detailed design is progressed. The aim of the Council is to reach agreements which each landowner for any land purchase, but the policy makes clear that if required the Council will use its CPO powers.	No changes proposed
	Reliance of technological advances to transport make active travel not reliable	The proposed approach looks to reduce modal shift and encourage more sustainable ways of travel. Any new routes for bus etc will be designed to accommodate more innovative modes of travel if required.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>Drainage</b>			
	Drainage plan has not been identified within evidence base, although it is clear that extensive mitigation will be required.	Please see SFRA Levels 1 and 2.	No changes proposed
	KCC: Drainage strategy policy should promote integration of drainage measures in open space for multi-functional benefits.  Surface water drainage measures must be outside areas of flood risk. Should be included within any design code.	Agree that further information on drainage strategy can be dealt with at SPD stage.	No changes proposed
	KCC considers Clarity needed on the drainage position along the northern boundary and proximity to flood risk around Tudeley Hale.	This will be dealt with through SPD and planning application stage.	No changes proposed
	Concerns about ground shrinkage from Climate change. Clay soil, impacting foundations and subsidence from drying soil.  This soil is prone to slippage, which could cause problems for a large housing development especially with large run-off.	Southern Water and EA, both members of the SSWG, are aware of the impact of the clay soil on infiltration levels and how this impacts the drainage systems. Infrastructure if being considered by Southern Water, through its DWMP.	No changes proposed
	Around 20 residents considered there was insufficient detail on sewage infrastructure. Tonbridge treatment plant stretched and Sewage systems in Paddock Wood/Five Oak Green area	Please see Statement of Common Ground between TWBC and Southern Water.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	already poor. According to Southern Water, they have no plans to expand this or to improve it.		
	There shouldn't be a get out clause for drainage strategies not to be in place even in "exceptional circumstances".	"Exceptional circumstances" sets a high bar for compliance; and its inclusion is not considered to provide an easy route for developers to not comply. Drainage is a key consideration in the acceptability of proposals within Paddock Wood and east Capel, and will be scrutinised very closely at planning application stage.	No changes proposed
	To meet demands for both SS1 and SS3, a new sewerage plant likely. Hadlow Estate has indicated it has land to provide this but this isn't shown. If added, this would add to flood risk and would need enhanced SUDs and other measures. This significant infrastructure should be specified. This would also reduce capacity of 2800 homes.	Hadlow Estate has significantly land holdings outside the allocation boundary.	
	TMBC understands that the Upper Medway Internal Drainage Board will be seeking developer contributions. Has this been taken into account with regard to the whole plan viability study?	No comments have been received to the Plan from the Upper Medway Drainage Board. The UMDB is a member of the SSWG. The Strategic Sites Masterplanning and Infrastructure Framework makes provision for drainage upgrades.	No changes proposed
<b>Flooding</b>			
	A large number of respondents (over 100, including TMBC and CPRE) have concerns with the risk of flooding on the site; located on a floodplain (therefore contrary to policy).	The comprehensive flood risk work undertaken for the Council in its evidence base documents; as highlighted above, assess Tudeley Village. The evidence submitted by Hadlow Estate on flood matters to Reg. 19 also supports this approach.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	Insufficient detail on prevention/mitigation/how it will be funded. This should not be left to subsequent stages, and costs should be factored into viability.	See Statement of Common Ground between Hadlow Estate and TWBC which identifies potential measures which can be delivered on / off site to provide betterment in flood risk to Five Oak Green. Further details will be required to be considered at Planning application stage/ through SPDs.	
	Alternative sites available outside flood plain. No sequential or exception test for Tudeley Village.	The vast majority of the site is located within Flood Zone 1. The SFRA Level 1 assessed the baseline flood position within Tudeley Village, which was then applied along with other considerations on the suitability of sites in the Sustainability Appraisal. Please see response to STR1 for information.	No changes proposed.
	Southern parcel does not benefit from the storage at Leigh; given sloping nature of terrain this descends towards Sherenden Road. The impact of Leigh barrier hasn't been considered.	The Leigh Flood Storage Area is considered in the SFRA.	No changes proposed
	Increased flooding from climate change. Increased rainfall should be incorporated into FRA.	The SFRA considers the potential impact of climate change on flood risk.	No changes proposed
	A large number (c. 65) of respondents have concerns that overdevelopment will increase flood risk. Removing permeable fields and trees and replacing with concrete. Mitigation plans are put in place, they will only exacerbate the impact on communities up and down river to places which	The evidence base confirms the redevelopment of this land can be made acceptable in flood risk terms.  The policy requires betterment to the flood situation in Five Oak Green. Further details will be	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	already struggle with flooding, such as Five Oak Green, Tonbridge, East Peckham, Yalding, and others. Loss of opportunity to enhance Five Oak Green.	provided at SPD stage and through detailed planning application.	
	Flood risk assessments based on old data (EA data out of date) that does not fully consider impact of climate change.	The SFRA was prepared with the data available at the time. JBA has confirmed that any additions/ changes are not considered material to the conclusions of this work.	No changes proposed
	Betterment of flood risk to Five Oak Green is not specified therefore justification for GB removal unsound.	This is a policy requirement. Details will be set out in SPDs / planning application stage. This is considered appropriate, as the policy should not be too prescriptive in this respect.  Please see Statement of Common Ground between TWBC and Hadlow Estate.	No changes proposed
	Presence of the total catchment of a Groundwater Source Protection Zone north of railway line creates a risk that must be carefully managed, and any development would put additional strain on existing resources, and without further consultation with EA, Water and Railway Companies will lead to increased flooding issues.	Noted. Ongoing engagement with these statutory consultees will remain throughout the preparation of the SPD and at planning application stage.	No changes proposed
	Existing proposal to create an extensive quarry site at current Stonecastle Quarries will have a significant impact on flood risk, with the water table lying just below the surface. This may cause a significant risk to any adjacent housing development. Would also create a considerable	The surrounding geology is well understood. These will be considered in the preparation of an appropriate drainage plan and in consultation with the relevant stakeholders.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	challenge to develop a suitable sewerage facility which will be required to treat waste from the development.		
<b>Water Supply</b>			
	SEW would need to supply bulk of water for site from north with new water treatment works, and increased transfer capacity. SEW will work with LPA and developers to ensure necessary infrastructure reinforcements is delivered ahead of occupation of development. It is important not to underestimate time required to deliver necessary infrastructure.	Noted.	No changes proposed
	SEW recommended that Council is ambitious and tries to achieve lower water usage targets as soon as regulation permits and to include a lower optional standard which could be trialled in selected new developments.	The Local Plan does propose the application of the lower water usage standard across the borough at Policy EN24.	No changes proposed
	A number of residents (c.25) noted that the area is already short of water; major investment required to prevent major water supply issues. Evidence needs to be provided demonstrating that water can be supplied.	Please see IDP.	No changes proposed
	Hartlake catchment aquifers must be safeguarded and protected from penetration to avoid pollution.	Noted. This will be considered at planning application stage.	No changes proposed
	Concern that increase in water flow will increase chemicals in the water supply.	The Council is engaging closely with the key water authorities including South East Water, Southern	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		Water and the EA, and will continue to do so through the preparation of an SPD and at planning application stage.	
<b>Heritage</b>			
	No heritage assessment assessing the impact of development on heritage assets has been carried out to inform the allocation.	<p>The Hadlow Estate has prepared a Heritage Assessment which has considered the heritage assets within and in close proximity to the area planned for growth; and responded to these accordingly within its Masterplan.</p> <p>Further detail will be progressed through SPDs, and planning applications will be determined in line with the statutory tests relating to heritage assets.</p> <p>TWBC notes Historic England is satisfied with the heritage evidence base to the Local Plan.</p>	No changes proposed
	Impact on heritage sites, listed buildings and many traditional ancient Kentish farmsteads (e.g. (views from) Hadlow Tower, Lilley Farm and Bank Farm within the proposed allocation, and numerous listed buildings at the edges of the allocation). Inconsistent with Policy EN4 and EN5 which seek to protect historic environment. Cannot do this with such a significant scale of development. Impact also on historic landscape	<p>The Sustainability Appraisal considers various elements of the sites, including heritage assets, in determining which sites to progress towards allocation. Please see the Sustainability Appraisal and Development Strategy Topic Paper for further detail.</p> <p>Planning applications for developments which affect the setting of listed buildings will need to meet the statutory tests and will be considered accordingly.</p>	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Specific concern with the impact on All Saints Church (Grade 1), which is world famous with its Chagall windows.</p> <p>The Capel United Church has concerns about the proposed housing block to the north-east of the All Saints' Church south of the railway line, which will affect its surroundings not least the view north from the churchyard to Greensand Ridge.</p> <p>Proposed that this block of housing is instead turned into parkland.</p>	<p>It is agreed that the setting of the All Saints Church needs to be carefully considered in the preparation of a masterplan for Tudeley Village. The Masterplan is not fixed and will be subject to engagement with relevant stakeholders in due course.</p>	<p>No changes proposed</p>
	<p>Hadlow Estate Delivery Strategy no detail on preserving heritage assets. See Save Capel Heritage Report.</p>	<p>The Hadlow Estate Delivery Strategy has been informed by a Heritage Assessment prepared by Orion, which has informed its Masterplan. Further detail on heritage assets will be developed through SPDs.</p>	<p>No changes proposed</p>
	<p>CPRE considers Section 7(b) of policy should consider the impact on views of Hadlow Tower from the High Weald AONB.</p>	<p>The list of key views will be determined at planning application stage. It is agreed this is an important view, but the Council does not consider this detail is required within the Policy.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Capel United Church notes that two parking areas leased by the church from Hadlow Estate are included within the garden village footprint. Need to ensure parking and access to the church is maintained and not threatened if insufficient parking is included in the plan.</p> <p>Capel United Church notes that All Saints' Church is usually unattended during the day. Its celebrated stained-glass windows have no physical protection, which would diminish their visual impact. Concerns of antisocial behaviour providing a risk to the enjoyment of this asset.</p>	<p>Loss of parking, amenity and other matters will be considered through the detailed preparation of the masterplan; and subsequent consideration of the planning application against other policies in the Plan.</p>	<p>No changes proposed</p>
	<p>The village would destroy the character of the area; as referred to in the Doomsday book.</p>	<p>It is accepted that the character of the area will change significantly as a result of the development. This is a consideration in the Sustainability Appraisal which determines which sites to progress towards allocation. Please see the Sustainability Appraisal and Development Strategy Topic Paper for further detail.</p>	<p>No changes proposed</p>
	<p>Loss of historic hop garden from bypass route.</p>	<p>The precise location and detailed design of the Five Oak Green bypass has not been determined. This will be subject to a proper Environment Impact Assessment and any necessary mitigation incorporated.</p>	<p>No changes proposed</p>
<b>Access and Movement</b>			
	<p>Question over deliverability of Network Rail Crossing. No evidence that Network Rail supports</p>	<p>Please see Statement of Common Ground with Network Rail where this matter is addressed.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>crossings over the railway line and therefore that these aspirations will be achieved. Also not included within viability costings.</p> <p>Costs of building new bridges over the railway may prove prohibitive leading to only half of the village ever being constructed, ensuring that the promised facilities are never provided because the developers cannot then afford to do so.</p>	<p>The costings for the railway lines are included within the Strategic Sites Masterplanning and Infrastructure Study which has been assessed as part of the viability assessment.</p>	
	<p>TWBC has a climate emergency. It is therefore prudent to show ow development will encourage active travel modes.</p>	<p>Active travel is integral to the policy; as set out under part 7a).</p>	<p>No changes proposed</p>
	<p>KCC considers the policy should mention PRoW network with upgrades. Mitigation should be sort to take account of increase network use.</p>	<p>Noted. The Policy sets out in point 7a that the design of the scheme should provide good levels of permeability, including walking &amp; cycling linkages, with the supporting text also highlighting the key garden settlement principles of a cohesive, walkable community. In addition, the supporting text to the Policy sets out cross reference to Policy TP 2: Transport Design and Accessibility which the approach for positive outcomes for PRoWs, including improving connectivity and securing contributions. No change proposed.</p>	
	<p>9 of the planned walks in Capel Path Rangers’ “15 Walks Around Capel” will be directly affected. Plan will have devastating effect on those people who use these walks regularly.</p>	<p>The proposed new settlement at Tudeley Village will be delivered on garden settlement principles. Green space has been fully considered in the development of the Masterplan Plan and green infrastructure will be a key consideration in the</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		<p>assessment of schemes for each of the key parcels.</p> <p>Improvements to existing public rights of way will also result from the development and enhancements to existing PROWs are likely to be a key elements of the compensatory improvements to the Green Belt for land to the west which will be removed from the Green Belt.</p>	
	<p>The British Horse Society notes that Tudeley will remove Bank Farm livery without any replacements. This will leave residents of new development, who wish to ride, together with existing clients, with nowhere to keep horses or ride. Equal consideration should be given to horse riding as it is given to walking and cycling. Map 32 should also show which routes are proposed as bridleways or restricted byways. Needs to also designate an area for a new riding centre or livery stables to replace Bank Farm, linked into the proposed bridleway network.</p>	<p>The Hadlow Estate has committed to seeking to find an alternative location for Bank Farm within its landholding, subject to planning.</p> <p>Policy STR/SS3 requires consideration of bridleways. Further detail to be considered through SPDs and planning application stage.</p>	<p>No changes proposed</p>
<b>Garden Settlement Principles</b>			
	<p>CPC and residents note that the railway line runs through the site, dividing the settlement. It will never satisfy garden settlement principles.</p>	<p>Permeability of the settlement across the railway line has been a key consideration in the preparation of the masterplan. The Strategic Sites Masterplanning and Infrastructure Study identifies three crossings over the railway line. These has</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		been costed and considered as part of the viability assessment; and discussed with Network Rail (please see signed Statement of Common Ground).	
	Garden City Principles are supposed to be locally led. This has not happened.	Hadlow Estate has sought to engage with the local residents and stakeholders; please see Strategic Sites Topic Paper. Further engagement is proposed in the development of the Masterplan and SPD.	No changes proposed
	Difficult for the settlement to be self-sustaining when so close to both Tonbridge and Paddock Wood which are medium sized service centres.	The settlement will include the provision of a number of services including a primary and secondary school, commercial uses (through a village centre and neighbourhood parades) and employment uses, amongst other things, to internalise trips.	No changes proposed
	Isolated area; if you do not drive many services will be inaccessible.	Enhancements to pedestrian and cycle links, both within and links to other nearby towns and settlements are a key policy requirement. The LCWIP sets this out in further detail.	No changes proposed
	Development doesn't meet garden settlement criteria.	TWBC considers this development can achieve the garden settlement criteria. Further information will be set out in the SPD.	No changes proposed
<b>SPD</b>			
	Some residents, and CPC, raised concerns SPD is not available yet, concerns the Plan is being rushed through. Without a SPD difficult to	Please refer to the Local Development Scheme. The role of SPDs is to supplement Policy contained within the statutory development plan;	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	comment on detailed matters such as provision and routes of key infrastructure.	and it was always envisaged these would be prepared subsequent to the finalisation of the Reg. 19 version of the Local Plan.	
	Natural England state SPD should be adopted before planning permission for new development is granted.	See para. 5.229. This states that the SPD will need to be adopted before any planning permissions for substantial new development at Tudeley Village are granted, unless exceptional circumstances arise.	No changes proposed
	KCC recommend design codes/SPDs for allocation to promote sustainable drainage design with consideration water quantity, quality, amenity and biodiversity. Existing watercourses should be retained and maintained.	Agree that further information on drainage strategy can be dealt with at SPD stage.	No changes proposed
<b>Delivery</b>			
	CPC notes that Hadlow Estate does not have experience of delivering this quantum of housing; therefore site is not deliverable.	The Hadlow Estate Delivery Strategy sets out the approach to be taken to deliver the settlement. Please also see the signed Statement of Common Ground between TWBC and Hadlow Estate.	No changes proposed
	An omission site promoter notes that development at Tudeley Village is not as viable as indicated under the same range of variables as other schemes. Tudeley Village is reliant on lower existing land values and higher property values to show it is viable.	The viability assessment which underpins the Local Plan concludes that the development is viable.	No changes proposed
	PWTC considers the Local Plan viability study should take a 'worst case scenario' view on	The approach taken by the Council's viability assessment is using the methodology which is	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>viability. Given need for mitigation infrastructure TWBC and its residents cannot afford for the viability study to be a ‘high level’ assessment which lacks finer grain detail and analysis required to fully understand challenges presented by proposals.</p>	<p>appropriate for Local Plan preparation, and follows the guidance set out within the NPPF.</p>	
<b>Consultation</b>			
	<p>Over 55 comments came in from residents, Capel and local Groups stating there had been insufficient consultation with TMBC, other LPA’s and neighbouring PC’s. No evidence of genuine cooperation with neighbouring LPAs on strategic matters, especially Tonbridge given the growth will place pressure on its infrastructure.</p> <p>No signed Statement of Common Ground with T&amp;M; in breach of Duty to Co-operate with T&amp;M especially given impact on neighbouring settlements in T&amp;M borough.</p> <p>Location of TV shows blatant disregard for MBC and TMBC. Suggests our borough is too constrained and the Council is asking others to bear the brunt of the growth.</p>	<p>See Responses under Legal Compliance and Duty to Cooperate.</p>	<p>No changes proposed</p>
	<p>CPC notes that Tudeley Village will place a burden on TMBC and the Council has only masterplanned to the borough boundary.</p>	<p>TMBC (and MBC) form part of the SSWG. The Council has worked closely with both boroughs as set out in the signed Statements of Common Ground.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>A couple of comments were submitted from local residents noting the Hadlow estate masterplan not included in TWBC bundle for Reg.19.</p>	<p>The Hadlow Estate Delivery Report was commissioned by the Hadlow Estate. It is their work which is relevant to the PSLP but not produced for TWBC as an evidence base document. It is material to the allocation, but not something that is TWBC's work. Please see Section 5 of the Strategic Sites Topic Paper for further information.</p> <p>Further, given the document is on the Hadlow Estate's website, in the public domain, it was not considered necessary to include it on the TWBC website at this time.</p>	<p>No changes proposed</p>
	<p>Limited engagement with DLA as part of the masterplanning. Lack of engagement with the Hadlow Estate and local community.</p> <p>TWBC not taking into consideration Vision for Capel NDP questionnaire.</p> <p>CPC only permitted to send one rep from PC and one from NDPG to SSWG; outnumbered by Developments (and SSWG should not be P&amp;C).</p>	<p>TWBC regularly engaged with Capel Parish Council once it was determined that its most appropriate strategy was to direct growth to strategic sites within Capel parish, and in relation to its Neighbourhood Development Plan in a similar manner to other Neighbourhood Development Plan groups.</p> <p>To enable productive discussions, attendees from all representatives within the SSWG have been limited to one person.</p> <p>Further consultation will take place with the local community, including Capel PC and Paddock Wood Town Council on the progression of SPDs.</p>	<p>No changes proposed</p>

## 5.4 Capel

### Notes

1. The total number of representations recorded against this policy is 27.
2. A number of comments submitted against this policy reflect concerns over the significant proportion of growth proposed in East Capel as set out in Policy STR/SS1 and Tudeley Village (Policy STR/SS3) This includes transport concerns, objections to the loss of Green Belt land, concerns over infrastructure provision, serving a local housing need, flooding concerns etc. These are not repeated here but clearly do relate to the proposed Strategy for Capel Parish as covered by this policy. Please see Response Table to Policies STR/SS1 and STR/SS3 which sets out the key issues relating to the growth around Paddock Wood (and land in east Capel) and sets out the Council's key position.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>General Comments</b>			
	CPC is concerned that unlike other settlements, no benefits like a new community hall etc. have been identified for Five Oak Green. No proposals for road traffic improvements.	The provision of a new garden settlement at Tudeley Village within Capel parish will deliver significant infrastructure to the parish, along with identified transport mitigation and community facilities  The policy does provide for contributions towards enhancements to facilities in Five Oak Green.	No changes proposed
	More thought should be given to making Five Oak Green into a sustainable settlement, rather than reliant on Tudeley.	The outcome of the Sustainability Appraisal, which took into consideration a number of issues when determining the most appropriate locations to direct growth, determined the most sustainable option in delivering the borough's housing need was the provision of a garden settlement at Tudeley.	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	An omission site promoter stated that the Council must revisit its Green Belt Study and Landscape Sensitivity Assessment specifically in the context of Five Oak Green; current approach in the Plan does not reflect the evidence base.	The GB studies do consider Five Oak Green. There is no expansion planned for Five Oak Green and so no specific additional landscape studies are considered necessary.	No changes proposed
	Plan does not explain implications of close proximity of Tudeley to Five Oak Green.	The plan identified all the required mitigation and infrastructure for development at Tudeley Village and east Capel to accommodate the growth; along with the existing infrastructure to serve the future needs of residents in Five Oak Green.	No changes proposed
<b>Green Belt</b>			
	CPC identifies that Point 4 re. GB Compensatory improvements - most properties flooding in Five Oak Green are not in the GB.	Yes this is true – the Green Belt is drawn tightly around the settlement of Five Oak Green but this also means that any flood, landscape or ecological mitigation for Five Oak Green must be placed in the Green Belt and so it is a Green Belt issue. Any such measures will also benefit the wider area and so are considered compensatory improvements. The reduced risk of flooding to a settlement wholly within and completely surrounded by Green Belt is considered a particularly important benefit.	No changes proposed
	Comments were submitted by residents, CPC and an omission site promoter stating that the plan envisages removal of 182ha of GB at Tudeley, and 148ha at East Capel; not considered compensatory improvements; woefully inadequate. Lack of details over what compensatory improvements might be.	The Council has considered the possibility of Green Belt replacement, in particular to areas around Paddock Wood, having regard to the requirements of paragraph 135 of the NPPF as set out in the Development Strategy Topic Paper. This sets a very high bar for such proposals and it is currently considered that the circumstances do not	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Only one compensatory improvement identified (potential to reduce flood risk around Five Oak Green); however, presence of flood risk is not a determining factor in the inclusion of land within the Green Belt, and therefore would not constitute a compensatory improvement.</p>	<p>exist to justify such an approach and so no replacement Green Belt is currently proposed. The decision to not designate further Green belt around Paddock Wood is supported by the Stage 3 Green Belt Study.</p> <p>It is not considered necessary, or indeed, effective to identify the compensatory improvements within the Local Plan itself. This provides flexibility in delivery the sites. However, discussions with site promoters as set out in the Statements of Common Grounds identify a number of potential measures which provides the necessary comfort that this element of the policy will be delivered. It is anticipated that further details will be set out in subsequent SPDs.</p>	
<b>Impact on Countryside</b>			
	<p>Local residents note that 15% of countryside will be lost, including the gravel extraction in Capel.</p>	<p>The Sustainability Appraisal considers various elements of the sites, including landscape considerations, in determining which sites to progress towards allocation. Please see the Sustainability Appraisal and Development Strategy Topic Paper for further detail.</p>	<p>No changes proposed</p>
	<p>Loss of rural landscape would impact on wellbeing; loss of benefits of getting into the countryside, exercising and experience nature/tranquillity.</p>	<p>The proposed growth within Capel will be delivered on garden settlement principles. Green space has been fully considered in the development of the Structure Plan for East Capel and Masterplan for Tudeley Village, and green infrastructure will be a key consideration in the assessment of schemes for</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		<p>each of the sites. On the western side of Paddock Wood in Capel Parish, a new Wetlands park is proposed to provide recreational amenity for existing residents.</p> <p>Improvements to existing public rights of way (PRoWs) will also result from the development; enhancements to existing PROWs are likely to be a key elements of the compensatory improvements to the Green Belt for land to the west which will be removed from the Green Belt.</p>	
<b>Flooding</b>			
	<p>Flooding has increased over past few years. Concreting over vast areas of land within Flood Zone 2 and 3 will inevitably increase run-off. Climate is changing; there is far more rain now and for longer periods. Flooding will become an ever-increasing problem.</p>	<p>See SFRA Reports. Further flood information has also been submitted by the Hadlow Estate which demonstrates that development can be delivered which is acceptable in flood risk terms and appropriate mitigation, where required, provided.</p>	<p>No changes proposed</p>
	<p>Flood risk analysis has not used 2019 information.</p>	<p>The SFRA was prepared with the data available at the time. JBA has confirmed that any additions/ changes are not considered material to the conclusions of this work.</p>	<p>No changes proposed</p>
	<p>Provision to mitigate flood risk and surface water management should be used to protect current homes at risk, not planning more homes to be at risk and then try to protect them.</p>	<p>Planning on such a significant scale provides the opportunity to provide infrastructure to provide betterment to flood risk for existing residents.</p>	<p>No changes proposed</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Based on sequential/exception tests, there are 439/513 other sites and questioned whether none of these are considered more suitable/safer sites than Paddock Wood, Five Oak Green and Tudeley.	The Sustainability Appraisal considers various elements of the sites, including flood risk considerations, in determining which sites to progress towards allocation. Please see the Sustainability Appraisal and Development Strategy Topic Paper for further detail.	No changes proposed
<b>Transport and Parking</b>			
	Expansion of Capel Primary School, Five Oak Green, will have a detrimental effect on traffic congestion; school-run parking is already chronic and a source of traffic congestion.	The future expansion of Capel primary school has been considered in the Transport work prepared by Sweco, and appropriate mitigation incorporated into the Plan.	No changes proposed
	KCC requests that the policy includes reference to the need for appropriate development contributions to be made towards improvements to the PROW network to provide Active Travel opportunities in the area.	Noted. Supporting text to the Policy sets out cross reference to Policy TP 2: Transport Design and Accessibility which the approach for positive outcomes for PRoWs, including improving connectivity and securing contributions. Given that the Plan is taken as a whole specific reference in the Policy is not necessary. No change proposed.	No changes proposed
	Increase in cars will increase danger to public safety in a parish that already has severe speeding issues.	Five Oak Green Bypass will help direct traffic flows away from Five Oak Green village. The increase in traffic has been modelled through the transport work.	No changes proposed
<b>Economic</b>			
	Tudeley Village, as well as Five Oak Green bypass, will discourage visitors/passing traffic that would support and sustain local services in Five Oak Green.	Five Oak Green bypass will stop through traffic which causes congestion and road safety concerns. This should make visiting any local services by residents in Five Oak Green easier.	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Whole of Capel will suffer from 15-20 years of severe disruption if Plan proceeds. This will likely deter local business.	The Council accepts growth at this scale will cause disruption to existing residents and business. It is considered investment overall will enhance the local economy.	No changes proposed
<b>Sport</b>			
	There is only one football pitch at Five Oak Green (not multiple), contrary to point b.	Plural is used to allow money to be spent to provide additional pitches if required/ sought over the plan period.	No changes proposed
<b>Education</b>			
	Capel Primary School does not have space for extra classrooms. Will also be a need for additional staff for teaching/support as well as parking.	The expansion of Capel Primary School has been discussed with KCC education.	No changes proposed
<b>Alternatives / Omission Sites</b>			
	Release of smaller areas of Green Belt land would result in less Green Belt compromise; number of sites located on the edge of Five Oak Green which could provide for a number of new homes and result in less of an incursion into the Green Belt (e.g. site 11; Land at Whetsted Road). Site 11 should be reassessed, and its sustainability appraisal should be reviewed; would provide a modest increase in dwellings (approx. 40-45 dwellings), and support/sustain local services and facilities. Issues identified in SHELAA include highways/noise; however, work carried out has demonstrated that highway concerns can be resolved with highways measures, and mitigation included in the development of the site to prevent noise from railway impacting on future occupiers.	The Sustainability Appraisal has determined that the most appropriate strategy for meeting the housing needs for the borough is to direct growth to Tudeley Village and significant expansion of land around Paddock Wood including land in east Capel.  Given this growth, it is not considered appropriate to allocate any smaller sites within Five Oak Green.  Please see response to Policy STR/SS1.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Site 143 (Land at Tolhurst Road) in Five Oak Green remains deliverable/available and as an organic, logical, and sustainable addition to the village; site can also be brought forward in a manner consistent with overarching delivery objectives. Exceptional circumstances exist/sound case can be made for Green Belt release; however, not considered the same for Tudeley.</p> <p>Sites 329/331 (Site at Finches Farm) in Five Oak Green should be reviewed; further detailed appraisal of the site confirms it is located in a suitable and sustainable location for accommodating housing and that technical concerns raised by the Council can be appropriately addressed alongside a sensitive residential development. There are numerous planning benefits associated with developing on this site.</p>		
<p>Land at Castle Hill Farm, Castle Hill Farm, Pembury Road, Capel TN11 0QG (Site 49, 62 and DPC7) Within Capel Parish, but in proximity to</p>	<ul style="list-style-type: none"> <li>• Inclusion of the site is sought as a garden settlement including residential allocation of up to 900 dwellings and associated facilities, including open space and community facilities,</li> <li>• Supporting document promoting site as an alternative to Tudeley in a sustainable location on the edge of Royal Tunbridge Wells (within Capel Parish).</li> <li>• Number of appendices including housing need justification/case studies/PINS decisions/Castle</li> </ul>	<p>The site has been assessed through the SHELAA process and has been found unsuitable as a potential allocation. The supporting/technical information submitted by the site promotor has been considered.</p> <p>This is a constrained site and has a complex topography. It is within both the AONB and the Green Belt. It is considered that development of this site would result in large scale development in the AONB. Given the strong policy protection given to the AONB (a national designation) in the NPPF, the</p>	<p>No changes proposed</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
Main Urban Area of Royal Tunbridge Wells and Southborough.	Hill Masterplan/ Overview Transport Strategy/A21 Impact Appraisal/Land at Tudeley Village Sustainability Technical note	site is considered unsuitable as an alternative garden village option or as an allocation within the Local Plan.	

## 5.5 Paddock Wood

### Notes

1. The total number of representations recorded against this policy is 48.
2. A number of comments submitted against this policy reflect concerns over the significant proportion of growth proposed around Paddock Wood as set out in Policy STR/SS1. This includes transport concerns, objections to the loss of Green Belt land, concerns over infrastructure provision, serving a local housing need, flooding concerns etc. These are not repeated here but clearly do relate to the proposed Strategy for Paddock Wood Parish as covered by this policy. Please see Response Table to Policy STR/SS1 which sets out the key issues relating to the growth around Paddock Wood (and land in east Capel) and sets out the Council's key position.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>General Comments</b>			
	The site promoters for land at Paddock Wood and East Capel consider Points 1 and 2 should be deleted and redrafted as supporting text at the beginning of the section, as other policies refer.	This is a strategic policy to cover the growth within the whole Parish. TWBC considers this needs to be retained. Strategic policies play a role in other key plan making stages and it is important this is complete.	No changes proposed.
	One of the Site Promoters notes that the Policy should be called 'Strategy for the Parish of Paddock Wood'.	Agree. Minor typo	Please amend Policy Title to "Strategy for Paddock Wood <b>parish</b> " (Additional text in bold)
	Two site promoters for land at Paddock Wood and east Capel consider criterion 10 [on developer	See response made to this point in the STR/SS1 policy.	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	contributions toward infrastructure], it is considered that any referred to changes to the Strategic Sites Infrastructure and Masterplanning Document should be subject to consultation with all relevant parties so as to establish implications of proposed changes for those promoting these sites/ensuring the local community have a chance to have their say on what is being amended and why.	The inclusion of the ref. to an amended Infrastructure Framework is to provide sufficient flexibility if changing circumstances means the infrastructure framework requires updating (similar to the IDP).  No additional wording is considered necessary.	
	Proposed allocations for Paddock Wood are excessive and not justified.	Please refer to Response Table on Policy STR1 which relates to the borough's Development Strategy.	No changes proposed.
	Developer contributions should not just be sought; they should be mandatory.	The policy framework makes clear these contributions will be required. No amendments considered necessary.	No changes proposed.
	Para 5.241 is false; there is at least 1,400 new houses. Should take into account number of windfall houses built in PW during that time, and pressure put on existing inadequate infrastructure.	The supporting text makes reference to the numbers delivered on the key major housing sites. It is provided as an indicative figure.	No changes proposed
<b>Transport and Parking</b>			
	A number of residents stated that while Paddock Wood railway station is a major factor for directing growth to Paddock Wood, car parking at station car parks is at capacity and therefore the station should not be a major factor in decision making for such a proposal, nor justify need for expansion into Green Belt, flood zones, and destroying prime arable land.	Car parking within the town centre will be considered through Policy STR/SS2.  The Sustainability appraisal considered a number of factors, including but not solely, the proximity of public transport facilities in determining the appropriate locations for growth. The Policy within	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
		STR/SS1 also requires cycle and walking routes to be integrated to the railway station.	
	Health and safety of local population not being considered, and young children and adults will be exposed to massive traffic dangers and air pollution.	Pollution is a consideration in the Sustainability Appraisal which concludes which sites should be allocated for growth. Planning applications will need to consider pollution as an amenity consideration and relevant mitigation identified.	No changes proposed.
	People do not walk or cycle as the car is integral to work/childcare/schools, etc.	See Response to STR/SS1. The pedestrian and cycle links promoted through the growth around Paddock Wood, are set out through the LCWIP and a key requirement for the growth around Paddock Wood and east Capel. The key aim of the growth is to integrate with the existing settlement in Paddock Wood so the whole area transforms into a garden settlement and realises a modal shift.	No changes proposed.
	KCC requests that the policy includes reference to the need for appropriate development contributions to be made towards improvements to the PROW network to provide active travel opportunities in the area.	Noted. Supporting text to the Policy sets out cross reference to Policy TP 2: Transport Design and Accessibility which the approach for positive outcomes for PROWs, including improving connectivity and securing contributions. Given that the Plan is taken as a whole specific reference in the Policy is not necessary.	No changes proposed.
	Will inevitably be a new road east of Paddock Wood (possibly within PW1_7), causing more light and noise pollution.	This is not identified as a required mitigation measure for the growth proposed through the Local Plan.	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Church Road needs more traffic calming.	The mitigation measures are identified and agreed with KCC in the Transport work undertaken by SWECO.	No changes proposed.
	No public transport for outer-lying areas to use. Too far to cycle particularly for the elderly population in villages.	Public transport strategy will be key to the delivery of the growth around Paddock Wood and Capel as set out in Policy STR/SS1,	No changes proposed.
<b>Flooding</b>			
	Rain-water run-off is at capacity. Concern that, as occurred elsewhere, attenuation ponds will overflow and be accidentally contaminated with sewage in times of flooding.	The evidence base has considered these matters in the formulation of growth in Paddock Wood. In particular there have been ongoing discussions with Southern Water and the EA.	No changes proposed.
	Developer must indicate examples of similar developments in flood prone areas where mitigation has proved successful by methods proposed. Calculations should be checked by a “independent authority”.	The evidence base has been prepared by expert consultants and the approach agreed with the statutory consultees. Please see signed Statements of Common Ground with the EA and Southern Water.	No changes proposed.
	Flood mitigation at present on existing new developments predominantly relies on drainage ponds which are not sustainable in the future due to climate change and more extreme weather events. They should not be built on high flood risk areas.	Sustainable drainage measures will be discussed with the statutory consultees through preparation of SPDs and at planning application stage.	No changes proposed.
<b>Housing</b>			
	TWBC very heavily reliant on development contributions, which are incorporated into house prices. Considered that this will not provide affordable housing.	The affordable housing requirements are set out through site specific policies (inc. STR/ SS1 and AL/PW1) and through Policy H3.	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	No mention of need for social housing; Paddock Wood needs more.	See Policy STR/SS1, AL/PW1 and Policy H3.	No changes proposed.
	Social care significantly reduced in Paddock Wood. No care home for the elderly. The few child-care facilities are full and only one has purpose-built accommodation.	The Policy for Paddock Wood and east Capel requires the provision of an extra care accommodation. Also see Policy H6.	No changes proposed.
<b>Countryside and Green Spaces</b>			
	Proposed 'green and blue' areas in the Paddock Wood NDP have not been legally defined in the Plan. No detailed account of how these will be mapped, created, maintained, protected, or how any of this would be policed.	TWBC is seeking to liaise with PW NDP group over the NDP but the draft NDP has not been shared with TWBC at this stage. The role of the NDP is to reflect the strategic policies of the Plan.	No changes proposed.
	Concern that the green space behind Wesley Centre, Mascalls school playing field, natural woodland behind Warrington Road/Heather Bank, ancient woodland/ponds/meadows south-east of Mascalls School, and Paddock Wood Primary School playing fields (AS_54) are not proposed for Local Green Space designation. Development on these sites is not what local residents want.	Noted. However, these sites have been assessed in accordance with the Council's <a href="#">Local Green Space Designation Methodology</a> document and found not to be suitable for Local Green Space designation. The assessment of each site and the reasoning for not proposing these sites as Local Green Spaces can be found in the <a href="#">Local Green Space Assessment</a> document.	No changes proposed.
	Insufficient green spaces. Developments in areas such as Foal Hurst Wood will make green spaces over-crowded. There is no parking at many local	Green infrastructure is a key requirement of all development in line with Policy EN14. The growth around Paddock Wood incorporates a large amount of open space as set out in Policy STR/SS1.	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	parks, and roads into Paddock Wood are too dangerous to allow children to walk along.		
<b>Climate Change</b>			
	Any new housing/commercial development should be forced to show how they will decrease amount of carbon emitted (which must include modal shift). Increasing concern regarding effect on health of emissions of particulates from braking.	This is required through Policies EN2 and EN3.	No changes proposed.
<b>Biodiversity and Landscape</b>			
	No mention is made to protection of Foal Hurst Wood nature reserved owned by PWTC. Light pollution a major threat to present wildlife that exist in the wood	Other policies in the Plan adequately protect existing areas of ecological importance including policies EN10 and EN12.	No changes proposed.
	Questioned whether TWBC have consulted Natural England, given Government policy is to protect the best and most versatile agricultural land from development.	See Statement of Common Ground between TWBC and Natural England	No changes proposed.
	Contrary to PWTC's draft NDP statement that Paddock Wood should remain of a largely rural nature. Development will have an adverse impact on the landscape setting of Paddock Wood and impact on distinctive views of surrounding countryside from public vantage points within/adjacent to built-up area.	The Sustainability Appraisal that has considered the most appropriate locations for growth considers the existing landscape context in reaching its conclusions.	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
<b>Drainage</b>			
	Not enough provision for sewage treatment. Existing sewage infrastructure already at capacity. Southern Water previously said the Paddock Wood Pumping Station was at capacity; however, a proposed foul water ring main for Paddock Wood has not materialised.	See Statement of Common Ground with TWBC and Southern Water.	No changes proposed.
<b>Employment and Economy</b>			
	Plans show little building for employment. Very little light industry/office space in Paddock Wood; most is warehousing, of which offers a very limited number of jobs. Questioned where all new people are going to work. New buyers may well have to commute to London and hence the development may simply create a commuter town and part of an ugly urban sprawl.	Both policies STR/SS1, STR/SS2 and STR/SS3 make provision for employment floorspace.	No changes proposed.
<b>Existing Developments</b>			
	No infrastructure changes coming from the current expansion. Council's "infrastructure first" statement has not been followed through. Council has failed to offer any financial support to improve the infrastructure from current developments.	The infrastructure delivery from the three permitted schemes is in line with the requirements of the s106 agreement.  The approach to infrastructure delivery for the growth around Paddock Wood and east Capel is set out in the Response Table to Policy STR/SS1.	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	Fresh water supply will be an issue; supply line pressure is dropping resulting impact of demand from new housing. Will require more investment from South East Water/Southern Water and/or developers.	TWC liaising with Southern Eater and South East Water. See Statement of Common Ground with Southern Water.	No changes proposed.
<b>Community Centre</b>			
	Objection to the provision of a community centre on Memorial Field. Against local views and alternative locations are considered appropriate.	Planning permission was granted on 19 October 2021 for a community centre in this location.	
	Proposed new hall will not be sufficient for the increase in population. Lack of consideration of community facilities or provision for High Street harming the community of Paddock Wood.	The revitalisation of Paddock Wood Town Centre is being secured through Policy STR/SS1. The provision of a community centre is also safeguarded through the policy.	No changes proposed.
<b>Education</b>			
	New primary school in Mascalls Court Farm development put on hold as not needed because potential numbers are too small.	KCC matter.	No changes proposed.
	While land is being reserved for the two-form entry expansion to existing Mascalls Secondary School, clarification is sought from KCC that this facility is still required/that the school's plans have not changed with regard to how future needs are to be addressed.	The identified education need within the IDP has been agreed with KCC Education. TWBC and KCC Education discuss provision on a regular basis. See Signed Statement of Common Ground with KCC.	No changes proposed.
	Extra two forms at Mascalls School will hugely increase parking problems which impacts on traffic.	These is a education need which can be met through the expansion of Mascalls Academy. Any	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	No alternative to private car under existing school bus policies and lack of safe cycle routes. Busy policy should be changed to provide proper school buses to where people live. Also need safe, dedicated cycle routes, separate from other traffic.	planning application will be subject to a Travel Plan which seeks to ensure pupils and staff use sustainable modes of transport.	
<b>Policy A1/Pw1: Land At Mascalls Farm</b>			
	The site allocation of 400 homes is over-intensive and unsustainable.	An assessment of site constraints has indicated that this number is achievable. Planning permission has been granted for 413 dwellings.	No changes proposed.
	With regard to paragraphs 5.256-5.257, these statements highlight the probability that the allocation of 3,590 will be exceeded as the duration of the Plan progresses; the limit of 3,590 must not be breached.	The 3,590 is an approximate figure based on high level masterplanning. It is not considered that there is scope to provide far in excess of this due to site constraints, but the Council is not fixing this as an upper limit.	No changes proposed.
	As this development already has planning permission, it is questioned why it is within the Plan and appears to be open to consultation (when it is not).	An allocation is still appropriate as the planning application for Phase 2 post-dates the base date of the Local Plan. The policy criteria will ensure that any other schemes meet important policy requirements, including higher levels of affordable housing provision.	No changes proposed.
	Southern Water notes that existing sewage infrastructure to the site has limited capacity to accommodate the proposed development. This is not a constraint provided that planning policy and	Noted. See Statement of Common Ground between TWBC and Southern Water.	No changes proposed.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>subsequent conditions ensure occupation of development is phased to align with delivery of new wastewater infrastructure. Proposals for 413 dwellings will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation. Therefore, additional criterion suggested: <i>“occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider”</i>.</p> <p>It also notes that this site incorporates Southern Water’s Badsell Road Paddock Wood Pumping Station. In order to mitigate any noise and/or vibration generated by its essential operation, a 15 metres gap between the pumping station and any residential dwelling would be required. Therefore, additional criterion suggested: <i>“a 15 metres gap between the pumping station and any sensitive development (such as housing) should be taken into consideration in the site layout”</i>.</p>		
	<p>With regard to paragraph 5.253, protection of Foal Hurst Wood and the link to Brick Kiln Wood should be included to protect the present Dormouse population in Foal Hurst Wood.</p>	<p>This issue is considered in the determination of planning applications, and appropriate conditions attached. No change to supporting text considered necessary.</p>	<p>No changes proposed.</p>

## 5.6 Cranbrook and Sissinghurst

### Notes:

1. The total number of representations recorded against the Cranbrook and Sissinghurst chapter is 73.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>STR/CRS 1: The Strategy for Cranbrook and Sissinghurst Parish</b>	1) <u>Sustainability</u> : allocations in Cranbrook are unsustainable and heavily reliant on the car	Cranbrook is a tier two settlement with a good range of services and on the main road network. All of the proposed site allocations are located adjacent to the existing built areas; policy criteria within the respective allocations require the delivery of safe pedestrian connections to services of Cranbrook and Hartley, as appropriate.	No changes proposed
	2) <u>Highways</u> : concern over cumulative impact at Flimwell junction/ Hawkhurst crossroads – traffic congestion	Transport modelling work and sensitivity testing has been undertaken to support the Local Plan. With the exception of AL/CRS2 Corn Hall (for 35-45 dwellings) all housing sites at Cranbrook have planning permission or a resolution to grant permission. National Highways raised no objection to applications for AL/CRS1 (Land at Brick Kiln Farm) and AL/CRS3 (Turnden Farm). The application for AL/CRS2 will be accompanied by a Transport Statement, which will (if required) assessing the impact on the Flimwell crossroads.	No changes proposed
	3) <u>Air Quality</u> : Concern over air pollution in Hawkhurst	The results of modelling carried out by the council during 2019 have indicated that there may be exceedances of the long-term air quality of in Cranbrook Road. Modelling has indicated that at the majority of the affected properties, any	No changes

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>4) <u>Development in the AONB</u>: There are objections variously in terms of scale, incompatibility with designation and NPPF, including lack of ‘exceptional circumstances’.</p> <p>5) <u>Infrastructure to support growth</u>: will there be sufficient contributions towards infrastructure requirements for the parish?</p> <p>6) <u>Neighbourhood Plan</u>: these policies should take account of evidence collected through the NDP process.</p>	<p>exceedance will be borderline, nevertheless, as a precautionary approach, and on consultants advice, the council has taken the decision to include all of the properties affected (around 40) in a proposed AQMA. The TWBC Air Quality Action Plan aims to deliver improvements in air quality with the ultimate aim of being able to revoke the Air Quality Management Area. Policy EN21 ensures that developments do not have an unacceptable air quality impact.</p> <p>The Council has given careful consideration to the proposed development in the AONB at a site and settlement level as well as considering the overall quantum and distribution of development within the AONB. The Council’s approach and considerations are set out in the Development Strategy Topic Paper</p> <p>The IDP seeks to identify the key elements of infrastructure that will be required to support the level and distribution of development being proposed in the Local Plan, how it will be delivered and phased to serve new development. At the local level, the requirements of Policy STR/CRS1 will ensure the delivery of the infrastructure required.</p> <p>It is noted that the Neighbourhood Plan for Cranbrook and Sissinghurst is at an early stage. In any event, discussions have previously taken</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>7) <u>High Weald Design Guide</u>: should be taken account of policy</p> <p>8) <u>Water quality</u>: pollution control measures are required for Sissinghurst wastewater treatment works</p>	<p>place with the parish council in respect of these policies and are based on a suite of robust evidence supporting their inclusion.</p> <p>The use of the AONB Management Plan and its supporting guidance is a requirement of policy EN19.</p> <p>All development proposals will need to meet the requirements of Policy EN24 Water Supply, Quality, and Conservation and Policy EN26 Sustainable Drainage.</p>	<p>No changes proposed.</p> <p>No changes proposed</p>
<p><b>AL/CRS1: Land at Brick Kiln Farm, Cranbrook</b></p>	<p>1) <u>Masterplanning</u>: Sites AL/CRS1 and CSR2 should be masterplanned together</p> <p>2) <u>Ancient woodland</u>: should be excluded from the allocation and have a 50m buffer from it.</p>	<p>Each site is in separate ownership and are at different stages in being promoted through the planning application process; to date no planning application has been received relating to AL/CRS2. Whilst this is the case, connectivity between these adjacent sites (AL/CRS 2 AL/CRS3) is a key aim. These matters will be considered through respective planning applications as set out in criteria 2 of the policy in order to create accessible, safe and non-vehicular routes through to the centre of Cranbrook from Hartley and Turnden.</p> <p>The allocation site as shown in Map 36 Site Layout Plan provides an indication of the location for built development, open space &amp; landscape buffers and access links and shows a suitable buffer to the ancient woodland. In addition to criterion within the</p>	<p>No change proposed</p> <p>No change proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>3) <u>Pedestrian access</u>: improvements required.</p> <p>4) <u>Major development in the AONB</u>: There are objections variously in terms of scale, incompatibility with designation and NPPF, including lack of ‘exceptional circumstances’.</p> <p>5) <u>Affordable housing</u>: the requirement should be 40%</p> <p>6) <u>High Weald Design Guide</u>: should be taken account of policy</p> <p>7) <u>Detailed design</u>: the areas shown on the maps should not limit the area for residential use.</p>	<p>policy to protect trees ancient woodland is separately covered by policy EN13 Ancient woodland and veteran trees.</p> <p>The policy criteria requires the provision of pedestrian (and cycle) links to provide permeability through this site and adjacent sites (ref Policies AL/CR2 and AL/CRS/3) to create an accessible, safe, non-vehicular route to the services provided at the centre of Cranbrook, Hartley, and surrounding residential areas and link into, and enhance, the established PRowS.</p> <p>The Council has given careful consideration to the proposed development in the AONB at a site and settlement level as well as considering the overall quantum and distribution of development within the AONB. The Council’s approach and considerations are set out in the Development Strategy Topic Paper</p> <p>Policy AL/CRS 1 requires the delivery of 40% affordable housing, to reflect the requirements of Policy H3 Affordable Housing.</p> <p>The use of the AONB Management Plan and its supporting guidance is a requirement of policy EN19.</p>	<p>No change proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		The Site Layout Plan (Map 36) is indicative, Detailed layouts will be subject to further detailed studies to inform a future application.	
<b>AL/CRS2: Land south of Corn Hall, Crane Valley, Cranbrook</b>	1) <u>Masterplanning</u> : Sites AL/CRS1 and CSR2 should be masterplanned together  2) <u>Ancient woodland</u> : should be excluded from the allocation and have a 50m buffer from it.  3) <u>Pedestrian access</u> : improvements required.	<p>Each site is in separate ownership and are at different stages in being promoted through the planning application process; to date no planning application has been received relating to AL/CRS2. Whilst this is the case, connectivity between these adjacent sites (AL/CRS 2 AL/CRS3) is a key aim. These matters will be considered through respective planning applications as set out in criteria 2 of the policy in order to create accessible, safe and non-vehicular routes through to the centre of Cranbrook from Hartley and Turnden.</p> <p>The allocation site as shown in Map 37 Site Layout Plan provides an indication of the location for built development, open space &amp; landscape buffers and access links and shows a suitable buffer to the ancient woodland. In addition to criterion within the policy to protect trees ancient woodland is separately covered by policy EN13 Ancient woodland and veteran trees.</p> <p>The policy criteria requires the provision of pedestrian (and cycle) links to provide permeability through this site and adjacent sites to the south and west (ref Policies AL/CR1 and AL/CRS/3) to create an accessible, safe, non-vehicular route to the services provided at the centre of Cranbrook,</p>	<p>No change proposed</p> <p>No change proposed</p> <p>No change proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>4) <u>Developable site area</u>: could be reduced and built at a higher density to reflect the settlement pattern.</p> <p>5) <u>Affordable housing</u>: the requirement should be 35%</p>	<p>Hartley, and surrounding residential areas and link into, and enhance, the established PRowS.</p> <p>The developable area has been determined by the need for appropriate landscape buffers that respond to the sensitivities of the location. The policy provides for approximately 35-45 dwellings, the density and layout within the developable area will be determined through further detailed studies to inform a future planning application.</p> <p>Policy AL/CRS2 requires the delivery of 40% affordable housing, to reflect the requirements of Policy H3 Affordable Housing.</p>	<p>No change proposed</p> <p>No change proposed</p>
<p><b>AL/CRS3: Turnden Farm, Hartley Road, Cranbrook</b></p>	<p>1) <u>Sustainability</u>: the site is not in a sustainable location for development.</p> <p>2) <u>Development in the AONB</u>: There are objections variously in terms of scale, incompatibility with designation and NPPF, including lack of 'exceptional circumstances'.</p>	<p>Cranbrook is a tier two settlement with a good range of services and on the main road network. The site is adjacent to the LBD and will be connected to the centre of the settlement by a range of walking and cycling routes. The location and accessibility of the site is therefore considered to be strongly sustainable in relation to its proximity to services and the nature of the routes to them.</p> <p>The Council has considered carefully the issues in relation to development in the AONB at a site, settlement and borough wide level and in particular the matter of major development and the exceptional circumstances test. The Councils approach to this is set out in the Development Strategy Topic Paper Section H.</p>	<p>No change proposed</p> <p>No change proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	3) <u>Coalescence</u> : potential coalescence of Cranbrook with Hartley	The Policy for the site has been informed by a Landscape and Visual Impact Assessment which has considered the matter of coalescence and policy map reflects those findings. The policy requires a further, more detailed assessment to inform the layout of the any development which will need to have regard to this issue.	No change proposed
	4) <u>Historic farmstead settlement pattern</u> : large scale development incompatible with historic farmstead settlement pattern, will impact on long distance views and will change the historic landscape forever. It does not comply with the High Weald AONB Design Guide	The Policy for the site has been informed by a Landscape and Visual Impact Assessment which has considered matters in relation to settlement pattern and views and the policy map reflects those findings. The policy requires a further, more detailed assessment to inform the layout of any development which will need to have regard to the AONB Management Plan and the Design Guide as required by the development management policies in the Local Plan.	No change proposed
	5) Historic Field Boundaries: the reinstatement of historic field boundaries may not be appropriate in some parts of the site.	A detailed landscape scheme and landscape management scheme will be required to indicate and provide details of how existing field boundaries will be integrated within development proposals. Any proposed scheme will be predicated on the High Weald AONB context and historic evidence, to include the provision of reinstated hedgerow historic field boundaries.	No change proposed
	6) <u>Crane Valley</u> : should be protected	Allocating this site for development is not considered as a precedent for development further	No change proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>7) <u>Dispersal of development</u>: smaller, more dispersed development should be prioritised.</p> <p>8) <u>Landscape evidence</u>: The LVIA looks at existing negative rather than positive traits e.g. birdsong, long distance views, soils and there is no balanced view of what would be lost against what would be gained – bias in favour of development</p> <p>9) <u>Ecological harm</u>: the development will result in harm to biodiversity and ancient woodland</p> <p>10) <u>Affordable housing</u>: the requirement should be 35%</p> <p>11) <u>Amenity</u>: <i>A 15 metre gap between the pumping station and any sensitive development (such as housing) should be taken into consideration in the site layout</i></p>	<p>along the Crane Valley. Policy criterion (7a) requires the provision of an extensive green infrastructure link along the Crane Valley to link to routes provided further north along the valley. This will create an extended and improved green route into the centre of Cranbrook and Hartley.</p> <p>The various options for development have been considered through the SA and the Councils approach to development is set out in the Development Strategy Topic Paper</p> <p>The LVIA work prepared on behalf of the Council has been carried out by an experienced professional and has followed current best practice.</p> <p>Ancient woodland will be protected and enhanced in accordance with policy and there is a requirement for development to deliver a net gain for biodiversity.</p> <p>Policy AL/CRS3 requires the delivery of 40% affordable housing, to reflect the requirements of Policy H3 Affordable Housing.</p> <p>Noted. An additional paragraph will be added to clarify the need for this buffer area.</p>	<p>No change proposed</p> <p>No change proposed</p> <p>No change proposed</p> <p>No change proposed</p> <p>Minor modification proposed to</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
			clarify the need for a buffer to the pumping station in accordance with Policies EN1 and EN27.
<b>AL/CRS4: Cranbrook School</b>	<p>1) <u>Sustainability</u>: the site is not in a sustainable location for development.</p> <p>2) <u>Highways</u>: The allocation will contribute to increase in traffic on the Hawkhurst Crossroads and Flimwell.</p> <p>3) <u>Loss of playing fields</u>: challenge as to the justification of the loss of playing fields.</p>	<p>Cranbrook is a tier two settlement with a good range of services and on the main road network. This site is located in the centre of Cranbrook and as well related to the services provided.</p> <p>Transport modelling work and sensitivity testing has been undertaken to support the Local Plan. With the exception of AL/CRS2 Corn Hall (for 35-45 dwellings) all housing sties at Cranbrook have planning permission or a resolution to grant permission. National Highways raised no objection to applications for AL/CRS1 (Land at Brick Kiln Farm) and AL/CRS3 (Turnden Farm). The application for AL/CRS2 will be accompanied by a Transport Statement, which will (if required) assessing the impact on the Flimwell crossroads.</p> <p>Any proposals that include the loss of playing fields will be judged against the policy which requires a medium- to long-term development plan indicating how such proposals relate to wider development</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>4) <u>Pedestrian links</u>: these links to the centre need improving</p> <p>5) <u>Flexibility</u>: questioned whether the policy allows the school to implement long-term plans to achieve future objectives.</p>	<p>and change in the locality and the local community in terms of need and playing field provision.</p> <p>Public footpaths fall to be considered under criteria 4 through the provision of a landscape management plan for those footpaths which fall within/adjacent to the masterplan area.</p> <p>It is considered that policy criteria 1 to 3 provides the necessary flexibility support the long-term future of school. The provision of the medium-long term development plan to be developed is key to setting out this potential future change.</p>	<p>No changes proposed</p> <p>No changes proposed</p>
<b>AL/CRS5: Sissinghurst Castle Garden</b>	No main issues raised against this policy.	N/A	N/A
<b>AL/CRS6: Land south of The Street, Sissinghurst</b>	<p>1) <u>Development in the AONB</u>: the scale of the site is objected to and that sites do not make efficient use of land/maximise density.</p> <p>2) <u>Viability</u>: concerned about viability of scheme if new hall and affordable housing is to be provided</p>	<p>The Council has considered carefully the issues in relation to development in the AONB at a site, settlement and borough wide level and in particular the matter of major development and the exceptional circumstances test. The Councils approach to this is set out in the Development Strategy Topic Paper Section H. The developable area and site capacity are considered appropriate for the site.</p> <p>It is noted that viability is questioned but this is not supplemented by any evidence to support this</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		representation. Plan-wide viability evidence supporting the Plan indicates that a development of this nature is viable. Notwithstanding the above, Policy H3 provides sufficient flexibility should there be a viability concern at the planning application stage, once specific site costs are known.	
<b>AL/CRS7: Land at corner of Frittenden Road and Common Road, Sissinghurst</b>	<ol style="list-style-type: none"> <li data-bbox="432 507 1099 603">1. <u>Highways and pedestrian access</u>: concern about single access, highway safety and pedestrian access.</li> <li data-bbox="432 707 1099 833">2. <u>Density</u>: One objector indicates that the site does not make efficient use of land/maximise density, while others seek increase in density or deletion of site.</li> </ol>	<p data-bbox="1153 507 1812 671">These matters are sufficiently addressed under the policy wording at criteria 1. Policy TP1 and TP2 of the Local Plan also ensure these matters are sufficiently considered. It is noted that the site has outline planning approval.</p> <p data-bbox="1153 707 1812 833">The capacity of the sites strikes a balance between housing delivery and site constraints/ its edge of centre location. It is noted that the site has outline planning approval.</p>	<p data-bbox="1843 507 2007 571">No changes proposed.</p> <p data-bbox="1843 675 2007 738">No changes proposed</p>
<b>Omission Sites</b>			
<b>The Vicarage, Waterloo Road, Cranbrook (Site allocations Local Plan allocation AL/CR3, not a SHELAA site)</b>	Inclusion of the site in the Local Plan is sought, in line with the existing allocation of the site in the Site Allocations Local Plan (SALP) (Policy AL/CR 3) providing approximately 4 additional dwellings [officer note: the representation refers to three dwellings plus the existing dwelling on the site].	The scale of development potential on the site, at less than 10 units, is such that it would not be suitable for allocation in the new Local Plan, as set out in the methodology explained in the SHELAA main report.	No changes proposed.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>Gate Farm, adjacent to Hartley Road and Glassenbury Road, Hartley, Cranbrook (SHELAA site 59, duplicated by SHELAA late site 14)</b>	<p>Inclusion of the site is sought for residential use. The site forming part of a larger parcel of sites (SHELAA sites 59, 70, 323, 345 and Late site 53 Bull Farm) was allocated in the Draft Local Plan as policy AL/CRS 6 for residential development.</p> <p>There is reference to planning history along Hartley Road, in particular to a recent planning appeal on site 59 itself for up to 27 units (planning reference 19/02170), which it is considered gives clear findings on a number of key matters. The planning appeal was dismissed on landscape/AONB grounds only.</p> <p>The sustainability credentials of the site are promoted and it is identified that the appeal Inspector found the site to be moderately sustainably located.</p>	<p>The site has been assessed through the SHELAA process, the findings of which indicate that the site is unsuitable as an allocation. This is on grounds relating to impact of development upon the AONB landscape and settlement pattern, as well as the site's location some distance from services.</p> <p>Whilst the site has been promoted through a planning application, this was refused by the and a subsequent appeal dismissed by the Inspector.</p>	No changes proposed.
<b>Land South West of Campion Crescent at Hartley (SHELAA site 70)</b>	<p>Inclusion of the site is sought for 8 – 10 residential units. The site was part of allocation policy AL/CRS 6 in the Draft Local Plan, (SHELAA sites 59, 70, 323, 345 and Late site 53 Bull Farm) – see Gate Farm above.</p> <p>There is reference to the sustainability credentials of the site, including that the previous appeal Inspector (see Gate Farm above) had concluded Hartley is moderately sustainable, and also to planning history of the site, in particular reference 17/03481 for eight dwellings. This was refused and dismissed at appeal on grounds relating to vehicular access and highway safety only.</p>	<p>The scale of development potential on the site, is such that it would not be suitable for allocation in the Local Plan, as set out in the methodology explained in the SHELAA main report.</p> <p>It is considered that should the previous grounds for refusal set out by the Inspector in the decision relating to the appeal for 17/03481 be addressed through an alternative proposal for the site (which shall also be found suitable in all other respects) that the site could come forward as a windfall.</p>	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	The site is also promoted on the basis that it is suitable, available and deliverable and would deliver a small/medium sized site.	The Local Plan makes sufficient provision for the delivery of small and medium sized sites, which is explained by the Housing Supply and Trajectory Topic Paper.	
<b>Land to west of Tilsden Lane, Cranbrook (SHELAA site DPC23 - addendum sheet)</b>	<p>Inclusion of the site is sought for a residential allocation providing a modest number of units (the number is not specified). The site is promoted on the basis it can provide much needed housing, including affordable housing. A scheme can be assimilated into the AONB landscape.</p> <p>There is reference to the requirements for the parish set out in the Infrastructure Development Plan and significant concern is raised about the financial burden of these requirements on current allocated sites and that this will hinder delivery of sites.</p>	<p>The site has been assessed through the SHELAA process, the findings of which indicate the site is unsuitable for allocation. This is on grounds relating to it being an unsustainable location, landscape impact, including upon the setting of the rural settlement located within the AONB.</p> <p>The infrastructure requirements to support existing site allocations have been identified and are set out in the strategic policy for Cranbrook &amp; Sissinghurst parish under policy PSTR/CRS 1 and individual site allocations, as well as in the Infrastructure Delivery Plan. These are shown to be viable.</p>	No changes proposed.
<b>Land at Boycourt Orchards, Angley Road, Wilsley Pound (SHELAA site 29)</b>	<p>Inclusion of the site is sought. Part of the site was allocated in the Draft Local Plan for residential development providing approximately 20-25 dwellings under Policy AL/CRS 16.</p> <p>There is particular reference to the Infrastructure Delivery Plan requirements for the parish, a lengthy list at significant cost. There is potential to allocate further sites in the parish, including outside the AONB</p>	<p>The site has been assessed through the SHELAA process and has been found to be unsuitable as a potential allocation. This is on the grounds of highway related matters and ease of access to local services and public transport as well as impact upon the historic settlement character.</p> <p>The infrastructure requirements to support existing site allocations have been identified and are set out in the strategic policy for Cranbrook &amp; Sissinghurst parish under policy PSTR/CRS 1 and</p>	No changes proposed.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>– this site is one of those, which would aid delivery of the infrastructure.</p> <p>The site features in the Sustainability Appraisal for the Draft Local Plan but not the Sustainability Appraisal for the Pre-Submission Local Plan (PSLP) – this is challenged, considered that the site should have been assessed as a reasonable alternative in the PSLP Sustainability Appraisal.</p>	<p>individual site allocations, as well as in the Infrastructure Delivery Plan. These are shown to be viable.</p> <p>The site is included in the Sustainability Appraisal for both the Draft Local Plan and the Pre-Submission Local Plan. For the Draft Local Plan there were appraisals for the whole site and the part site (the previous draft allocation AL/CRS 16), while at Pre-Submission stage, there was an appraisal for the site as a whole only.</p>	
<p><b>Jaegers Field, Angley Road (SHELAA site 131)</b></p>	<p>Inclusion of the site is sought for residential use. The site was allocation policy AL/CRS 3 in the Draft Local Plan, providing approximately 30-35 dwellings.</p> <p>The site is promoted on the basis that it is suitable, available and achievable. There is reference to ecology, highways and landscape matters. It's a site that is disconnected from Cranbrook School and is surplus to school requirements. Loss of the playing field can be accounted for at the school's Big Side playing field.</p> <p>The Local Plan has an over reliance on large, strategic sites and allocation would provide an additional small/medium sized site, which could also contribute to meeting unmet housing need from adjoining authorities. The site can also be delivered in the early years of the Plan period.</p>	<p>The site has been assessed through the SHELAA process. Findings indicate that the site is unsuitable for allocation on grounds relating to impact upon school sports provision.</p> <p>The site has recently been promoted through a planning application, reference 21/02396/outline for 63 residential units, which was refused 14/10/21 for reasons relating to sports provision, highways and AONB/landscape (amongst other reasons).</p> <p>The overall housing numbers and development strategy are justified in the Development Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper. Representations about unmet need (including unmet need from adjoining authorities)</p>	<p>No changes proposed.</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	It is considered that the site could be considered alone or in conjunction with Rammell Field (see below).	and reliance on strategic sites are dealt with under Policy STR1: The Development Strategy. The Local Plan makes sufficient provision for the delivery of small and medium sized sites, which is explained by the Housing Supply and Trajectory Topic Paper.	
<b>Rammell Field, Bakers Cross, Cranbrook (SHELAA site 132)</b>	<p>Inclusion of the site is sought for a residential led scheme that would also provide publicly accessible open space, affordable and low cost market housing and a memorial garden (for the world wars). Allocation would make more efficient use of the site, which is surplus to school requirements (Cranbrook School).</p> <p>It is considered that the site could be considered alone or in conjunction with Jaegers Field (see above).</p>	The site has been assessed through the SHELAA process, the findings of which indicate it is unsuitable as a potential allocation, on grounds relating to landscape/AONB and heritage.	No changes proposed.
<b>Land east of Camden Lodge, adjacent to Mill Lane and Sissinghurst Road (SHELAA site 120)</b>	<p>Inclusion of the site is sought, for residential development of 40 – 45 units. It was previously an allocation in the Draft Local Plan under allocation policy AL/CRS 13 for approximately 40 dwellings.</p> <p>There is reference to a recent planning application on the site, reference 19/00308 for 42 dwellings, which was refused on highway grounds and is currently subject to appeal. It is advocated that there are no landscape grounds that justify omission of the site.</p>	<p>The site has been assessed through the SHELAA process, the findings of which identify it is unsuitable for allocation. The Sheela assessment concludes that a safe, suitable and sustainable access for both vehicles and pedestrians cannot be achieved to serve this site.</p> <p>While the site has been promoted through a recent planning application, reference 19/00308, this was refused and is currently at appeal.</p>	No changes proposed.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>The Sustainability Assessment consideration of the site is challenged, in particular reference to the AONB when the sites lies outside of the AONB.</p> <p>The site is suitable, available and deliverable and the uplift in scale can help secure a 20% buffer for the Local Plan. The promotor considers a safe and suitable access can be provided. It can be delivered within the first five years of the Plan period.</p>	<p>Reference to the AONB in Sustainability Assessment (and on the SHELAA) are a reference to the setting of the AONB. It is acknowledged that the site does not lie within the designated AONB.</p> <p>Representations about the Local Plan buffer are dealt with under Policy STR1: The Development Strategy.</p>	
<p><b>Land to the west of Frythe Way and east of Freight Lane, Cranbrook (SHELAA site 25)</b></p>	<p>Inclusion of the site is sought for 70 dwellings. It is suitable, available and deliverable within the first five years of the Plan period. It would form a logical addition to the settlement, with part of the site already in the defined settlement.</p> <p>There is reference to sustainability matters, including accessibility and is considered more sustainable than some other allocated sites.</p> <p>It is advocated that there is an over reliance on large, strategic sites, with concern about lead in time and annual yields and there is concern about unmet housing need of adjoining authorities, including from London. More site allocations are needed to remedy this.</p> <p>The site assessment process (SHELAA) and sustainability assessment evidence is challenged, with it being considered the Council has not taken account of reasonable alternatives. There are errors</p>	<p>The site has been assessed through the SHELAA process, the findings of which indicate it is unsuitable as a potential allocation. This is because there is a landscape concern arising from an allocation of this site as well as concern about ability to provide an appropriate means of vehicular access to the site from the wider road network. There is concern about the impact of increased traffic movements arising from the development upon the road junction of Frythe Way and Bakers Cross, and upon the road junction of The Hill, Waterloo Road and Stone Street.</p> <p>The overall housing numbers and development strategy are justified in the Development Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper. Representations about unmet need (including unmet need from adjoining authorities)</p>	<p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	and inconsistencies in the evidence, which have resulted in omission of suitable and sustainable sites.	<p>and reliance on strategic sites are dealt with under Policy STR1: The Development Strategy.</p> <p>All sites have been assessed using a robust methodology, set out in the SHELAA main report, and Sustainability Appraisal, which has been consistently applied.</p>	
<p><b>Land Adjacent to The Barracks, Cranbrook (SHELAA site FS 8)</b></p>	<p>Inclusion of the site is sought for residential use, providing 268 units as a retirement village (based on 50 dph).</p> <p>It would enable allocation of a medium site and contribute towards a 20% for the Local Plan. The site is further promoted on the basis that the Council has a lack of a five year housing land supply and concern about reliance on windfalls.</p> <p>There is also reference to the infrastructure requirements for the parish and the costs for this to be sought by S106, and to ensure delivery, further sites should be allocated.</p>	<p>This site has been assessed through the SHELAA and has been sound to be unsuitable for allocation. It is considered that allocation would cause significant harm to the rural and historic landscape, and upon the setting of the settlement and wider settlement pattern, located within the AONB.</p> <p>The Local Plan makes sufficient provision for the delivery of small and medium sized sites, which is explained by the Housing Supply and Trajectory Topic Paper. Representations about the Local Plan buffer are dealt with under Policy STR1: The Development Strategy. The Brownfield and Urban Land Topic Paper provides the evidence for the windfall allowance used to inform the Plan.</p> <p>The infrastructure requirements to support existing site allocations have been identified and are set out in the strategic policy for Cranbrook &amp; Sissinghurst parish under policy PSTR/CRS 1 and individual site allocations, as well as in the Infrastructure Delivery Plan. These are shown to be viable.</p>	<p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<p><b>Land adjoining Wilsley Farm, adjacent to Angley Road and Whitewell Lane (SHELAA site 125)</b></p>	<p>Inclusion of the site is sought for up to 20 dwellings. The site was allocated in the Draft Local Plan for 15 – 20 dwellings, under allocation policy AL/CRS 1.</p> <p>The site is promoted on the grounds of a lack of five-year housing land supply, lack of allocated small and medium sized and that would not be major development in the AONB. Also, that there is an over reliance on large, strategic sites in the Plan.</p> <p>There is reference to recent planning history on the site, planning reference 20/03816 for 20 dwellings which was refused in April 2021 (landscape and heritage grounds). The site assessment process is challenged.</p>	<p>The site has been assessed through the SHELAA, the findings of which indicate it is unsuitable as an allocation. This is on grounds relating to impact on the AONB, including settlement pattern, the Wilsley Green Conservation Area and listed buildings.</p> <p>The Local Plan makes sufficient provision for the delivery of small and medium sized sites, which is explained by the Housing Supply and Trajectory Topic Paper. The overall housing numbers and development strategy are justified in the Development Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper.</p> <p>The site has been promoted through a planning application, reference 20/03816, for 20 dwellings, which was refused on reasons that support the findings of the SHELAA. All sites have been assessed using a robust methodology, set out in the SHELAA main report, which has been consistently applied.</p>	<p>No changes proposed.</p>
<p><b>Land adjoining Cranbrook Primary School,</b></p>	<p>Inclusion of the site is sought for residential use. It was previously allocated in the Draft Local Plan under policy AL/CRS 5 for 35-45 units, a replacement nursery and safeguarding of land for future primary school expansion.</p>	<p>The site has been assessed through the SHELAA process. This concludes that the site is unsuitable as an allocation, on highway related grounds only. It was not found unsuitable for sustainability or AONB reasons.</p>	<p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<p><b>Quaker Lane, Cranbrook (SHELAA site 71)</b></p>	<p>It is considered a sustainable site, with reference to proximity to the settlement and services and that it would be a natural extension to this.</p> <p>It is advocated that development can be achieved without material harm to the AONB, despite recent refusal of planning application 21/00519 for 35 units and a replacement pre-school children’s day care nursery facility. Omission of the site is not justified and sites have not been allocated on a consistent basis.</p> <p>There is reference to the lack of a five-year housing land supply and concern about a growing need for housing in the borough due to difficulties in keeping up with delivery.</p>	<p>The reasons for refusal of 21/00519 reflect the SHELAA assessment on highway grounds (there are also other reasons why the application was refused).</p> <p>All sites have been assessed using a robust methodology, set out in the SHELAA main report, which has been consistently applied.</p> <p>The overall housing numbers and development strategy are justified in the Development Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper.</p>	

## 5.7 Hawkhurst

**Notes:**

*The total number of representations recorded against the Hawkhurst chapter is 83.*

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
<p><b>PSTR/HA1 – The Strategy for Hawkhurst Parish</b></p>	<p>1. <u>Level of development</u>: Concern about the overall level of development being proposed within the AONB. TWBC evidence is not justified.</p> <p>2. <u>Traffic impact</u>: negative impact on Hawkhurst Crossroads and Flimwell Junction not shown in the evidence base.</p>	<p>The Council has given careful consideration to the proposed development in the AONB at a site and settlement level as well as considering the overall quantum and distribution of development within the AONB. The Councils approach and considerations are set out in the Development Strategy Topic Paper.</p> <p>Proposed major development in the AONB and the policies for individual sites has been informed by a Landscape and Visual Impact Assessment</p> <p>Transport modelling work and sensitivity testing has been undertaken to support the Local Plan.</p> <p>The strategic policy for Hawkhurst (STR/HA1) requires that (through the assessment of planning applications) the impact on the Flimwell crossroads be demonstrated to be acceptable.</p> <p>All housing sites for allocation in Hawkhurst parish have planning permission, except AL/HA4</p>	<p>No changes proposed.</p> <p>No changes proposed.</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>3. <u>Air Quality</u>: Concern over air pollution on Hawkhurst crossroad and recent new monitoring tubes installed.</p>	<p>(land at Copthall Avenue and Highgate Hill). No objection was raised on an application for this site by National Highways during its consideration in 2021.</p> <p>With the exception of AL/CRS2 Corn Hall (for 35-45 dwellings) all housing sties at Cranbrook have planning permission or a resolution to grant permission. National Highways raised no objection to applications for AL/CRS1 (Land at Brick Kiln Farm) and AL/CRS3 (Turnden Farm). The application for AL/CRS2 will be accompanied by a Transport Statement, which will (if required) assessing the impact on the Flimwell crossroads.</p> <p>The results of modelling carried out by the council during 2019 have indicated that there may be exceedances of the long-term air quality of in Cranbrook Road. Modelling has indicated that at the majority of the affected properties, any exceedance will be borderline, nevertheless, as a precautionary approach, and on consultants advice, the council has taken the decision to include all of the properties affected (around 40) in a proposed AQMA. The TWBC Air Quality Action Plan aims to deliver improvements in air quality with the ultimate aim of being able to revoke the Air Quality Management Area. Policy</p>	<p>No changes proposed.</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>4. <u>Infrastructure</u>: lack of infrastructure to support development, policies are not strong enough to deliver infrastructure needed.</p> <p>5. <u>The LBD</u>: the Hawkhurst LBD should be extended along the north of the High Street along to the Hawkhurst Hospital</p>	<p>EN21 ensures that developments do not have an unacceptable air quality impact.</p> <p>The IDP seeks to identify the key elements of infrastructure that will be required to support the level and distribution of development being proposed in the LP, how it will be delivered and phased to serve new development. At the local level, the requirements of Policy STR/HA1 ensure the delivery of the infrastructure required.</p> <p>Extending the LBD westwards as suggested would not reflect the methodology used to review/set the LBD boundaries in the PSLP.</p>	<p>No changes proposed.</p> <p>No changes proposed.</p>
<b>AL/HA1: Land at the White House, Highgate Hill</b>	<p>1. <u>Sustainability</u>: the site is not in a sustainable location for development.</p>	<p>This is a PDL site located adjacent to built development within the LBD. It is therefore considered to be located in a sustainable location and has a consented development granted at appeal (19/01271 applications have been submitted to discharge conditions)</p>	<p>No changes proposed.</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>2. <u>AONB</u>: objected to, the site will be detrimental to the AONB.</p> <p>3. <u>Highways</u>: The allocation will contribute to increase in traffic on the Hawkhurst Crossroads and Flimwell.</p>	<p>It is acknowledged that this site is located within the AONB and within the LBD. Development in this location would be considered in the context of Policy EN19 -:High Weald AONB. It is noted that this site has a consented development granted at appeal (19/01271 applications have been submitted to discharge conditions).</p> <p>Highways have not objected to the redevelopment of this PDL site. They confirm (as part of the consideration of the recent planning application) that the development would not cause severe congestion to the crossroads either in isolation or in combination with other development. It is noted that the site has planning approval.</p>	<p>No changes proposed.</p> <p>No changes proposed.</p>
<p><b>AL/HA2: Brook House, Cranbrook Road</b></p>	<p>1. <u>Sustainability</u>: the site is not in a sustainable location for development.</p> <p>2. <u>Highways</u>: The allocation will contribute to increase in traffic in the local area.</p>	<p>This site is located adjacent to built development within the LBD. It is therefore considered to be located in a sustainable location and was allocated in Site Allocations Local Plan as part of Policy AL/HA1. It is also noted that the site has an outline consent granted 25 apartment issued 1 April 2019 (17/03780/O).</p> <p>The principle of development in this location has been established through the allocation of the site through the adopted Site Allocations Local Plan.</p>	<p>No changes proposed.</p> <p>No changes proposed.</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>3. <u>Trees</u>: the area of landscape importance needs to be retained.</p>	<p>At the appeal Hearing for application 17/03780/O, the Highway Authority accepted that the proposal would not result in an unacceptable impact on highway safety, nor would the residual cumulative impacts on the road network be severe.</p> <p>Criteria (3) requires that proposals have regard to TPOs, with the layout/design protecting those trees of most amenity value, proposals will also be required to be informed by an aboricultural survey.</p>	<p>No changes proposed.</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
<b>AL/HA3: Former site of Springfield Nurseries</b>	<ol style="list-style-type: none"> <li data-bbox="432 339 1115 403">1. <u>Sustainability</u>: the site is not in a sustainable location for development.</li> <li data-bbox="432 643 1115 707">2. <u>Highways</u>: The allocation will contribute to increase in traffic in the local area.</li> <li data-bbox="432 1042 1115 1106">3. <u>Trees</u>: the area of landscape importance needs to be retained.</li> </ol>	<p data-bbox="1144 339 1780 571">This site is located adjacent to built development within the LBD. It is therefore considered to be located in a sustainable location and was allocated in Site Allocations Local Plan as part of Policy AL/HA1. It is also noted that the site has an outline consent granted for 22 dwellings issued 30 November 2020 (17/02192/O).</p> <p data-bbox="1144 611 1780 946">Transport modelling work and sensitivity testing has been undertaken to support the Local Plan. The strategic policy for Hawkhurst (STR/HA1) requires that (through the assessment of planning applications) the impact on the Flimwell crossroads be demonstrated to be acceptable. The appeal decision for application 17/02192/O concluded that there is no unacceptable impact on highway safety, in relation to either vehicle or pedestrian movements.</p> <p data-bbox="1144 986 1780 1114">Criteria (3) requires that proposals have regard to TPOs, with the layout/design protecting those trees of most amenity value, proposals to be informed by an arboricultural survey.</p>	<p data-bbox="1807 339 2000 403">No changes proposed.</p> <p data-bbox="1807 643 2000 707">No changes proposed.</p> <p data-bbox="1807 1042 2000 1106">No changes proposed.</p>
<b>AL/HA4: Land off Copthall Avenue and Highgate Hill</b>	<ol style="list-style-type: none"> <li data-bbox="432 1190 1115 1286">1. <u>Major development</u>: This major development in the AONB is not justified and contrary to national planning policy.</li> </ol>	<p data-bbox="1144 1190 1780 1310">The Council has given careful consideration to the proposed development in the AONB at a site and settlement level as well as considering the overall quantum and distribution of development</p>	<p data-bbox="1807 1190 2000 1254">No changes proposed</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>2. <u>Sustainability</u>: the site is not in a sustainable location for development.</p> <p>3. <u>Air Quality</u>: Concern over air pollution on Hawkhurst crossroads</p>	<p>within the AONB. The Councils approach and considerations are set out in the Development Strategy Topic Paper.</p> <p>Proposed major development in the AONB and the policies for individual sites has been informed by a Landscape and Visual Impact Assessment</p> <p>This is a PDL site located adjacent to built development within the LBD. It is therefore considered to be located in a sustainable location</p> <p>The results of modelling carried out by the council during 2019 have indicated that there may be exceedances of the long-term air quality of in Cranbrook Road. Modelling has indicated that at the majority of the affected properties, any exceedance will be borderline, nevertheless, as a precautionary approach, and on consultants advice, the council has taken the decision to include all of the properties affected (around 40) in a proposed AQMA. The TWBC Air Quality Action Plan aims to deliver improvements in air quality with the ultimate aim of being able to revoke the Air Quality Management Area. Policy EN21 ensures that developments do not have an unacceptable air quality impact.</p>	<p>No proposed changes</p> <p>No proposed changes</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
	<p>4. <u>Highways</u>: The allocation will contribute to increase in traffic in the local area.</p> <p>5. <u>Density</u>: does not make an efficient use of land. Housing should be provided at an alternative site that can be built at a higher density.</p> <p>6. <u>Deliverability</u>: the wording of the location of the pedestrian link should be amended to be more flexible and to include the option of securing emergency vehicle and pedestrian access to be provided “either to Copthall Avenue, Highgate Hill and/or Fieldways”.</p>	<p>Transport modelling work and sensitivity testing has been undertaken to support the Local Plan. The strategic policy for Hawkhurst (STR/HA1) requires that (through the assessment of planning applications) the impact on the Flimwell crossroads be demonstrated to be acceptable. Highways have not objected to the redevelopment of this site which is part PDL. They confirm (as part of the consideration of the recent planning application) that the development would not cause severe congestion to the crossroads either in isolation or in combination with other development.</p> <p>The density within the area of built development is considered to be appropriate for this edge of settlement location and reflects adjacent existing built development. Significant green space is to be provided as part of a comprehensive landscape led scheme that responds to the AONB context and provides landscape and ecological mitigation.</p> <p>It is considered that the wording of the policy is appropriate. It is noted that there was no highways objection to the proposed means of access for the recent planning application.</p>	<p>No proposed changes</p> <p>No proposed changes</p> <p>No proposed changes</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
<b>AL/HA5: Land to the north of Birchfield Grove</b>	<ol style="list-style-type: none"> <li>1. <u>AONB</u>: objected to, the site will be detrimental to the AONB.</li> <li>2. <u>Enabling development</u>: A medical centre should be part of a wider scheme that includes a proportion of housing/other community benefits.</li> <li>3. <u>Alternative location</u>: The medical centre should be proposed on AL/HA6: King George V Playing Field.</li> <li>4. <u>Highways</u>: The allocation will contribute to increase in traffic in the local area.</li> </ol>	<p>Developments in the AONB are justified in the Development Strategy Topic Paper and supported by detailed LVIAs. The LVIA covering proposed sites within the AONB prepared for the borough identified the potential for a cumulative effect from development proposed at Hawkhurst. Taking on board the comments of Natural England with regards major development and the quantum of development proposed in the Reg 18 Local Plan within the AONB and the risk of a cumulative effect on the AONB the Council has concluded that it will not continue to propose the wider site as an allocation.</p> <p>Discussions with the site owners/promoter indicated that land was available to deliver the medical centre without enabling development.</p> <p>Deliverability of the use is key and relocation of medical services to alternative sites is not supported by the existing medical practices themselves.</p> <p>Transport modelling work and sensitivity testing has been undertaken to support the Local Plan. The strategic policy for Hawkhurst (STR/HA1) requires that (through the assessment of planning applications) the impact on the Flimwell</p>	<p>No changes proposed.</p> <p>No changes proposed.</p> <p>No changes proposed.</p> <p>No changes proposed.</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
		crossroads be demonstrated to be acceptable. All housing sites for allocation in Hawkhurst parish have planning permission, except AL/HA4 (land at Copthall Avenue and Highgate Hill). No objection was raised on an application for this site by National Highways during its consideration in 2021.	
AL/HA6	<u>No main issues raised</u>	N/A	N/A
<b>AL/HA7: Hawkhurst Station Business Park</b>	<ol style="list-style-type: none"> <li>1. <u>Highways</u>: The allocation will contribute to increase in traffic in the local area.</li>   <li>2. <u>Landscape buffer</u>: the need for the landscape buffer is not justified and all the land on site allocation should be designated as employment land.</li> </ol>	<p>Transport modelling work and sensitivity testing has been undertaken to support the Local Plan. The strategic policy for Hawkhurst (STR/HA1) requires that (through the assessment of planning applications) the impact on the Flimwell crossroads be demonstrated to be acceptable. All housing sites for allocation in Hawkhurst parish have planning permission, except AL/HA4 (land at Copthall Avenue and Highgate Hill). No objection was raised on an application for this site by National Highways during its consideration in 2021.</p> <p>Site assessments undertaken, including the LVIA work, to support the allocation conclude that proposals for built development would need to reflect the site's location within the AONB which results in the need to include the provision of an appropriate landscape buffer.</p>	<p>No changes proposed.</p> <p>No changes proposed.</p>

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
<b>AL/HA8: Site at Limes Grove (March's Field)</b>	1. <u>Highways</u> : The allocation will contribute to increase in traffic in the local area.	Transport modelling work and sensitivity testing has been undertaken to support the Local Plan. The strategic policy for Hawkhurst (STR/HA1) requires that (through the assessment of planning applications) the impact on the Flimwell crossroads be demonstrated to be acceptable. All housing sites for allocation in Hawkhurst parish have planning permission, except AL/HA4 (land at Copthall Avenue and Highgate Hill). No objection was raised on an application for this site by National Highways during its consideration in 2021.	No changes proposed.
<b>Omission Sites</b>			
<b>Hawkhurst Golf Club (SHELAA site 115)</b>	<p>Inclusion of the site in the Local Plan is sought. It was included in the Draft Local Plan, under policy AL/HA 1, for 400-450 dwellings along with a relief road (connecting the A229 Cranbrook Road with the A268 High Street and closing off the northern arm of the cross roads to create a pedestrianised focal point) and community centre. The reinstatement of the site is requested, however, with a reduced scale of 374 units.</p> <p>The site is promoted for development that will include delivery of various public and community benefits. This includes highway benefits, including</p>	<p>The site has been assessed through the SHELAA process, the findings of which indicate that the site is unsuitable for allocation.</p> <p>Following the appeal against non-determination of planning application 19/02025 (Hybrid Application: Redevelopment of existing golf course with full consent sought for new relief road and associated earthworks and junctions with A268 and A229, and outline consent sought for residential development, a C2/C3 care home, class D1 facilities such as a doctors' surgery and/or community hall, public car park, public park. And associated works) the Council issued</p>	No changes proposed.

<b>Policy/Topic Area</b>	<b>Main Issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	<p>works to the Hawkhurst crossroads and resultant improvement in air quality.</p> <p>The site has been promoted by a planning application, which is subject to an appeal (by way of Public Inquiry) against non-determination.</p> <p>There is reference to a lengthy list of infrastructure deficiencies set out in the Infrastructure Delivery Plan, including medical centre, community hall and expansion of the Primary School for example. It is advocated that the Plan does include proposals to address such deficiencies, and that allocation of this site would make a significant contribution to meeting the deficiencies.</p>	<p>a formal Decision Notice setting out that had the Council determined the application, the decision would have been one of refusal. In summary, this is on grounds relating to adverse impact on the High Weald AONB, including landscape character and scenic beauty, failure to demonstrate sustainable development, biodiversity and contributions including affordable housing and community facilities. The matters involved in this proposed scheme have been heard in detail at a recent public inquiry which recently closed with a decision yet to be issued. The Council maintains that there would be harmful impacts as set out within the reasons for refusal.</p> <p>It is considered that the findings of the Sheela assessment remain valid.</p> <p>The infrastructure requirements to support existing site allocations have been identified and are set out in the strategic policy for Hawkhurst parish under policy PSTR/HA 1 and individual site allocations, as well as in the Infrastructure Delivery Plan. These are shown to be viable.</p>	
<b>Santer's Yard, Gills Green, Hawkhurst</b>	Inclusion of the site in the Plan is sought for up to 37 residential units. It was previously Draft Local Plan allocation Policy AL/HA 9, allocated for a mix of	This site has been assessed through the SHELAA process, the findings of which indicate that the site is unsuitable for allocation. This sets out significant concern about landscape impact	No changes proposed.

<b>Policy/Topic Area</b>	<b>Main Issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
<b>(SHELAA site 422)</b>	<p>residential and employment land (B1, B2 and B8 uses). It is requested that the site be reinstated, with the northern part of the site retained for public amenity space and ecological enhancements.</p> <p>There is reference to a pre-application request to the Council relating to a residential scheme for the site, including an area of open space. The site would make a meaningful contribution to housing supply and is considered sustainable and acceptable in AONB terms.</p>	<p>and location of the site away from the main settlement of Hawkhurst. Lack of facilities and services in Gills Green means the location is not well suited to housing. The SHELAA findings remain valid.</p>	
<b>Highgate Hill, south of an existing permission. (SHELAA site 86)</b>	<p>Inclusion of the site is sought, as a phase 2 residential allocation of the existing, adjacent Highgate Hill site built by the same developer. It is considered there are exceptional circumstances to justify allocation in the AONB. It is available and deliverable.</p> <p>There is reference to sustainability credentials, in particular proximity of the site to the settlement centre and access to services, facilities and bus routes/stops, and the ability to walk to these. It is considered a logical site for allocation.</p> <p>The SHELAA assessment of the site is challenged, with the view that this is neither robust or reliable.</p>	<p>The site has been assessed through the SHELAA process for residential development, the findings of which indicate that the site is unsuitable for allocation. The assessment sets out that built development in this location would have an adverse impact upon the landscape character and settlement pattern. The SHELAA findings remain valid. The site has not been omitted on sustainability grounds.</p> <p>All sites have been assessed using a robust methodology, set out in the SHELAA main report, which has been consistently applied.</p> <p>The overall housing numbers and development strategy are justified in the Development</p>	No changes proposed.

<b>Policy/Topic Area</b>	<b>Main Issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	It is considered that the Plan has an over reliance on strategic sites, and that this site would provide a small/medium sized site needed to remedy this.	Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper.	
<b>Land at Streatley, Horns Road, (SHELAA site 52)</b>	<p>Inclusion of the site is sought for a residential allocation of up to 40 dwellings. The site is suitable, available and deliverable and would contribute to housing supply, assisting the plan with provision of a 20% buffer.</p> <p>Allocation would address a shortfall in allocation of small and medium sized sites.</p> <p>There is objection to the assessment of the site in the Sustainability Assessment and SHELAA, in particular matters of landscape character, settlement pattern and impact on the AONB, including the scores given for biodiversity and air quality.</p> <p>There is reference to the infrastructure deficiencies set out in the Infrastructure Delivery Plan, including a community hall, with allocation of this site able to make a significant contribution</p>	<p>The site has been assessed through the SHELAA process, the findings of which indicate the site is unsuitable for allocation, on grounds relating to impact upon the landscape character and settlement pattern, located in the AONB. Representations about the Local Plan buffer are dealt with under Policy STR1: The Development Strategy.</p> <p>The Local Plan makes sufficient provision for the delivery of small and medium sized sites, which is explained by the Housing Supply and Trajectory Topic Paper.</p> <p>All sites have been assessed using a robust methodology, set out in the SHELAA main report, which has been consistently applied. It is considered that the Sustainability assessment for the site is correct.</p> <p>The infrastructure requirements to support existing site allocations have been identified and are set out in the strategic policy for Hawkhurst</p>	No changes proposed.

Policy/Topic Area	Main Issues	TWBC Response	Changes – Yes/No
		parish under policy PSTR/HA 1 and individual site allocations, as well as in the Infrastructure Delivery Plan. These are shown to be viable.	
<b>Chittenden Fields (SHELAA site 2)</b>	<p>Inclusion of the site is sought for residential allocation of around 70 dwellings. It would have a landscape setting and is sustainably located, within walking distance of the settlement centre and within the established confines of the settlement.</p> <p>Allocation would make a contribution to housing supply and assist with meeting unmet housing need of adjoining authorities. It is deliverable within the early part of the Local Plan period. It would form a logical addition to the settlement and could be developed sensitively.</p>	<p>The site has been assessed through the SHELAA process for residential development, the findings set out this is an historic field located within the AONB. Built development would have an adverse impact upon the AONB landscape character and upon the settlement pattern. The site is located at some distance from the established Limits to Built Development and development would not form a logical extension to the LBD. The SHELAA findings remain valid.</p> <p>The overall housing numbers and development strategy are justified in the Development Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper. Representations about unmet need (including unmet need from adjoining authorities) and reliance on strategic sites are dealt with under Policy STR1: The Development Strategy.</p>	No changes proposed.

<b>Policy/Topic Area</b>	<b>Main Issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
<p><b>Land north of Birchfield Grove</b></p> <p><b>(SHELAA site 413)</b></p>	<p>Inclusion of the whole site is sought, promoted in accordance with the site allocation set out in the Draft Local Plan, under allocation Policy AL/HA 4. The draft allocation was for a mix of housing and community uses, including a new medical centre, open space and land safeguarded for the provision of playing fields for the local Primary School. There is reference to the Site Allocations Local Plan Policy AL/HA 4, Birchfield, Rye Road, which acknowledges the potential of the site. In addition allocation could include provision of public car parking. It is considered that allocation is supported by the Council's own LVIA evidence work.</p> <p>The air quality assessment is challenged. Local Plan allocation AL/HA 5 for a medical centre is part of this larger site. There is reference to the need for the medical centre and ongoing engagement between interested parties. It is advocated that the medical centre cannot be delivered alone and that its delivery is dependent upon allocation of the wider package of uses promoted. Without the whole mix of uses, there are issues about access, land provision and funding.</p>	<p>The SHELAA assessment concludes it is not suitable to allocate the whole site, recognising that part of the site is suitable (as shown by the allocation policy AL/HA 5) to provide for an identified need for a new medical centre. Development of the whole site would have an adverse impact upon the character of the landscape/AONB and settlement pattern and includes reference to the highway capacity. The SHELAA assessment remains valid.</p> <p>The site has not been found unsuitable on either sustainability or air quality grounds.</p> <p>The land was put forward for the medical centre by the landowner and there are no viability concerns about bringing the site forward.</p>	<p>No changes proposed.</p>

## 5.8 Benenden

### Notes:

1. The total number of representations recorded against the Benenden chapter is 215.

2. The Examiners report for the Benenden Neighbourhood Development Plan (NDP) was received by the Council in August 2021. TWBC have been working with Benenden Parish Council to produce the Referendum version of the NDP. The report seeking authorisation to go to referendum is due to go to the Planning and Transportation Cabinet Advisory Board, and then Cabinet in November 2021. The Referendum is expected to be held on 3<sup>rd</sup> February 2021. The Council would wish to review its position in respect of policies contained in the Benenden chapter of the Local Plan once the referendum has been held.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>PSTR/BE1: The Strategy for Benenden Parish</b>	1. <u>Procedural</u> : It is unlawful to state that in the event that the Benenden Neighbourhood Plan is adopted all the policies relating to Benenden AL/BE 1 to 4 will be omitted.	TWBC has already indicated that should a NDP with the requisite allocations be ‘made’ prior to the conclusion of the Local Plan Examination. It shall request to the Inspector that those policies contained within the LP be removed to avoid duplication. This approach is not considered to be unlawful.	No changes proposed
	2. <u>LBD</u> : The LBD does not provide sufficient flexibility to allow for a small amount of sustainable housing within the village.	The approach to the Benenden LBD is consistent the methodology used to review/set the LBD boundaries in the Local Plan. It is also noted that it was considered by the Examiner appointed to consider the Neighbourhood Plan and found to have no required alterations	No changes proposed
<b>AL/BE1: Land adjacent to New Pond Road (known as Uphill), Benenden</b>	1. <u>Brownfield status</u> : the site should be treated as greenfield rather than Previously Developed Land (PDL).	The site is considered to be PDL and it is also noted that the Independent Examiner’s report for the Benenden NP confirms that this site should be treated as treats site as PDL.	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	2. <u>Children’s playspace</u> : This requirement is unnecessary.	TWBC considers that a children’s playspace should be necessarily provided on site. However, it is noted that the Referendum version of Benenden Neighbourhood Plan which incorporates the Examiners recommendations from the NPs Examiner Report does not include the provision of an on-site children’s play area as the Examiner concurred with the Parish Council’s view that a financial contribution towards enhancements of existing playgrounds in the village was appropriate.	No changes proposed
<b>AL/BE2: Feoffee Cottages and land, Walkhurst Road, Benenden</b>	No main issues raised	N/A	N/A
<b>AL/BE3: Land at Benenden Hospital (south of Goddards Green Road), East End</b>	1. <u>Sustainability</u> : unsustainable location for development  2. <u>Highways impact</u> : Impact of traffic on local rural roads  3. <u>AONB</u> : the development will have a negative impact on the setting of the AONB	It is considered that this site contributes to the delivery of sustainable development within the Benenden parish. It is noted that the Examiner for Benenden NDP concurs with this view.  The Benenden NDP Examiner considered this in detail at the Examination and concluded that any traffic implications of the proposed development were not considered to be significant.  It is noted that there is an extant planning permission granted, initially in 2013, for the construction of 24 dwellings on part of the allocation and is no longer required to be used	No changes proposed  No changes proposed  No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>4. <u>Historical asset</u>: The Garland Wing should be retained</p> <p>5. <u>Local Wildlife Site</u>: concern as to the impact on the LWS</p>	<p>for hospital uses. The Examiner of the NDP noted that the requirement for a detailed masterplan can ensure proper consideration is given to the impact of development upon the setting of the AONB.</p> <p>The extant planning permission (noted above) specifically allowed for the demolition of the Garland Wing, notwithstanding its more recent designation as a non-designated heritage asset. Notwithstanding this, policy criteria 9 ensures that a feasibility assessment is undertaken to consider refurbishment and conversion of the Garland Wing.</p> <p>The policy requirements are considered to be robust. Policy AL/BE3 includes cross reference to Local Plan Policy EN 10 Protection of Designated Sites and Habitats, requiring the positive management of designated sites. For example, criterion (3) requires that the design and layout of development minimises the potential impact on notable habitats, that includes Local Wildlife Sites.</p> <p>In addition, criterion (10) of AL/BE3 ensures that the long-term management of the LWS is appropriately considered.</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	6. <u>Provision of a primary school bus service</u> ; question its practicality and request a commuted sum is collected instead.	The policy requirement for the provision of a minibus service is not prescriptive and could be provided/funded in a number of ways, including provision of a minibus service run in-conjunction with a local coach company or a Hopper Bus. However, it noted that the Examiner for the Benenden NDP considered the developer could make a contribution to the purchase of a minibus by the school itself. This is considered within the parameters of policy wording.	No changes proposed
<b>AL/BE4: Land at Benenden Hospital (north of Goddards Green Road), East End</b>	<p>1. <u>Sustainability</u>: unsustainable location for development.</p> <p>2. <u>Highways impact</u>: Impact of traffic on local rural roads</p> <p>3. <u>AONB</u>: the development will have a negative impact on the setting of the AONB</p>	<p>It is considered that this site contributes to the delivery of sustainable development within the Benenden parish and that the residential usage of this site in a more efficient manner, can be considered as delivering sustainable development. It is noted that the Examiner for Benenden NDP concurs with this view.</p> <p>The Benenden NDP Examiner considered this in detail at the Examination and concluded that any traffic implications of the proposed development were not considered to be significant.</p> <p>Criterion (1) of AL/BE3 requires comprehensive proposals for this site, together with the site area included with Policy AL/BE4. It is noted that the Examiner of the NDP indicated that the requirement for a detailed masterplan can ensure proper consideration is given to the</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>4. <u>Local Wildlife Site</u>: concern as to the impact on the LWS</p> <p>5. <u>Provision of a primary school bus service</u>; question its practicality and request a commuted sum is collected instead.</p>	<p>impact of development upon the setting of the AONB.</p> <p>The policy requirements are considered to be robust. Policy AL/BE3 includes cross reference to Local Plan Policy EN 10 Protection of Designated Sites and Habitats, requiring the positive management of designated sites. For example, criterion (3) requires that the design and layout of development minimises the potential impact on notable habitats, that includes Local Wildlife Sites.</p> <p>In addition, criterion (10) of AL/BE3 ensures that the long-term management of the LWS is appropriately considered.</p> <p>The policy requirement for the provision of a minibus service is not prescriptive and could be provided/funded in a number of ways, including provision of a minibus service run in-conjunction with a local coach company or a Hopper Bus. However, it noted that the Examiner for the Benenden NDP considered the developer could make a contribution to the purchase of a minibus by the school itself. This is considered within the parameters of policy wording.</p>	<p>No changes proposed</p> <p>No changes proposed</p>
<b>Omission Sites</b>			

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<p><b>Land to the rear of Greenacres, The Street, and adjacent to New Pond Road, Benenden (SHELAA site 158, which includes late site 16)</b></p>	<p>Inclusion of this site is sought for residential use. A quantum/scale of development is not identified but there is reference to sustainability credentials of the site including proximity to bus routes and the site being within walking distance of the settlement centre and school.</p> <p>It is considered there are inconsistencies in how sites in Benenden Parish have been treated/assessed, in particular that the omission of sites is not supported by evidence. The Sustainability Assessment and application of the methodology used to inform proposed Limits to Built Development are questioned.</p>	<p>The site has been assessed through the SHELAA process, the findings of which indicate the site is suitable in part only. The part of the site found suitable is the land duplicated as late site 16 (allocated under Policy AL/BE 1), which forms a small part of this larger SHELAA site 158. The remainder of the site is not considered suitable for allocation. The SHELAA findings identify that the site is sensitive in landscape terms. The scale of development would result in harm to the landscape character and settlement pattern, located in the AONB.</p> <p>All sites have been assessed using a robust methodology, set out in the SHELAA main report, which has been consistently applied. The methodology behind proposed Limits to Built Development has been consistently applied consistently.</p>	<p>No changes proposed</p>
<p><b>Land on the west side of Iden Green Road, Benenden (SHELAA site 222)</b></p>	<p>Inclusion of this site is sought for residential use. A quantum/scale of development is not identified but there is reference to sustainability credentials of the site including proximity to bus routes and the site being within walking distance of the settlement centre and school.</p> <p>It is considered there are inconsistencies in how sites in Benenden Parish have been treated/assessed, in particular that the omission</p>	<p>The site has been assessed through the SHELAA process, the findings of which indicate the site is unsuitable for allocation. The SHELAA findings identify that the site is important to both the heritage and settlement pattern, and to the landscape and ecological setting of Benenden, located in the AONB.</p> <p>All sites have been assessed using a robust methodology, set out in the SHELAA main report, which has been consistently applied. The</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	of sites is not supported by evidence. The Sustainability Assessment and application of the methodology used to inform proposed Limits to Built Development are questioned.	methodology behind proposed Limits to Built Development has been applied consistently.	
<b>Hams Travel Site (SHELAA site DPC4)</b>	<p>Inclusion of this site is sought for residential use. A quantum/scale of development is not identified but there is reference to sustainability credentials of the site, in particular that it is a largely brownfield site surplus to requirements in proximity to the settlement centre.</p> <p>It is advocated that inclusion of the site will enable visual enhancements to the AONB. It will also provide a more flexible, deliverable growth strategy for the Parish, less dependent on the current allocations proposed and will maintain a good housing supply. Omission of the site is not consistent with the approach taken at Benenden Hospital.</p>	<p>The site has been assessed through the SHELAA process, the findings of which indicate the site is unsuitable for allocation. This is on grounds relating to the unsustainable location of the site relative to the settlement centre and because the site could come forward as an economic windfall site.</p> <p>The overall housing numbers and development strategy are justified in the Development Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper.</p>	No changes proposed
<b>Land south of Chapel Lane, Iden Green (SHELAA site LS8)</b>	Inclusion of this site is sought for residential use. A quantum/scale of development is not identified but there is reference to sustainability credentials of the site including proximity to a bus route, the site being less remote than proposed allocations at Benenden Hospital, and proximity (one mile) from the village, which is connected by a paved footway.	The site has been assessed through the SHELAA process, the findings of which indicate the site is unsuitable for allocation. The SHELAA findings identify this on grounds including remoteness of the site relative to the Benenden settlement centre. Furthermore, the Council’s Settlement Role and Function Study found Iden Green to be unsustainable for further growth, a reflection of limited key facilities and	No changes proposed

Policy/Topic area	Main issues	TWBC Response	<i>Changes – Yes/No</i>
	<p>It is considered there are inconsistencies in how sites in Benenden Parish have been treated/assessed, in particular that the omission of sites is not supported by evidence. The Sustainability Assessment and application of the methodology used to inform proposed Limits to Built Development are questioned.</p>	<p>bus services. The new Local Plan proposes the deletion of the established Limits to Built Development at Iden Green for this reason.</p> <p>All sites have been assessed using a robust methodology, set out in the SHELAA main report, which has been consistently applied. The methodology behind proposed Limits to Built Development has been applied consistently too.</p>	

## 5.9 Bidborough

### Notes:

1. The total number of representations recorded against the Bidborough chapter is three.
2. Representation about the location of AL/SP2 (Land at and adjacent to Rusthall Recreation Ground) and the ability of this to serve the needs of Bidborough is dealt with under AL/SP 2 in the Speldhurst section of this report.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>PSTR/BI 1: The Strategy for Bidborough Parish</b>	1. <u>Public Rights of Way</u> : There is request for the policy to include reference to the need for appropriate development contributions to be made towards improvements to the PRoW network to provide Active Travel opportunities in the area. (KCC).	The request is noted. The supporting text to the Policy sets out cross reference to Policy TP 2: Transport Design and Accessibility which the approach for positive outcomes for PRoWs, including improving connectivity and securing contributions. Given that the Plan is taken as a whole specific reference in the Policy is not necessary.	No changes proposed.

## 5.10 Brenchley and Matfield

### Notes:

1. The total number of representations recorded against the Brenchley and Matfield chapter is 24.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>PSTR/BM 1: The Strategy for Brenchley and Matfield Parish</b>	1. <u>Hop Pickers Line</u> : question viability of the route given parts of line are covered by new development and numerous different landowners involved?	<p>Policy TP5 Safeguarding Railway land seeks to retain this former line as a green infrastructure corridor. This will include seeking contributions to enhance the route, provide improved/new access points.</p> <p>Para 6.574 of the Local Plan states that where sections of the former route are no longer available to provide a trail for walking and cycling, suitable alternatives and new links may need to be found, and these will be provided through negotiation with individual landowners as necessary.</p>	No changes proposed.
	2. <u>Sustainability</u> : object, Matfield is not a sustainable location for development.	<p>Whilst Matfield has a limited range of services, the level of growth proposed takes account of its proximity to Brenchley, better travel connection to Paddock Wood, and local benefits. Matfield itself is nonetheless suitable for some small-scale development as proposed.</p>	No changes proposed.
	3. <u>Traffic</u> , consideration should be made to the cumulative impact of development.	<p>The site allocation policies set out the need for proposals to be accompanied by a highway assessment, which will consider impact of development and any mitigation/highway improvement works needed. Proposals will also be</p>	No changes proposed.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>4. <u>Transport</u>, better public transport and cycle/pedestrian links are needed</p>	<p>assessed against Policy TP 1: Transport Assessments/Statements, Travel Plans, and Mitigation. This includes the consideration of the cumulative impact of development.</p> <p>The Local Plan is supported by an Infrastructure Delivery Plan which sets out the infrastructure required to support growth. Policy PSTR/BM 1 also sets out required infrastructure for Brenchley &amp; Matfield Parish whilst also setting out the need for provision of any other mitigation measures, should these be found necessary and justified in the future.</p>	<p>No changes proposed.</p>
<p><b>AL/BM1: Land between Brenchley Road, Coppers Lane and Maidstone Road</b></p>	<p>1. <u>Site suitability and capacity</u>, object - would be better to reduce number of houses and increase green open space and buffer, is an importance open space in the village.</p> <p>2. <u>Major Development in the AONB</u>, objection</p> <p>3. <u>Density</u>, the site is too low density</p>	<p>It is considered that the allocation provides sustainable development with significant public benefits. The development would not cause significant harm to neighbouring residential amenity, ecology or the surrounding landscape character. It is noted that site has extant planning permission.</p> <p>Developments in the AONB are justified in the Development Strategy Topic Paper and supported by detailed LVIAs, where appropriate.</p> <p>The developable area and site capacity has drawn on the site characteristics and context. The developable area and site capacity are considered appropriate for the site given its edge of settlement location and the sensitivity of the site in landscape and ecological terms</p>	<p>No changes proposed.</p> <p>No changes proposed.</p> <p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>4. <u>Sustainable transport</u>, concerns about walking/cycle safely to school and reliance on private car</p> <p>5. <u>Vehicle speeds</u>, relocation of 30mph speed limit on Maidstone Road is a priority</p> <p>6. <u>Pedestrian link</u>, Suggest onto Coppers Lane, by retaining gap in hedge created during installation of site utilities</p>	<p>The policy (and recently approved planning application) considers existing sustainable modes of transport (buses – including school services and existing cycle routes). The Policy – criteria 2 (and planning permission) seeks to secure off-site highway mitigation works to improve pedestrian and highway safety.</p> <p>Criteria 4 in the policy appropriately sets out the consideration to the relocation of the 30mph speed limit.</p> <p>The policy provides for a pedestrian link onto Maidstone Road. Highways have previously raised concerns about safety for pedestrians walking straight out onto the highway and this option was discounted.</p>	<p>No changes proposed.</p> <p>No changes proposed.</p> <p>No changes proposed.</p>
<b>AL/BM2: Land at Maidstone Road</b>	<p>1. <u>Site suitability and capacity</u>, some objections relating to the need to reduce number of houses and increase green open space. Whilst some objections were made in respect of the site not making efficient use of the land.</p> <p>2. <u>Impact on AONB and biodiversity</u>, object, negative impact on character and rural, open approach</p>	<p>This allocation includes the delivery of play space/open space; the layout and design of development to protect those trees/hedgerows of most amenity value. It is considered that the proposed number of dwellings reflects the edge of settlement location in the AONB whilst also seeking to make efficient use of land.</p> <p>Policy criteria (4): ensures that proper regard is made to existing hedgerows/mature trees on site. Policy EN9 - Biodiversity Net Gain of the Plan is also relevant.</p>	<p>No changes proposed.</p> <p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>3. <u>Site layout should be amended</u>, object, community use area should include a LEAP and open space, car park no longer required.</p> <p>4. <u>Road safety</u>: objections raised in respect of road safety.</p> <p>5. <u>Size of units</u>: smaller affordable units needed</p> <p>6. <u>Deliverability</u>: legal covenants restrict this site coming forward.</p>	<p>It has been previously identified that additional parking is required for the village hall to avoid cars being parked on the main road, causing a potential road hazard. The children’s play space is identified to be located on the area marked in green on the site layout plan.</p> <p>Policy criteria (1) &amp; (2) ensure that ensure that proper consideration of road safety measures relating to vehicular and pedestrian access are considered through any planning application.</p> <p>Policies H1 Affordable Housing and H3 Housing Mix of the Plan ensure an appropriate mix of housing will come forward on the site.</p> <p>Whilst it is noted that there is a covenant on the land, this is not a specific planning issue. Covenants can be discharged or modified. Whilst it may impact on the timing of the site coming forward it is not considered that it will restrict the site coming forward. The site promoter has given assurances that they do not consider that it will impact on delivery of the site.</p>	<p>No changes proposed.</p> <p>No changes proposed</p> <p>No changes proposed.</p> <p>No changes proposed.</p>
<b>Omission Sites</b>			
<b>Matfield House – Orchards and Land, Matfield (SHELAA site 18)</b>	Inclusion of the site is sought for 20 – 30 dwellings. The site was included in the Draft Local Plan (Policy AL/BM2) and re-instatement of this is requested. The Draft Local Plan policy recognised opportunities and that the site is a sustainable site.	The site has been assessed through the SHELAA process, the findings of which indicate the site is unsuitable for allocation, due to loss of Priority Habitat. The presence of the Priority habitat has been confirmed by an independent survey carried out by Kent Wildlife Trust	No changes proposed.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>TWBC removed the site from the Plan for the reason relating to Priority Habitat following further work by the Council (Grassland Survey and work commissioned from Kent Wildlife Trust). The promotor, with support of their own work, challenges the Council's evidence that has led to omission of the site. It is considered that the site is not Priority Habitat. It is noted that the Plan includes other sites that include sensitive habitat.</p> <p>It is noted that KCC Highways supported access to the site as set out in the Draft Local Plan and there is also reference to impact on heritage matters, sustainability and impact on the AONB, none of which are factors in omission of the site.</p> <p>The site is suitable, deliverable and achievable and would make a contribution towards meeting unmet need of adjoining authorities.</p>	<p>It is the Council's approach to important habitats is to follow the mitigation hierarchy – first avoid the harm, then sequentially where this is not possible reduce, mitigate and only then compensate. Plan making has a choice to avoid the harm by not allocating this site and to allocate sites that do not include the loss of priority habitats.</p> <p>As set out in the SHELAA the Council does not consider this a suitable site for allocation, given its more recent evidence work. Representations about unmet need (including unmet need from adjoining authorities) are dealt with under Policy STR1: The Development Strategy.</p>	
<p><b>Ashes Plantation, Maidstone Road, Matfield (SHELAA site 353)</b></p>	<p>Inclusion of the site is sought for approximately 60 residential units. The site was included in the Draft Local Plan (Policy AL/BM 3) and similar policy wording is sought. A flexible approach to provision of means of access is requested, with this being from either Maidstone Road or Oakfield Road.</p>	<p>The site has been assessed through the SHELAA process, the findings of which indicate that the site is unsuitable for allocation. While the site was included in the Draft Local Plan, work to inform the emerging plan since that time indicates that it is no longer a suitable site, as set out in the SHELAA assessment, including concerns about the suitability of taking access from this site onto Oakfield Road, as well as the site not relating well to the settlement pattern and is not considered a logical extension to the LBD</p>	<p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>It is promoted on the basis that it is a sustainable, deliverable site that can contribute to housing need, including the unmet need of neighbouring authorities. It would form a logical addition to the settlement and can be designed in a landscape led way. There are various benefits arising from site allocation such as provision of affordable housing and support for local services.</p> <p>Omission of the site is not justified when assessed against reasonable alternatives. There is reference to the Sustainability Appraisal scores for the site, which are questioned (these are unchanged between Draft and Pre-Submission Local Plans).</p>	<p>Representations about unmet need (including unmet need from adjoining authorities) are dealt with under Policy STR1: The Development Strategy.</p> <p>Detail on the reason why sites were chosen for allocation (when compared with reasonable alternatives) is provided in the commentary for Brenchley and Matfield parish in the Sustainability Appraisal. Detailed consideration was given to the cumulative impact scores for the parish when determining whether it should remain an allocation.</p>	
<p><b>Matfield MOT Centre and land to rear, Geddes Hill, Matfield (SHELAA site PSPC_3)</b></p>	<p>Inclusion of the site is sought for mixed use, comprising the existing commercial use on the site, with opportunities to enhance and create new commercial uses of the site, along with an element of residential use.</p> <p>The site is promoted on the basis that it would be community lead and there is good access to the site. There is reference to a range of benefits resulting from development of the site.</p>	<p>The site has been assessed through the SHELAA process (see SHELAA addendum, October 2021) for 58 dwellings (based on 30 units per hectare). The findings of the assessment indicate that the site is unsuitable as a potential allocation. This is because the site is not well related to a settlement centre and therefore any residential use of the site would be unsustainable in this context.</p>	<p>No changes proposed.</p>

## 5.11 Frittenden

### Notes:

2. The total number of representations recorded against the Frittenden chapter is six.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>PSTR/FR 1: The Strategy for Frittenden Parish</b>	1. <u>Facilities and contributions</u> : The Parish Council seeks contributions for a proposed community shop/cafe within the policy, to help address a lack of permanent retail facilities. Also, while the policy refers to the need for additional allotments, this is not considered a priority for the village and a policy amendment to exclude allotments is sought.	Criterion 3g) of the policy PSTR/FR 1 enables contributions to be sought for other necessary mitigation measures, such as a community shop/café, if this is duly found to be necessary and deliverable. The comment about allotments is noted, however, there could be a need for allotment provision during the Local Plan period so it is proposed to retain this reference.	No changes proposed.
	2. <u>Sustainability</u> : Opportunities are recognised as limited, but it is considered that the village could become a more sustainable location and be a less environmentally harmful location for development than other sites in the Plan. Amendment to the policy is sought to improve bus services.	The small-scale development proposed is unlikely to deliver improved bus services, which due to the scale of development proposed for the Parish would most likely be unviable. Whilst Frittenden has limited services, it is none the less suitable for some small-scale development as proposed.	No changes proposed.
	3. <u>Public Rights of Way</u> : There is a request for the policy to include reference to the need for appropriate development contributions to be made towards improvements to the PRow network to provide Active Travel opportunities in the area. (KCC).	The request is noted. The supporting text to the Policy sets out cross reference to Policy TP 2: Transport Design and Accessibility which the approach for positive outcomes for PRow, including improving connectivity and securing contributions. Given that the Plan is taken as a whole specific reference in the Policy is not necessary.	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
<b>AL/FR 1: Land at Cranbrook Road, Frittenden</b>	<u>Site density/efficient use of land</u> : There is objection to the proposed density of the site and that this does not make efficient use of land. More efficient use of the site is sought.	Allocation AL/FR 1 has been assessed through the SHELAA site assessment process, the findings of which identify the site suitable as a potential allocation. The developable area and site capacity has drawn on the site characteristics and context. It is considered that the site density (of 28 dph on average) is appropriate for the site on the edge of the settlement.	No changes proposed.
<b>Omission site</b>			
<b>Land at Shenlands Barn, Ayleswade Lane (SHELAA site PSPC_2)</b>	Inclusion of the site is sought for residential development (or a retirement village) or other uses. It measures some 9.4 ha and is promoted on the basis the site lies outside the AONB and there are no flooding or Public Right of Way concerns. It is also in single ownership and is considered (by site promotor) to be well located for services and there is a bus stop at the end of the lane. There is reference to developments taking place in the wider area and to access points serving the site. The promotor advises the site could be delivered within 5 years.	The site has been assessed through the SHELAA process (see SHELAA addendum, October 2021) for 239 dwellings (based on 30 units per hectare). The findings of the assessment indicate that the site is unsuitable as a potential allocation. This is because the site has a rural context, and it is considered occupants of the site would be car dependent, which is unsustainable in this context.	No changes proposed.

## 5.12 Goudhurst

### Notes:

1. The total number of representations recorded against the Goudhurst chapter is 6.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>PSTR/GO 1: The Strategy for Goudhurst Parish</b>	1. <u>Health infrastructure</u> . CCG has not identified a need for a new premises' requirement for Goudhurst	Clarification wording is proposed to provide clarity.	<p>A minor modification proposed at paragraph 5.536 of the Local Plan to clarify this point. Replacement wording is as follows:</p> <p>'The IDP identifies that there is existing practice provision serving this area at Goudhurst. The NHS Kent and Medway Clinical Commissioning Group confirms that it is expected that contributions will be required towards the Old Parsonage Surgery at Goudhurst (improvements/reconfiguration, etc) or another practice within the area if appropriate, in order to mitigate the impact of development'.</p> <p>The IDP will also be updated accordingly.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>2. <u>Highways/vehicular access</u>: object, poor road access in Goudhurst, number of HGVs travel through the village.</p> <p>3. PRow, object, general wording to include contributions for improvements to active travel and the PRow network</p>	<p>Vehicular access to development sites and any required mitigation works are to be informed by a Transport Assessment, as set out policy Policy TP 1: Transport Assessments of the Plan. Impact on the local road network would be expected to be identified and mitigated for through the development.</p> <p>The Supporting text to the Policy sets out a cross reference to Policy TP 2: Transport Design and Accessibility. Given that the Plan is taken as a whole specific reference in the Policy is not necessary.</p>	<p>No changes proposed.</p> <p>No changes proposed.</p>
<b>AL/GO1: Land east of Balcombes Hill and adjacent to Tiddymotts Lane</b>	<p>1. <u>Underground Infrastructure</u>: underground infrastructure crosses site.</p>	<p>Noted, cross reference will be made to Policy EN24 in the paragraph underneath Policy AL/GO 1 as agreed in the Southern Water SoCG.</p>	<p>Reference to Policy EN 24 - Water Supply, Quality, and Conservation to be added to the paragraph underneath Policy AL/GO 1.</p>
<b>AL/GO2: Land at Triggs Farm, Cranbrook Road</b>	<p>1. <u>Access</u>, object, allocation is too prescriptive on the requirements</p>	<p>An alternative access cannot be provided via the existing farm track leading to the site as this is not supported by KCC Highways. would not support it.</p> <p>It is noted that a planning application was granted on appeal for this site (ref refers: 17/02765/0).</p>	<p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>2. Site capacity, object, capacity should increase to 20 homes.</p> <p>3. <u>Deliverability</u>, objects, practicality of delivering 4 affordable units on site</p>	<p>The site has been assessed through the SHELAA site assessment process, finding that the site is suitable as a potential site allocation. This conclusion of the SHELAA is supported by the recent planning appeal approval. The developable area and site capacity has drawn on the site characteristics and its context, with the scale of development considered appropriate for the site and reflecting indicative plans approved through the appeal decision.</p> <p>Affordable housing is to be delivered in accordance with PSLP Policy H3. There is no reason to indicate that the affordable housing cannot be delivered on this site.</p>	<p>No changes proposed.</p> <p>No changes proposed.</p>

## 5.13 Horsmonden

### Notes:

1. The total number of representations recorded against the Horsmonden chapter is 28.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>PSTR/HO 1: The Strategy for Horsmonden Parish</b>	1. <u>Housing growth</u> : the totality of development in Horsmonden will have a detrimental impact on the village.	The overall housing numbers are justified in the Development Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper and in some instances, site specific LVIA's. (See also site allocations below)	No changes proposed.
	2. <u>Infrastructure</u> : insufficient infrastructure to support growth in the village including a new village hall.	The Local Plan is supported by an Infrastructure Delivery Plan which sets out the infrastructure required to support growth. Infrastructure requirements for Horsmonden are identified in the IDP. The strategic policy for the parish, Policy PSTR/HO1, and each individual site allocation policy requires the delivery of specific infrastructure through policy criteria and developer contributions.	No changes proposed
	3. <u>AONB</u> : reference to protecting the AONB should be referred to in the strategy policy.	Policy EN19 The High Weald Area of Outstanding Natural Beauty requires that all development within, or affecting the setting of, the High Weald Area of Outstanding Natural Beauty (AONB) shall seek to conserve and enhance its landscape and scenic beauty, having particular regard to the impacts on its	No changes proposed

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>4. <u>Traffic impacts</u>: increasing traffic will impact in designated rural lanes.</p> <p>5. <u>Hop Pickers Line</u>: this should become a green corridor.</p> <p>6. <u>PRoWs</u>: reference to development contributions towards improvements to the ProW network is needed.</p>	<p>character components, as set out in the High Weald AONB Management Plan.</p> <p>Developments in Horsmonden may result in some additional traffic on these designated rural lanes but this is not considered a constraint on development.</p> <p>Policy TP5 Safeguarding Railway land seeks to retain/protect the Hop Pickers Line for use as a green infrastructure corridor.</p> <p>Supporting text to the Policy sets out cross reference to Policy TP 2: Transport Design and Accessibility which the approach for positive outcomes for PRoWs, including improving connectivity and securing contributions. Given that the Plan is taken as a whole specific reference in the Policy is not necessary. This approach is included in the SoCG with KCC (PRoW).</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>
<p><b>AL/HO1:</b> <b>Land adjacent to Furnace Lane and Gibbet Lane</b></p>	<p>1. <u>Traffic</u>: contributions should be sought for traffic calming</p>	<p>Planning applications for this site are to be informed by a Transport Assessment as per the requirements of Policy TP 1: Transport Assessments/Statements, Travel Plans, and Mitigation. This will consider impact of development and any mitigation/highway improvement works needed. Policy PSTR/HO 1 identifies that developer contributions, in kind or financial towards mitigation measures necessary, will be secured when directly related to the develop and area fairly and reasonably related in scale and kind.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		It is noted that this site received planning approval in March 2021.	
<b>AL/HO2: Land south of Brenchley Road and west of Fromandez Drive</b>	<ol style="list-style-type: none"> <li data-bbox="434 371 1037 432">1. <u>AONB</u>: objected to, the site will be detrimental to the AONB.</li> <li data-bbox="434 639 1037 738">2. <u>Impact on a historic park and garden (Sprivers)</u>: detrimental impact on the historic park &amp; garden</li> <li data-bbox="434 911 1037 975">3. <u>Buffers</u>: a buffer of at least 50m for the ancient woodland should be required.</li> <li data-bbox="434 1118 1037 1182">4. <u>Pedestrian safety</u>: concerns relating to safety of pedestrians walking to the village.</li> <li data-bbox="434 1246 1037 1310">5. <u>Highways/traffic matters</u>: There is concern in particular about impact on the local road</li> </ol>	<p data-bbox="1070 371 1762 603">This site is not located in the AONB but is immediately adjacent to it. The potential for the development to impact upon the setting of the AONB has been considered through the AONB Setting Analysis Report which concluded that the allocation would not cause significant harm to the setting of the AONB.</p> <p data-bbox="1070 639 1762 871">This allocation presents a number of significant opportunities in relation to Sprivers with potential for improved public access and new parking for example. In addition, criterion 5 of the policy sets out the requirement for a pedestrian access into the Sprivers from the site. It is noted that the National Trust support this policy.</p> <p data-bbox="1070 911 1762 1078">The site layout plan and criteria 7 of the policy indicates substantial buffers around the western and southern boundaries of the site allocation. In addition, a cross reference is made to Policy EN13 Ancient Woodland and Veteran Trees.</p> <p data-bbox="1070 1118 1762 1214">Criteria 4 of policy sets out the need to provide pedestrian access along Brenchley Road to the wider footway network.</p> <p data-bbox="1070 1246 1762 1310">Vehicular access and any required mitigation works are to be informed by a Transport Assessment, as</p>	<p data-bbox="1785 371 1951 435">No changes proposed</p> <p data-bbox="1785 608 1951 671">No changes proposed</p> <p data-bbox="1785 879 1951 943">No changes proposed</p> <p data-bbox="1785 1086 1951 1150">No changes proposed</p> <p data-bbox="1785 1214 1951 1278">No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>network and provision of a suitable access to the site.</p> <p>6. <u>Layout</u>: the site layout is overly prescriptive</p> <p>7. <u>Infrastructure</u>: Underground Infrastructure crosses the site.</p>	<p>set out by the policy. Impact on the local road network would be expected to be identified and mitigated for through the development.</p> <p>The site layout plan sets out the parameters for the site taking into account the criteria set out in the policy and whilst it is indicative indicates the requirements for the uses set out on the site.</p> <p>Noted, cross reference will be made to Policy EN24 in the paragraph underneath Policy AL/HO 2 as agreed in the Southern Water SoCG.</p>	<p>No changes proposed</p> <p>Reference to Policy EN 24 - Water Supply, Quality, and Conservation to be added to the paragraph underneath Policy AL/HO 2.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>HO3: Land to the east of Horsmonden</b>	<p>1. <u>Highways/traffic matters/vehicular access:</u> There is concern in particular about impact on the local road network and provision of a suitable access to the site.</p> <p>2. <u>AONB:</u> objected to, the site will be detrimental to the AONB.</p> <p>3. <u>Pedestrian safety:</u> concerns relating to safety of pedestrians walking to the village</p> <p>4. <u>Integration with the village and surrounds/loss of trees:</u> the site should well integrated with the village including land scape setting and infrastructure connections.</p> <p>5. <u>Provision of Infrastructure/PRoW/Hop Pickers Route (HPL):</u> Protection for the</p>	<p>Vehicular access and any required mitigation works are to be informed by a Transport Assessment, as set out policy cross reference to Policy TP 1: Transport Assessments/Statements, Travel Plans, and Mitigation. Impact on the local road network would be expected to be identified and mitigated for through the development.</p> <p>This site is not located in the AONB but can be seen in views from it. The potential for the development to impact upon the setting of the AONB has been considered through the AONB Setting Analysis Report which concluded that the allocation would not cause significant harm to the setting of the AONB.</p> <p>Criteria 2 of policy sets out that pedestrian links be provided/ improved along the Goudhurst Road. Criteria (3) requires linkages to the existing PRoW through the site (that allows for north-south &amp; east-west linkages) through the site).</p> <p>Criteria (1), (2) &amp; (3) will ensure that development is well integrated with the surrounding area, retaining and creating new linkages. Criteria (6) requires that the layout/design is informed by landscape appraisals, whilst criteria (8) requires the eastern edge of the site to be at a lower density to reflect the edge of settlement location</p> <p>Criteria (13) that requires the delivery of on-site amenity/natural green space and children’s and</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>amenity of public rights of way and the Hop Pickers Line route</p> <p>6. <u>Community uses/orchard</u>: this term may limit other possibilities in that space could be used for.</p> <p>7. <u>Surface Water</u>: The existing surface water drainage for the site as it blocks regularly.</p> <p>8. <u>Density</u>: the requirement for the eastern area of the site to be at a lower density is not necessary.</p> <p>9. <u>New Health Facilities</u>: unclear as to whether the development is expected to provide land for a health centre, not the building itself.</p> <p>10. <u>The Bassett Villas</u>: The development will have a detrimental impact on these heritage assets</p>	<p>youth play space Criteria (5) of the Policy will ensure that the route of the HPL is maintained; whilst Policy TP5 Safeguarding Railway land seeks to safeguard the HPL as a green infrastructure corridor</p> <p>The northern, higher part of the allocation as shown on the site layout plan is the most sensitive part of the site, with community uses and not built form being identified as the most appropriate use, as this would reduce the impact of the development on the wider rural area. The policy wording is clear about the uses to come forward in this area but is no prescriptive as to their exact form.</p> <p>Policy EN26 Sustainable Drainage Systems requires that all development should deliver adequate drainage systems</p> <p>Criterion (8) is included to reflect the edge of settlement location of this part of the site. The LVIA required by the policy will be used to inform the detailed design of this part of the site.</p> <p>Criterion (14) provides the basis for delivering this land-use, using a suitable legal mechanism.</p> <p>It is acknowledged that the Villas are positive contributors. Criteria 10 and 11 set out any scheme should take into account, and respect, the New</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>11. <u>Layout/form of the allocation:</u> flexibility of the layout and form of development is questioned.</p>	<p>Bassett Cottages and the character and appearance of nearby listed buildings.</p> <p>Paragraph 5.604 of the supporting text sets out that the types and layout of development could address issues of landscape sensitivity, with the eastern part of the site to be developed at a lower density than the rest of the site (as informed by a landscape assessment). The northern, higher parts of the site to be used for community uses and not built form, would reduce the impact of development upon the wider rural area, including views from the areas of higher land to the south of the site outside of the developed area of the village, including distant views from Goudhurst. Policy Criterion (6) of the Policy sets out the requirements that development proposals will need to meet with to ensure there is no adverse impact upon the setting of the High Weald AONB.</p>	<p>No changes proposed</p>
<p><b>Omission Sites</b></p>			
<p><b>Land adjacent to Apple Tree Cottage (SHELAA Late Site 42)</b></p>	<p>Inclusion of the site is sought for a small (undefined) number of residential units. The site forms part of the route of the historic Hop Picker's railway line and can link with/contribute to provision of significant enhancements to public footpaths and link with public access proposed for another site allocation (officer note: although not specified in the representation this is likely to be site AL/HO 3). Allocation can also provide an opportunity for</p>	<p>The site has been assessed through the SHELAA process, the findings of which indicate the site is unsuitable for allocation. The SHELAA assessment identifies that the site is constrained and that any yield that could overcome the site's constraints is likely to be of a scale considered unsuitable for allocation.</p>	<p>No changes proposed</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
	the site to be used as part of a wider green infrastructure corridor.		
<b>Land South of Goudhurst Road, Horsmonden (SHELAA Site – PSPC_8, including SHELAA site 355)</b>	<p>Inclusion of this site is sought for residential development of 35 units. The site is promoted on the basis that the Council has not taken account of the housing needs of adjoining authorities, it is a non-AONB and non-Green Belt site and the Plan has not allocated enough small and medium sized sites to ensure the trajectory can be delivered.</p> <p>The housing numbers for Horsmonden parish are considered broad ranging, with over reliance on larger sites (Horsmonden and the strategy generally). Allocation of the site would reduce risk from non-delivery of such sites and is considered to be a logical rounding off of the settlement.</p>	<p>The package of supporting information has been considered however, there remains concern as set out in the SHELAA Assessment Addendum, including access, impact on heritage and landscape.</p> <p>The overall housing numbers and development strategy are justified in the Development Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper. Representations about unmet need (including unmet need from adjoining authorities) are dealt with under Policy STR1: The Development Strategy.</p>	No changes proposed

## 5.14 Lamberhurst

### Notes:

1. The total number of representations recorded against the Lamberhurst chapter is 11.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>PSTR/LA 1: The Strategy for Lamberhurst Parish</b>	<ol style="list-style-type: none"> <li>1. <u>Development in the AONB</u>; objected to, including lack of exceptional circumstances and not consistent with the NPPF.</li> <li>2. <u>The car park on the Broadway</u>, objected to as it is not a public car park but one that belongs to The Chequers Inn. No mention is made of the public car park adjacent to The Brown Trout that is owned by the Parish Council.</li> <li>3. <u>PRoW</u> - requests that the policy includes development contributions to be made towards improvements to the PRoW network and Active Travel opportunities.</li> </ol>	<p>Developments in the AONB are justified in the Development Strategy Topic Paper and supported by detailed LVIA's.</p> <p>Whilst the Broadway car pub is privately owned, it is currently used as a public car park, and centrally located within, Lamberhurst. The protection of this car park is carried forward from the 2006 Local Plan. The car park adjacent to the Brown Trout is also proposed for protection as set out in Policy TP 4 but incorrectly omitted from Policy PSTR/LA 1. Therefore, the policy wording will be amended to clarify this.</p> <p>Noted. Supporting text to the Policy sets out cross reference to Policy TP 2: Transport Design and Accessibility which the approach for positive outcomes for PRoWs, including improving connectivity and securing contributions. Given that the Plan is taken as a whole specific reference in the Policy is not necessary. No change proposed.</p>	<p>No change proposed.</p> <p>Amend policy wording to PSTR/LA 1, point 3) to: <i>Retain the public car parks at The Broadway, Lamberhurst and land adjacent to the Brown Trout, Lamberhurst, as defined on the Policies Map;</i></p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>AL/LA 1: Land to the west of Spray Hill</b>	<ol style="list-style-type: none"> <li data-bbox="427 272 1010 400">1. <u>Development in the AONB</u>; objected to, including lack of exceptional circumstances and not consistent with the NPPF.</li> <li data-bbox="427 475 1010 539">2. <u>Risk of coalescence between Lamberhurst and The Down</u>, objection.</li> <li data-bbox="427 576 1010 639">3. <u>Highways/access matters</u>; objections, in particular about site access</li> <li data-bbox="427 847 1010 975">4. <u>Footways</u>, objected to, provision of footway not necessary and should be required to ensure good pedestrian connectivity instead.</li> <li data-bbox="427 1018 1010 1082">5. <u>Public Rights of Way</u>: Direct reference to the footpath reference is required.</li> </ol>	<p data-bbox="1032 272 1668 368">Developments in the AONB are justified in the Development Strategy Topic Paper and supported by detailed LVIAs.</p> <p data-bbox="1032 483 1668 547">The policy includes the provision of a proposed buffer to prevent coalescence.</p> <p data-bbox="1032 584 1668 823">Vehicular access and any required mitigation works are to be informed by a Transport Assessment as set out by the policy. Impact on the local road network would also form a consideration of the Transport Assessment and any impacts would be expected to be identified and mitigated for through the development.</p> <p data-bbox="1032 860 1668 956">The requirement to include a pedestrian footway is considered necessary to achieve sustainable connectivity.</p> <p data-bbox="1032 1031 1668 1302">PROWs are shown on the site layout plan and reference made in the policy to the provision of a pedestrian link to join up with the existing footway network. Specific references to footpath numbers are unnecessary. The requirement for sensitive lighting reflects edge of settlement location within AONB and is considered necessary.</p>	<p data-bbox="1691 272 2000 304">No changes proposed.</p> <p data-bbox="1691 483 2000 515">No changes proposed.</p> <p data-bbox="1691 584 2000 616">No changes proposed.</p> <p data-bbox="1691 860 2000 892">No changes proposed.</p> <p data-bbox="1691 1031 2000 1062">No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>6. <u>Lighting</u>, objected to, lighting requirement should be omitted.</p> <p>7. <u>Infrastructure</u>: Underground Infrastructure crosses the site.</p>	<p>Reflecting the sites edge of settlement location within the AONB and its proximity to Scotney Castle, sensitive lighting is imperative.</p> <p>Noted. It is apparent that SW's infrastructure follows the eastern boundary of the site – therefore, additional wording has been agreed for inclusion in the supporting text to Policy AL/LA1:</p>	<p>No changes proposed.</p> <p>Additional supporting text proposed '<i>Southern Water's underground infrastructure follows the eastern boundary of the site and therefore the layout and design of the scheme should take account of this infrastructure.</i>'</p>
<b>Omission Site</b>			
<b>Lamberhurst Winery (site 423)</b>	<p>Inclusion of the site is sought for 125 dwellings. Masterplan submitted to show how the site could come forward.</p>	<p>The supporting information submitted with the representation has been considered, however concerns regarding the site still remain. It is considered that the SHEELA outcome (Site 423) remains correct.</p> <p>There is concern about the scale of development proposed, the development of c125 dwellings being considered as major development in the AONB landscape. There is also concern about the impact of this scale of development on the landscape character and heritage setting of the settlement, located in the AONB. These concerns would also relate to</p>	<p>No changes are proposed.</p>

Policy/Topic area	Main issues	TWBC Response	<i>Changes – Yes/No</i>
		proposals for a lower amount of development within a smaller part of the site.	

## 5.15 Pembury

### Notes:

1. The total number of representations recorded against the Pembury chapter is 61.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>PSTR/PE 1: The Strategy for Pembury Parish</b>	<ol style="list-style-type: none"> <li>1. <u>Housing numbers:</u> There is concern that these are too high, the need is unproven and should not outweigh the merits of preserving the Green Belt and AONB, with various options of brownfield sites given preference over sites in the Green Belt/AONB, increasing density on AL/PE 1 and AL/PE 2 and not allocating AL/PE 3 and AL/PE 4.</li> <li>2. <u>Loss of Green Belt:</u> There is objection to the loss of Green Belt, that it cannot be/is not being replaced elsewhere, a lack of 'exceptional circumstances' to justify the loss and whether public improvements, which justify release of Green Belt, will materialise.</li> <li>3. <u>Development in the AONB:</u> There are objections variously in terms of scale, incompatibility with designation and NPPF, including lack of 'exceptional circumstances'.</li> <li>4. <u>Coalescence:</u> There is concern that Pembury will become a suburb of Tunbridge Wells.</li> </ol>	<p>The overall housing numbers are justified in the Development Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper and in some instances, site specific LVIAs. (See also site allocations below)</p> <p>The Development Strategy Topic Paper sets out at section 6 (I) the exceptional circumstances for Green Belt releases, with Appendix 1 providing an individual assessment of the relevant sites. This is supported by Green Belt studies, which also consider replacement.</p> <p>Developments in the AONB are justified in the Development Strategy Topic Paper and supported by detailed LVIAs.</p> <p>Pembury will retain its clear identity, physically separate and distinct from RTW.</p>	No changes proposed.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>5. <u>Infrastructure and developer contributions</u>: Various references to there being an existing ‘infrastructure deficit’, with particular reference to medical facilities/GPs, Primary School, water supply, flooding, sewerage, sports provision and transport improvements (see also below) and a new Community Hall as well as to the timing of infrastructure provision.</p> <p>6. <u>Highways/traffic matters</u>: There are concerns variously regarding the ability of the local road system to cope with extra traffic, including cumulative impact with strategic developments on traffic along Pembury Road, knock-on effects, speeding through village, parking capacity and related air and noise pollution; also, inadequate bus service; while proposed improvements are generally welcomed.</p> <p>7. <u>Need for further attention to Public Rights of Way/footpaths</u>: This includes reference to need for including a sufficiently direct, safe off-road active</p>	<p>The Local Plan is supported by an Infrastructure Delivery Plan which sets out the infrastructure required to support growth. Policy PSTR/PE 1 sets out required infrastructure for Pembury Parish and sets out that developer contributions would be sought. Point 3i of the policy sets out the need for provision of any other mitigation measures, should these be found necessary and justified in the future.</p> <p>The Pembury strategic policy PSTR/PE 1 sets out the highway improvement and mitigation measures to support the planned growth. Developer contributions would be sought to deliver these, as set out in the policy. In addition, all site allocation policies set out the need for proposals to be accompanied by a Transport Assessment, which will consider impact of development and any mitigation/highway improvement works needed. Proposals will also be assessed against Policy TP 1: Transport Assessments/Statements, Travel Plans, and Mitigation. Development must provide parking in accordance with Policy TP3: Parking Standards, while Policy AL/PE 1 requires a car parking area which will provide public car parking for Pembury.</p> <p>This is noted. The supporting text to the Policy sets out cross reference to Policy TP 2: Transport Design and Accessibility which the</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>travel route to the proposed recreation facilities at Hawkenbury PRoWs to be listed for expected contributions and direct reference to specified Public Footpaths is sought.</p>	<p>approach for positive outcomes for PRoWs, including improving connectivity and securing contributions. Given that the Plan is taken as a whole specific reference in the Policy is not necessary.</p>	
<p><b>AL/PE 1: Land rear of High Street and west of Chalket Lane</b></p>	<ol style="list-style-type: none"> <li>1. <u>Loss of Green Belt:</u> This is objected to, a lack of exceptional circumstances and the public benefits proposed do not justify release from Green Belt. Points 3, 4 and 5 of policy unlikely to produce the public benefits sought.</li> <li>2. <u>Development in the AONB:</u> This is objected to, including scale and lack of exceptional circumstances, not consistent with NPPF and that sites do not make efficient use of land/maximise density. The site may be more acceptable if the size and scale are reduced (cumulatively with AL/PE 2 and AL/PE 3) so that it is no longer major development (Natural England) while others seek increase in density or deletion of site.</li> <li>3. <u>Local road network and parking:</u> Concern is expressed about impact on the local road network and mixed views about provision of public parking, including quantum and location, relative to settlement, of this. Concern about management of</li> </ol>	<p>The Development Strategy Topic Paper sets out at section 6 (I) the exceptional circumstances for Green Belt releases, with Appendix 1 providing an individual assessment of the relevant sites. This is supported by the Green Belt studies. The promoters of sites AL/PE 1 – AL/PE 3 inclusive accept policy requirements of points 3, 4 and 5, which are supported by viability work.</p> <p>Major developments in the AONB are justified in the Development Strategy Topic Paper and supported by detailed LVIAs. The developable area and site capacity has drawn on the LVIA work as well as the site characteristics and context. The developable area and site capacity are considered appropriate for the site. It is noted that Pembury Parish Council favourably notes that the proposed density of housing has been reduced (note: compared with Regulation 18 Draft Local Plan).</p> <p>Vehicular access and any required mitigation works are to be informed by a Transport Assessment, as set out in the policy. The policy seeks to deliver around 30 car parking spaces available for the Village Hall and public to use in</p>	<p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>this and need for the proposed pedestrian link to the Village Hall. Reference is made to the parking being exclusive to the Village Hall only. Determining point of access is a concern.</p> <p>4. <u>Cycle links</u>: It is considered that these should be made available to horse riders through upgrades to bridleway/restricted byways and that points 3, 4 and 5 of the policy will not provide active travel/sustainable development – stronger worded is needed to these and point 7 to ensure provision.</p>	<p>response to concerns over lack of parking raised in the earlier public consultation on the Draft Local Plan and negotiated following a meeting of representatives from the Parish Council, Village Hall Management Committee and site promotor. Management of the car parking would be determined through the planning application. The pedestrian link is included to facilitate connectivity between the parking and the Village Hall.</p> <p>With regards to cycle links - Criterion 5 of AL/PE 1 seeks the upgrade required (of Chalket Lane). The Plan's approach to Public Rights of Way is set out through various policies in the Plan, which should be read as a whole – this includes point 3i of PSTR/PE 1 which enables contributions towards mitigation measures to be sought. Other policies reference active travel opportunities, including STR 6: Transport and Parking and TP 2: Transport Design and Accessibility. The landowners/promotors of sites AL/PE 1 – AL/PE 3 inclusive accept policy requirements of points 3, 4 and 5, supported by viability work.</p>	
<b>AL/PE 2: Land at Hubbles Farm and south of</b>	<p>1. <u>Development in the AONB</u>: Objections relate to the scale of development, including lack of exceptional circumstances, not consistent with the NPPF and that sites do not make efficient use of land/maximise density. The site may be more</p>	<p>Developments in the AONB are justified in the Development Strategy Topic Paper and supported by detailed LVIAs. The developable area and site capacity has drawn on the LVIA work as well as the site characteristics and</p>	<p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>Hastings Road</b>	<p>acceptable if the size and scale are reduced (as well as AL/PE 1 and AL/PE 3) so that it is no longer major development (Natural England) while others seek increase in density or deletion of site. The site promotor seeks amendment to the policy, so the yield is a minimum quantity of units and, in addition, indicates an upper end number of units (being 121 dwellings).</p> <p>2. <u>Loss of Green Belt:</u> There is objection, with a lack of exceptional circumstances. Points 6, 7 and 8 of policy unlikely to produce the public benefits sought or active travel/sustainable development.</p> <p>3. <u>Cycle links:</u> It is considered that these should be made available to horse riders through upgrades to bridleway/restricted byways and that points 6,7 and 8 of the policy will not provide active travel/sustainable development.</p>	<p>context. The developable area and site capacity are considered appropriate for the site. It is noted that Pembury Parish Council favourably notes the small reduction of the proposed housing density (note: compared with Regulation 18 Draft Local Plan).</p> <p>The Development Strategy Topic Paper sets out at section 6 (I) the exceptional circumstances for Green Belt releases, with Appendix 1 providing an individual assessment of the relevant sites. This is supported by the Green Belt studies. The public benefits from this site and adjacent schemes are accepted by land promoters and supported by viability work.</p> <p>Criterion 8 of AL/PE 2 seeks the upgrade required (of Chalket Lane). The Plan's approach to Public Rights of Way is set out through various policies in the Plan, which should be read as a whole – this includes point 3i of PSTR/PE 1 which enables contributions towards mitigation measures to be sought. Other policies reference active travel opportunities, including STR 6: Transport and Parking and Policy TP 2: Transport Design and Accessibility. In addition, the landowners/site promoters of sites AL/PE 1 – AL/PE 3 inclusive accept policy</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>4. <u>Highways/traffic matters</u>: There is concern in particular about impact on the local road network and provision of a suitable access to the site.</p> <p>5. <u>Infrastructure</u>: Concern is raised in relation to the capacity of sewerage infrastructure, with additional policy wording sought (by Southern Water) to increase capacity.</p> <p>6. <u>Cemetery expansion</u>: There is comment in support (Pembury Parish Council), though representation from site promotor, including supporting information, utilises part of the cemetery safeguarded land for an alternative use.</p> <p>7. <u>Ancient Woodland buffer</u>: There is a request for a minimum 50- metre buffer is sought between Ancient Woodland and development (as a precaution), unless demonstrated that a smaller buffer is sufficient (Woodland Trust).</p>	<p>requirements of points 6, 7 and 8, supported by viability work.</p> <p>Vehicular access and any required mitigation works are to be informed by a Transport Assessment, as set out by the policy. Impact on the local road network would be expected to be identified and mitigated for through the development. Discussions between the site promotor and KCC Highways indicate that there is a workable solution that will enable a satisfactory and safe access to be achieved.</p> <p>There is cross-reference to Policy EN:24 Water Supply, Quality and Conservation, which covers this issue and a Statement of Common Ground has been agreed with Southern Water.</p> <p>The extent of land safeguarded for cemetery expansion is required to support the planned growth at Pembury. The extent of safeguarding has drawn on information provided by Pembury Parish Council on burial rates.</p> <p>The Plan Policy EN13: Ancient Woodland and Veteran Trees sets out the Plans approach to ancient woodland, including buffers. A 50-metre buffer is unjustified.</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>AL/PE 3: Land north of the A21, south and west of Hastings Road</b>	<ol style="list-style-type: none"> <li>1. <u>Development in the AONB:</u> This is objected to, including lack of exceptional circumstances, not consistent with the NPPF and that sites do not make efficient use of land/maximise density. The site may be more acceptable if the size and scale are reduced (cumulatively with AL/PE 2 and AL/PE 3) so that it is no longer major development (Natural England, while others seek deletion of site, if AL/PE 1 and AL/PE 2 are given higher densities, or alternatively a reduced developable area is sought.</li> <li>2. <u>Highways and access matters:</u> There are objections, in particular about site access, impact on on-site parking and use of the highway by other road users, speeding, increased traffic on local road network and cumulative impact with development at Paddock Wood/Tudeley. View that A21 would need to be re-modelled.</li> <li>3. <u>Loss of open space and landscape buffer:</u> There are comments that the site is used informally for recreation by the local community and concern that assessment work has not considered the value of the western part of the site to the community and that the Sustainability Appraisal's neutral score is incorrect.</li> </ol>	<p>Developments in the AONB are justified in the Development Strategy Topic Paper and supported by detailed LVIAs. The developable area and site capacity has drawn on the LVIA work as well as the site characteristics and context. It is noted that Pembury Parish Council favourably notes the small reduction of the proposed housing density (note: compared with Regulation 18 Draft Local Plan).</p> <p>Vehicular access and any required mitigation works are to be informed by a Transport Assessment, as set out by the policy. Impact on the local road network would be expected to be identified and mitigated for through the development. The evidence base supporting the Local Plan includes A21 modelling work, which has included assessment of junctions along the A21, including merge/diverge analysis where identified by NH.</p> <p>The site has not been submitted as Local Green Space. The sustainability score is appropriate for the site. The policy proposals for the site, as well as retaining the existing PRoW through the site, will enhance public access through provision of an east-west cycle route, which will link with sites AL/PE 1 and AL/PE 2 and the wider cycle network.</p>	<p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>4. <u>Cycle links:</u> Views are expressed that these should also be made available to horse riders through upgrades to bridleway/restricted byways and that points 7, 8 and 9 of the policy will not provide active travel/sustainable development and that stronger worded is needed.</p> <p>5. <u>Infrastructure:</u> There are various infrastructure concerns, including education, doctors, flood risk and drainage and the capacity of sewerage infrastructure, with additional policy wording sought (by Southern Water) to increase capacity.</p> <p>6. <u>Loss of Green Belt:</u> objections, with a lack of exceptional circumstances. Points 6, 7 and 8 of policy unlikely to produce the public benefits sought.</p>	<p>Criterion 9 of AL/PE 3 seeks the upgrade required (to Chalket Lane). The Plan's approach to Public Rights of Way is set out through various policies in the Plan, which should be read as a whole – this includes point 3i of PSTR/PE 1 which enables contributions towards mitigation measures to be sought. Other policies reference active travel opportunities, including Strategic Policy 6: Transport and Parking and Policy TP2: Transport Design and Accessibility. In addition, the landowners/site promoters for sites AL/PE 1 – AL/PE 3 inclusive accept policy requirements of points 7, 8 and 9 supported by viability work.</p> <p>The Local Plan is supported by an Infrastructure Delivery Plan which sets out the infrastructure required to support growth. Policy PSTR/PE 1 sets out required infrastructure for Pembury Parish and sets out that developer contributions would be sought. There is cross-reference to Policy EN:24 Water Supply, Quality and Conservation, which covers this issue and a Statement of Common Ground has been agreed with Southern Water.</p> <p>The Development Strategy Topic Paper sets out at section 6 (I) the exceptional circumstances for Green Belt releases, with Appendix 1 providing</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
		an individual assessment of the relevant sites. This is supported by the Green Belt studies.	
<b>AL/PE 4: Land at Downingbury Farm, Maidstone Road</b>	<ol style="list-style-type: none"> <li>1. <u>Highways and access matters:</u> There are objections, with various references to access from Church Road and preference for access from Maidstone Road, additional traffic including impact on local road network (and cumulative with Paddock Wood/Tudeley) and use of Church Road by cyclists and horse riders. Deletion of the policy is sought.</li> <li>2. <u>Loss of Green Belt:</u> Objections relate to a lack of exceptional circumstances and view that if AL/PE 1 and AL/PE 2 were used more efficiently it would not be necessary to allocate this site. It is considered that the western part of the site should be retained as Green Belt.</li> <li>3. <u>Development in the AONB:</u> This is objected to, including lack of exceptional circumstances, not consistent with the NPPF and that site does not make efficient use of land/maximise density, damaging to rural character.</li> </ol>	<p>The policy sets out that proposals are to be informed by a Transport Assessment. This will consider impact of development and any mitigation/highway improvement works needed. Proposals will also be assessed against Policy TP 1: Transport Assessments/Statements, Travel Plans, and Mitigation.</p> <p>The Development Strategy Topic Paper sets out at section 6 (l) the exceptional circumstances for Green Belt releases, with Appendix 1 providing an individual assessment of the relevant sites. This is supported by the Green Belt studies. The SHELAA site assessment process has found the site to be suitable for development.</p> <p>Developments in the AONB are justified in the Development Strategy Topic Paper. This site allocation is not considered major development in the AONB and exceptional circumstances do not therefore need to be demonstrated. The developable area and site capacity has drawn on the site characteristics and context. The developable area and site capacity are considered appropriate for the site.</p>	No changes proposed.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>4. <u>Infrastructure</u>: Concern is raised in relation to the capacity of sewerage infrastructure, with additional policy wording sought to increase capacity and to take account of existing wastewater infrastructure that crosses the site (Southern Water).</p> <p>5. <u>Use of legal mechanism</u>: There is concern raised by an interested party that tying the provision of the safeguarded land to the housing element of the site will create a barrier to expansion of the Hospice. It is felt that the allocation should be two separate allocations.</p>	<p>There is cross-reference to Policy EN:24 Water Supply, Quality and Conservation, which covers this issue and a Statement of Common Ground has been agreed with Southern Water.</p> <p>The use of a legal mechanism required by the policy is sought to ensure that the residential element of the policy is not delivered without the provision of the safeguarded land being made available to the Hospice in the Weald for expansion and securing this public benefit. To secure the delivery of the safeguarded land for expansion of the Hospice, it is considered necessary that the two elements are linked through a single allocation as proposed. It is not felt appropriate to separate them.</p>	
<p><b>AL/PE 6: Woodsgate Corner, Pembury</b></p>	<p>1. <u>Highway matters</u>: Objections have been received, with reference to resultant increase in traffic and need for a Traffic Assessment to determine mitigation measures.</p>	<p>The site policy requires a Transport Assessment to be submitted with a planning application, which will assess the impact on the local road network and determine mitigation measures required. Proposals will also be assessed against Policy TP 1: Transport Assessments/Statements, Travel Plans, and Mitigation. In addition the Pembury strategic policy PSTR/PE 1, at criterion 3a sets out various highway improvement and mitigation measures to support the planned growth. Developer contributions would be sought to deliver these, as set out in the policy. Furthermore, strategic Policy STR 6: Transport and Parking sets out highway improvement</p>	<p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>2. <u>Proposed use:</u> The landowner seeks to amend the policy to include flexibility to provide general needs (C3) housing as part of a “care led” scheme, also highlighting other barriers for extra care housing, including an existing Woodland Management Plan (which reduced developable area) and lease agreements.</p> <p>3. <u>Landscape buffer:</u> opposing views on extent of buffer from landowner and environmental group.</p>	<p>expectations of the Plan, which include measures along the A228/A264, including junction capacity improvements at Woodsgate Corner and a roundabout at the Pembury Road/Halls Hole Road/Blackhurst Lane.</p> <p>The proposed use for the site, assessed through the SHELAA is considered appropriate. It is not considered an appropriate site for general needs C3 housing. The Council is not aware of any planning reason restricting such use.</p> <p>The landscape buffer shown on the plan is indicative only and would be agreed in more detail through the planning application process.</p>	
<b>AL/PE 8: Owlsnest, Tonbridge Road</b>	<u>Ancient Woodland buffer:</u> A minimum 50-metre buffer is sought between Ancient Woodland and development (as a precaution), unless demonstrated that a smaller buffer is sufficient and amendment to exclude Owlsnest Wood from land allocated (Woodland Trust).	Development Management Policy EN13: Ancient Woodland and Veteran Trees sets out the Plans approach to ancient woodland, including buffers. A 50-metre buffer is unjustified.	No changes proposed.
<b>Omission sites</b>			
<b>Saltmans Meadow, Pembury.</b>	Inclusion of the site, which lies to the south of the A21 between Pastheap Farm and Kipping’s Cross	The site has been assessed through the SHELAA process (see SHELAA addendum, October 2021), for 82 dwellings (based on 30	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
<b>(SHELAA site PSPC_5)</b>	roundabout is sought. A use is not specified. It measures some 3.57 ha and is in single ownership.	units per hectare) or for economic use. The findings of the assessment indicate that the site is unsuitable as a potential allocation, for reasons relating to location of site relative to a settlement centre, and harm arising should the site be released from the Green Belt as well as landscape impact on the AONB. In terms of economic use of the site, there are other more appropriate sites that can meet the economic growth needs of the borough.	
<b>Stonecourt Farm, Stone Court Farm Lane, Pembury (SHELAA site 354)</b>	<p>Inclusion of the site is sought for up to 40 – 50 dwellings. There is reference to sustainability credentials and the SHELAA assessment and Sustainability Assessment, including Air Quality and Green Belt, which are objected to.</p> <p>Reference is made to earlier supporting information, which it is contended has not been sufficiently considered as well as planning history on the site and there is also concern raised about the deliverability of larger sites in Pembury (AL/PE 1 – AL/PE 3 inclusive). There is also reference to the site being able to contribute to unmet housing need from neighbouring authorities. Release from the Green Belt is sought along with inclusion in the LBD.</p>	The supporting/technical information submitted by the site promotor, including Green Belt matters has been considered. There remains significant concern about the ability to provide a safe and suitable access to the site. The case put forward by the site promotor does not materially affect the findings of the site assessment work undertaken previously as part of the SHELAA, nor is it swayed by the argument that the site could contribute to wider housing needs. There are not exceptional circumstances to justify release from the Green Belt or allocation.	No changes proposed.
<b>Land to the north east of Tonbridge Road,</b>	Inclusion of the site is sought for 24-33 dwellings, with release from the Green Belt. There is the view that the site has potential to deliver different housing types and that the reasons for omission no longer apply.	The site has been assessed through the SHELAA process, the findings of which indicate the site is unsuitable as a potential allocation. The site has not been omitted for Green Belt	No changes proposed.

Policy/Topic area	Main issues	TWBC Response	<i>Changes – Yes/No</i>
<b>Pembury (SHELAA site 304)</b>		reasons. The SHELAA findings remain valid and there is nothing new to alter the SHELAA findings.	

## 5.16 Rusthall

### Notes:

1. This table summarises duly made representations.
2. The total number of representations recorded against the Rusthall chapter is four.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>PSTR/RU 1: The Strategy for Rusthall Parish</b>	1. <u>Public Rights of Way</u> : There is a request for the policy to include reference to the need for appropriate development contributions to be made towards improvements to the PRow network to provide Active Travel opportunities in the area. (KCC).	The request is noted. The supporting text to the Policy sets out cross reference to Policy TP 2: Transport Design and Accessibility which the approach for positive outcomes for PRow, including improving connectivity and securing contributions. Given that the Plan is taken as a whole specific reference in the Policy is not necessary.	No changes proposed.
<b>Omission sites</b>			
<b>Home Farm, Lower Green Road, Rusthall (SHELAA site 60)</b>	<p>Inclusion of the site is sought for a residential allocation of 25 residential dwellings, with consequential inclusion in the defined extent of the village.</p> <p>The site is promoted on the basis of its sustainability credentials including location and accessibility, and the site being a logical extension to the settlement. There are pedestrian linkages and sustainable advantages of growth at Rusthall.</p>	<p>The site has been assessed through the SHELAA process, the findings of which indicate the site is unsuitable as a potential allocation.</p> <p>The supporting/technical information submitted by the site promotor, including Green Belt matters and information relating to proposed access improvements, has been considered.</p> <p>There does however remain significant concern about the ability to provide a safe and suitable</p>	No changes proposed.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Release from the Green Belt is sought with reference to containment of the site in the wider Green Belt and inconsistencies between the site assessment work (SHELAA) and TWBC's Green Belt studies.</p> <p>The promotor considers there to be a failure to adequately take account of technical highway information submitted to Regulation 18 Draft Local Plan consultation, which demonstrates a safe and satisfactory means of access is achievable.</p> <p>The site is also promoted on the basis that its allocation could help meet the unmet housing need of neighbouring authorities.</p>	<p>access to the site. Consideration has been given to the possibility of other options for means of access to the site, but this is felt to raise environmental concerns. The supporting information has been fully considered and does not materially affect the assessment of the site already undertaken. There are not exceptional circumstances to justify release from the Green Belt or allocation.</p> <p>The overall housing numbers and development strategy are justified in the Development Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper. Representations about unmet need (including unmet need from adjoining authorities) are dealt with under Policy STR1: The Development Strategy.</p>	
<p><b>Tunbridge Wells Golf Course (SHELAA site 146)</b></p>	<p>Inclusion of the site is sought for a residential allocation of up to 100 dwellings (mix of types), including open space and community facilities, with supporting information.</p>	<p>The site has been assessed through the SHELAA process and has been found unsuitable as a potential allocation. The supporting/technical information submitted by the site promotor has also been considered, and it is considered that this does not materially affect the findings/conclusion of the SHELAA assessment previously undertaken. In particular, there remains significant concern about release of the whole site from the Green Belt as well as concern about access to the eastern part of</p>	<p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>Reference is made to sustainability credentials including location and accessibility, flood risk (low), and the Council’s lack of housing land supply/Housing Delivery test. Release from the Green Belt is sought with reference to there being exceptional circumstances, namely a lack of urban sprawl/coalescence, unmet need from neighbouring authorities, contribution to housing supply/provision of specialist/extra care housing. An over reliance on strategic sites is raised, and a need for more small/medium sites as well as older persons housing.</p>	<p>the site, constrained by the lack of rights of access from Bishops Down Park Road.</p> <p>The overall housing numbers and development strategy are justified in the Development Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper. Representations about unmet need (including unmet need from adjoining authorities) and reliance on strategic sites are dealt with under Policy STR1: The Development Strategy.</p> <p>The overall approach to meeting the housing needs for older people (and people with disabilities, including specialist/extra care) is dealt with by Policy H6: Housing for older people and people with disabilities and is based on a proportionate evidence base. Representations relating to the provision of specialist/extra care housing are dealt with under Development Management Policy H6: Housing for older people and people with disabilities.</p>	

## 5.17 Sandhurst

### Notes:

1. The total number of representations recorded against the Sandhurst chapter is 17.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<p><b>PSTR/SA 1: The Strategy for Sandhurst Parish</b></p>	<p>1. <u>Strategy/Limits to Built Development (LBD)</u>: There is objection to the proposed strategy, notably the site allocations, and related changes to the LBD, with particular reference to the allocation of Sharps Hill Farm (AL/SA 2) and application of the LBD methodology. There is objection because Sandhurst has poor services and facilities, being bottom of the settlement hierarchy, with various deficiencies being identified in the Infrastructure Delivery Plan and highlighted by the Sustainability Appraisal, suggesting development would be unsustainable. Sandhurst is reliant on Hawkhurst and use of the car, with railway stations at Staplehurst and Etchingham being some distance away, and there is a lack of bus services and travel options. Deletion of allocations AL/SA 1 and AL/SA 2 is sought (with consequential changes to the LBD).</p> <p>2. <u>Traffic and air quality matters</u>: There is objection to the traffic thresholds set out at point 3 of the policy, which are considered too high. Amendment is sought so that the requirement of</p>	<p>The overall development strategy is justified in the Development Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper. (See also site allocations below).</p> <p>The scale of development proposed is appropriate for the scale of the settlement which has services including a Primary school, Post Office and convenience store. The policy sets out at point 4 a list of infrastructures for which developer contributions would be sought. In addition, the site allocation policies set out the need for a Transport Assessment which will consider impact of the development and any mitigation which could include measures to enhance active travel.</p> <p>It is considered that the LBD methodology has been applied consistently.</p> <p>The evidence base informing the Local Plan has not indicated that development of the scale proposed at Sandhurst would have an unacceptable impact on traffic or air quality. The</p>	<p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>point 3 applies to all development that results in increased traffic/air pollution, so that it is clear that cumulative increase in unacceptable. There are criticisms of the evidence in the Air Quality Topic Paper.</p> <p>3. <u>Development in the AONB:</u> There is objection to development, as there are not exceptional circumstances to justify building on greenfield sites in the AONB. There is also reference to site densities and consequential changes to the Sandhurst LBD resulting in development on AONB land to an unnecessary extent and failure to make efficient use of land.</p> <p>4. <u>Public Rights of Way:</u> There is request for the policy to include reference to the need for appropriate development contributions to be made towards improvements to the PRoW network to provide Active Travel opportunities in the area. (KCC).</p>	<p>thresholds set out at point 3 have been formulated and agreed with input from Environmental Health officers.</p> <p>Developments in the AONB are justified in the Development Strategy Topic Paper and AL/SA 2 is further supported by a detailed LVIA. Neither of the allocations at Sandhurst are considered major developments meaning that exceptional circumstances do not need to be demonstrated. There remains a need, however, for great weight to be given to conserving and enhancing the AONB, which has been a consideration in the decision to allocate the site.</p> <p>The request is noted. The supporting text to the Policy sets out cross reference to Policy TP 2: Transport Design and Accessibility which the approach for positive outcomes for PRoWs, including improving connectivity and securing contributions. Given that the Plan is taken as a whole specific reference in the Policy is not necessary.</p>	
<p><b>AL/SA 1: Land on the south side of Sayville, Rye Road and</b></p>	<p>1. <u>Development in the AONB:</u> There is objection to development in the AONB. CPRE Kent advises it objected to the planning application 21/00825/outline for residential development on</p>	<p>Developments in the AONB are justified in the Development Strategy Topic Paper. In addition, the site benefits from outline planning consent, under planning reference 21/00825 for up to 15 dwellings, granted on 02/09/21.</p>	<p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<p><b>west of Marsh Quarter Lane, Sandhurst</b></p>	<p>the site (of up to 15 dwellings), which now has planning permission.</p> <p>2. <u>Density/efficient use of land:</u> There is objection to density, which it is felt does not make efficient use of land. An amendment is sought by CPRE Kent that if the planned growth for Sandhurst is provided entirely on-site AL/SA 2 (Sharps Hill Farm) by increasing density there, that this site, AL/SA 1 be deleted from the Plan.</p> <p>3. <u>Infrastructure:</u> Southern Water advises that it has underground infrastructure crossing the site, which needs consideration in development proposals, and that easements will be required; hence, the policy should be amended accordingly.</p> <p>4. <u>Public Rights of Way:</u> KCC requests that the policy makes direct reference to the need for improvements to existing PRow to link to the wider network and provide active travel to local facilities.</p>	<p>The site has been assessed through the SHELAA site assessment process, with the findings that the site is suitable as a potential site allocation. This conclusion of the SHELAA is supported by the recent planning approval. The developable area and site capacity has drawn on the site characteristics and context of the site, with the scale of development considered appropriate for the site and reflecting indicative plans submitted with the planning application. Both proposed allocations AL/SA 1 and AL/SA 2 have been found through the SHELAA assessment proposal to be suitable sites on their own merits.</p> <p>There is cross-reference to Policy EN:24 Water Supply, Quality and Conservation, which covers this issue, and a Statement of Common Ground has been agreed with Southern Water.</p> <p>The request is noted. The supporting text to the Policy sets out cross reference to Policy TP 2: Transport Design and Accessibility which the approach for positive outcomes for PRow, including improving connectivity and securing contributions. Given that the Plan is taken as a whole specific reference in the Policy is not necessary.</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>AL/SA 2: Sharps Hill Farm, Queen Street</b>	<ol style="list-style-type: none"> <li data-bbox="416 304 1133 676">1. <u>Compatibility with refusal of planning permission:</u> There is objection to allocation of the site, on the basis that it has not had regard to the recent refusal of planning application (ref. 19/01493, outline application for up to 16 dwellings). The planning refusal is a significant and material consideration. Major development would result in significant harm, not outweighed by benefits. The site promotor/developer considers that the recent refusal should not be a barrier to allocation of the site, since a range of site layouts is possible.</li> <li data-bbox="416 715 1133 1050">2. <u>Development in the AONB:</u> There is objection to major development, which would not conserve or enhance the AONB and to a lack of exceptional circumstances. Development of the site will lead to specific AONB and heritage impacts which individually and collectively are significant and a level of harm that outweighs any benefits associated with housing delivery. The site promotor/developer considers that the site can be developed with limited impact on the AONB.</li> <li data-bbox="416 1120 1133 1319">3. <u>Visual/heritage impact:</u> There is objection to allocation on grounds of impact on heritage assets and the Sandhurst Conservation Area, including its rural, agricultural context. The site promotor/developer considers that the site can be developed with limited impact on heritage assets.</li> </ol>	<p data-bbox="1144 304 1827 676">The site has been assessed through the SHELAA site assessment process, the findings of which identify that the site is suitable as a potential allocation. The developable area and site capacity has drawn on the site characteristics and context and is informed by the Council's LVIA work. The refusal of planning reference 19/01493 (currently at appeal) has been considered. However, a different scheme indicating a different scale, site layout/mix of units may be considered suitable for the site.</p> <p data-bbox="1144 715 1827 1082">Developments in the AONB are justified in the Development Strategy Topic Paper and the site is informed by a detailed LVIA. Allocation of the site, for approximately 10 – 15 dwellings is not considered to constitute major development in the AONB and therefore exceptional circumstances do not need to be demonstrated. There remains a need, however, for great weight to be given to conserving and enhancing the AONB, which has been a consideration in the decision to allocate the site.</p> <p data-bbox="1144 1120 1827 1319">These issues have been considered as part of the site assessment process and it is found these can be satisfactorily addressed. Furthermore, the policy incorporates the need for more detailed assessment of these matters as part of any planning application.</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>4. <u>Density/efficient use of land:</u> The site allocation should be deleted or, if retained, there should be an increase in density - either a smaller land take or could compensate for the deletion of AL/SA 1. The development of the site will lead to specific AONB and heritage impacts which individually and collectively are significant and a level of harm that outweighs any benefits associated with housing delivery. The site promotor/developer seeks amendment of the policy to enable a higher number of units and a higher density on the site.</p> <p>5. <u>Limits to Built Development:</u> There is objection to inclusion of AL/SA 2 within the Limits to Built Development (LBD), with objection to how the LBD methodology has been applied, including application of methodology relating to exclusions from the LBD (and taking account of the refusal of 19/01493). The deletion of AL/SA 2 is sought, along with consequential amendment to the LBD.</p> <p>6. <u>Housing need:</u> The site promotor / developer supports the allocation and seeks an increase in the number of units and higher density (as set out above) or amendment so that quantum of units is a minimum. This would contribute/enhance contribution to the borough’s housing need and would enable allocation and delivery of a small</p>	<p>The developable area and site capacity has drawn on the LVIA work as well as the site characteristics and context. The scale of development is considered appropriate. Given that the site allocation AL/SA 1 benefits from planning consent (and still regarded as suitable for the development proposed), it is not appropriate to delete allocation AL/SA 1 as suggested. As noted previously, both allocations have been assessed through the SHELAA process and are considered suitable for allocation on their own merits. Allocation of this site for approximately 10 – 15 dwellings is considered appropriate.</p> <p>It is considered appropriate to retain the site allocation and to incorporate it into the proposed LBD for Sandhurst, as per the LBD methodology. The refusal of planning application reference 19/01493 has been considered, however, as stated previously a different scheme indicating a different site layout/mix of units may be considered suitable for the site.</p> <p>The overall development strategy is justified in the Development Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper. As set out previously, the allocation of this site for</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	site to sustain housing land supply and avoid reliance of the Plan on delivery of windfall developments and extant planning consents.	approximately 10 – 15 dwellings is considered appropriate.	

## 5.18 Speldhurst

### Notes:

1. The total number of representations recorded against the Speldhurst chapter is 23.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<b>PSTR/SP 1: The Strategy for Speldhurst Parish</b>	<p>1. <u>Development in the AONB</u>: There is objection to development in the AONB on the basis that exceptional circumstances have not been demonstrated.</p> <p>2. <u>Highway matters</u>: There is concern about lack of parking in Speldhurst and that development will worsen this.</p> <p>3. <u>Infrastructure</u>: There is an existing infrastructure deficit in Speldhurst, with reference to schools, GP's, public transport and lack of employment opportunities/cycle routes.</p> <p>4. <u>Green Belt</u>: There is objection to loss of Green Belt and belief that there is a lack of exceptional circumstances to justify release of land from the Green Belt.</p>	<p>The site allocated under AL/SP 1 is not considered 'major' development in the context of the AONB and, hence, exceptional circumstances do not need to be demonstrated. There remains a need, however, for great weight to be given to conserving and enhancing the AONB.</p> <p>Development is expected to provide parking in accordance with Development Management Policy TP3: Parking Standards.</p> <p>The Local Plan is supported by an Infrastructure Delivery Plan which sets out the infrastructure required to support growth. Policy PSTR/SP 1 sets out required infrastructure for Speldhurst Parish and sets out that developer contributions would be sought.</p> <p>The Development Strategy Topic Paper sets out at section 6 (I) the exceptional circumstances for Green Belt releases, with Appendix 1 providing an individual assessment of the relevant sites. This is supported by the Green Belt studies.</p>	No changes proposed.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>5. <u>Public Rights of Way</u>: There is a request for the policy to include reference to the need for appropriate development contributions to be made towards improvements to the PRow network to provide Active Travel opportunities in the area. (KCC).</p>	<p>Policy PSTR/SP 1 makes specific reference to supporting active travel by delivering improvements to the local pedestrian network, including through the provision of contributions. In addition, supporting text to the Policy sets out cross reference to Policy TP 2: Transport Design and Accessibility which sets out the approach for positive outcomes for PRow, including improving connectivity and securing contributions. Given that the Plan is taken as a whole, specific reference in the Policy is not necessary.</p>	
<p><b>AL/SP 1: Land to the west of Langton Road and south of Ferbies</b></p>	<p>1. <u>Highway matters</u>: There is concern about various matters, with particular reference to speeding, traffic calming measures, traffic and parking (including effect on local road network) as well as concern about provision of a safe and suitable means of access to the site.</p> <p>2. <u>Visual amenity/heritage</u>: There is concern that the approach/setting of Speldhurst village will be harmed, with reference to Conservation Area/listed buildings and archaeology (on site AL/SP 1). Amendment to policy is sought to ensure the TPO trees have to remain. Traffic calming will urbanise Speldhurst village.</p>	<p>The policy sets out the need for development proposals to be supported by a Transport Assessment which will consider impact of development and any mitigation/highway improvement works needed, including site access. Development is expected to provide parking in accordance with Development Management Policy TP3: Parking Standards.</p> <p>The Plan should be read as a whole, which includes various policies that seek to protect amenity, heritage and trees and ensure development proposals respect site context. These policies include EN1: Sustainable Design, EN4: Historic Environment, EN5: Heritage Assets, EN12: Trees, Woodland, hedges and development as well as EN19: High Weald AONB. In addition, the site policy sets out at criterion 4 that there should be given full consideration to the historic environment.</p>	<p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>3. <u>Green Belt</u>: There is objection to loss of Green Belt and belief that there is a lack of exceptional circumstances to justify release of land from the Green Belt.</p> <p>4. <u>Infrastructure/contributions</u>: There is concern about impact on infrastructure, with particular reference to schools, GP's, public transport and lack of cycle routes, as well as concern about developer contributions being spent outside of the Village.</p> <p>5. <u>AONB</u>: There is objection to development in the AONB for which exceptional circumstances have not been demonstrated.</p> <p>6. <u>Housing numbers</u>: There is concern about the density of the site, that it is not making efficient use of land and that this would be more sound if density is substantially increased. Deletion of the site is sought.</p>	<p>The Development Strategy Topic Paper sets out at section 6 (l) the exceptional circumstances for Green Belt releases, with Appendix 1 providing an individual assessment of the relevant sites. This is supported by the Green Belt studies.</p> <p>The Local Plan is supported by an Infrastructure Delivery Plan which sets out the infrastructure required to support growth. Policy PSTR/SP 1 sets out required infrastructure for Speldhurst Parish, with point 4 e of the policy seeking provision of any other mitigation measures. The site allocation policy sets out that development proposals need to accord with Policy PSTR/SP 1.</p> <p>The site allocated under AL/SP 1 is not considered 'major' development in the context of the AONB and therefore exceptional circumstances do not need to be demonstrated. There remains a need, however, for great weight to be given to conserving and enhancing the AONB, which has been a consideration in the decision to allocate the site.</p> <p>The developable area and site capacity has drawn on the site characteristics and context, including the edge of settlement location in the AONB. The site density of on average 17dpha is considered appropriate for this sensitive edge of settlement site.</p>	

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>7. <u>Promoters</u>: Support has been received from promoters - comments relate to the scale of development and its delivery, speed limit, open space, amenity and play provision as well as biodiversity net gain, with supporting information.</p>	<p>Support from the site promotor is noted, including the trajectory for delivery of the site (within the first five years of the plan period), sustainability credentials, highway related matters and biodiversity net gain.</p>	
<p><b>AL/SP 2: Land at and adjacent to Rusthall Recreation Ground, Southwood Road</b></p>	<p>1. <u>Need</u>: The need for the proposal is challenged, with particular reference to a lack of local identified need and the use of out-of-date evidence. Priority should be upgrading the quality of existing pitches (poor drainage) A review of current facilities is sought, with a staged approach to development (with expansion of the facilities onto the southern field being last stage) and that if there is a need, priority should be provision of a 3G pitch. Assessment of other reasonable alternatives is also sought.</p>	<p>The approach to the provision of sport and recreation has been informed by the 'Playing Pitch Strategy (2017)', the 'Open Space Study (2017)' and the 'Site Options Analysis – Tunbridge Wells Borough Council Sports Hub (2020), which was also informed by the Local Football Facility Plan for Tunbridge Wells. The site allocation, in part, comprises an existing local sports/recreation provision, which is suitable for future enhancements/provision to serve the wider area.</p> <p>The provision of sport and infrastructure is also set out within the Infrastructure Delivery Plan under 'Theme 7' and specific infrastructure items/projects are detailed on a parish basis in Appendix 1: Infrastructure Delivery Schedule.</p> <p>There is also an existing planning consent on the site (planning reference 21/00068) for the change of use of land to expand existing recreational facilities through provision of additional sports pitches, together with associated additional car parking provision, 'ball stop' fencing, and other works.</p>	<p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
	<p>2. <u>Sustainable development/ location and ease of travel/active travel</u>: There is concern about the location of AL/SP 2 relative to neighbouring villages/parishes, including concern about lack of safe routes for active travel and that this will increase unsustainable traffic movements. Also, that the location is such it will not meet the needs of Speldhurst/Bidborough.</p> <p>3. <u>Impact on existing uses</u>: There is local objection on grounds that allocation would jeopardise the existing Jockey Farm (football) pitch, undermining a community football club, and affect the viability generally of Jockey Farm.</p> <p>4. <u>Biodiversity</u>: There is concern about biodiversity assessment, with reference to it being unclear how biodiversity net gain would be achieved. A biodiversity assessment is sought, including a badger sett and there should be mitigation, compensation, biodiversity net gain.</p> <p>5. <u>Development in the AONB</u>: Concern is expressed about development in the AONB.</p>	<p>The approach to the provision of sport and recreation has been informed by the 'Playing Pitch Strategy (2017)', the 'Open Space Study (2017)' and the 'Site Options Analysis – Tunbridge Wells Borough Council Sports Hub (2020)', which was also informed by the Local Football Facility Plan for Tunbridge Wells. The site allocation, in part, comprises an existing local sports/recreation provision, which is suitable for future enhancements/provision to serve the wider area.</p> <p>The proposal will improve recreational facilities for the local and wider area. It is acknowledged that discussions with the landowner will be required, and as set out in the supportive text to the policy, it is recognised that it may be necessary to serve a Compulsory Purchase Order to enable the land to be acquired for the wider benefit of the community.</p> <p>Policy EN 9: Biodiversity Net Gain sets out the Plan's approach to ensuring development proposals achieve biodiversity net gain.</p> <p>The uses proposed by the allocation policy are not unacceptable in principle in the AONB. Furthermore, a significant extent of the allocation comprises an existing recreation ground with</p>	

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC Response</b>	<b>Changes – Yes/No</b>
		ancillary development and there is existing planning permission (as referenced above) on the agricultural land comprising the remainder of the allocation.	
<b>Omission sites</b>			
<b>Land at High View, Langton Road, Langton Green (SHELAA site 42)</b>	<p>Inclusion of the site is sought for residential development of 20 dwellings, along with inclusion in the Limits to Built Development. The site is promoted on the grounds of its sustainability credentials, including accessibility to bus routes and pedestrian routes. The site is also promoted on the basis of its contribution towards housing numbers and the distribution of planned growth for Speldhurst Parish. The settlement hierarchy is referenced with the ability of Langton Green to take some growth.</p> <p>The SHELAA assessment of the site is objected to, in particular the SHELAA assessment of Green Belt matters. Release from the Green Belt is sought, with reference to the site being a logical extension of the settlement (Langton Green), with consequential amendments to PSTR/SP 1 including housing numbers for Speldhurst Parish.</p>	<p>The site has been assessed through the SHELAA process and has been found to be unsuitable as a potential allocation. The omission of reference to trees along the boundary in the assessment sheet is not considered to materially affect the assessment of the site and conclusion already reached. There are landscape concerns about allocation of this site. There are not exceptional circumstances to justify release from the Green Belt or allocation.</p> <p>The overall housing numbers and development strategy are justified in the Development Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper.</p>	No changes proposed.
<b>Milford House, Penshurst Road,</b>	Inclusion of the site is sought for residential development, with release from the Green Belt and inclusion within the Limits to Built Development. There is reference to lack of five-year housing land	The site has been assessed through the SHELAA process and has been found to be considered unsuitable as a potential allocation. The recent planning consent granted on part of the site	No changes proposed.

Policy/Topic area	Main issues	TWBC Response	Changes – Yes/No
<p><b>Speldhurst (SHELAA site 94)</b></p>	<p>supply, borough housing need and housing need of neighbouring authorities, including unmet need from Sevenoaks District Council.</p> <p>There is reference to the suitability of the site, including previously developed land and exceptional circumstances to justify Green Belt release. In support of allocation there is reference to a recent planning consent on part of the site (application reference 21/00618) for a single dwelling granted April 2021 and consequential Permitted Development rights.</p> <p>The SHELAA site assessment is challenged, with comparison to the planning consent 21/00618 and with reference to nearby developments.</p>	<p>(reference 21/00618) does not materially affect the Council’s view on the suitability of the site as a potential site allocation, assessment and outcome, given the scale of the planning permission for a single dwelling house located on part of the site that forms part of the already established Limits to Built Development (with only the rear curtilage extending into the Green Belt).</p> <p>Neighbouring developments are also of a smaller scale of development and, in terms of Permitted Developments Rights, are restricted in size by virtue of their location in the AONB.</p> <p>The overall housing numbers and development strategy are justified in the Development Strategy Topic Paper, supported by the Housing Needs and Supply Topic Papers, and by site assessments in the SHELAA, as well as the Brownfield Land Topic Paper. Representations about unmet need (including unmet need from adjoining authorities) are dealt with under Policy STR1: The Development Strategy.</p>	

## Section 6: Development Management Policies

### 6.1 Environment: Environment and Design (Policies EN1 to EN8)

#### Notes:

- 1) *The following totals have been recorded against each policy for comments received from individuals and organisations: Policy EN 1 – 20 comments; Policy EN 2 – 10 comments; Policy EN 3 – 14 comments; Policy EN 4 – 9 comments; Policy EN 5 – 13 comments; Policy EN 6 – 4 comments; Policy EN 7 – 5 comments; Policy EN 8 – 9 comments.*
- 2) *Where reference is made to a Development Management (DM) policy in the context of a representation on a specific site rather than the DM policy wording itself, this is dealt with under Section 5 – Place Shaping and not included in the table below*

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
<b>EN1: Sustainable Design</b>			
Sustainable Design	<ol style="list-style-type: none"> <li>1. KCC queries whether it is possible to require a Construction Environmental Management Plan (CEMP) for all developments, not just those over 20 units/ 2,000sqm. Also, it notes that residents have raised concerns about the control of erosion and silt deposition from construction sites, and therefore recommend this is included in the CEMP.</li> <li>2. Inclusion of carbon offsetting is sought, and that developers can use it to deliver emission reduction targets; also, criterion 8 (carbon</li> </ol>	<p>The CEMP thresholds are deemed appropriate and reasonable, so as not to overburden smaller developers.</p> <p>It is expected that the control of erosion and silt deposition would be included in the CEMP; and explicit mention is not deemed necessary.</p> <p>Reducing emissions is preferred to offset, in line with the energy hierarchy. Also, carbon offsetting/emission targets are considered</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>emissions) be amended to reflect national government guidance.</p> <p>3. The Plan should encourage the promotion and inclusion in design codes/SPDs of green roofs for appropriate developments</p> <p>4. The word <i>must</i> should be used instead of <i>should</i> throughout the policy</p>	<p>generally by Policy EN3 in the form of renewable energy provision.</p> <p>Green roofs are already referred to in other policies and the Biodiversity Net Gain SPD will also include reference to them.</p> <p>Should is more appropriate allowing each case to be assessed on its merits.</p>	<p>No changes proposed</p> <p>No changes proposed</p>
Design, character and site context	<p>Concerns about clarity of policy criteria, with some alternatives put forward, including:</p> <p>1. Criteria relating to ‘<i>Design, character and site context</i>’ could prevent denser or more sustainably designed development than existing nearby and hence not make the most efficient use of land.</p> <p>2. Query as to legitimacy of requirements for the provision of communication infrastructure;.</p>	<p>Criterion 1.3 is specific to making efficient use of land and buildings, while policy wording to “<i>respect</i>” the relationship with immediate surroundings does not mean it needs to be replicated.</p> <p>Requirements for communications equipment accords with PPG.</p>	<p>No changes proposed</p> <p>No changes proposed</p>
Biodiversity	<p>1. Inclusion of native species planting is suggested, as many native insects (c.10,000 species) require this to complete their lifecycle</p> <p>2. It is questioned how development proposals can definitively assess a site’s capacity to provide various ecosystem services.</p>	<p>Native planting is adequately referred to in the design checklist to policy EN1 as well as policy EN12: Trees, Woodland, Hedges, and Development and in documents and guidance these policies refer to.</p> <p>Guidance on ecosystem services is continuing to develop, but we follow existing Defra guidance.</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
Residential amenity	<ol style="list-style-type: none"> <li>1. Dementia-friendly design should be included</li> <li>2. Given the anticipated impact from COVID-19, suggest mentioning provision for increased home working this in the policy.</li> </ol>	<p>Para 6.367 of Policy H6: Housing for Older People and People with Disabilities makes reference to accommodation for people with dementia.</p> <p>This is already mentioned in criterion 7 of the policy.</p>	<p>No changes proposed</p> <p>No changes proposed</p>
<b>EN2: Sustainable Design Standards</b>	<p>A number of representations have been made, mainly relating to the ambition of the policy and its relationship to national standards:</p> <ol style="list-style-type: none"> <li>1. The policy is focussed on specific standards, not advocated by the NPPF. New wording suggested which removes reference to HQM and residential standards in relation to demonstrating compliance.</li> <li>2. Phrase '<i>until national policy allows otherwise</i>' is presumptuous. Any future policy update must be clearly justified.</li> <li>3. Concern approach may not be viable/is overly ambitious, and that viability testing for BREEAM standards in the Energy Viability Report are not adequate.</li> </ol>	<p>The policy is sufficiently flexible. Final sentence of the policy and para 6.27 suggest other standards are possible/available for use. Also, the phrase 'unless agreed otherwise' makes it clear residential compliance is not obligatory.</p> <p>It is noted that the 2021 NPPF update includes emphasis on locally produced design guides and codes. It is expected that the scoring systems for the national sustainability standards referenced within this policy will allow for local design codes. TWBC will be obligated to do this, if and when an update is required.</p> <p>The Energy Viability was supplementary to the Dixon and Searle Viability Report which was quantitative and considered this policy in the context of whole plan viability. In addition,</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>4. Query regarding benefit of introducing sustainable design standards when government is likely to introduce an uplift to Buildings Regs Part L and F and the Future Homes/ Buildings Standards.</p> <p>5. The policy is not ambitious enough for residential development, especially in the AONB</p>	<p>Paragraph 6.29 allows for flexibility. A 7% maximum uplift tested by the Dixon and Searle report was considered achievable.</p> <p>Sustainable design standards go beyond environmental topics of energy and ventilation considered by Part L and F. For example, water, biodiversity, waste, air, landscape, travel, health and wellbeing are also assessed.</p> <p>The Local Plan evidence base has judged the current approach to be achievable within existing constraints.</p>	<p>No changes proposed</p> <p>No changes proposed</p>
<b>EN3: Climate Change Mitigation and Adaptation</b>	<p>1. 25% total improvement over Building Regulations is higher than the 20% from 2015 Ministerial Statement, now reflected in PPG.</p> <p>2. EN3 conflicts with EN1 because it is not possible to respect character and form whilst radically reducing GHG emissions.</p> <p>3. Concern policy is non-viable.</p>	<p>Local Authorities are permitted to require up to 19% for the fabric first approach. Reductions from renewable energy (in addition to the 19% fabric first) provision are unaffected. The Council has sought legal advice on this matter. See Energy Topic Paper.</p> <p>The policy is flexible enough to respond to surroundings and local character</p> <p>This is not expected, at least for the large majority of applications. The Government is currently working with house builders on introducing a Building Reg uplift of 31%.</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	4. Should include reference to the KCC Climate Risk and Impact Assessment, to assist developers.	Add at the end of paragraph 6.48: “ <i>Policy EN 3 details how the Local Planning Authority will ensure this takes place and developers should refer to KCC’s Climate Risk and Impact Assessment for local advice</i> ”.	Yes, as a minor modification – see Table on Minor Mods.
	<p>5. Need for detail on how flood risk would be addressed, including the flood risk climate change allowance.</p> <p>6. Equivalent standards should be sought for existing development e.g. extensions</p> <p>7. Developers should have flexibility to choose how to balance fabric first vs renewable energy approaches to emissions reductions rather than be given two separate targets.</p> <p>8. Include native broadleaf trees in under point 1 (green infrastructure) - Climate change adaptation.</p> <p>9. Remove phrase “especially those for vulnerable users...”, as it weakens the policy.</p> <p>10. Remove the 25% energy reduction commitment, as this will be redundant when the uplift in Building Regs comes into effect</p>	<p>Policy EN25 deals with flood risk. Paragraph 6.34 explains this policy deals with elements of climate change that are not considered elsewhere in the Local Plan.</p> <p>Para 6.40 considers existing buildings. In addition, national policy intervention is likely to consider the existing stock alongside the TWBC corporate climate agenda.</p> <p>The approach described in the policy is designed to follow the energy hierarchy</p> <p>This additional text would be overly detailed in this context. There are separate policies relating to trees.</p> <p>Vulnerable users are considered to warrant specific reference.</p> <p>The uplift to Part L of Building Regs comes into effect in June 2022. Once in place, this part of policy EN3 will be superseded as explained in the</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
		wording ‘unless superseded by national policy or legalisation’.	
<b>EN4: Historic Environment</b>	<ol style="list-style-type: none"> <li>Specific mention should be made in para 6.51 of the medieval and post-medieval farming landscape and its field boundaries.</li> <li>Should respect setting and context of nearby historic buildings and Conservation areas.</li> <li>There is insufficient attention to Government Guidance set out in Section 16 of the NPPF and paragraphs 189-192 in particular, relative to other Guidance.</li> <li>The policy uses terms such as ‘have regard, where possible, consideration’, words that do not convey any surety that the Policy will safeguard our unique historic environment despite acknowledging that it is an irreplaceable asset.</li> </ol>	<p>Agree that suitable wording should be added to second bullet point of paragraph 6.51 of the supporting text:  <i>surrounded by ancient Farmsteads <b>and historical field patterns</b>, and linked by ancient routeways</i></p> <p>The policy is worded in such a way as to ensure that consideration is given to the setting and context of historic assets, in accordance with the relevant legislation and national policy.</p> <p>Policy wording should not just repeat NPPF policy but give meaning to it in a local context. The evidence base and resultant policy wording reflect this. The guidance referred to all relate back to the NPPF.</p> <p>This wording is consistent with historic environment legislation and national policy.</p>	<p>Yes, minor modification – see Table of Minor Mods.</p> <p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>
<b>EN5: Heritage Assets</b>	<ol style="list-style-type: none"> <li>The Hop Pickers line is not referenced as a heritage asset. The historic environmental assessment of the line should be added to the evidence base.</li> </ol>	The policy references the Historic Environment Review, which goes into detail about the line. The archaeological study of the Hop Pickers Line is on the Council’s web site. It is not felt necessary to add it to the evidence base documents.	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>2. It is not demonstrated that the Local Plan or supporting documents complies with the NPPF and Historic England (HE) guidance, particularly the staged approach to site allocations set out in HE Advice Note 12: Statements of Heritage Significance.</p> <p>3. The relationship with the relevant guidance set out in Section 16 of the NPPF is not clear – the wording of the policy differs materially from that in the NPPF.</p> <p>4. There is no list of local heritage assets: The Plan requires the Council to either commit to producing a definitive list, or to modify the Plan to indicate how the built heritage of Royal Tunbridge Wells will be protected.</p> <p>5. The penultimate paragraph, last sentence, is vague and unhelpful and should be transferred to explanatory text. If Local Plan heritage policies are to be applied to non-designated heritage assets, they should be identified in the Plan and locally listed. It is not sufficient to identify them at the application stage.</p> <p>6. Concern with the use of the word '<i>normally</i>' in '<i>proposals that affect a designated or non-</i></p>	<p>The Council has given due consideration to heritage and related when assessing potential site allocations. Historic England has confirmed that it is satisfied with the relevant Development Management policies and site allocations.</p> <p>The wording has been checked with statutory consultees familiar with national heritage policy and it is agreed that it is consistent.</p> <p>The Local Plan commits to the production of a list and gives a hook for the Council's forthcoming Heritage Strategy, which will include this as a work programme. Non-designated heritage assets are otherwise clearly referenced as being important to the Borough as a whole.</p> <p>The policy wording in the PSLP and the adopted Local Heritage Asset SPD provide a framework for compilation of a list which will form part of a heritage strategy. The relevant NPPF states that it is sufficient, and acceptable, to identify NDHA at the application stage.</p> <p>This was inserted with agreement from KCC and Historic England to best reflect the intentions of</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<i>designated heritage asset or its setting will normally only be permitted where the development conserves or enhances the character, appearance, amenity and setting of the asset.'</i>	the NPPF, specifically paragraphs 195, 196 and 197.	
<b>EN6: Shop Fronts</b>	No main issues		
<b>EN7: Advertisements</b>	<ol style="list-style-type: none"> <li>1. No illuminated advertisements should be allowed in historic town and village centres.</li> <li>2. Advertisement consent can only be determined on 'amenity' and 'public safety', taking account of cumulative impacts. The wording of Policy EN 9 is considered onerous, unnecessary and not in accordance with the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended). It is not 'effective' or 'consistent with national policy'. Delete policy.</li> </ol>	<p>Each application would be assessed on its merits having regard to heritage assets and the historic environment, as covered by other policies.</p> <p>The introductory paragraphs in the pretext to the policy provide explanation with regard to the application of the advertisement regulations and a further paragraph 6.109 was added (between the Regulation 18 and 19 consultations) to confirm the policy will only apply to those advertisements which require express consent from the Local Planning Authority</p>	<p>No changes proposed</p> <p>No changes proposed</p>
<b>EN8: Outdoor Lighting and Dark Skies</b>	<ol style="list-style-type: none"> <li>1. The policy is missing requirements on: time restriction, flood lighting/columns to be discreetly designed and sited and for light spillage from windows to be limited in and near AONB. Suggested wording provided and request to omit 'outdoor' from title</li> <li>2. Objection that the policy standards are not high enough, due to the protection of AONB in GN01 Standard for Rural Areas.</li> </ol>	<p>The policy can only control outdoor and not indoor lighting. It covers the whole borough not just the AONB and column design would be covered by normal design policies.</p> <p>The standards are in accordance with published guidance.</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	<i>Changes – Yes/No</i>
	3. Suggestion that impactful light spill on wildlife corridors and foraging behaviours be included	This is adequately covered by paras 6.121, 6.122 and 6.127 in the supporting text to the policy.	No changes proposed

## 6.2 Environment: Natural Environment (Policies EN9 to EN20)

### Notes:

- 1) *The following totals have been recorded against each policy for comments received from individuals and organisations: Policy EN 9 – 21 comments, Policy EN 10 – 7 comments, Policy EN 11 – 6 comments, Policy EN 12 – 9 comments, Policy EN 13 – 9 comments, Policy EN 14 – 11 comments, Policy EN 15 – 11 comments, Policy EN 16 – 4 comments, Policy EN 17 – 3 comments, Policy EN 18 – 7 comments, Policy EN 19 – 9 comments and Policy EN 20 – 6 comments*
- 2) *Where reference is made to a Development Management (DM) policy in the context of a representation on a specific site allocation or strategic site rather than the DM policy wording itself, this is dealt with under Section 5 – Place Shaping and not included in the table below.*

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
<b>EN9: Biodiversity Net Gain (BNG)</b>			
Use of Defra metric	<p>Natural England (NE) welcomes the reference to the Defra Biodiversity Metric throughout. In EN 9 policy point 1, it suggests further strengthening the policy by advising that the Defra Biodiversity Metric be used in line with the latest guidance from Defra/Natural England.</p> <p>It adds that the Environment Bill is expected to require Biodiversity Net Gain on non-major developments as well as major developments. Therefore, we advise that point 6.135 should state that BNG will be expected to be achieved on non-major developments, when Defra’s Small Site Metric is adopted and when legislation requires this. This is something that the upcoming SPD for BNG should cover in more detail.</p>	<p>Paragraph 6.135 may be amended to highlight that legislation and guidance is evolving to cover small sites. Therefore, it is proposed to add the following text to the second sentence (also incorporating an amendment re offsetting, as sought by NE), to read:  <u>‘Subject to forthcoming legislation provisions, a similar approach applies to non-major development, in a proportionate manner, also having regard to the most recent Metric and the Small Sites Metric and supporting Defra/Natural England guidance.’</u>  <i>For such development, on-site mitigation, compensation, and enhancement measures will be the preferred option, but off-site measures or offsetting will be considered ...’</i></p>	<p>Yes - Paragraph 6.132 and 6.135 be amended by adding the text shown opposite.</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>Point 6.120 [sic 6.132] should refer to delivering 'measurable' net gains</p> <p>[NE also expressed concern that the same text refers to 'offsetting' as part of non-major development, which it considered should be removed as it is open to misinterpretation and is not consistent with the terminology used for Biodiversity Net Gain which refers to more clearly defined 'off-site' measures.]</p>	<p>It is proposed that the word '<i>measurable</i>' be inserted between '<i>delivering</i>' and '<i>net gains</i>' in the first line of paragraph 6.132.</p>	
<p>Part a – On/Off-site contributions</p>	<p>The “exceptional circumstances” test be removed or amended for off-site contributions, as they have the potential to achieve BNG as much as on-site measures.</p> <p>Natural England support the principle of prioritising on-site measures to <i>achieve</i> net-gain, but adds that in some cases, off-site measures can achieve more meaningful net-gains if on-site opportunities are limited. Therefore, the reference in point 6.135 to only accepting off-site measures in 'exceptional circumstances' is too strong. Instead, it suggests that the wording should require major developments to '<i>exhaust all reasonable opportunities to achieve measurable and meaningful biodiversity net-gain on-site before considering off-site measures, in line with the Good Practice Guide jointly produced by CIEEM CIRIA and IEMA that is referenced elsewhere in the policy</i>'.</p> <p>The wording used regarding non-major development should also apply to major</p>	<p>Natural England supports the policy in prioritising on-site BNG measures but notes that there can be limitations for these. The actual policy requires BNG to be on, or adjacent to, the site '<i>wherever possible</i>'. The supporting text elaborates, with flexibility for off-site measures in relation to achieving BNG gains for non-major developments where that provides the best outcome for biodiversity.</p> <p>It is agreed that the phrase '<i>...only in exceptional circumstances...</i>' at line 5 of paragraph 6.135 be replaced by '<i>where necessary and appropriate ...</i>'</p> <p>No further amendments are considered necessary, as the paragraph already provides that mitigation may be 'immediately adjacent to the site', while criterion 2 of the policy covers the need to accord with the mitigation hierarchy.</p>	<p>Yes - It is agreed that the phrase '<i>...only in exceptional circumstances...</i>' at line 5 of paragraph 6.135 be replaced by '<i>where necessary and appropriate ...</i>'</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>development: <i>'where it offers the best outcome for biodiversity, is in reasonably close proximity to the application site, and follows the mitigation hierarchy.'</i></p> <p>There is a separate proposal that where net gain is delivered off-site this be part of a comprehensive Local Nature Recovery Network approach, in line with the new requirement for Local Nature Recovery Strategies.</p>	<p>The link to Nature Recovery Strategies is for further consideration as part of the proposed SPD.</p>	<p>No changes are proposed</p>
Part b- Percentage BNG	<ol style="list-style-type: none"> <li data-bbox="439 643 1099 906">1. Some development interests state that the Council cannot require a higher level of net gain through a supplementary planning document (SPD), as the legislation is not yet in force. It is recommended that the reference to <i>'or greater where required by supplementary planning guidance'</i> should be deleted.</li> <li data-bbox="439 1082 1099 1185">2. The Kent Nature Partnership advocates that Tunbridge Wells moves towards a 20% biodiversity net gain</li> </ol>	<p>The suggestion that matters such as the % of gain cannot be set out in SPD is not believed to be correct. Many SPDs set out significant matters such as play area contributions, housing mixes etc. It is also appropriate in the current circumstances. All the indications are that legislation will require a <u>minimum</u> of 10% and so subject to the supporting evidence the Council is entitled to propose a higher level. The Council undertakes full public consultations on such SPDs and so the views on any supporting evidence will be properly considered.</p> <p>The Council has indicated that it will consider a target greater than 10% through the SPD but this will depend upon the evidence.</p>	<p>No changes proposed</p> <p>No changes proposed</p>
Soil biodiversity	<ol style="list-style-type: none"> <li data-bbox="439 1217 1099 1321">1. There should be a greater emphasis on preservation and improvement of soil biodiversity.</li> </ol>	<p>The Defra Biodiversity Metric is a proxy for biodiversity and does not separately identify soil biodiversity which in any event is an intrinsic part of all terrestrial habitat.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	The Defra Biodiversity Metric to measure biodiversity in the soil is questioned	Para 6.137 already makes reference to the need to take account of soils: “ <i>Specific consideration of the effect on soils and ecosystem services may also be required in accordance with other policies in this plan</i> ”, but could usefully be expanded with the following wording “..and development will be expected to follow the Defra “ <a href="#"><i>Construction code of practice for the sustainable use of soils on construction sites</i></a> ”.	Yes – add text to end of last sentence of para 6.137 to refer to Defra guidance, as opposite.
<b>EN10: Protection of Designated Sites and Habitats</b>	Although most representations are supportive, including from Natural England and KCC, there is a proposal that reference be made to wildlife corridors and stepping-stones that connect sites, as required by NPPF paragraph 174a, and ecological networks.	These issues are already well covered by Policy EN14 paragraph 6.180 “ <i>The Council will seek to avoid and reduce habitat fragmentation and to initiate the enhancement of biodiversity by identifying how networks of habitats can be created and linked to improve ecological connectivity, providing opportunities for increased species permeability...</i> ”,	No changes proposed
<b>EN11: Ashdown Forest Special Protection Area and Special Area of Conservation</b>	Although the policy is supported by Natural England and Wealden DC, there is an objection that the policy relies on conclusions from the HRA, which is considered deficient in identifying the area from which additional visitor pressure could arise and proposing mitigation measures unsupported by data confirming their effectiveness.	This criticism is considered unfounded and is responded to in the Summary for the HRA, to which it principally relates.	No changes proposed
<b>EN12: Trees, Woodland, Hedges, and Development</b>	1. Some environmental groups recommend various modifications to the policy, including by adding a canopy cover target for development sites, setting a greater than 1:1 ratio for tree replacement and specifying native trees. It is also suggested that	Most points raised have been already considered (at the Regulation 18 stage) and some changes made, but the further changes sought are not considered necessary. Arcadian Areas are covered in the policy by “ <i>important landscape or townscape trees</i> ”, and also subject to a separate	No changes are proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>references are made to ‘Arcadian areas’ in the list of circumstances at points 1 to 8 in first part of policy and to tree-lined streets, in supporting text/policy, in line with proposed NPPF revisions.</p> <p>2. Developers view the wording “<i>adversely affects</i>” as imprecise and that the policy should refer to “<i>loss or material damage</i>”. Lesser impacts are potentially not serious and do not justify the presumption against development that is implicit in the Policy; also, the expectation that all development must increase tree cover, especially in urban areas, is excessive and not justified by any national policy requirement.</p>	<p>policy, EN 17. Street trees are already highlighted in paragraph 6.168, but cross reference may be made to the NPPF paragraph 131 of the NPPF.</p> <p>It is appropriate that development must not adversely impact important trees, with tolerable impacts considered using <i>BS 5837: Trees in Relation to Design, Demolition and Construction</i> and each site assessed on its merits, as advised in the supporting text.</p> <p>Increasing tree cover is a general expectation, not a requirement. The NPPF (paragraph 131) encourages both tree retention and planting in new developments. Again, each site would be assessed on its merits.</p>	<p>No changes are proposed.</p> <p>No changes are proposed</p>
<p><b>EN13: Ancient Woodland and Veteran Trees</b> - Protection buffers and mitigation</p>	<p>1. Some environmental groups recommend further strengthening the policy by setting a minimum 50 metre buffer to be maintained between a development and the ancient woodland, unless the applicant can demonstrate very clearly how a smaller buffer would suffice.</p> <p>2. In relation to the provision of adequate buffers (criterion 5), some developers regard the position as ambiguous, contrary to paragraph 16 of the NPPF, as paragraph 6.170 refers to buffers of 25m to ancient Woodland but goes on to suggest that ‘<i>The Council expects</i></p>	<p>There is no convincing evidence to justify the proposed 50m buffer.</p> <p>The need for an assessment to determine the appropriate distance is set out in the Planning Policy Guidance and Natural England standing advice.</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<i>developers, through assessment, to confirm that this or any other distance is appropriate’.</i>		
<b>EN14: Green, Grey, and Blue Infrastructure</b>	<ol style="list-style-type: none"> <li>1. An environmental group recommends adding as a 7<sup>th</sup> item/strategy in the first section - Local Nature Recovery Strategies</li> <li>2. Developers believe that the words ‘<i>protect existing</i>’ may contradict the effectiveness of Policy EN9 or EN14 which adopt more appropriate, effective and practical approaches to existing features, with overall net gains at their heart, as it may be better to replace some features, and enhance in the form of new features on or off-site as part of a comprehensive approach. Suggest these words be revised to be consistent with Policy EN9 and others that instil the required flexibility to be effective and endure the plan period.</li> </ol>	<p>This is premature, ahead of publication of the Environment Bill. If required, it will be covered by legislation.</p> <p>The Council acknowledges that there are cases where existing features may be harmed (e.g. hedgerow loss for an access), but this is clearly an expectation and not an absolute requirement and is consistent with the mitigation hierarchy and so it is felt that wording has the appropriate emphasis.</p>	<p>No changes proposed</p> <p>No changes proposed</p>
<b>EN15: Local Green Space</b>			
Non-Compliance with NPPF	Policy considered contrary to paragraph 35 of the NPPF as is not positively proposed, justified, effective, or consistent with national policy to promote sustainable development.	The Council has produced a robust methodology that prioritises the delivery of sustainable development. Paragraphs 3.3 and 4-6 of Appendix 2 of the Local Green Space Designation Methodology (LGSDM) document specifically addresses the need for consistency with the local planning of sustainable development.	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>Policy EN15 is overly restrictive and does not reflect requirement of NPPF regarding Green Belt. Consistency with GB policy needs to be fully incorporated into policy and must respect paragraphs 145/146 of the NPPF which provides specific guidance on what types of development are appropriate in the GB. EN15 does not currently mention any of these exceptions.</p> <p>Council's approach to existing AONB/Green Belt protections not logical, nor explained why further policy protections are needed. Strong objection to additional levels of protection imposed on sites which already benefit from protection, as this overly protective approach is in direct conflict with NPPF/PPG.</p>	<p>The policy is not overly restrictive and offers sufficient clarity as to exceptions where development may be permitted that does not conflict with the NPPF.</p> <p>The LGSDM clearly outlines the approach taken toward, and justification for, the proposed designation of sites protected already by Green Belt and/or AONB (e.g. see Paragraphs 2.7-2.8, and Paragraphs 11 and 13 of Appendix 2 of the LGSDM).</p>	
General Objection to Policy	<p>All proposals should be reviewed/carefully reassessed; sites not submitted by local community, but rather resulted from an 'in-office suggestion'. Neither Wealden/Rother proposed any LGS designations. Also noted that the Plymouth and South West Devon Joint Local Plan clearly demonstrated that a similar approach was found fundamentally unsound.</p> <p>Unclear what has changed since Regulation 18 despite review of methodology; 177 sites still</p>	<p>The Council has produced a robust methodology and has continually liaised with Parish Councils throughout the assessment process (including on sites put forward by officers for consideration by the local community), whereby a number of demonstrably special Local Green Spaces have been identified and agreed across the borough's settlements. The LGSDM document clearly states that, where in-office suggestions have received significant objections, these sites have been reviewed and generally removed (unless also received support requiring further consideration).</p> <p>Appendix 2 of the LGSDM clearly outlines the review of the Methodology used by the Council,</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>proposed. There are now 61 fewer LGS sites put forward, 4 of which are new sites previously rejected, and Green Belt sites still included despite no sound justification/need for doing so. All such designations should therefore be deleted due to failing to be in accordance with the NPPF/PPG.</p>	<p>including the approach taken toward, and justification for, the proposed designation of sites protected already by Green Belt (e.g. see Paragraphs 2.7-2.8, and Paragraph 13 of Appendix 2 of the LGSDM).</p>	
<p>General Objection to Policy</p>	<p>PSLP makes LGS designations in rural villages where local community has access to open green spaces within minutes. Such designations not appropriate or necessary. Methodology not appropriate as based on guidance for densely populated urban areas.</p> <p>Differences and inconsistencies with assessments of individual sites and compliance with selection criteria; e.g. site 97 previously designated but now considered sufficiently protected. Sites used heavily by local community for formal/informal recreation not designated (e.g. AS_23, AS_24, and AS_17). Sites controlled by parish Council previously designated and now considered sufficiently protected (perceived as a strong bias against privately owned land seen as being in 'higher danger of development').</p>	<p>The Council has produced a robust methodology (LGSDM) and have continually liaised with Neighbourhood Planning Groups/Parish Councils throughout the assessment process, whereby a number of demonstrably special Local Green Spaces have been identified and agreed across the borough's settlements. The methodology also clearly notes that the ANGSt standards are used only as a guide.</p> <p>The Council has taken a robust and consistent approach, as per the LGSDM, which also includes sites being assessed on a site-by-site basis based where further evidence and/or information is available. It is noted that proposals were removed following the Regulation 18 consultation following a further review of the methodology; details of this review can be found in Appendix 2 of the LGSDM. Site-specific commentary on reasoning for removing proposals to designate are outlined within the Local Green Space Assessment (LGSA) document.</p>	<p>No changes proposed</p> <p>No changes proposed</p>
<p>Sandown Park (Site 217)</p>	<p>1. Objection to proposed LGS at Sandown Park (site 217). There was no advanced contact with the site promoter on the LGS designation</p>	<p>Landowners of all sites proposed for designation were contacted in July 2019, prior to the Draft Local Plan Regulation 18 consultation in</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>and, therefore the Reg.18 proposal was unexpected; and prevents potential release of the site from the GB. Proposal fails the 2<sup>nd</sup> ('demonstrably special') of the 3 combined tests for designation set out in NPPF/PPG.”</p> <p>2. There is no criteria for any LGS assessment listed in Table 2 of Appendix 1 of Council's previous methodology, meaning the Council has not followed its own methodology in selecting the site. The site does not meet any assessment criteria listed in Council's previous assessment form.</p>	<p>September and steps 4 and 5 of Section 4 of the LGSDM outlines how the community (and landowners) were consulted on LGS proposals. This site has been assessed for development potential in the SHELAA and found unsuitable due to harm to the Green Belt and its AONB setting; the Council considers that this site meets the designation criteria as outlined with the LGSDM and as assessed in the LGSA document.</p> <p>Appendix 1 of the LGSDM is not exhaustive; the document itself within section 3 further outlines the criteria used (with examples as guidance) in assessing sites.</p>	
Land to the North of Wish Court, Matfield (Site 20)	<p>The following points have been raised in objection to this LGS designation:</p> <ul style="list-style-type: none"> <li>• This site (call for site 36) has been consistently proposed for development (considered as potential replacement for Brenchley Primary School in 2016) and the Council's initial assessment identified a potential yield of 110 units, which would make an important contribution toward housing need.</li> <li>• It is considered that not all parts of paragraph 100 are met/is not demonstrably special.</li> <li>• The designation appears to have been initiated solely as a result of the Role and Function Study.</li> </ul>	<p>The site has been assessed for development potential in the SHELAA and found unsuitable due to significant woodland coverage/part of site being an ecological mitigation area; this site is considered a suitable Local Green Space site that is demonstrably special to the local community, as assessed in the LGSA document.</p>	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<ul style="list-style-type: none"> <li>• There is an overprovision of amenity greenspace in the Parish.</li> <li>• Special amenity point overstates wildlife richness on site and is not evidence-based by any studies.</li> <li>• The site is not local in character and contrasts with every other undeveloped piece of land in vicinity.</li> </ul> <p>In terms of access to the site, there is no legal public access; and it is peripheral and remote from most of the Matfield community. The public would therefore not benefit from the designation.</p> <p>The Council’s definition of ‘extensive tract of land’ is at odds with other Examiners’ views on NDPs (smaller sites considered extensive).</p> <p>There is nothing within the LGS Assessment that mentions support from the local community. The local community were aware of previous development plans and did not try to instigate any further protection. The Council has not demonstrated that the area is special to the local community.</p>	<p>The LGSDM document, as well as Planning Practice Guidance (PPG), also makes it clear that designation does not require public access.</p> <p>Paragraph 7c of Appendix 2 of the LGSDM document makes clear the Council’s approach, notably following the PPG which states that “<i>there are no hard and fast rules about how big a Local Green Space can be</i>” and therefore each site should be assessed on its own merits.</p> <p>The proposed designation is also being proposed in Brenchley and Matfield’s emerging NDP and is therefore clearly supported by the local community.</p>	<p>No changes proposed</p> <p>No changes proposed</p>
Rammell Field (Site 36) and Big Side Playfield Field	<p>The following points have been raised in objection to this LGS designation:</p> <ul style="list-style-type: none"> <li>• Both sites are playing fields with no public access and no community benefits;</li> </ul>	<p>See response above regarding no need for public access.</p> <p>Both sites have been assessed for development potential in the SHELAA and found unsuitable due to heritage/landscape concerns (Rammel) and</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
(Site 40), Cranbrook	<ul style="list-style-type: none"> <li>Neither site meets LGS criteria; Rammell Field is surplus to school's future requirements, is remote from the main school site, and has been put forward for a variety of potential uses.</li> <li>LGS designation of both sites has potential to seriously impact the future development/success of the school.</li> </ul>	impact on the Conservation Area/rural and AONB setting/loss of open space for sport provision (Big Side); these sites are considered suitable for LGS designation that are demonstrably special to the local community, as assessed in the LGSA document.	
Land on the West Side of Iden Green Road, Benenden (AS_45)	<p>The following points have been raised in objection to this LGS designation:</p> <ul style="list-style-type: none"> <li>The assessment does not provide robust evidence or justification to substantiate the conclusions reached or meet NPPF requirements;</li> <li>The site does not meet criteria/is not demonstrably special;</li> <li>The site makes limited contribution to the Conservation Area/setting of listed buildings;</li> <li>The site has limited views and a limited sense of openness due to the dense hedgerows preventing views into site no adjacent PROW and</li> <li>No historic significance.</li> </ul>	<p>The site has been assessed for development potential in the SHELAA and found unsuitable due to impact on heritage/settlement pattern, as well as on landscape, ecological, and AONB setting; this site is considered a suitable Local Green Space site that is demonstrably special to the local community, as assessed in the LGSA document.</p> <p>This site has also been considered suitable for Local Green Space designation by the Independent Examiner for Benenden's Neighbourhood Plan (see Independent Examiner's Report).</p>	No changes proposed
Goudhurst Green Field (North of Church Road; Site 102)	<p>1. The following points have been raised in objection to this LGS designation:</p> <ul style="list-style-type: none"> <li>The site does not have qualities required by NPPF/is not demonstrably special;</li> <li>Goudhurst already has a good network of PROWs, which assure access to the open</li> </ul>	The Council considers that this site meets the designation criteria, with the assessment commentary justifying why further protection (beyond existing Conservation Area/AONB designations) is considered appropriate. The LGSDM also clearly outlines the approach taken toward, and justification for, the proposed designation of sites with existing protections (e.g.	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>countryside; The site is the only privately owned site proposed within central Goudhurst;</p> <ul style="list-style-type: none"> <li>• The site is already restricted by Conservation Area/AONB designations;</li> <li>• There is no access for recreation, while other sites regularly used for recreation are not designated;</li> <li>• The site is not beautiful, in an agricultural field with no special features;</li> <li>• Long-distance views are only available from the footpath within site and views into site from A262 are of no distinguishable quality;</li> <li>• While the site is within a CA, it is not a site of historic significance;</li> <li>• The site is not tranquil due to the A262;</li> <li>• There is no evidence to demonstrate any richness in wildlife;</li> <li>• The site is local in character, but no more than other agricultural fields in close proximity;</li> <li>• The site is also of a significant size when compared with other selected sites.</li> </ul> <p>2. Inconsistent that SHELAA assessed site as “unsuitable for development” while increasing level of ‘protection’; this is in conflict with paragraph 16f of the NPPF.</p>	<p>see Paragraphs 2.5-2.10 and Paragraphs 9-14 of Appendix 2 of the LGSDM). See response above regarding no need for public access.</p> <p>See response above regarding the production of the methodology which has prioritised the delivery of sustainable development.</p>	<p>No changes proposed</p>
General comment about Goudhurst Sites	It is considered that the Goudhurst LGS designations are unnecessary due to their AONB protection. The proposed LGS sites in Goudhurst effectively create an area of Green Belt which is contrary to the PPG.	All the sites proposed in proximity to Goudhurst have been assessed in the LGSA document and considered not to form extensive tracts of land.	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
<b>EN16: Landscape within the Built Environment</b>	No main issues.	N/A	No changes proposed
<b>EN17; Arcadian Areas:</b>	No main issues.	N/A	No changes proposed
<b>EN18: Rural Landscape</b>	<p>1. An environmental group does not support Paragraph 2 of the policy requiring mitigation to ensure against significant harm, rather than development not to cause significant harm, which is seen as weaker than at Regulation 18.</p> <p>2. Developers regard the provisions of Policy EN 18 as onerous, on the basis that the NPPF states policies should recognise the intrinsic character and beauty of the countryside, but beyond this, is limited on existing rural landscape. Suggests that the word <i>conserve</i> is replaced with <i>contribute</i> in criterion 1.</p>	<p>The Council believe that the current wording provides sufficient clarity and strength.</p> <p>The wording is consistent with the NPPF and the adopted Landscape Character Assessment SPD</p>	<p>No changes proposed</p> <p>No changes proposed</p>
<b>EN19: The High Weald Area of Outstanding Natural Beauty</b>	<p>Several points have been raised:</p> <p>1. Natural England (NE) welcomes the overall intention of this policy but seeks some strengthening, to ensure that appropriate levels of landscape assessment, including against the AONB Management Plan and its associated guidance, are carried out for non-major development proposals within the AONB, or its setting, where they are expected to significantly impact the AONB. Most significantly, it wishes the opening paragraph</p>	<p>The second paragraph of the policy already refers to the objectives of the AONB Management Plan in relation to all development. Furthermore, paragraph 6.236 similarly refers to the Management Plan for all development, as well as its associated guidance, which is regarded as appropriate, as this is not a statutory document.</p> <p>The undertaking of landscape assessments is a process matter, rather than an outcome and,</p>	<p>Yes - Revise wording in Para 6.238 as opposite.</p> <p>“ ”</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>to be amended to remove the words ‘seek to’ in ‘<i>All development within, or affecting the setting of, the High Weald AONB, shall seek to conserve and enhance its landscape and scenic beauty, ...</i>’</p>	<p>hence, more appropriately included within supporting text.</p> <p>The policy is already positively worded in relation to seeking to conserve and enhance the AONB in line with legislation and national policy. Making conservation and enhancement an absolute requirement goes beyond the legal and NPPF positions, so is inappropriate and cannot be agreed.</p> <p>Following ongoing dialogue, a number of (minor) modifications are agreed to be acceptable.]</p> <p>a) paragraph 6.238 may be expanded to read:  <i>“All proposals for major or other development either in the AONB or its setting, where they are expected to significantly impact the AONB, should be accompanied by a landscape and visual impact assessment and an assessment of the proposal against all relevant AONB Management Plan objectives.”</i></p> <p>It is not possible for all development to conserve and enhance and so the use of the word ‘seek’ is considered appropriate when taken together with the statutory duty and other policies and guidance. The supporting document are noted in para 6.236 and so it is not necessary or appropriate to include them within the policy wording.</p>	

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>2. High Weald AONB Unit seeks some changes to strengthen wording, notably to also refer to Advice Notes that supplement the Management Plan, to change criterion 3 - <i>Conserve and enhance the historic characteristics of the landscape including its distinctive field systems and features and the <del>Where present, protect, enhance, and restore</del> key characteristics of historic routeways, and amend Criterion 4 to - Retain and support the distinctiveness of individual settlements and their key characteristics <u>and their historic settlement pattern;</u></i></p> <p>3. Developers believe that the relationship between a generic development plan policy and specific guidance provided by an external consultee body should be kept separate. It is not the function of all new development to promote the management objectives of the HWAONB Unit. A simple reference to the HWAONB Management Plan in the explanatory text is sufficient.</p>	<p>The historical nature of the High Weald AONB is clearly articulated in Para 6.234 and the first para of the policy requires ‘particular regard’ to all of the ‘character components’ which includes medieval field systems</p> <p>It is considered that the term ‘key characteristics’ includes ‘settlement pattern’.</p> <p>The High Weald AONB Management Plan is a statutory document and is rightly elevated into the Policy wording.</p>	<p>No changes proposed</p> <p>No changes proposed</p>
<b>EN20: Agricultural Land</b>	<p>1. Land promoters believe that the assumption that, in the absence of site-specific Agricultural Land Classification, land is assumed to be classified as best and most versatile, should be deleted from the policy.</p>	<p>As explained at the Regulation 18 stage, the Council’s evidence on agricultural land classification as set out in para 6.242 ‘indicates that the land in the borough is generally of a slightly higher grade than the provisional mapping indicates’ and this approach is justified.</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	<i>Changes – Yes/No</i>
	2. Environmental interests believe that the word “acceptable” is too weak – replace with “essential” (or “necessary”)	It is felt that in the context of this policy the word acceptable is entirely appropriate.	No changes proposed

## 6.3 Environment: Air, Water, Noise, and Land (Policies EN21 to EN28)

### Notes:

- 1) The following totals have been recorded against each policy for comments received from individuals and organisations: Policy EN21 – 7 comments, Policy EN22 – 3 comments, Policy EN23 – 1 comment, Policy EN24 – 6 comments, Policy EN25 – 11 comments, Policy EN26 – 9 comments, Policy EN27 – 4 comments and Policy EN28 – 3 comments
- 2) Where reference is made to a Development Management (DM) policy in the context of a representation on a specific site allocation or strategic site rather than the DM policy wording itself, this is dealt with under Section 5 – Place Shaping and not included in the table below

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
<b>EN21: Air Quality</b>	<ol style="list-style-type: none"> <li>1. Should set out a timescale for lowering the NOx from heating systems (from 40mg NOx per kWh) during the plan period in supporting text.</li> <li>2. Policy should be stronger (air quality positive, rather than neutral, is expected) especially in RTW.</li> <li>3. Query over phrase ‘small-scale mitigation measures’ in relation to EV charging infrastructure, as Tudeley is likely require grid reinforcement.</li> </ol>	<p>The standard is current good practice – which may be highlighted in paragraph 6.249. This will be monitored, with further consideration given as part of the 5-year of the Local Plan.</p> <p>The approach is supportive of positive air quality measures in a number of respects, while also consistent with the local air quality action plan.</p> <p>These are essentially “small-scale” measures. The infrastructure requirements for Tudeley Village are dealt with separately in Section 5.</p>	<p>Yes – Add reference to current good practice at paragraph 6.249.</p> <p>No changes proposed.</p> <p>No changes proposed.</p>
<b>EN22: Air Quality Management Areas</b>	The word ‘major’ should be removed from paragraph 6.256, so all development must undertake an emissions mitigation assessment.	The paragraph reflects fact that major development is more likely to affect an AQMA. At the same time, it is accepted that smaller developments may, in certain situations warrant assessment. The text will be amended accordingly.	Yes - Change added to paragraph 6.256 – see Table of Minor Modifications.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
<b>EN23: Biomass Technology</b>	There is a general concern about the carbon footprint of this technology.	The existing policy seeks to manage biomass, rather than promote it. A similar concern was raised at Reg 18 stage, following which the policy (and policy EN 3) was amended to emphasise the expectation for local sourcing of the biomass.	No changes proposed.
<b>EN24: Water Supply, Quality, and Conservation</b>	<ol style="list-style-type: none"> <li>1. South East Water's Water Resources Management Plan (2015-2040) is superseded by their Water Resources Management Plan 2019 (2020-2080) and should be updated. At paragraph 6.273 – the Environment Agency's 2013 water stress classification has just been consulted on - paragraph should be updated to include reference to this.</li> <li>2. The Environment Agency suggests adding a requirement for water efficiency in non-domestic developments such that at least larger developments meet a BREEAM standard of Very Good or Excellent – some Councils have required Outstanding.</li> <li>3. Major developments should not take place before the appropriate infrastructure is financed and put in place.</li> </ol>	<p>The supporting text at paragraph 6.273 will be updated to reference South East Water's Water Resources Management Plan 2019 (2020-2080) and at Paragraph 6.273 to update the reference to the Environment Agency's 2013 water stress classification.</p> <p>Policy EN2 requires non-domestic developments to meet BREEAM 'Excellent' by 2026 for developments 1,000 – 5,000m<sup>2</sup> (or by 2023 for development over 5,000m<sup>2</sup>). The viability work carried out on behalf of the Council concluded that a rating of 'Excellent' is achievable. No change required</p> <p>The Local Plan should be read as a whole – Policy EN 24 provides the policy approach to infrastructure projects as set out within the IDP.</p>	<p>Yes - Change added to Table of Minor Mods.</p> <p>No changes proposed.</p> <p>No changes proposed.</p>
<b>EN25: Flood Risk</b>	<ol style="list-style-type: none"> <li>1. KCC support this policy, however it recommends that a flood risk assessment and/or drainage strategy should be</li> </ol>	It is not considered appropriate to make this amendment, as the approach taken is consistent with the NPPF. It is however considered that there could be instances where	Yes - Changes added to Paragraph 6.279 in the Table of Minor Mods.

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>required for “all major development” within Flood Zone 1.</p> <p>2. Climate change and increased risk of flooding is not accounted for in policy.</p> <p>3. Concern about whether the sequential test has been carried out for the whole borough (as required by the NPPF) due to lack of evidence in LP/SFRA and the Exception Test does not steer development away from higher risk of flooding areas.</p> <p>4. Nitrate Vulnerable Zones, identified in the SFRA, are not mentioned in the Local Plan.</p>	<p>it may be appropriate to seek a FRA for smaller developments and it would be appropriate to consult with KCC as the lead local flood authority on a case-by-case basis. An amendment to the supporting text to Policy EN25 at paragraph 6.279 is proposed to provide clarification.</p> <p>The SFRA (as well as the Strategic Sites Masterplan) modelling has used higher climate change allowances than are required by the latest guidance. Additionally, the EA is satisfied with the SFRA and further discussions on site specific flood mitigation will take place at the planning application stage.</p> <p>The SHELAA assessments draw on the flood risk assessment from the SFRA, having regard to the ‘Sequential Test’. Where sites are under consideration in flood zones 2 or 3, they have been subject to further assessment as part of the masterplan work for the Strategic Sites. The EA have supported this Policy and the approach taken by the Council. The SFRA also considers cumulative effects as required by the NPPF. The overall approach to the assessment of sites against the NPPF requirements is set out in detail in the Development Strategy Topic Paper.</p> <p>The Council understands Natural England may be looking at water quality in both the Rivers Medway and Swale; it is systematically doing that for all aquatic European sites. However, at</p>	<p>No changes proposed.</p> <p>No changes proposed.</p> <p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>5. Flood risk mitigation measures detailed within the IDP for Paddock Wood indicate that there is a funding gap – it is unclear as to how the funding gap will be met.</p>	<p>this time the Council understands there are no plans to extend nutrient neutrality to the Medway Estuary. It is understood that while the North Kent estuaries are hypernutrified, the eutrophication (smothering macroalgal growth) does not happen because of a combination of lower water temperatures, high turbidity and stronger wave action. The Council will continue to monitor this in the usual way.</p> <p>Costs have been assigned and run through the viability model in the Viability Assessment which underpins the Local Plan. This concludes that at this stage of the Plan process, the Council is confident that the sites allocated can be delivered without external funding. Please also refer to Section 5 in relation to Paddock Wood.</p>	<p>No changes proposed.</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
<b>EN 26: Sustainable Drainage</b>	<ol style="list-style-type: none"> <li>1. Concern that existing SUDs do not work, and that new development will result in further flooding issues around Paddock Wood.</li> <li>2. KCC request that clarity is provided in relation to the expectation by the Borough Council of how the provision of adequate drainage as part of new development is demonstrated. KCC has recommended revised text.</li> <li>3. The aim for run-off to be reduced below existing greenfield rates may be undeliverable in all situations, particularly on brownfield sites.</li> </ol>	<p>The approach to Sustainable Drainage is set out within Policy EN 26 of the Local Plan. See also Section 5 in relation to specific policies for Paddock Wood.</p> <p>This issue is already covered within Policy EN25, however an amendment to the supporting text of Policy EN26 at paragraph 6.277 is proposed.</p> <p>It is considered that the policy is in accordance with the Government’s Non-Statutory Technical Standards for Sustainable Drainage.</p>	<p>No changes proposed.</p> <p>Yes - Changes added to Table of Minor Mods.</p> <p>No changes proposed.</p>
<b>EN 27: Noise</b>	<ol style="list-style-type: none"> <li>1. General support for the policy, but suggestion that there should be more emphasis on road and aircraft (particularly from Gatwick Airport) noise in the first paragraph.</li> </ol>	Road and aircraft noise is already mentioned in paragraph 6.290 and the Noise SPD.	No changes proposed.
<b>EN28: Land Contamination</b>	While generally supporting the policy, the Environment Agency (EA) considers that closed landfill sites represent development risks that should be addressed directly, either in Policy EN 28 or be the subject of its own policy.	Policy EN 28 covers the situations that the EA refers to, however the Council considers that additional wording should be added to the supporting text at paragraph 6.302 to aid clarity on this issue.	Change added to Table of Minor Mods.

## 6.4 Housing: Housing Delivery (Policies H1 to H5)

### Notes:

1. The following totals have been recorded against each policy for comments received from individuals and organisations: Policy H1 – 9 comments, Policy H2 – 4 comments, Policy H3 – 18 comments, Policy H4 – 2 comments, Policy H5 – 3 comments.
2. Where reference is made to a Development Management (DM) policy in the context of a representation on a specific site allocation rather than the DM policy wording itself, this is dealt with under Section 5 – Place Shaping and not included in the table below.
3. Representations on accessibility have been dealt with under policy H6 - Housing for Older People and People with Disabilities

Policy/Topic area	Main issues	TWBC initial response	Changes – Yes/No
<b>H1: Housing Mix</b>	1. A few promoters would prefer more clarity on the Council's expectations for the mix of housing that the authority is looking for, including having regard to population forecasts.	Various policies set expectations in terms of the provision of affordable housing, housing for older people and other needs. Housing needs, and the understanding of them, can change, so it is appropriate to be responsive to the most up-to-date local evidence for an area, as well as policies in NDPs.	No changes proposed.
	2. There is no mention of the provision of Social Housing, which is urgently required	Policy H 3 covers social housing. However, a cross-reference to that policy (and Policy H6: Housing for Older People and People with Disabilities) in paragraph 6.310 would help prevent potential confusion - see table of minor modifications.	Yes – modify paragraph 6.310 to make these cross-references
	3. The Local Plan should include the Government's Optional minimum space standards to ensure adequately sized dwellings.	Review of previous planning applications and looking at market demands has shown that there is not sufficient evidence to support the inclusion on a Minimum Space Standards Policy.	No changes proposed
<b>H2: Housing Density</b>	1. Some developers and local groups state that the policy lacks clarity on how it will make	The efficient use of land is clearly set out as the core policy expectation, but that is should also	No changes proposed.

Policy/Topic area	Main issues	TWBC initial response	Changes – Yes/No
	<p>efficient use of land -minimum density standards should be included.</p> <p>2. There is an objection that the phrase '<i>planning applications will be refused where development is found not to make efficient use of land</i>' has been dropped from this policy since Reg 18.</p>	<p>focus on the site context. Given this, a specific minimum is not considered appropriate.</p> <p>The policy is worded positively, in line with national guidance, but it remains that proposals that do not accord with it would be refused, subject to other policies and material considerations.</p>	
<b>H3: Affordable Housing – C2 housing</b>	Several providers of specialist housing for older people want it to be made explicitly clear in the policy that Affordable Housing Contributions will not be required for development that falls within C2 of the Use Class Order.	A recent Court case concluded that C2 developments are not automatically exempt from affordable housing requirements. While an Affordable Housing Contribution will not normally be required on developments that fall within the C2 use class, this is dependent on circumstances and each application is judged on a case-by-case basis.	No changes proposed.
<b>H3: Affordable housing - Thresholds</b>	Criterion 4 should be amended so that within the AONB Affordable Housing contributions are required on site, and for schemes of 5 dwellings or fewer.	It is considered reasonable, and practicable, to seek financial contributions for more than 5 but less than 10 dwellings. On-site provision for small sites is generally not supported by Registered Providers. Also, the NPPF sets a general threshold of 10 dwellings, and is interpreted (based on an earlier Ministerial Statement) as supporting a lowering in AONBs, etc down to 6 units.	No changes proposed
<b>H3 Affordable Housing – Phasing</b>	Phasing – should be more flexible, and alternative wording suggested to criterion 3, <i>Timing of affordable on-site housing provision: a <u>target</u> of 50 percent of the affordable housing to be delivered on-site will be expected to be completed and transferred to a Registered Provider (or appropriate alternative) prior to occupation of a</i>	The Housing Needs Assessment 2021 demonstrates there is a high need for Affordable Housing and the policy has been drafted to ensure delivery, including in ensuring a 'minimum level of affordable housing as development progresses, rather than the more vague 'target'.	No changes proposed

Policy/Topic area	Main issues	TWBC initial response	Changes – Yes/No
	<i>target maximum of 50 percent of the open market units to be provided on-site.”</i>		
<b>H3: Affordable Housing - Local Connection</b>	The Local Connection Test should relate to affordable rent only	There is a demand from local residents for the provision of all tenures of affordable housing and local connection is important for local communities, including Parish Councils; hence, policy expression.	No changes proposed.
<b>H3: Affordable housing - Tenure</b>	<ol style="list-style-type: none"> <li>1. There is no justification for prioritising shared ownership as the most appropriate type of intermediate housing.</li>   <li>2. The Council should consider whether it would be appropriate to include the requirements for First Homes.</li> </ol>	<p>While paragraph 6.330 says that shared ownership is one of the intermediate tenures '<i>currently considered the most appropriate</i>', The policy itself refers to 'intermediate tenures or other affordable routes to home ownership. The report for the Council on affordable housing needs (February 2021) highlights the role of shared ownership, but also acknowledges that regard will need to be had to First Homes, as this tenure is developed.</p> <p>The Ministerial Statement of 24 May 2021 set out a transition period for plan making regarding the inclusion of First Homes. As the Local Plan has reached an advanced stage of preparation in line with this Statement, it does not need to reflect the First Homes requirements. However, First Homes may form part of the Intermediate Housing element of Affordable Housing and the phrase '<i>40 percent as intermediate tenures or other affordable routes to home ownership, subject to consideration of any subsequent local policy and/or evidence</i>' has been included in the policy to reflect this.</p>	No changes proposed, but consider future policy approach to First Homes

Policy/Topic area	Main issues	TWBC initial response	Changes – Yes/No
<b>H 3: Affordable housing – Exceptional circumstances</b>	<p>1. Request the following paragraph be added to the policy itself: <i>“There may be exceptional circumstances where compliance with this policy would make the development not viable. In each case these circumstances would need to be fully demonstrated to warrant a departure from compliance with this policy.”</i></p> <p>2. The order of preference for when Affordable Housing on site cannot be delivered is not effective. (A reduced level of affordable housing on site should be seen as less preferable than a variation in tenure).</p>	<p>The policy has a section on Exceptional Circumstances which sets out how instances where an Affordable Housing contribution is not viable will be considered.</p> <p>Both the Housing Needs Study (2018) and the SHMA show a greater need for social rent housing. Given this higher need, where the full quota and tenure split is not viable on the site, the Council would prefer that a lesser level of affordable housing with a policy-compliant tenure mix (if the option of another site in the local area providing the full quota at the tenure split proposed is not possible) over reducing the social rented element.</p>	<p>No changes proposed.</p> <p>No changes proposed</p>
<b>H3: Affordable Housing – Design and Layout</b>	Having the Affordable Housing clustered throughout the development may not be practical on small sites.	This part of the policy is to assist management of Affordable Housing. The layout of sites will be assessed on a case-by-case basis taking the size and number of dwellings proposed into account.	No changes proposed
<b>H3: Affordable Housing- Building Standards</b>	The requirement that all affordable homes are built to M4(2) is not justified.	The justifications for the policy requirements are based on a robust evidence base and are set out in the Housing Needs Assessment Topic Paper. Furthermore, RSLs require M4(2) as a minimum on new development.	No changes proposed
<b>H4: Estate Regeneration</b>	There should be no justification accepted for any net loss of affordable housing	The thrust of the policy is to support the upgrading of estates and effective use of land while recognising there may be some loss of affordable housing only in exceptional circumstances.	No changes proposed.

Policy/Topic area	Main issues	TWBC initial response	Changes – Yes/No
<b>H5: Rural Exception Sites</b>	1. Expand policy to say that a S106 agreement will be required to ensure that the housing provided on a rural exception site remains as affordable housing subject to the local connection test in perpetuity.	The need for a local connection for housing on rural exceptions sites is set out in the policy. , and occupants being subject to the This is secured in perpetuity through a S106 agreement as part of the application process.	No changes proposed.

## 6.5 Housing: Types of Housing Delivery (Policies H6 to H12)

### Notes:

1. There were 13 representations relating to Policy H 6, with only a few representations (c5 each) on policies H 7 and H 8. There were 16 representations on policy H 9. There have been few representations against Policies H 10 – H 12, with less than 5 recorded against each.
2. Where reference is made to a Development Management (DM) policy in the context of a representation on a specific site allocation rather than the DM policy wording itself, this is dealt with under Section 5 – Place Shaping and not included in the table below.
3. Where reference is made to whether or not C2 development would be expected to pay affordable housing contributions, this is dealt with under H3 – Affordable Housing.

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
<b>H6: Housing for Older People and People with Disabilities</b>			
Provision for Older People’s Housing	<p>The Local Plan does not provide adequate provision for Extra Care and Sheltered Housing over the plan period:</p> <p>a) The Plan is over reliant on the market to deliver older person’s housing.</p> <p>b) Insufficient sites are being allocated to meet the projected demand; also, the strategic sites will not be delivered until the end of the plan period and will not meet the current demand.</p>	<p>The Local Plan is considered to respond positively to meeting the range of housing needs of older people, drawing on a proportionate evidence base and engagement with KCC’s Adult Social Care, as set out in The Housing Needs Assessment Topic Paper.</p> <p>Extra Care and Sheltered Housing is being delivered by the market, which is both supported by the Local Plan and supplemented with allocations and requirements for provision as part of larger developments, including at the strategic sites, which are expected to come forward by the middle of the plan period.</p>	No changes proposed.
Definition of C2 use	The definition of C2 Use should include Extra Care	It is acknowledged that some specialist housing for older people do not fall neatly into either a	Yes – proposed amendment is

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
		<p>C2 or C3 use class, with each proposal assessed on a case-by-case basis. Policy H6 has been worded such that proposals are considered on their own merits, taking account of the particular characteristics of the scheme. For clarification, a note may be added to the definitions at paragraph 6.350 to the effect that Extra Care housing may be C2 depending on the level of care provided.</p>	<p>set out in the modifications schedule.</p>
<p>Accessibility</p>	<ol style="list-style-type: none"> <li data-bbox="517 608 1146 842">1. Kent County Council seek confirmation that Building Regulation Standards Part M4(2) applies across all housing development types, namely market and affordable housing; also, consider that M4(3) standards should apply to all new market housing.</li> <li data-bbox="517 1082 1146 1214">2. The requirements of criterion 2-4 of the policy are not justified, specifically that a proportion of new homes should be built to M4(2) is not justified and should be reduced.</li> </ol>	<p>The Council does propose that the Part M4(2) accessible and adaptable housing standard be introduced to all market housing.</p> <p>With relation to M4(3) standards, the Local Plan is informed by an evidence base (SHMA and 2017 SHMA Update and Housing Needs Study 2018) that does not support a policy that would require M4(3) standards on all market housing and it was only considered appropriate to require dwellings to be accessible for people with disabilities where the Council had some control over occupation.</p> <p>The justifications for the policy requirements are based on a robust evidence base and are set out in the Housing Needs Assessment Topic Paper. Registered Providers for Affordable Homes also require that all Affordable Housing be built to M4(2) standards.</p>	<p>No changes proposed.</p> <p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
<b>H8: Self Build and Custom Housebuilding</b>			
Calculation of Self Build and Custom Housebuilding (SBCH) Need	It is considered that the projected need for 518 self/custom build dwellings (based on the average monthly registrations since the Register's introduction 01 April 2016 of 1.96) over the Plan period is too simplistic a forecast and does not reflect actual demand.	It is acknowledged that the 518 figure (inclusive of the need of 108 registrations at the base date) is an estimate. However, it is considered that this estimate is more robust than just considering the current level of need and draws on research outlined within the Housing Needs Assessment Topic Paper.	No changes proposed.
Choice of site allocations for 5% SBCH requirement	<ol style="list-style-type: none"> <li>1. The SBCH requirement on three proposed major site allocations on AONB and/or greenfield land would not be necessary if overall housing need reduced due to borough constraints and if sites built at greater densities. Consider alternative sites should be chosen for SBCH requirement.</li> <li>2. There is little choice in location with SBCH requirement on just 3 proposed site allocations, with long-term reliance on one strategic site.</li> <li>3. The Local Plan does not set out the rationale for the provision of self/custom build at 3 allocations sites over other sites in the Local Plan. The selection of self/custom build sites will depend on consumer choice, on where individual households seek to build their own home. This predominantly occurs on single dwelling/windfall schemes</li> </ol>	<p>Paragraphs 6.31/6.32 of Housing Supply and Trajectory Topic Paper provide the justification for the requirement on these sites based on current assessments of need. The comment on overall housing need is addressed as part of Policy STR 1: Development Strategy.</p> <p>The majority of SBCB housing comes forward on small windfall sites, which are provided for in many settlements across the borough. The larger sites are well located in relation to demand and provide the opportunity for effective delivery of such housing.</p> <p>The policy contains a mechanism in the event there is no demand for SBCH plots.</p> <p>It is also noted that SBCH is not a form of affordable housing under Government policy and, hence, should be located in accordance with other Local Plan policies.</p>	<p>No changes proposed.</p> <p>No changes proposed.</p> <p>No changes proposed.</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>and can also be locationally dependent, including village and countryside settings.</p> <p>4. Considered there is no effort to address the shortfall in the SBCH requirement which will be exacerbated by Tudeley not delivering for at least 8 years.</p>	<p>The Plan aims to meet the SBCH need in full, both as of the base date of the Plan, but also projected forward to the end of the plan period.</p>	<p>No changes proposed.</p>
<p>5% SBCH requirement on Spratsbrook site, Royal Tunbridge Wells (AL/RTW 16)</p>	<p>Site promoter highlights that the ability of the Spratsbrook site to deliver self/custom build plots will depend on viability considerations. Flexibility is sought in the policy provision to cater for the demand at the time a scheme is at the planning application stage. It is concluded that the sites in policy H8 are deleted, in that self/custom build can come forward as based on the demand for suitable locations at build out. The following wording amendment is suggested: “... <u>and if required (subject to need) feasible and viable a minimum of five percent to be delivered as serviced self-build and custom housebuilding plots...</u>”.</p>	<p>The marketing provision within the policy provides the necessary safeguard in the event of a lack of demand at the time of a planning application.</p> <p>Regarding viability, it is noted within the Council’s Stage 1 Viability Assessment that plots are “<i>likely to remain a profitable aspect of the overall development activity and have a broadly neutral effect on viability</i>”.</p> <p>The present wording is regarded as a more positive in terms of helping to support delivery of CBSH, in line with national policy/guidance.</p>	<p>No changes proposed.</p>
<p>Local Need for SBCH</p>	<p>Windfall schemes should only be provided where the Register shows evidence of SBCH need in that area and only of those who meet the local connection test.</p>	<p>There is clear evidence of a need for SBCH across the borough. While the local connection test has been applied to assess the level of need, it cannot be used to control occupancy.</p>	<p>No changes proposed.</p>
<p>SBCH Windfall Schemes</p>	<p>Addressing SBCH need using the windfall allowance for single unit schemes is double-counting and will not help to increase the amount of homes built, nor plots available to satisfy the SBCH need.</p>	<p>Evidence shows that small windfall sites are the main source of supply toward meeting SBCH need; there is no double-counting; in fact, only a half of single unit schemes are treated as SBCH. Further detail on how the supply of</p>	<p>No changes proposed.</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
		SBCH homes will be delivered can be found in the Housing Supply and Trajectory Topic Paper.	
Green Belt Considerations	The policy should make clear how SBCH dwellings will be assessed in relation to Green Belt interests.	Proposals would be assessed against policies of the Local Plan taken as a whole, including Green Belt Policy STR9 (Green Belt) and Green Belt policy within the NPPF (i.e. development to take place only in very special circumstances).	No changes proposed.
Size, Design, and Density of SBCH Plots	Concern that there is nothing in the policy on size or design of buildings on SBCH plots, nor on density of areas set aside for SBCH. Therefore, policy considered too vague.	SBCH housing is treated in the same way as other housing, with the size, design, and density of buildings addressed under other Development Management policies (i.e. EN1 - Sustainable Design and H2 - Housing Density).	No changes proposed.
Advised Offering of SBCH Plots to the Council	It is unclear why policy advises that SBCH plots are offered to the Council, if unsold after 6-month marketing period and asks why this would increase the chance of the plot being developed as a SBCH dwelling. Alternatively, suggested that plot should be developed and put on the market as soon as possible after the 6-month period.	The policy makes it clear that offering plots to the Council is only advisory after the 6-month period has ended, as the Council may wish to purchase these plots to meet local housing needs. The landowner may immediately build for sale on the open market instead if preferred (after the 6-month period has ended).	No changes proposed.
<b>H 9: Gypsies and Travellers</b>			
Gypsy and Traveller Accommodation Assessment (GTAA)	GTAA was published nearly 3.5 years ago and is clearly out of date. Study explains at paragraph 3.2 that there are several weaknesses with reliability of data used to determine the need for accommodation. Also states at paragraph 3.7 that the data used in the study is from January 2015 to January 2017.	The Council considers that the GTAA remains as the most up-to-date assessment of G&T need in the borough. Site-specific need on sites with suitable additional capacity for further pitches has also been confirmed by the Council through correspondence with residents, including at site visits.	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
	Evidence being used is unreliable and dates from nearly 6.5 years ago. It is therefore considered unreliable, and which Local Plan policy/allocations should not be based on.		
Site criteria	Residential amenity and highways access safety and capacity should be specific criteria for this policy.	All development proposals will be subject to relevant policies in the Plan and the NPPF, including Policy EN 1 that applies to all proposals for development in the borough.	No changes proposed
Relationship to Green Belt	The policy should make it clear how proposals for accommodation for gypsies and travellers will be assessed in relation to Green Belt interests.	All development proposals will be subject to relevant policies in the Plan (i.e. STR 9) and the NPPF. The PPTS 2015 also makes it clear in para 16 that gypsy and traveller sites (temporary or permanent) in the Green Belt are inappropriate development and should only be approved in very special circumstances.	No changes proposed
Greenfields Farm, Paddock Wood (Proposed new site)	<p>Several objections seeking that Greenfields Farm (Inset Map 82) is deleted, variously citing:</p> <ol style="list-style-type: none"> <li>1. Insufficient consideration given towards resultant traffic impacts, with access road unsuited to additional traffic, given its single width character, poor surface and existing congestion. Also, no pedestrian ways at all on both Old Hay and Pearsons Green Road and access to shops, schools and local facilities would require additional car journeys.</li> <li>2. Unsuitable for gypsy and traveller use, on character and amenity grounds. Although there are existing residential properties,</li> </ol>	<p>NB There is a current undetermined planning application (for 10 pitches, rather than 3 proposed in the Council's assessment within Annex 1 of the Housing Supply and Trajectory Topic Paper). All identified site-specific issues will also be addressed through determination of the current application in due course.</p> <p>Transport Assessment outcomes associated with current application still awaited as at October 2021.</p> <p>Regarding character and local amenity, the site is adjacent to an existing/established consented permanent residential caravan site and</p>	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>they experience noise and disturbance from commercial activities, which affects residential amenity, with no street lighting.</p> <p>3. Notwithstanding criterion 1 of Policy H9, the site (and current planning application) is significantly larger than the 3 pitches allocated in Table 11, with concerns that the site would inevitably grow, with greater impacts.</p> <p>4. Surface water flooding along this access road and especially near the proposed site, or mains drainage.</p> <p>In contrast to the above, there is also some local support for residents and businesses:</p> <p>1. Allocation supported in principle, although capacity of the site should be increased from 3 pitches to 10 pitches as per the current planning application (21/00600/FULL), as 3 pitches would not be an efficient use of land.</p> <p>2. Identified need is a minimum figure, and it would be a positive and proactive response for the site to be used to a higher density.</p>	<p>therefore it is considered that the proposed use of the site would not conflict with the local character of the area/land. There are also a number of other existing residential properties on this road.</p> <p>Noted regarding size of the application – the Council’s own assessment indicates the site would be suitable for only 3 pitches.</p> <p>Any application will be subject to an assessment of flood risk and drainage.</p> <p>The current application is undetermined; however, as above, the Council’s own assessment indicates the site would be suitable for only 3 pitches.</p> <p>Noted, however site suitability on wider grounds must be taken into account.</p>	

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>3. Drainage infrastructure and contributions makes viability for only three pitches very challenging.</p> <p>4. There is significant interest in the site from local gypsy families.</p> <p>5. Site is not remote; also proposed extension to Paddock Wood means the site will be very close to the urban area.</p> <p>6. Proposed car sharing for school and shopping trips reduces number of car movements. There is also a bus stop nearby.</p>	<p>The Planning Act 2008 and CIL Regulations 2010 require that development contributions are reasonably related in scale and kind.</p> <p>Noted, however site suitability on wider grounds must be taken into account.</p> <p>Noted, however proposed extension to Paddock Wood is subject to examination of the Local Plan.</p> <p>Plans to reduce number of car movements will be subject to a Transport Assessment (and if required, a Travel Plan) in accordance with Policy TP1 as part of any planning application.</p>	
Allocation as part of strategic site, Paddock Wood (STR/SS 1)	<p>Objections from some site promoters:</p> <p>1. The need for a gypsy/traveller site within eastern parcel of STR/SS1 has not been justified, with a number of gypsy/traveller sites identified in close proximity;</p> <p>2. The Housing Supply and Trajectory Topic Paper shows that there are sufficient sites to meet need without requiring the STR/SS1 site.</p>	<p>The small G&amp;T site proposed within the STR/SS 1 is to contribute to meeting the identified need for pitches in the borough, as set out in the relevant Topic Papers; also, there is also an identified need for a site for a local family.</p> <p>A small degree of potential over-supply is made in the event that any pitches on existing sites do not come forward, but this site is still relied on at the lower end of the capacity range</p>	No changes proposed
Hartleylands, Cranbrook	The Hartleylands sites are unsuitable for further intensification due to isolation within the AONB and poor access track, which is a public right of way, so would cause conflict with farm access and footpath use and urbanise the rural	The access track currently serves a number of other dwellings. Intensification is proposed within the existing boundaries of each site, rather than expansion	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	location. A planning application on one site has been refused.	<p>into adjacent undeveloped land within the AONB.</p> <p>The sites at Hartleylands have also been assessed within Annex 1 of the Housing Supply and Trajectory Topic Paper which has included an acknowledgment of the sites' location within the AONB/adjacent to a PROW as well as giving regard to the visual impact on the local landscape.</p> <p>While noting that the 3 Hartleylands site was recently refused permission to increase the number of pitches from 1 to 3 and will be subject to an appeal hearing in due course, the Council considers that this site would only be suitable for an additional 0-1 pitches through intensification as part of a reordering/landscaping of the whole site.</p>	
<b>H10: Replacement Dwellings outside the Limits to Built Development (LBD)</b>	<ol style="list-style-type: none"> <li>1) Amendment is sought to control light spillage from both outdoor lighting and large windows and skylights.</li> <li>2) Clarification is sought on how planning applications in the Green Belt will be assessed.</li> <li>3) Amendment is sought to the policy to include provision for new housing in remote rural locations.</li> </ol>	<ol style="list-style-type: none"> <li>1) Proposals are assessed against the plan as a whole and other DM policies EN 8 - Outdoor Lighting and Dark Skies; and EN 18 - the Rural Landscape cover this.</li> <li>2) This is already explained in the supporting text to the policy.</li> <li>3)</li> <li>4) The policy is for replacement dwellings only and any other proposals for new dwellings in rural areas would be assessed against</li> </ol>	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
		<p>other DM policies such as EN 1, EN 18, EN 19 and H 5, STR 1 and the NPPF.  <i>[See also consideration of representations on the use of LBDs under Policy STR 1.]</i></p>	
<b>H11: Residential Extensions, Alterations, Outbuildings, and Annexes</b>	<p>There are various objections regarding soundness in relation to the NPPF:</p> <ol style="list-style-type: none"> <li>1) Questioned whether 50% limit should apply to extensions outside the LBD which are not in the Green Belt</li> <li>2) The maximum limits are at odds with the more generous proportions allowed under PD rights</li> <li>3) The definition of “original” building is questioned</li> <li>4) The 50% limit is rolled on from Policy H11 in the 2006 Local Plan, based on the Kent Structure Plan which no longer exists</li> <li>5) No consideration is given to whether existing dwellings are small, medium or large in applying the maximum volume limit of 250 cubic metres</li> <li>6) Similar amendments sought, as comments on Policy H10 set out above</li> </ol>	<p>(1) and (2) The introduction to the policy is clear in that it only applies to proposals which fall outside permitted development rights and TWBC considers the 50% limit to be necessary for all proposals outside the LBD to protect the intrinsic character and beauty of the countryside, as well as the openness of the Green Belt.</p> <p>This is based on the definition in the glossary to the NPPF.</p> <p>This has been found to be an appropriate limit to protect the Green Belt and rural areas.</p> <p>Any increase is relative to the size of the dwelling and, as above, the limit is set to reduce visual harm to the rural area and openness of the Green Belt</p> <p>Please see response set out under Policy H10 above.</p>	<p>No changes proposed</p>
<b>H12: Extensions to Residential</b>	<p>No main issues but some support.</p>	<p>N/A</p>	<p>No changes proposed</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
<b>Curtilages outside the LBD</b>			

## 6.6 Economic Development: Employment Provision (Policies ED1 to ED7)

### Notes:

- 1) The following totals have been recorded against each policy for comments received from individuals and organisations: Policy ED1 – 8 comments, Policy ED2 – 8 comments, Policy ED3 – 2 comments, Policy ED4 – 4 comments, Policy ED5 – 6 comments, Policy ED6 – 4 comments and Policy ED7 – 6 comments
- 2) Where reference is made to a Development Management (DM) policy in the context of a representation on a specific site allocation rather than the DM policy wording itself, this is dealt with under Section 5 – Place Shaping and not included in the table below
- 3) Where representations have been made in relation to the extent of Key Employment Areas e.g. Gills Green, these are dealt with under the relevant strategic policy or site allocation policy in Section 5.

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
<b>ED1: The Key Employment Areas (KEAs)</b>			
Southborough and High Brooms and Royal Tunbridge Wells North Farm/Longfield Road KEAs	<ol style="list-style-type: none"> <li>1. <b>Remove reference to retail (including food and drink), leisure and other <i>sui generis</i> uses of an appropriate type and scale as acceptable new uses in the Policy ED 1 for the KEAs for Southborough and High Brooms and Royal Tunbridge Wells North Farm/Longfield Road. This reference should only apply to Royal Tunbridge Wells Town Centre, as it is inconsistent with policy in the NPPF and the evidence base for the Local Plan in terms of the Town Centre first approach.</b></li> <li>2. Include Class B2 – General industrial in the list of appropriate uses for the Southborough and High Brooms KEA (Chapman Way)</li> </ol>	<p>Paragraph 6.446 sets out the type of uses which are considered appropriate within the KEAs and refers to the background to this approach, which recognises that these areas have an existing mix of uses. It also recognises the recent change in government policy in relation to Use class E: Commercial which is reflected within this policy. Further information on the background to the provision of employment land and the KEAs is included in the Economic Development Topic Paper.</p> <p>The Southborough and High Brooms KEA is surrounded by residential development to the north, south and west and it is considered that some B2 uses may not be compatible with the</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	3. Add dwelling houses and residential institutions to the list of appropriate uses for the RTW North Farm/Longfield Road area and the Southborough High Brooms Area.	<p>surrounding residential uses. However, it should be noted that the policy does not necessarily rule out B2 uses as each case would be assessed on its merits in consultation with Environmental Protection and the relevant Development Management policies including EN 28 – Noise.</p> <p>Residential use is considered unsuitable in this location</p>	No changes proposed
Gill's Green, Hawkhurst KEA	Should provide a LBD boundary at Gills Green, Hawkhurst, to coincide with the defined Key Employment Area to protect the AONB.	The reason for removing the LBD is explained in the LBD Topic Paper	No changes proposed
Cranbrook	Failure to address evidence from Cranbrook on need for creation of more employment sites.	<p>The retention and provision of employment space is considered to be sufficiently addressed by criterion 6 of strategic policy STR/CRS1, which states that <i>“the development strategy for Cranbrook and Sissinghurst parish is to: (6) seek to retain land and buildings currently used for non-residential uses within the centres of Cranbrook and Sissinghurst for employment-generating and community uses, and support proposals for such uses in suitable locations within the Limits to Built Development”</i>.</p> <p>It should also be noted that Cranbrook lies in close proximity to the Gill's Green Employment Area which is proposed to be extended - Please refer to Section 5.</p>	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
<b>ED2: Retention of Existing Employment Sites and Buildings</b>			
Post-pandemic patterns to working	Future adaptability – KCC feel that changing work patterns as a result of Covid-19 must be demonstrated in the Local Plan.	The Plan does consider and takes into account the implications of the pandemic and different ways of working. The Council commissioned an update to the Retail and Leisure Study in mid-2020, (Tunbridge Wells Retail, Leisure and Town Centre Uses Study Update – November 2020) which updated the previous work and also considered the implications of the pandemic and emerging retail and leisure, office and town centre trends. This work has informed the policy approach set out in the Local Plan.	No changes proposed
Series of tests unsuitable and onerous	1. Consider the wording of the policy implies that criterion (a) to (d) of the policy would apply to all conversions/changes of use whether for employment use or not. It would be onerous to require such tests when maybe changing one employment use to another employment use. Suggested the wording is amended to allow some flexibility.	It is agreed it would be helpful to clarify this point in the supporting text, by amending paragraph 6.453 to read:  <i>Applicants submitting planning applications for the conversion/change of use of employment buildings, or sites <del>for alternative uses</del>, to <u>non-employment uses</u> should demonstrate that ....</i> Also, by amending the following wording in the policy box to read:  <i>Applicants seeking to redevelop/convert existing employment buildings and sites <u>to non-employment uses</u> must demonstrate the following: ...</i>	Yes, as minor modifications, set out in the table of minor modifications

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>2. The policy appears to still apply to sites which have been clearly identified in the plan as being suitable for alternative uses – again recommended that this should be clarified.</p>	<p>It is agreed that it would be helpful to clarify this point regarding the application of Policy ED 2 to be consistent with site specific allocation policies in the Local Plan, by adding a further criterion after the first paragraph, and after criterion 3:</p> <p><i>‘4. have been identified as being suitable for alternative uses in the Local Plan or another adopted development plan document...’</i></p>	<p>Yes, as a minor modification, set out in the table of minor modifications</p>
<b>ED3: Digital Communications and Fibre to the Premises (FTTP)</b>	<p>1. Reference to 24mbps should be amended to 30mbps (definition increasingly used by Government to define superfast broadband).</p> <p>2. Wording of para 6.459 should be reviewed to ensure it is clear.</p> <p>3. Wireless should only be considered if Fibre to the Premises (FTTP) cannot be offered. KCC recommends there should at least be reference to gigabit-capable technologies within in the policy as ‘wireless’ can offer a range of speed options.</p>	<p>To ensure that the text reflects current guidance, clarifies prioritisation of FTTP and gigabit capable technologies, and to improve overall clarity, a number of minor amendments to the supporting text (at paragraphs 6.459 and 6.462) and policy wording have been agreed with the KCC Broadband team. These are set out in the table of minor modifications.</p>	<p>Yes, as minor modifications set out in the table of minor modifications</p>
<b>ED4: Rural Diversification</b>	<p>No main issues raised.</p>	<p>N/A</p>	<p>No changes proposed</p>
<b>ED5: Conversion of Rural Buildings outside the Limits to Built Development</b>			

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
Residential Conversions	<ol style="list-style-type: none"> <li data-bbox="483 264 1128 504">1. The policy is inconsistent with the NPPF and the criteria in the Policy give preference to employment uses and tourism over residential use and could result in a negative impact on housing supply. No depth of need of analysis of this in the Economic Needs Study (ENS).</li> <li data-bbox="483 600 1128 839">2. Number of the Policy criteria do not comply with Schedule 2, Part 3 of the T&amp; CP GDPO 2015 which allows redundant farm buildings to go to residential use without any requirement that they first be tested for an alternative economic use or be of historic merit.</li> <li data-bbox="483 935 1128 1110">3. Para 79(c) of the NPPF only refers to “<i>the development would re-use redundant or disused buildings...</i>” there is no requirement for them to be of historic or architectural interest.</li> <li data-bbox="483 1270 1128 1378">4. The 18 months marketing period is onerous, unnecessary and against rapid decision making, and it is suggested this is deleted</li> </ol>	<p data-bbox="1151 264 1798 568">The delivery of housing and the promotion of the rural economy and employment are both important in the NPPF. The supporting text to the policy clearly explains that the economic priorities of policy ED5 are based on evidence produced in the Council’s ENS Study. Meeting economic needs in the rural areas will continue to rely on making effective use of existing buildings.</p> <p data-bbox="1151 600 1798 903">The supporting text makes clear reference to Part 3 of the GDPO and that the policy would only apply to proposals which fall outside the remit of this Order, such as those located in the High Weald AONB, conservation areas or listed buildings. It would therefore apply to a significant number of rural buildings, given the extent of landscape and heritage designations across the borough.</p> <p data-bbox="1151 935 1798 1206">Paragraph 79(b) of the NPPF 2019 rather than 79(c) (now paras 80 (b) and (c) of the NPPF 2021) applies to and supports criterion (a) – “<i>the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets</i>”. Therefore, considered this criterion should not be modified.</p> <p data-bbox="1151 1270 1798 1378">The priority is for the change of use/conversion of buildings to business, recreation and tourism uses over residential and a sufficient period is</p>	<p data-bbox="1821 264 2011 328">No changes proposed</p> <p data-bbox="1821 600 2011 663">No changes proposed</p> <p data-bbox="1821 935 2011 999">No changes proposed</p> <p data-bbox="1821 1270 2011 1334">No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>5. Several deletions from the policy wording are suggested:</p> <ul style="list-style-type: none"> <li>• The curtilage being drawn as tightly as possible (criterion 6)</li> <li>• That a building should be worthy of retention as part of a whole farm plan and no other use is viable (point a)</li> <li>• That the building needs to be in a sustainable location and not physically separated from existing farm buildings/built development (point b)</li> </ul> <p>6. The following additions are suggested:</p> <ul style="list-style-type: none"> <li>• Criterion 5 should also allow such information to be submitted by planning condition</li> <li>• Additional criterion suggested - <i><u>the development would re-use redundant or disused buildings and enhance its immediate setting</u></i></li> </ul>	<p>needed to clearly demonstrate that the property has been adequately marketed and alternative business uses sought prior to submitting an application for residential conversion. This period has been reduced from 2 years.</p> <p>The Council considers that all the criteria should remain as worded in the PSLP as they are required and justified to both conserve and protect the intrinsic value and locally distinctive character of the countryside, as well as supporting the objective of promoting a stronger rural economy.</p> <p>As above, the Council considers that all the criteria should remain as worded in the PSLP, to conserve and protect the intrinsic value and locally distinctive character of the countryside. Also, the existing policy wording allows for the re-use of redundant/disused buildings which would be expected to enhance/not detract from its setting, as set out in criterion 4.</p>	<p>No changes proposed</p> <p>No changes proposed</p>
<b>ED6: Commercial and Private Recreational Uses</b>	No main issues raised.	N/A	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
<b>in the Countryside</b>			
<b>ED7: Retention of, and improvements to existing, and the promotion of new, tourist accommodation and attractions -</b> Loss of tourist accommodation - policy criteria	<ol style="list-style-type: none"> <li>1. Policy appears to tighten regulations at a time when hotel industry faces severe challenges - pandemic and effect of Brexit on European travellers</li> <li>2. Evidence of actual demand should be considered as well as individual circumstances. Term 'adequate supply' does not distinguish between aspirations of TWBC and actual usage by tourists of each range of accommodation available. Evidence of actual tourist demand by sector should be considered when assessing applications</li> <li>3. Assumed non-viability remains the cornerstone of any application and all other criteria are designed to evidence assertion that continued operation would result in loss/ closure of premises - needs clarification in the Policy.</li> <li>4. Criterion 1 - small budget hotels often use on-line marketing channels, web sites, online travel agents rather than printed brochures or media advertisements</li> <li>5. Criterion 2 – market price - if the Council facilitates the construction of large new hotels, it should also indemnify smaller</li> </ol>	<p>The implications of the Covid pandemic are recognised as an issue, and further considered in the Economic Development Topic Paper which supports the Economic DM policies. The Council are looking to encourage tourism, which is expected to be at least as strong going forward</p> <p>Each proposal for loss of tourist accommodation/ facilities would be assessed on its merits, taking into account both individual circumstances and the demand for a particular type of facility. The policy criteria were amended following the Reg. 18 consultation to account for local/individual circumstances.</p> <p>The thrust of the policy criteria requires sufficient evidence to be submitted to demonstrate that a tourist facility is no longer viable as a business operation and to justify the loss of such a facility.</p> <p>The types of advertisement listed in criterion 1 are only examples and include websites.</p> <p>It is recognised that some permitted development rights allow for change of use without the need for planning permission. Also, as above, each</p>	<p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	businesses driven into non viability because of them. Recent government directives for easier conversion to residential use indicates benefits that should be considered when former residential houses are no longer viable as small hotels.	proposal for loss of tourist accommodation/ facilities would be assessed on its merits, taking into account both individual circumstances and the demand for a particular type of facility.	

## 6.7 Economic Development: Town, Rural Service, Neighbourhood Centres and Village Centres (Policies ED8 to ED12)

### Notes:

- 1) The following totals have been recorded against each policy for comments received from individuals and organisations: Policy ED8 – 3 comments, Policy ED9 – 2 comments, Policy ED10 – 3 comments, Policy ED11 – 3 comments and Policy ED12 – 4 comments.
- 2) Where reference is made to a Development Management (DM) policy in the context of a representation on a specific site allocation rather than the DM policy wording itself, this is dealt with under Section 5 – Place Shaping and not included in the table below.

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
<b>ED 8: Town, Rural Service and Neighbourhood Centres and Village Settlements Hierarchy</b>			
Tudeley	Tudeley Village should be referred to as a rural service centre.	The new neighbourhood centre(s) at Tudeley Village are intended to serve the needs of residents within the new settlement, and therefore the Neighbourhood Centre designation is considered appropriate.	No changes proposed
Prior approvals	6.521 ' <i>Prior approval</i> ' for conversion from Class E(c) to residential use is in conflict with ED2	Policy ED2 only applies where planning permission is required.	No changes proposed
<b>ED 9: Defined Town and Rural Service Centres - Retail Hierarchy</b>	Remove " <i>retail</i> " from last sentence – Policy ED8 sets out settlement hierarchy, not retail hierarchy. The primary function of settlement centres should not be defined by its retail function alone, but a mix of retail, civic and	Policy ED8 is not intended to set out the settlement hierarchy. It sets out the retail hierarchy as required by the NPPF. The settlement groupings/hierarchy are set out in the	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	community buildings, leisure & hospitality, services, first- and second-floor residential and offices, as well as public realm spaces. All of these functions act to draw in footfall and ensure vitality of town and village centres, i.e. the “ <i>defined town and rural service centres</i> ”.	Role and Function Study. The purpose of each is different and no amendment is necessary	
<b>ED 10: Sequential Test and Local Impact Test</b>			
Heritage issues	The effect on heritage also needs to be considered. Suggest that after point 2 of the policy, add; <i>The sequential test shall be applied with due regard to relevant heritage policies (EN4, 5, 6 and 7)</i> . This is identified as particularly relevant to Cranbrook, with the development of sites on the edge of the existing centre in the Conservation Area and AONB.	Reference to heritage is not relevant to the application of the Sequential Test. The Local Plan should be read as a whole and guidance in relation to heritage matters are covered by Policies EN 4 - Historic Environment, EN 5 – Heritage Assets and EN 6 – Shop Fronts.	No changes proposed
Unclear and ambiguous policy	<ol style="list-style-type: none"> <li>As for the Reg 18 consultation – it is maintained that the policy continues to fail to provide a suitably worded over-arching retail, office and leisure use policy. It is unclear and ambiguous and conflicts with NPPF requirements.</li> <li>Dispute para 6.523 of the supporting text - <i>“Applicants will be expected to have demonstrably followed a sequential approach when selecting development sites for town centre uses, including fully exploring how the scheme could be adapted so that it</i></li> </ol>	<p>The policy was amended between Reg 18 and 19 to provide greater clarity and is considered to be consistent with the NPPF.</p> <p>The wording in the supporting text provides guidance on the application of the policy which is based on guidance contained within the NPPG and the Tunbridge Wells Retail, Leisure and Town Centre Uses Study Update – 2021.</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p><u>could be accommodated on a more central site (i.e. disaggregation: operating from a number of units within the centre rather than one single unit)</u>". There is no explicit requirement to disaggregate development proposals as evidenced by various case law and Court decisions (see Dundee, Rushden Lakes, Aldergate, Scotch Corner). Therefore, suggest the underlined text above is removed from the supportive text.</p> <p>3. Disagree with the local thresholds specified in the policy and the lack of justification for them. Therefore, suggest the nationally recognised default position of 2,500 sqm gross threshold for impact assessments relating to retail, leisure and office provision should be used.</p>	<p>The local thresholds have been reviewed in the Tunbridge Wells Retail, Leisure and Town Centre Uses Study – 2021 and are confirmed to still be appropriate.</p>	<p>No changes proposed</p>
<p><b>ED 11: Primary Shopping Areas and Retail Frontages</b></p>	<p>1. As this policy concerns areas that lie within Conservation Areas (particularly Cranbrook, Hawkhurst and Royal Tunbridge Wells), it should contain a reference to compliance with heritage policies. Suggest adding the following to point 2 of the policy: <i>where the premises lie within a conservation area or include a listed building, it complies with relevant heritage policies (EN 4, 5, 6 and 7).</i></p> <p>2. Add 1 (b) iv Other Social Infrastructure uses including venues for community group activities</p>	<p>The Local Plan should be read as a whole, and this issue is sufficiently covered by other policies including Policies EN 4 -Historic Environment, EN 5 – Heritage Assets and EN 6 – Shop Fronts.</p> <p>This would require specific evidence of need in a particular area and a consideration of alternatives. Also, such uses would be expected to be less viable than a business use and hence</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
		not a reasonable option. If a need is established outside of this Plan, it may be allocated through a Neighbourhood Plan.	
<b>ED 12: Retention of Local Services and Facilities</b>	<ol style="list-style-type: none"> <li>1. Suggestion that local services should include primary education sites</li> <li>2. The policy should include reference to the loss of cultural facilities.</li> <li>3. Criterion 1 of the policy should be removed to ensure conformity with paragraph 92 (pre NPPF July update) of the NPPF.</li> <li>4. Paragraph 6.535 affords opportunity for valued and/or potentially viable facilities to be lost. The presence of more than one of the same type of facility does not mean they are both the same or that the users of one can be absorbed by the other.</li> </ol>	<p>Many of the Neighbourhood and Village Centres already have an existing primary school and/or children’s nursery to serve the local area, which Policy ED12 seeks to protect and retain.</p> <p>Add recreation <i>and cultural</i> into last line of para 6.534 of supporting text</p> <p>It is considered that the policy is in conformity with Paragraph 93 (previously paragraph 92) of the NPPF, particularly in relation to Para 93 (c) <i>guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs.</i></p> <p>Existing wording explains any loss of facilities would need to be justified through the considerations set out at paragraph 6.536.</p>	<p>No changes proposed</p> <p>Yes - amend paragraph 6.534 as opposite</p> <p>No changes proposed</p> <p>No changes proposed</p>

## 6.8 Transport and Parking (Policies TP1 to TP6)

### Notes:

1. There were 39 representations against the Transport and Parking chapter, spread across all policies, although with less than 10 representations on each policy.
2. Where reference is made to a Development Management (DM) policy in the context of a representation on a specific site allocation rather than the DM policy wording itself, this is dealt with under Section 5 – Place Shaping and not included in the table below]

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
<b>TP1: Transport Assessments, Travel Plans, and Mitigation</b>	1. Policy should state that all additional traffic movements have to be compensated by developer funding infrastructure to enable motor traffic reduction elsewhere.	This would not be justifiable and be contrary to national policy.	No changes proposed
	2. Should be a case-by-case approach to the requirement of the submission of a Transport Assessment, with a specific concern that the thresholds based on m2 do not reflect the scale of activity to be undertaken within, or the likely number of employees and HGVs and other vehicles attending the site daily, or location.	The policy wording as currently written allows for such a flexible approach (i.e. irrespective of whether KCC's thresholds are met having regard to site-specific circumstances).	No changes proposed
	3. Third paragraph is weakened by using terms such as 'will seek' rather than 'require'.	This is written in the context of contributions being a potential resolution to a transport impact, while it is clear that " <i>Where a proposal necessitates highway improvements, the developer will be <u>required</u> to meet the cost of the improvements and deliver the identified scheme..</i> "	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
<b>TP2: Transport Design and Accessibility</b>	<ol style="list-style-type: none"> <li>1. A requirement to have regard to DfT’s Local Transport Note guidance on cycle infrastructure design, should be added to point 3 of the policy.</li> <li>2. The County Council states that the final paragraph of the policy (‘Shared Space Schemes...’) does not necessarily reflect its approach, as highway authority, which it would consider as part of the Transport Assessment; also, the phrasing of the criteria doesn’t make sense, as written.</li> <li>3. A quota of charging points runs a significant risk of obsolescence. The provision of cabling to car parking spaces to enable future installation of charging points in line with wishes of residents is a more practical measure.</li> </ol>	<p>This is one of a series of detailed Local Transport Notes relevant to transport design, so it is considered more appropriate to make textual reference, collectively, in paragraph 6.550.</p> <p>The use of shared spaces may be appropriate in certain circumstances and it is considered useful to highlight their potential, whilst also clarifying that there would need to be discussion and agreement with KCC, as local highway authority.</p> <p>Noted, however the Policy makes it clear that the developer must refer to the latest Electric Vehicle Charging Points for New Development Guidance Note for Applicants. This guidance will be updated in the future if required based on future trends/changes to technology.</p>	<p>Yes – textual amendment – see Schedule</p> <p>Yes – add reference to KCC role and omit instances</p> <p>No changes proposed</p>
<b>TP3: Parking Standards</b>	<ol style="list-style-type: none"> <li>1. The imposition of minimum parking standards could generate a requirement for more parking than necessary as well as undermine sustainable transport strategies and run counter to strategic objectives that encourage active travel and reduce impact on the highway network.</li> <li>2. The blanket approach in the three zones fails to take into account any diversity of situations within these areas.</li> </ol>	<p>Minimum residential parking standards are in line with the NPPF and based on extensive analysis of average car/van ownerships in the borough. As noted within the supporting text, they will be duly reviewed to assess whether ownership levels have changed. They are not considered to detract from policies and proposals for active travel.</p> <p>The policy offers sufficient flexibility whereby it may allow proposals to depart from the standards within the policy should any identified exceptional circumstances be met.</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>3. Standards will inhibit the design process, going beyond guidance to stipulate a design response, which is not positive planning. Policy also fails to acknowledge principle of using design to change patterns of car ownership and/or encourage sustainable transport choices, with specific reference to tandem parking providing 'side-friction' from on-street parking to slow down drivers.</p> <p>4. Requirement to delivered at least one space per unit in Zone B could stifle the ability to achieve the optimum density of development, resulting in sites with more parking than necessary, such as where proximity to a mainline station. Table 14 should be amended to include, under Zone B, “unless lower provision can be robustly justified”.</p> <p>5. Maximum standards for non-residential development do not appear to comply with paragraph 106 of the NPPF which says that maximum standards should only be set where there is clear/compelling justification.</p> <p>6. Given existing parking issues in Hawkhurst, it is questioned whether there will be sufficiently good public transport/cycle routes, and/or sufficient public parking spaces for it to be within Zone B rather than Zone C.</p>	<p>Providing for the likely level of car ownership is part of meeting the needs of users in the design process. It has been found that tandem parking can reduce likelihood of off-street parking (due to the need to move one car to the access the other), thereby resulting in parking on internal development roads, both to the detriment of amenity and (at times) reducing pavement widths.</p> <p>See response at 2 above (i.e. there is sufficient flexibility within the policy).</p> <p>Maximum standards are currently, and are expected to be, justified within KCC’s latest guidance. The current KCC guidance (as per TWBC’s current parking policy) is SPG4.</p> <p>New residential parking standards are designed to ensure that existing parking issues are not exacerbated. Parking standards are reflective of local car/van ownership levels.</p> <p>It is noted within the policy and supporting text that Use Class C2 schemes will be required to</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>7. Policy does not provide bespoke parking standards for specialist older persons' housing, the need for which is variable depending on nature of housing. Contended that it is not be possible/appropriate to attempt to apply standards to all these forms of accommodation; also cycle parking unlikely to be required for elderly persons'/extra care housing, An internal mobility scooter store for use by residents is a far more relevant requirement.</p>	<p>deliver parking space provision in accordance with KCC's latest guidance as appropriate, these being maximum standards, appreciative of the lower car ownership associated with higher degrees of health support provided.</p> <p>In contrast, age-restricted, sheltered and extra care housing covers a range of circumstances and the prudent approach taken by the County Council is supported. If there are cases where a particular form of specialist housing is still classed as C3 but is demonstrated to justify lesser parking provision, these would be material considerations in the determination of a planning application.</p> <p>Cycle parking requirements are not onerous and would appear to be consistent with encouraging active living. Nonetheless, the point regarding mobility scooters will be forwarded to KCC.</p>	<p>No changes proposed</p>
<p><b>TP4: Public Car Parks</b></p>	<p>1. Should consider the future potential use of car parks as electric car charging hubs, both in the town centre and in car park locations near residential area. Public car parks should all have at least one charging point.</p> <p>2. Anticipating car park demand is uncertain. Recent years have shown a significant decline in car park use. Policy criteria requiring no net loss of parking space (or lengthy explaining where developments might be built) may be short-sighted and</p>	<p>Noted. This is addressed within the supporting text (paragraph 6.566) as well as Policy TP2. The comment regarding Council-owned car parks will be passed to the Council's Parking section.</p> <p>Noted, but public car parking occupancy has been generally high (prior to the pandemic – see Residential Parking Standards Topic Paper). Car access supports the economic roles of commercial cores. However, Plan makes it clear that it will aim to prioritise active travel/public</p>	<p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	discourage active travel. Options should be considered for alternative/additional uses.	transport. A review of the Council’s Parking Strategy is planned.	
<b>TP5: Safeguarding Railway Land</b>	<ol style="list-style-type: none"> <li data-bbox="472 400 1133 807">1. Hadlow Estate supports the principle of this policy but suggests that, in relation to Tudeley Village, the following wording is added “<i>where identified in accordance with the Masterplan to be development in respect of Policy STR/SS3 The Strategy for Tudeley Village, land either side of the railway line within Tudeley Village will be safeguarded for potential bridge crossings and a potential rail halt and shall not be made available for other uses unless specifically identified in the Masterplan</i>”.</li> <li data-bbox="472 807 1133 1206">2. Paragraph 6.574 says that where sections of the former Hop Pickers Line route are no longer available for walking/cycling, suitable alternatives/new links may need to be found, to be provided through negotiation with individual landowners as necessary. The Policy fails to say what will happen if individual landowners refuse unlike for strategic road links. Use of CPO powers if needed should be added.</li> <li data-bbox="472 1206 1133 1378">3. Although the policy refers to the lines as defined on the policies map, and although sections are shown on some inset maps,</li> </ol>	<p data-bbox="1149 400 1812 568">This suggestion has been previously considered, and it remains the view that this amendment is not necessary or appropriate within the context of a borough-wide policy relating to the safeguarding of existing infrastructure.</p> <p data-bbox="1149 568 1812 807">The proper consideration of the provision of a new railway station/halt at Tudeley village and any case for enabling this in the future is more properly contained within the Strategic Sites chapter and as part of the masterplanning work to support that.</p> <p data-bbox="1149 807 1812 1206">The use of CPO powers would be for the Council to take, corporately, having due regard to the circumstances at the time, including the consideration of “off-line” sections. Policy STR 4: Ensuring Comprehensive Development, clarifies that ‘the Council will use its Compulsory Purchase Order powers if necessary to deliver strategic transport links, and/or will work in partnership with other organisations or authorities as necessary.’</p> <p data-bbox="1149 1206 1812 1378">The boundaries of the safeguarded routes, as shown on the extant Local Plan (SALP 2016) are not being amended. However, for clarity, the Council will produce an interactive map showing</p>	<p data-bbox="1827 400 2045 480">No changes proposed</p> <p data-bbox="1827 807 2045 887">No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	there seem to be no policies maps which show the lines clearly in their entirety.	all policies across the borough alongside the submission of the Plan.	
<b>TP6: Safeguarding Roads</b>	<p>While there is support from KCC, as the highway authority and other community groups, there are various concerns raised to certain schemes:</p> <ol style="list-style-type: none"> <li data-bbox="472 507 1106 842">1. The proposed A21 Kippings Cross to Lamberhurst Improvement and A228 Colts Hill Bypass will have substantial effects on AONB countryside and biodiversity. Land should be safeguarded for a largely online scheme; also, there appears to be no confirmation in the supporting documents that Highways England still intends to construct an upgrade of the A21 from Kippings Cross to Lamberhurst.</li> <li data-bbox="472 1286 1106 1380">2. Kent Wildlife Trust notes that, while they are not making a formal objection to the safeguarded A228 bypass route, it suggests</li> </ol>	<p>It is noted within the supporting text that neither scheme is required to mitigate the impact of strategic growth planned in Paddock Wood and Capel parishes, although are to remain safeguarded as long-term options. These are both previously approved routes. Also, the supporting text makes it clear that regard must be given to the A228's location within the AONB, and the same would be expected for the A21 Kippings Cross to Lamberhurst route within the AONB. Natural England will be consulted throughout the consideration of the exact chosen route, having regard to environmental and landscape impacts. The supporting text makes it clear that land for the A21 is safeguarded along National Highway's preferred route. Although not in the current programme, it is regarded as prudent to safeguard the line in the event of further needs arising in a future plan period.</p> <p>While the A228 route is not required to mitigate development proposed in the Plan, it remains a long-term cross-district transport priority in the Kent County Council Transport Plan 2016-2031 and is accordingly safeguarded.</p> <p>The A228 has previously been through a detailed design process, with consideration of all environmental effects, and found to be</p>	<p>No changes proposed</p> <p>No changes proposed</p> <p>No changes proposed</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>that ‘<i>Option 1 – KCC bypass</i>’ would not meet the test of “wholly exceptional reasons” for destroying ancient woodland as set out in the NPPF; also, there is concern about potential impacts to traditional orchard priority habitat located along the A228, which would not be in accordance with paragraph 174b of the NPPF. Needs further information to fully establish the wildlife impacts of options 2 and 3.’</p> <p>3. Policy says that the two roads, as defined on the Policies Map, are safeguarded, but there is no Policies Map accompanying the PSLP which shows either of these routes in its entirety and/or in sufficient detail for it to be clear what the actual routes to be safeguarded are</p>	<p>acceptable. Further consideration of habitat impacts would be reviewed as part of the development of a new scheme in the context of prevailing NPPF policies. However, this does not detract from the need to safeguard the approved route from development that may prejudice it at this point.</p> <p>The boundaries of the safeguarded routes, as shown on the extant Local Plan (SALP 2016) are not being amended. However, for clarity, the Council will produce an interactive map showing all policies across the borough alongside the submission of the Plan.</p>	<p>No changes proposed</p>

## 6.9 Open Space, Sport and Recreation (Policies OSSR1 and OSSR2)

### Notes:

- 1) *Relatively few representations have been received in relation to this chapter: Policy OSSR 1 – 8 representations; Policy OSSR 2 – 7 representations.*
- 2) *Where reference is made to a Development Management (DM) policy in the context of a representation on a specific site allocation or omission site rather than the DM policy wording itself, this is dealt with under Section 5 – Place Shaping and not included in the table below.*

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
<b>OSSR 1: Retention of Open Space</b>			
Criterion 4 of Policy OSSR 1	Sport England advises that Criterion 4 is not consistent with NPPF para 97 or its Playing Field Policy and should be deleted. Suggested amendment - where sites in existing or last in use for sport or recreation use are allocated for another purpose / use / development that this is subject to <i>An assessment having been undertaken which has clearly shown the area of playing field which would be lost as a result of the development is surplus to requirements; or the loss of playing fields resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.</i>	Criterion 4 of Policy OSSR 1 is an additional criterion to that set out within the NPPF (Paragraph 97, now Paragraph 99) and should be applied in conjunction with the other criteria detailed within the policy which are consistent with the NPPF. It is not considered necessary or justified to delete this criterion from the policy.	No changes proposed
Inset Maps and Open Space Study	On Inset Map 20 (Brenchley), two areas are identified as existing open spaces, even though these areas have been in private ownership for many years and include a large area north of the parish, formerly occupied by Moatlands Golf Club, which was sold in 2008 and is now owned by several private landowners, and the former allotments on Tibbs Court Lane, north west of Southfield Cottages which are also now in private ownership.	This is confirmed and it is accepted that the mapping is out of date and that these areas should be removed from the relevant Inset Map.	Yes – Amend Inset Map 20 to delete golf course and allotments designations.
Equestrian establishments	The Open Space, Sport and Recreation Study on which this policy is based fails to consider equestrian sport and recreation. There are only	The Policy maps do not include commercial sports uses such as riding stables and it is not	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	four riding establishments in the borough which should be preserved. Policy maps should be amended to include licensed riding establishments and livery stables.	considered appropriate to identify these on the policies maps.	
<b>OSSR 2: The Provision of Publicly Accessible Open Space and Recreation</b>			
Convenient and safe alternative provision	The reference to alternative provision mentioned in Paragraph 6.591 should clarify what could be considered “ <i>conveniently and safely accessible</i> ”	This is sufficiently addressed through other strategic, site allocation and Development Management policies across the Plan.	No changes proposed
Woodland Access Standards	The Woodland Trust generally support the policy, but suggest adding its Woodland Access Standard (designed to complement the ANGSt Standard and in line with the Government’s new England Trees Action Plan 2021) into Table 17 and to include under the heading Natural Green Space <i>a minimum provision of woodland:</i> <ul style="list-style-type: none"> <li>• <i>One area of accessible woodland no less than 2ha in size within 500m of home</i></li> <li>• <i>One area of accessible woodland of no less than 20ha within 4km of home</i></li> </ul>	Woodland may not be a suitable habitat/public space in some locations and so to set it as a standard may give rise to conflict with other wider environmental objectives, e.g. the AONB Management Plan. In addition, the borough already exceeds the Woodland Trust’s national target for woodland cover	No changes proposed
Field in Trust guidelines	CPRE (as for Reg.18) and B&MPC consider Field in Trust Guidelines (FIT) should be applied to smaller developments in rural areas; and B&MPC suggest a levy (based on the	FIT guidelines were considered as part of the Open Space, Sport and Recreation Study and the quantity guidelines in the policy. FIT accepts that some standards are not always	No changes proposed

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
	number of dwellings) be sought for smaller developments in rural areas.	appropriate in practice and can result in inadequate provision or a lot of small provision which is either undeliverable or can result in a proliferation of smaller play areas/amenity space which is not always desirable. It is considered that smaller provision would be better dealt with under Neighbourhood Development Plans.	
Designation of Village Greens	The supporting text should mention that new open spaces will be designated as village greens.	This may not be applicable or appropriate for all forms of open space and is a designation which falls outside the remit of this policy.	No changes proposed

## **Section 7: Delivery and Monitoring**

No main issues were raised in response to Chapter 7 Delivery and Monitoring.



## Section 9: Late Representations

### Notes:

2. *This table summarises representations received following the end of the Regulation 19 Pre-Submission Local Plan consultation. Separate tables summarise main issues raised in duly made representations (those received within the consultation period).*
3. *The total number of late representators summarised in this table is eight.*

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
Highways England General Comments	1. Highways England identified a number of junctions which have congestion issues; therefore strongly advised that emphasis within Local Plan is placed on reducing need to travel, and use sustainable modes where travel is necessary rather than rely on improvements being in place.	Noted. In accordance with STR 6 (Transport and Parking), active travel, followed by public transport, will be prioritised over the private car.	No changes proposed.
	2. Kippings Cross/Blue Blues requires sensitivity testing as part of evidence base and will also be required as part of the assessment of any forthcoming applications likely to affect these junctions.	Noted. The Kippings Cross/Blue boys junction has been sensitivity tested as part of the sensitivity testing of the modelling work for the evidence base with mitigation measures identified in the Transport Assessment Addendum 2 report (October 2021).	No changes proposed.
	3. May be helpful to include text in the Plan (e.g. para 2.39) covering applicants' need to engage with Highways England. Could refer to need for developers of sites that by	Noted. Is reference at para 6.548 (supporting text to Policy TP1 Transport Assessments and Statements) to the need for mitigation, and that to be determined in agreement with Highways	Given text elsewhere in plan – no proposed changes.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
	<p>virtue of its location or traffic generation may affect safety or operation of strategic road network to provide robust evidence regarding impacts and, as appropriate, to mitigate them. Mitigation likely to be agreed/delivered via use of S278 agreements rather than S106 or CIL; cross referencing to national transport policy and Highways England guidance would also assist; process should out what infrastructure is needed to enable delivery of all development, and also detail associated costs, sources of funding, timescales for delivery and gaps in funding; should also cross reference text on Transport and Parking, Section 6. Similar text/cross references should also be included in IDP.</p> <p>4. Vision and Objectives 1 (para 3.4) makes no mention of sustainable travel.</p>	<p>England (and others). Policy TP1 has requirements about how infrastructure improvements will be provided (i.e. funded by development).</p> <p>Noted. A clear hierarchy prioritising active and sustainable travel is set out in STR 6 (Transport and Parking).</p>	<p>No changes proposed.</p>
<p>SWECO Transport Modelling</p>	<p>Highways England note the following observations/need for further discussions on the SWECO Transport Modelling:</p> <p>1. Strategic model construction, where some assumptions appear to have gone beyond what is normally accepted. Need to understand</p>	<p>Noted and further sensitivity testing of the modelling work has been undertaken to address the issues raised.</p> <p>Noted. Further information is set out in Statement of Common Ground between NH and TWBC – including on sensitivity testing, with a further Statement of</p>	<p>No changes proposed.</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
	<p>justification for approach taken; potentially model will need adjusting.</p> <p>2. Discussion regarding calibration/validation and forecasting approach taken.</p> <p>3. Clear that further junction augmentation required by detailed application junction models to add clarity around traffic impacts of both Local Plan development and cumulative impacts.</p>	Common Ground between National Highways (as now known) and TWBC to be provided ahead of the Examination.	
Policy AL/RTW 6	<p>1. Consider that the site is not a greenfield site</p> <p>2. The development proposed is too dense ay 96dph</p> <p>3. TPO affecting over half of the trees on the site</p> <p>4. Traffic impact including concerns over the access and highways safety</p> <p>5. Concern over loss of biodiversity</p> <p>6. Impact on residential amenity</p>	Please see responses to AL/RTW 6 within Section 5: Place shaping.	No changes proposed
STR/SS 1 (The Strategy for Paddock Wood, including land at east Capel)	Regarding proposed bypass and link roads, whilst Highways England has no objection in principle, in order to provide a full response, proposals need to be supported by a robust review of DLP model, and supplemented by additional junction modelling in each area; also need to be supported by full transport assessment and likely geo-technical, flooding, and environmental impact assessments.	<p>Noted. Further information is set out in Statement of Common Ground between NH and TWBC – including on sensitivity testing, with a further Statement of Common Ground between National Highways (as now known) and TWBC to be provided ahead of the Examination.</p> <p>It is agreed that further detailed work will be required covering geo-technical, flooding and environmental impact</p>	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
		assessment for the proposed bypass and link road at Paddock Wood/east Capel.	
STR/SS 2 (The Strategy for Paddock Wood Town Centre)	Petition submitted against consideration to close Paddock Wood railway bridge.	This issue is already summarised in the summary for STR/SS 2 (The Strategy for Paddock Wood Town Centre).	No changes proposed.
STR/SS 3 (The Strategy for Tudeley Village)	Highways England identify that further modelling and junction assessments would be required to ensure that Vauxhall Junction is able to accommodate proposed level of growth and not require further mitigation.	Noted. Further information is set out in Statement of Common Ground between NH and TWBC – including on sensitivity testing, with a further Statement of Common Ground between National Highways (as now known) and TWBC to be provided ahead of the Examination.	No changes proposed.
STR/SS 3 (The Strategy for Tudeley Village)	<p>General objections to Tudeley Village and land in east Capel, including the following issues:</p> <ul style="list-style-type: none"> <li>• Proximity to flood plain/flooding issues; flood risk ignored.</li> <li>• TWBC will receive all additional Council Tax while TMBC will have to provide/maintain majority of infrastructure, public services, and education.</li> <li>• Does not meet local needs; attract commuters from London, increasing affordability issues.</li> <li>• Impact on biodiversity; loss of wildlife.</li> <li>• Removal of Green Belt (currently very productive fertile agricultural land).</li> <li>• Loss and closure of farms and small businesses, destroying local farming communities.</li> </ul>	Issues raised are similar to those already summarised in the summary for STR/SS 3 (The Strategy for Tudeley Village).	No changes are proposed.

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<ul style="list-style-type: none"> <li>• Focus should be on regenerating town itself and many available brownfield sites.</li> <li>• Lack of public engagement.</li> <li>• Need for 6,800 homes within Capel parish not justified.</li> <li>• Development will be dependent on private car use.</li> <li>• Current road network unable to accommodate increase in cars.</li> <li>• Proposed infrastructure will not be online until end of Plan period.</li> <li>• Increase in pollution; cumulative impact from increase in cars and HGVs; negative environmental and well-being/quality of life implications for humans and biodiversity/wildlife.</li> <li>• Unclear why alternative sites have been rejected (e.g. Horsmonden and Frittenden); not located in GB and closer to mainline railway services; no flooding issues. Unclear why Horsmonden and Frittenden identified as having impact on AONB, but Tudeley and east Capel not.</li> <li>• Unclear why Castle Hill and Kippings Cross were rejected, which are both located close to the A21.</li> <li>• Limited infrastructure, and proposed infrastructure may not happen due to substantial costs.</li> <li>• Impact on character/identity.</li> </ul>		

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	Impact on Hartlake Road and Golden Green residents.		
Section 5: Place shaping: Pembury	<ol style="list-style-type: none"> <li data-bbox="477 341 1021 608">1. <u>Congestion</u>: Severe congestion around Pembury is identified with reference to an A21 safety package including works between Tonbridge and Lamberhurst, with specific locations identified. The inability of small-scale schemes to add capacity to the network is identified.</li> <li data-bbox="477 644 1021 1182">2. Various references are made to congestion issues, pinch points, modelling requirements and mitigation being required and junctions including A21/A228 and Kipping’s Cross roundabout. Various references to existing planning consents and a need for sensitivity testing is identified as part of evidence base for the PSLP as well as the need to potentially use Grampian conditions in the future to limit occupation, as well as Transport Assessments needed for some sites and careful consideration of intensification of use of junctions (A21/Henwood Green Road)</li> <li data-bbox="477 1219 1021 1378">3. <u>Responsibility of Local Plan and planning applications</u>: reference is made to the need to assess individual/ cumulative impacts and mitigation and delivery of</li> </ol>	<p data-bbox="1050 341 1594 576">Noted. Further information is set out in Statement of Common Ground between NH and TWBC – including on sensitivity testing, with a further Statement of Common Ground between National Highways (as now known) and TWBC to be provided ahead of the Examination.</p> <p data-bbox="1050 644 1413 676">Noted. Response as above.</p> <p data-bbox="1050 1219 1594 1378">Noted. In addition to the sensitivity testing undertaken, Policy TP1 is clear that the cumulative impact should also be assessed in transport assessments/statements.</p>	<p data-bbox="1624 341 1973 373">No changes are proposed.</p> <p data-bbox="1624 644 1973 676">No changes are proposed.</p> <p data-bbox="1624 1219 1973 1251">No changes are proposed.</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>improvements by proposals/the Plan (with reference to identification, design, management and funding and mechanisms).</p> <p>4. <u>Reference to need for emphasis being on reducing the need to travel/use of more sustainable modes</u> rather than reliance on highway improvements.</p>	<p>Noted. In STR 1 the Development Strategy sets out the approach to sustainable growth that will reduce the need to travel including effective use of urban and previously developed land and growth based on garden settlement principles. A clear hierarchy prioritising active and sustainable travel is set out in STR 6 (Transport and Parking).</p>	<p>No changes proposed.</p>
<p>Development Management Policy: TP6 and para. 6.582</p>	<p><u>Amendment sought to Policy TP6 and para. 6.582</u> to delete reference to safeguarded land for future dualling of the A21 (Kipping's Cross to Lamberhurst roundabout).</p>	<p>While not required to mitigate growth proposed in the Local Plan, as per policy TP6, the Council is safeguarding the A21 Kippings Cross to Lamberhurst route as it remains a long-term cross-district transport priority in the Kent County Council Transport Plan 2016-2031.</p> <p>Discussions will continue on this point ahead of Examination, with an updated position to be provided in the further SoCG mentioned previously. Further discussions</p>	<p>No changes proposed</p>
<p>Policy H 6 Housing for Older People and People with Disabilities</p>	<p><u>All new homes should be built to M4(3) standards</u></p>	<p>The Local Plan is informed by an evidence base (SHMA and 2017 SHMA Update and Housing Needs Study 2018) that does not support a policy that would require M4(3) standards on all market housing.</p>	<p>No changes proposed.</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
STR 2 (Place Shaping and Design)	Highways England consider that the list of design guidance in para 4.64 should include various design guidance relevant to roads such as the Design Manual for Roads and Bridges and the Manual for Streets.	Noted. Para 4.64 does not include a list of design guidance, but rather this is set out at para 6.24. Para 6.24 already includes Manual for Streets, but does not include Design Manual for Roads and Bridges (DMRB).	Change to insert Design Manual for Roads and Bridges (DMRB) in bullet points at para 6.24
STR 4 (Ensuring Comprehensive Development)	Highways England note that a ‘holistic’ approach should be taken for larger sites in terms of transport infrastructure within the wider area, and an assessment made of sensitive junctions likely to be impacted by proposed development. Major sites within PSLP cannot be assessed in isolation.	Noted. A comprehensive approach to transport assessment has been undertaken.	No changes proposed.
Section 5 Place Shaping Policies: Cranbrook	<p>Given multiple proposals are for &gt;100 dwellings, Highways England recommend a full transport assessment accompanies proposal. TA should include junction modelling for A21/A268 roundabout.</p> <p>Proposed that STR/CRS 1 is updated to include statement that “all development proposals establish an acceptable impact upon the Hawkhurst crossroads junction (the A229/A268) and the Flimwell crossroads (the A21/A268)” in line with policy STR/HA 1.</p>	<p>The request for this addition is noted. Transport modelling work and sensitivity testing has been undertaken to support the Local Plan.</p> <p>However, with the exception of AL/CRS2 Corn Hall, Cranbrook (for 35-45 dwellings) and Policy AL/CRS 6 Land south of The Street, Sissinghurst, all housing sites at Cranbrook and Sissinghurst have planning permission or a resolution to grant permission.</p> <p>National Highways raised no objection to applications for AL/CRS1 (Land at Brick Kiln Farm) which has planning permission for 1880 houses and AL/CRS3 (Turnden</p>	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
		<p>Farm) which has a resolution to grant for 170 houses.</p> <p>The applications for AL/CRS2 and 6 will be accompanied by a Transport Assessment/Statement, which will (if required) assessing the impact on the Flimwell crossroads.</p> <p>Accordingly it is not considered that further changes are required.</p>	
Section 5 Place Shaping Policies: Hawkhurst	<p>Highway capacity improvements proposed to mitigate impact.</p> <p>Transport Assessment submitted with 19/02025/HYBRID planning applications.</p> <p>S106/S278 Agreement</p> <p>Junction sensitivity tests may be required as part of a cumulative impact assessment and modelling at A21/Flimwell and Hawkhurst Junction (A229/A268) as part of any future planning applications. Increase in proposed housing number likely to cause congestion increases that will require appropriate mitigation.</p>	<p>Noted.</p> <p>All housing sites for allocation in Hawkhurst parish have planning permission, except AL/HA4 (land at Cophall Avenue and Highgate Hill). No objection was raised on an application for this site by National Highways during its consideration in 2021.</p> <p>Further modelling work has been undertaken in response to the issues raised by NH with additional information set out in Statement of Common Ground between NH and TWBC – including on sensitivity testing, with a further Statement of Common Ground between National Highways (as now known) and TWBC to be provided ahead of the Examination.</p>	No changes proposed.
Section 5 Place Shaping Policies:	The location of Matfield means there is only 1 primary route option for traffic accessing the A21. Recommend junction	Further modelling work has been undertaken in response to the issues raised by NH with additional information	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
Brenchley & Matfield	modelling at the A21/B2160 roundabout. Mitigation at roundabout may be required to accommodate increase in trips.	set out in Statement of Common Ground between NH and TWBC – including on sensitivity testing, with a further Statement of Common Ground between National Highways (as now known) and TWBC to be provided ahead of the Examination.	
Section 5 Place Shaping Policies: Horsmonden	T junction modelling recommended at the B2162 Lamberhurst Rd/ A262 to understand impact of development turning right onto the A262 to join A21.  Roundabout modelling recommended at Forstal Farm roundabout. Mitigation at roundabout may be required to accommodate increase in trips.	Further modelling work has been undertaken in response to the issues raised by NH with additional information set out in Statement of Common Ground between NH and TWBC – including on sensitivity testing, with a further Statement of Common Ground between National Highways (as now known) and TWBC to be provided ahead of the Examination.	No changes proposed.
Section 5 Place Shaping Policies: Lamberhurst	Roundabout modelling recommended at Forstal Farm roundabout.	Further modelling work has been undertaken in response to the issues raised by NH with additional information set out in Statement of Common Ground between NH and TWBC – including on sensitivity testing, with a further Statement of Common Ground between National Highways (as now known) and TWBC to be provided ahead of the Examination.	No changes proposed.
Section 5 Place Shaping Policies: Five Oak Green	Highways England have the following comments:  Strategic transport links shall be provided between Tonbridge, Tudeley Village, the A228, Five Oak Green, Royal Tunbridge	Noted. Proposed strategic infrastructure is set out in STR 6 (Transport and Parking) and in the Infrastructure Delivery Plan.	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
	Wells/Southborough, and land at Capel and Paddock Wood and Paddock Wood Town Centre. To include the provision of an offline A228 strategic link. Links from Tudeley Village to the east should minimise the impact on the road network in the settlement of Five Oak Green. The exact location of such a link has not been determined;		
Section 5 Place Shaping Policies: Paddock Wood	<p>Highways England have the following comments:</p> <p>Transport infrastructure to include the A228 Colts Hill bypass, a distributor road in the eastern part of Paddock Wood, and bus and cycle links from Paddock Wood to Tonbridge via Tudeley.</p> <p>Mitigations measures required for Kippings Cross/ Tonbridge Rod Roundabout; full modelling assessment.</p> <p>Trip distribution assessment onto M20.</p>	<p>Noted. Proposed strategic infrastructure is set out in STR 6 (Transport and Parking) and in the Infrastructure Delivery Plan.</p> <p>Noted. Further modelling work has been undertaken in response to the issues raised by NH with additional information set out in Statement of Common Ground between NH and TWBC – including on sensitivity testing, with a further Statement of Common Ground between National Highways (as now known) and TWBC to be provided ahead of the Examination.</p>	No changes proposed.
Section 5 Place Shaping Policies: Capel (Tudeley)	<p>Highways England have the following comments:</p> <p>Local road network improvements for A228 (Colts Hill bypass).</p>	Further modelling work has been undertaken in response to the issues raised by NH with additional information set out in Statement of Common Ground between NH and TWBC – including on	No changes proposed.

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
	<p>Eastern link from Tudeley Village to be considered.</p> <p>TA required with junction modelling and trip distribution for A21/A26 Pembury Rd Roundabout and further distribution onto M20 and M26.</p>	<p>sensitivity testing, with a further Statement of Common Ground between National Highways (as now known) and TWBC to be provided ahead of the Examination.</p>	
<p>Section 5 Place Shaping Policies: Southborough</p>	<p>Highways England have the following comments:</p> <p>Transport Assessment likely for this area given the relationship to the A21 and Royal Tunbridge Wells.</p> <p>Trip distribution and assignment to the wider M25/26 should also be assessed.</p> <p>For Mabledon, safe and direct access will be provided from the A26. Full capacity modelling would be required for the junction given its proximity.</p>	<p>Further modelling work has been undertaken in response to the issues raised by NH with additional information set out in Statement of Common Ground between NH and TWBC – including on sensitivity testing, with a further Statement of Common Ground between National Highways (as now known) and TWBC to be provided ahead of the Examination.</p> <p>Criteria in relation to the requirement for a highways assessment and the provision of a safe and acceptable access arrangement from the A26 is included at criteria 1 of Policy SO 2 which adequately deals with this issue.</p>	<p>No changes proposed.</p> <p>No changes proposed</p>
<p>Section 5 Place Shaping Policies: Royal Tunbridge Wells</p>	<p>Highways England have the following comments:</p> <p>Transport Assessment likely for this area given the relationship to the A21 at various junction points, especially A21/A26.</p>	<p>Further modelling work has been undertaken in response to the issues raised by NH with additional information set out in Statement of Common Ground between NH and TWBC – including on sensitivity testing, with a further Statement of Common Ground between National Highways (as now known) and</p>	<p>No changes proposed</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
	Trip distribution and assignment to the wider M25/26 should also be assessed.	TWBC to be provided ahead of the Examination.	
AL/SO 2 (Land at Mableton House)	Site promoters of Mableton House continue to promote the development of a hotel at the site and support the Council's policy AL/SO 2 for the house, grounds and parkland. Site promoter supports wording amendments since Reg.18.	Support for the allocation policy AL/SO 2 from the site promoter is noted.	No changes proposed
EN 7 (Advertisements)	For completeness, Highways England considers that the supporting text should cross reference to DfT Circular 02/2013 that contains guidance regarding advertising along, or visible from, the Strategic Road Network.	It is agreed that reference should be made to this Circular in the supporting text to the Policy, by adding in a new paragraph after existing paragraph 6.117 to read as follows:  <i>For advertisements located along, or visible from the Strategic Road Network (motorways or some A roads), National Highways advises that regard should be had to the Department of Transport's Circular 02/2013 (or any update to this).</i>	Yes, as a minor modification as set out in the table of minor modifications
EN 26 (Sustainable Drainage Systems)	Highways England notes that there is no mention of where highways surface runoff may connect into various highway systems within Policy EN 24. Policy should be amended to reflect national policy regarding the Strategic Road Network (in line with DfT C2/13 para 50).	It is agreed that reference should be made to this Circular in the supporting text to Policy EN26, rather than Policy EN24 as this is more relevant, by adding in a new paragraph after existing paragraph 6.289 to read as follows:  <i>Developers are also advised to have regard to the Department for Transport's Circular 02/2013 (paragraph 50)(or any update to this) in relation to water run-off that may arise due to proposed development. The Circular advises that such water run off will not be accepted into the highway drainage systems,</i>	Yes, as a minor modification as set out in the table of minor modifications

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
		<i>and there should no new connections into those systems from third party development or drainage systems.</i>	
ED 1 (Key Employment Areas)	<ol style="list-style-type: none"> <li>1. Highways England note that a large number of employment sites (specifically B8) can be predominantly vehicle-based. Therefore, as well as providing a Transport Assessment, a route distribution assessment will be required. This requirement should be included in policy/text as appropriate.</li> <li>2. Highways England recommends that policy/text explicitly states that applications for parcel delivery companies are dealt with on own merits and not automatically considered to be in accordance with Local Plan (as tend to generation up to 6-8 times more traffic as other B8 uses).</li> </ol>	<p>Highways England submitted both of these comments in response to the Draft Local Plan Regulation 18 consultation, and the following wording was added to the supporting text of the PSLP Regulation 19 Policy to address these issues:</p> <p><i>PSLP Paragraph 6.447- Some changes of use/new development proposals may require the submission of a transport assessment to support a planning application, as set out in Policy TP 1: Transport Assessments, Travel Plans, and Mitigation, depending on their size and relationship to the local highway network. This may be particularly relevant where planning permission is required for parcel delivery companies which generate a high number of vehicular movements.</i></p> <p>No further changes are considered to be necessary.</p>	No changes proposed
Infrastructure Delivery Plan	<p>Highways England made the following comments on the IDP:</p> <ol style="list-style-type: none"> <li>1. It would assist to include a map of the borough showing key infrastructure locations.</li> </ol>	A map is included at Figure 1: Local Plan Key Diagram which illustrates the key settlements and key transport	No changes proposed

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>2. While themes are helpful, Plan/IDP should ensure that a holistic approach is taken; e.g., to ensure the transport implications of the delivery of education, health, energy or communications provision in particular locations are assessed at the outset.</p> <p>3. Theme 1 Transport: Text should be included to acknowledge that mitigation is required as a result of development within the borough may be located beyond its boundary; e.g., at the Flimwell Crossroads.</p>	<p>infrastructure and road improvements. It is difficult to clearly show all of the key infrastructure locations on a map of this scale and is not considered appropriate.</p> <p>A holistic approach has been taken and considered as part of the overall plan preparation. The Themes set out the overall needs per service area and the Infrastructure Delivery Schedule details all of the infrastructure requirements per settlement as well as identifying borough wide infrastructure.</p> <p>Agreed – amended wording proposed below:</p> <ul style="list-style-type: none"> <li>• Cross boundary infrastructure; Paragraph 3.16</li> <li>a. Individual site allocations will bring forward site-specific mitigation on the local road network, through the mechanism of site-specific Transport Assessments. It is also acknowledged that mitigation required as a result of development within the borough may be located beyond its boundary; for example, at the Flimwell Crossroads, within East Sussex.</li> </ul>	<p>No changes proposed</p> <p>Yes, as amendment in IDP.</p>

Policy/Topic area	Main issues	TWBC response	Changes – Yes/No
	<p>4. Table 1: Equestrians should be included under transport.</p>	<p>Reference will be made to equestrians (see below), although there are no specific equestrian requirements identified.</p> <p>Table 1 – Types of Infrastructure Under ‘Cycling and Walking’ – amend to say ‘Cycling and walking including Public Rights of Way’</p> <p>Amendment to paragraph 3.61 as follows  <i>A growing population will undoubtedly add to the pressure and importance of the PRow network, as the public seek opportunities for walking and cycling. Appropriate investments will therefore need to be made in the PRow network, to ensure this access resource caters for future user demands, including walking and equestrian users as part of the Bridleway network and these highly regarded links are not degraded. The Borough Council will also work with and support the work of the Public Rights of Way and Access service at KCC to support localised Public Rights of Way improvements across the borough.</i></p>	<p>Yes, as amendment in IDP.</p>
<p>Transport Strategy Review</p>	<p>Highways England made the following comments on the Transport Strategy Review:</p> <p>1. Public Transport: Highways England would be supportive of measures that allowed for an increase in public</p>	<p>Noted.</p> <p>Improved bus-rail links are set out in the Transport Assessment and IDP.</p>	<p>No changes proposed.</p>

<b>Policy/Topic area</b>	<b>Main issues</b>	<b>TWBC response</b>	<b>Changes – Yes/No</b>
	<p>transport uptake, but did not encourage rail heading.</p> <p>2. Rural Transport Issues: While Highways England welcome measures to address gaps in availability of public transport in rural areas, a connected cycling/walking scheme that is designed with a purpose along with improvements to bus services in these areas are likely to be the main drivers of modal shift.</p>	<p>Noted. Measures to facilitate walking and cycling area set out in the LCWIP and IDP.</p>	

## 10. Appendix for Part Two

### Appendix 1: Table of Regulation 19 Responses

PSLP Policy Number	PSLP Policy Title	Count per Policy	Count per Chapter
	Pre-Submission Local Plan	38	
	Foreword	2	
	Index of Policies Maps and Inset Maps	1	41
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Section 2:	Setting the Scene	12	
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Table 2	Types of infrastructure to be delivered	1	14
Section 3:	Vision and Objectives	30	
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Vision and Strategic Objectives 2	Strategic Objectives	6	43
Section 4:	The Development Strategy and Strategic Policies	15	295
Table 3	Housing Need and Supply 2020-2038	1	
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Table 4	Distribution of housing allocations	1	112
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Policy STR 3	Brownfield Land	15	
Policy STR 4	Ensuring Comprehensive Development	18	
Policy STR 5	Infrastructure and Connectivity	28	
Policy STR 6	Transport and Parking	28	
Policy STR 7	Climate Change	23	
Policy STR 8	Conserving and Enhancing the Natural, Built, and Historic Environment	20	

<b>PSLP Policy Number</b>	<b>PSLP Policy Title</b>	<b>Count per Policy</b>	<b>Count per Chapter</b>
Table 6	Green Belt Sites	2	
Policy STR 9	Green Belt	31	
Policy STR 10	Neighbourhood Plans	6	
Section 5:	Place Shaping Policies	5	
	Royal Tunbridge Wells	2	172
Policy STR/RTW 1	The Strategy for Royal Tunbridge Wells	22	
Policy STR/RTW 2	Royal Tunbridge Wells Town Centre	10	
Policy AL/RTW 1	Former Cinema Site, Mount Pleasant Road	3	
Policy AL/RTW 2	Land at the Auction House, Linden Park Road	1	
Policy AL/RTW 3	Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road	1	
Policy AL/RTW 4	Land at 36-46 St John's Road	2	
Map 5	Site Layout Plan	2	
Policy AL/RTW 5	Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm, Speldhurst Road	29	
Map 6	Site Layout Plan	1	
Policy AL/RTW 6	Land at 202 and 230 Upper Grosvenor Road	9	
Policy AL/RTW 7	Land at former Gas Works, Sandhurst Road	3	
Policy AL/RTW 8	TN2 Centre and adjacent land, Greggs Wood Road, Sherwood	1	
Policy AL/RTW 10	Montacute Gardens	2	
Policy AL/RTW 11	Former Plant & Tool Hire, Eridge Road	1	
Policy AL/RTW 12	Land at Tunbridge Wells Telephone Engineering Centre, Broadwater Down	3	
Policy AL/RTW 13	Turners Pie Factory, Broadwater Lane	2	
Map 14	Site Layout Plan	3	

<b>PSLP Policy Number</b>	<b>PSLP Policy Title</b>	<b>Count per Policy</b>	<b>Count per Chapter</b>
Policy AL/RTW 14	Land at Tunbridge Wells Garden Centre	24	
Policy AL/RTW 15	Land at Showfields Road and Rowan Tree Road	4	
Policy AL/RTW 16	Land to the west of Eridge Road at Spratsbrook Farm	17	
Policy AL/RTW 17	Land adjacent to Longfield Road	4	
Policy AL/RTW 18	Land at the former North Farm landfill site, North Farm Lane and land at North Farm Lane, North Farm Industrial Estate	2	
Map 19	Site Layout Plan	1	
Policy AL/RTW 19	Land to the north of Hawkenbury Recreation Ground	12	
Map 20	Site Layout Plan	1	
Policy AL/RTW 20	Land at Culverden Stadium, Culverden Down	4	
Policy AL/RTW 21	Land at Colebrook Sports Field, Liptraps Lane	3	
Policy AL/RTW 22	Land at Bayham Sports Field West	3	
Policy STR/SO 1	The Strategy for Southborough	5	10
Policy AL/SO 1	Speldhurst Road former allotments (land between Bright Ridge and Speldhurst Road)	1	
Policy AL/SO 2	Land at Mabledon House	3	
Policy AL/SO 3	Land at Baldwins Lane, North Farm Road	1	
	Strategic Sites: Tudeley Village and Paddock Wood, including land at east Capel	8	
Map 26	Site Layout Plan	2	
Policy STR/SS 1	The Strategy for Paddock Wood, including land at east Capel	147	

<b>PSLP Policy Number</b>	<b>PSLP Policy Title</b>	<b>Count per Policy</b>	<b>Count per Chapter</b>
Map 28	Paddock Wood and East Capel Structure Plan (published with the permission of David Lock Associates Ltd)	2	
Policy STR/SS 2	The Strategy for Paddock Wood Town Centre	55	
Map 31	Site Layout Plan	1	
Map 32	Tudeley Village Plan	2	
Policy STR/SS 3	The Strategy for Tudeley Village	196	
Map 33	Transport Connections: Tudeley Village (published with the permission of David Lock Associates Ltd)	2	407
	Paddock Wood	1	
Policy STR/PW 1	The Strategy for Paddock Wood	43	
Policy AL/PW 1	Land at Mascalls Farm	5	49
	Capel	1	
Policy STR/CA 1	The Strategy for Capel parish	26	27
	Cranbrook and Sissinghurst	2	
Policy STR/CRS 1	The Strategy for Cranbrook and Sissinghurst parish	24	
Policy AL/CRS 1	Land at Brick Kiln Farm, Cranbrook Road	9	
Policy AL/CRS 2	Land south of Corn Hall, Crane Valley, Cranbrook	6	
Policy AL/CRS 3	Turnden Farm, Hartley Road, Cranbrook	15	
Policy AL/CRS 4	Cranbrook School	5	
Policy AL/CRS 5	Sissinghurst Castle Garden	2	
Policy AL/CRS 6	Land south of The Street, Sissinghurst	6	
Policy AL/CRS 7	Land at the corner of Frittenden Road and Common Road, Sissinghurst	4	73
	Hawkhurst	2	
Policy STR/HA 1	The Strategy for Hawkhurst parish	24	
Policy AL/HA 1	Land at the White House, Highgate Hill	6	
Policy AL/HA 2	Brook House, Cranbrook Road	7	
Policy AL/HA 3	Former site of Springfield Nurseries, Cranbrook Road, Hawkhurst	8	

<b>PSLP Policy Number</b>	<b>PSLP Policy Title</b>	<b>Count per Policy</b>	<b>Count per Chapter</b>
Policy AL/HA 4	Land off Copthall Avenue and Highgate Hill	12	
Map 47	Site Layout Plan	1	
Policy AL/HA 5	Land to the north of Birchfield Grove	15	
Policy AL/HA 7	Hawkhurst Station Business Park	4	
Policy AL/HA 8	Site at Limes Grove (March's Field)	4	83
	Benenden	1	
Policy PSTR/BE 1	The Strategy for Benenden parish	49	
Policy AL/BE 1	Land adjacent to New Pond Road (known as Uphill), Benenden	16	
Policy AL/BE 2	Feoffee Cottages and land, Walkhurst Road, Benenden	9	
Policy AL/BE 3	Land at Benenden Hospital (south of Goddards Green Road), East End	70	
Policy AL/BE 4	Land at Benenden Hospital (north of Goddards Green Road), East End	70	215
Policy PSTR/BI 1	The Strategy for Bidborough parish	3	3
Policy PSTR/BM 1	The Strategy for Brenchley and Matfield parish	14	
Policy AL/BM 1	Land between Brenchley Road, Coppers Lane and Maidstone Road	3	
Policy AL/BM 2	Land at Maidstone Road	7	24
	Frittenden	2	
Policy PSTR/FR 1	The Strategy for Frittenden parish	5	
Policy AL/FR 1	Land at Cranbrook Road, Frittenden	1	8
Policy PSTR/GO 1	The Strategy for Goudhurst parish	4	
Policy AL/GO 1	Land east of Balcombes Hill and adjacent to Tiddymotts Lane	1	
Policy AL/GO 2	Land at Triggs Farm, Cranbrook Road	1	6
Policy PSTR/HO 1	The Strategy for Horsmonden parish	11	
Policy AL/HO 1	Land adjacent to Furnace Lane and Gibbet Lane	2	

<b>PSLP Policy Number</b>	<b>PSLP Policy Title</b>	<b>Count per Policy</b>	<b>Count per Chapter</b>
Policy AL/HO 2	Land south of Brenchley Road and west of Fromandez Drive	6	
Policy AL/HO 3	Land to the east of Horsmonden	9	28
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Policy AL/LA 1	Land to the west of Spray Hill	6	11
	Pembury	1	
Policy PSTR/PE 1	The Strategy for Pembury parish	12	
Policy AL/PE 1	Land rear of High Street and west of Chalket Lane	7	
Policy AL/PE 2	Land at Hubbles Farm and south of Hastings Road	8	
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Policy AL/PE 4	Land at Downingbury Farm, Maidstone Road	9	
Policy AL/PE 5	Land at Sturgeons fronting Henwood Green Road	2	
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Policy AL/PE 7	Land at Cornford Court, Cornford Lane	2	
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Policy EN 23	Biomass Technology	1	
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Policy H 4	Estate Regeneration	2	
Policy H 5	Rural Exception Sites	3	40
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