Report to Tunbridge Wells Borough Council

by Roy Foster MA MRTPI FRGS

an Inspector appointed by the Secretary of State for Communities and Local Government

The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN
☎ 0117 372 8000

Date >6th April 2010

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

REPORT ON THE EXAMINATION INTO THE TUNBRIDGE WELLS CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 12 August 2009

Examination hearings held between 25 November and 15 December 2009
File Ref: PINS/M2270/429/5

ABBREVIATIONS USED IN THIS REPORT

AA ..... Appropriate Assessment
ADPD ..... Allocations Development Plan Document
AONB ..... Area of Outstanding Natural Beauty
CS ..... Core Strategy
DPD ..... Development Plan Document
EDA ..... Employment Development Area
ELS ..... Employment Land Study
IDP ..... Infrastructure Delivery Plan
KEA ..... Key Employment Area
LBD ..... Limits to Built Development
LDS ..... Local Development Scheme
P&R ..... Park-and-Ride
PPS ..... Planning Policy Statement
PDL ..... Previously developed land
RTW ..... Royal Tunbridge Wells
SA ..... Sustainability Appraisal
SAC ..... Special Area of Conservation
SCI ..... Statement of Community Involvement
SEEPB ..... South East England Partnership Board
SEP ..... South East Plan
SHLAA ..... Strategic Housing Land Availability Assessment
SLA ..... Special Landscape Area
SPA ..... Special Protection Area
TCAAP ..... Town Centres Area Action Plan
TWBC ..... Tunbridge Wells Borough Council

1 Introduction and Overall Conclusion

1.1 Section 20(5) of the Planning & Compulsory Purchase Act 2004 states that the purpose of an independent examination of a development plan document (DPD) is to determine:
(a) whether it satisfies the requirements of s19 & 24(1) of the Act, the Regulations made under s17(7) of the Act, and any Regulations made under s36 concerning the preparation of the document; and
(b) whether it is sound.

1.2 My report assesses the Tunbridge Wells Core Strategy DPD (CS) in the above terms and includes my binding recommendations and the reasons for them, as required by s20(7) of the Act. I deal with the legal requirements at part 2 and soundness issues at part 3.

1.3 My overall conclusion is that the CS meets the requirements of the Act and Regulations. It will also be sound within the definition at paragraph 4.52 of Planning Policy Statement 12 (PPS 12), provided that changes are made as set out in my recommendations. I have recommended changes only where necessary to secure soundness. None alters the material substance of the CS and its proposals and policies or undermines the processes of public consultation and sustainability appraisal already undertaken.

1.4 The main changes required to achieve soundness may be summarised as follows:

(i) changes to CP1, CP2 and CP6 to bring compliance with PPS3 by providing an appropriate, less fettered framework within which the proposed future DPDs will be able to work to identify a flexible, responsive supply of deliverable and developable housing land;
(ii) adding to paragraph 4.21 to confirm the effectiveness of the CS by reference to the findings of the Infrastructure Delivery Pan (IDP);
(iii) deleting references to the Special Landscape Areas (SLAs) and changing 5.97 to clarify and underpin the role of landscape character assessment;
(iv) including material to indicate the actual numbers of dwellings to be planned for at the various locations (not just percentages of the Borough total) and replacing the housing trajectory with a simplified version;
(v) reducing the affordable housing threshold at the main urban area of Royal Tunbridge Wells (RTW)/Southborough to 10, so that it does not vary across the Borough;
(vi) bringing policies for employment and retailing into line with PPS4;
(vii) clarifying policy at Paddock Wood in relation to the guidelines set for future DPD work on the proposed urban extension, the design identity of the town, and flood-risk matters;
(viii) communicating the approach to the villages and rural areas effectively by replacing policies CP14 and 15 with a single merged and edited policy.

2 Legal Requirements

2.1 Paragraph 4.50 of PPS12 summarises five legal requirements with which the CS should comply. The first is that it should have been prepared in accordance with the Local Development Scheme (LDS) and in compliance with the Statement of Community Involvement (SCI).

2.2 The LDS shows the CS timed for submission in July 2009. That date was missed by a few weeks but I find the timing and content of the CS generally in accordance with the scheme. Turning to the SCI, this was adopted by the Council in July 2006. From the documents submitted, including the Regulation 30(d) and 30(e) Statements and the Self Assessment Paper, I conclude that the requirements for community involvement have been met.

2.3 I am also satisfied that the CS complies with the requirements of the 2004 Regulations (as amended) including those concerning the publication of the prescribed documents, their local advertisement and availability for inspection, the notification of DPD bodies, and the provision of a list of superseded saved policies.

2.4 The second requirement is for the CS to be subject to sustainability appraisal (SA). The final SA report was submitted with the CS and it is evident that the required process of SA was undertaken in parallel with preparation of the CS.

2.5 In addition to the SA the Council carried out an Appropriate Assessment (AA) in accordance with the Habitats Directive. The AA concluded that the proposals of the CS would have no adverse effects on the Dungeness Special Area of Conservation (SAC)/Dungeness to Pett Level Special Protection Area (SPA) and Hastings Cliffs SAC because of (a) the distances between these areas and the main population centres of the Borough and (b) the management schemes already in place at the SACs and SPA, which are considered sufficient to control recreational pressures.

2.6 However, the AA expressed some concern that the recreational pressure arising from an additional 6000 homes in the Borough could have adverse effects on Ashdown Forest SAC/SPA, especially when considered in the context of a total of more than 90,000 dwellings planned throughout the recreational catchment area of the Forest by 2026. Issue 5 of this report deals with the implications of this.

2.7 The third legal requirement is for the CS to have regard to national policy. This is an integral part of my consideration of soundness in part 3 of this report and, where necessary, I recommend changes in that respect.

2.8 Concerning the fourth requirement, the South East England Partnership Board (SEEPB) has indicated that the CS is in general conformity with the South East Plan (SEP). I am satisfied that this is so.

2.9 Finally, the CS meets the fifth requirement by having appropriate regard to the sustainable community strategies for the area adopted by the County and Borough Councils.

2.10 I therefore find that the legal requirements have all been met.

3 Is the CS sound in terms of its justification, effectiveness, and consistency with National Policy?

3.1 I examine the soundness of the CS against the above matters by considering 14 issues identified and dealt with beneath.

3.2 Before turning to those issues, I record that the Council (TWBC) issued a list of 'minor' post-publication/pre-submission changes in response to certain representations made under Regulation 28. I agreed that all but one of these were 'minor' (ie, not related to soundness) and have treated them as if they were embedded in the CS at submission. The only exception was a proposed insertion at paragraph 4.21 of the CS, expressing TWBC's view of the conclusions of its IDP, dated August 2009. This change was advertised and I have taken the subsequent representations into account in considering Issue 3 in this report.

Issue 1 Is the CS founded on a spatial vision and strategic objectives/sustainable development objectives which are sound?

3.3 The spatial vision set out at paragraphs 3.4-3.12 is appropriately locally-distinctive and proved largely uncontroversial.

3.4 Alternative spatial options (greater concentration at RTW/Southborough; more widespread dispersal; or a 'new expanded town') were considered at issues and options stage. However, I accept that the chosen option (most development at RTW/Southborough with modest development at the small rural towns) is the most appropriate and deliverable, having regard to:– (i) the SEP's designation of the RTW-Tonbridge joint regional hub, (ii) the needs and opportunities presented by the main settlements, their individual sustainability credentials, and their locations in relation to the major constraints such as the High Weald Area of Outstanding Natural Beauty (AONB), the Green Belt, and functional floodplains, and (iii) the distribution among the towns of development opportunities on previously developed urban land (PDL).

3.5 The CS also establishes a set of 7 strategic objectives and 5 objectives for sustainable development. However, it is somewhat unclear whether (a) the two sets of objectives in boxes 1 and 2 are of equal priority in relation to each other, or (b) the individual objectives within the two boxes are themselves in any priority order. Since the Council has clarified that no priorities are implied, a note needs to be introduced beneath box 2 to make the CS effective in communicating that point.

3.6 As for the 12 objectives themselves, most are somewhat general in nature and have little local focus. In particular, the very high level

sustainable development objectives are no more relevant to Tunbridge Wells than anywhere else. This approach may represent a missed opportunity, but the objectives are not unsound, save that SD3 and SD4 require strengthening to avoid any impression of being weaker than the national objectives set out in the guiding principles of 'Securing the Future' (2005).

3.7 **Recommendation 1** To secure the soundness of the CS, changes are required to SD3 and SD4 and a footnote needs to be added beneath box 2, as set out in Appendix 1.

Issue 2 Is the spatial strategy sound in relation to its proposals for the distribution and delivery of development, including the question of a Green Belt review?

3.8 The spatial strategy (summarised in box 3) appropriately sets out the principal steps necessary in development terms to achieve the spatial vision described in CS Chapter 3. Although Box 3 makes no specific reference to the AONB, the Green Belt, or the countryside in general, their centrality to the CS is clear from the DPD as a whole. [However, at issue 5 below I recommend inclusion of a strengthened description of the characteristics of the AONB at 5.94 of the CS.]

3.9 As for the settlement hierarchy in box 4, this chimes with the chosen spatial option and reflects the well-established pattern of the main urban area of Royal Tunbridge Wells (RTW) and Southborough, complemented by the 3 small rural towns, and the 17 villages. I find no grounds to support any alternative approach.

3.10 Table 3/appendix 3 summarises the proposed distribution of development [75% to the main urban area; 19% to the small rural towns; and 6% to the villages and their environs]. This distribution reflects the selected option for the spatial strategy and I support it as the most appropriate and deliverable having regard to the range of factors discussed at paragraph 3.4 above.

3.11 The quantity of development allocated to the various towns should enable them to meet (or continue to meet) the particular functions identified for them in the CS. This applies not only to the 75% allocated to the main urban area at RTW/Southborough but also to the specific percentages allocated to the small rural towns – 10% at Paddock Wood, 5% at Cranbrook and 4% at Hawkhurst. In my judgement these proportions are broadly appropriate to the circumstances of the 3 smaller towns having regard to their individual needs and opportunities and their defined roles. I find no grounds for any change to this distribution of development. However, to ensure that the future Allocations DPD (ADPD) and Town Centres Area Action Plan (TCAAP) make positive and effective plans for the actual numbers of dwellings implied by these proportions, rather than relying on the towns achieving their defined percentages of an as-yet unknown Borough outturn figure, it was agreed to be necessary

for the CS to convert the percentages into specific figures (ie 4200 at RTW, 300 at Southborough, 600 at Paddock Wood; 300 at Cranbrook; and 240 at Hawkhurst). TWBC accepts that this will bring clarity and certainty to the CS and make it effective in this respect.

3.12 As for the 6% (360) allocated to the villages and rural areas, in view of the quantity of development already completed or committed within the Limits of Built Development (LBD) of villages, development to 2026 in and around these settlements is likely to exceed the numbers which the CS may appear to suggest, because small-scale windfall developments will inevitably occur. However, I do not find this a reason to increase the 'planned' share for these areas. The CS is appropriately focused on the most sustainable locations and is therefore sound in its plans to make positive allocations at villages only at the modest level proposed. It is clear that the main need at villages is for more affordable housing, and this is properly catered for by the emphasis of the CS on planning positively for exceptions sites.

3.13 Turning to policy CP1, this proved to be one of the most contentious topics covered at the hearings. There are two main areas of concern. These relate to (1) the guidelines set by the CS for securing the balance and certainty sought by PPS1 and PPS3 in terms of ensuring a 'flexible, responsive supply of land' and (2) the 'contiguity' test contained in CP1.

3.14 Dealing with point 1 (a flexible and responsive land supply), CP1 and its supporting text appear to place too much reliance on the former PPG3 sequential test and can be read as requiring the supply of PDL to be exhausted before any green field land can be developed. While PPS3 certainly prioritises the development of PDL, this has to be balanced with the need (a) to establish clear and rigorously-assessed 5 and 10 year land supplies and (b) where it is necessary to bring forward complex sites or large (often green field) sites - such as those able to produce a greater proportion of benefits and facilities, eg affordable housing - to ensure that developers are given enough certainty to have the confidence to do so. The long lead-in times sometimes necessary to commence development on such sites do not sit comfortably alongside what could appear to be a highly stop-go approach to the phasing and 'release' of such green field land. Yet, CP1(6) and some of its related paragraphs appear to envisage just such an approach. Once planning permission has been granted windfall sites may count towards the identified land supply but the CS must not appear to give the impression that the advent of windfalls could lead to repeated or late withholding of planning permission on sites that have been allocated within a certain phase in the forthcoming ADPD and are therefore expected to deliver associated infrastructure and facilities within that timeframe. Change is necessary to bring the CS into clear alignment with national policy in PPS3.

3.15 The second point (the contiguity test in CP1), is an extension of point 1. The term 'contiguous' originates in the Strategic Housing Land Availability Assessment (SHLAA), in which sites were required to be contiguous with (ie to touch) the presently defined Limits of Built Development (LBD) before they could be ascribed a housing potential. While it is arguable

whether or not that was an appropriate test for the SHLAA to pose, I certainly share the view that carrying-over the contiguity test into CP1 is arbitrary and simplistic. If applied slavishly the SHLAA's contiguity test would place premature, unnecessary restriction on the potential of the ADPD to consider the merits of certain types of site as potential candidates for allocation - for example, sites not actually touching the LBD but otherwise well-related to it, such as sites across a road from the LBD but near to necessary facilities.

3.16 My overall conclusion is that CP1 is unnecessarily complex and unwieldy in the criteria which it sets, both for making site allocations and in terms of the processes and mechanisms it seems to provide for 'releasing' allocated and unallocated sites. As a result it does not provide the upcoming ADPD and TCAAP with the clear, unambiguous brief which is necessary for them to address the task which they have to fulfil. This could hamper the potential content of these DPDs, directing them in an unnecessarily constrained way and making it difficult for them to secure soundness in land supply terms.

3.17 All the above matters were discussed extensively at the hearing and some revisions were put forward by the Council. On the whole these are generally helpful and appropriate, but some further redrafting and editing is necessary to achieve full clarity and consistency with national policy on the above matters.

3.18 Referring briefly to CP1(7), TWBC confirmed its intention merely to reflect national policy in Circular 05/2005. In that sense it is sound.

3.19 Green Belt Turning to what the CS has to say about the Green Belt, the South East Plan (SEP) provides for the possibility of a small-scale Green Belt review at RTW, reflecting its role as a joint regional hub. While I find it generally appropriate that policy CP2 should refer to the maintenance of the 'general extent' of the Green Belt, I consider that the CS does not provide clarity or effectiveness in relation to the circumstances in which a review would be required, or when that may become necessary. In addition, paragraphs 5.28-40, and TWBC's general responses on this issue, do not adequately distinguish between the concept of a 'review' of the Green Belt (that is, the process of considering whether or not there is a need for change) and the decision to 'release' land from it (which may or may not be an eventual outcome of such a review).

3.20 However, it is already clear from the evidence of the SHLAA that the ADPD may have to draw quite heavily upon the identified areas of safeguarded land on the edge of RTW which are outside the Green Belt and have for some time been held in reserve against the future growth needs of the Borough in accordance with national policy in PPG2. These areas are known locally as 'Rural Fringe' sites. If the SHLAA makes over-optimistic assumptions about the 'deliverability/developability' of some PDL sites (and I conclude under issue 7 that this may well be the case) these Rural Fringe sites could potentially be still more important to a sound and successful future ADPD. Moreover, from my inspection of the

Rural Fringe sites regarded by TWBC as developable after 2026, and from such information as was available to me, it is at least questionable whether some of these areas (consisting of active schools and playing fields) will prove effective in playing a continuing role as Rural Fringe in the sense of their being likely to be offered, or even considered suitable, for future development.

3.21 Against this background the CS does not address sufficiently directly the need for a review to be undertaken in parallel with the preparation of the ADPD to assess whether or not the stock of Rural Fringe sites will need to be replenished before 2031, allowing for housing development to be able to continue at the SEP rate of 300pa. While the outcome of such a review cannot be predicted, the CS is ineffective in not requiring the process to take place. As the CS does not provide the ADPD with a certain brief on this matter, change is required to CP2 and paragraphs 5.32-33 and 5.38-39 to achieve this and thereby make the CS effective and consistent with PPG2 and the SEP.

3.22 In addition, change is needed to paragraph 5.31 to bring its references to Green Belt 'functions' and 'openness' properly into alignment with the nationally-defined primary 'purposes' of the Green Belt, as set out in PPG2.

3.23 **Recommendation 2** To secure the soundness of the CS, changes are required to CP1, 5.3-4, 5.10-12, 5.14-17, 5.19-24, CP2, 5.31-33 and 5.38-39, all as set out in Appendix 1.

Issue 3 Does the CS provide a sound strategy for the delivery of infrastructure?

3.24 As indicated at paragraph 3.2, TWBC prepared a post-publication/pre-submission Infrastructure Delivery Plan (IDP). In the Council's view this demonstrates that the CS is based on credible evidence about the timely provision of necessary infrastructure. The IDP provides an implementation table listing the main items of required infrastructure and identifying in every case the timescale within which provision is expected, the lead delivery agency, the cost and funding source(s), any critical dependencies, the risks of non-delivery, and the risk to the CS itself of non-delivery.

3.25 The IDP identifies two items as being at 'high risk' of not proceeding (A21 Lamberhurst to Flimwell and Colts Hill bypass). However, the IDP assesses non-delivery of both schemes as presenting 'low risk' to the CS itself. Indeed, the CS plainly states that Colts Hill bypass is only a long-held 'aspiration' and accepts that its funding is uncertain, albeit that the County Council continues to view the A228 as the appropriate primary route between the A21 and the M20. Colts Hill has been deleted from the schemes identified in Appendix 1 of the CS (Implementation and Monitoring) and, overall, I find no evidence to suggest that the soundness of the CS hinges inappropriately on the implementation of these two schemes.

3.26 A small number of other infrastructure items are presented both as being at 'medium risk' of not proceeding and as posing a 'medium risk' to the CS if they do not. These are affordable housing and a group of transport-related items - park-and-ride (P&R) sites/high quality bus routes, travel plans, unstated packages of measures of junction improvements & traffic management schemes, and air quality management issues.

3.27 I deal with affordable housing under issue 7 and P&R under issue 4. As for the other items, their constituent elements are often relatively small-scale measures normally implemented as part of (or in step with) one-off schemes so it is difficult to understand how the grouped risks to the CS of packages of separate measures could be assessed. It seems to me very unlikely that the soundness of the CS would be jeopardised even if some failures occurred in these areas.

3.28 Overall I consider that the form and content of the IDP is as robust and reliable as any evidence of this kind can practicably be, bearing in mind the variety of funding sources, the different operating timescales of some of the major funding agencies, and the uncertainties attached to funding in the medium to long term and (in current circumstances) even the short term. Despite these difficulties the IDP provides useful and consistent templates and an implementation table which (subject to the proposed regular updating and monitoring to be undertaken through the Local Strategic Partnership) will be able to identify any changes occurring in the degrees of risk identified in the current IDP. I therefore share the Council's conclusions that (a) the CS does not place undue reliance on critical elements of infrastructure for which funding is unknown and (b) there is a reasonable prospect of such critical elements being delivered in the plan period. This requires an appropriate insertion to be made at paragraph 4.21 referring to the findings of this important part of the evidence base, since the CS would otherwise not be demonstrably justified or effective.

3.29 **Recommendation 3** To secure the soundness of the CS, changes are required to para 4.21 as set out in Appendix 1.

Issue 4 Does the CS provide a sound vision and strategy for transport in the Borough?

3.30 The inter-connections between the desired sustainable growth of RTW and the necessary changes in its transport infrastructure represent an important topic for which the CS should be expected to set out a locally-distinctive place-shaping vision, providing an enduring strategy for the next 20 years. However, the CS does not demonstrate very clearly how fixed rail and highway infrastructure will be integrated with policies on buses, parking, cycling and walking to shape and contribute to a changing, increasingly more sustainable pattern of settlements, land-uses and movement. Instead, CP3 is highly generalised and the

focus of the accompanying text is on individual modes of transport, on-going studies and generally short-term ventures and commitments.

3.31 This lack of a clear, integrated, long-term vision for transport and existing/future development is disappointing and can be seen as a missed opportunity, albeit that in my experience TWBC is far from alone in failing to develop this aspect of its CS. The very high-level policy in CP3 is minimally sound, although the vision presented is somewhat skeletal. The forthcoming review of the Tunbridge Wells Borough Transport Strategy (and its important conversion to a longer timeframe) may enable the TCAAP and ADPD to put more flesh on the bones of the transport elements of the spatial strategy and make the LDF a more cohesive overall entity.

3.32 An illustration of the underdevelopment of the CS on transport matters is its treatment of P&R, a concept long under consideration in RTW, including coverage of potential edge-of-town interchange sites at the last two Local Plan inquiries. Although the most recent Inspector's report recommended the preparation of an early P&R-related DPD, the principle is still not resolved and the CS seeks only to 'investigate the need' for such facilities. Paragraphs 5.76-77 describe it as a corporate priority to reach a strategic view on the merits of P&R and state that a study is being finalised to identify possible interchange sites and investigate the feasibility of implementing bus lanes/priority measures along potential routes.

3.33 Since it is not yet decided whether P&R is necessary, it is surprising that the IDP identifies non-delivery of P&R sites/expanded high quality bus routes as posing a 'medium risk' to the CS if not implemented. However, according to TWBC, P&R is <u>not</u> itself essential to the delivery of the strategy as it could be replaced by high quality bus routes. The County Council has a different view, considering the provision of P&R sites, integrated with high quality transit routes, to be *'more of an essential component of the future transport network and emerging transport strategy than an aspiration in terms of addressing the Borough's transport challenges and enabling sustainable development to occur'.*

3.34 At present TWBC has to decide planning applications for sites allocated for P&R interchanges in the absence of any decision on whether or not the concept forms a useful and/or feasible contributor to its planning strategy. The CS does not provide any relief from this situation in the sense of setting firm guidelines for the ADPD & TCAAP about whether or not existing allocations for P&R sites should be retained, augmented or discontinued. I therefore reiterate that although the high-level transport content of the CS is minimally sound, completion of the Borough Transport Strategy and its close integration with the planned TCAAP and ADPD are urgent priorities if the long-term spatial planning framework of the Borough is to be placed on a firmer and more detailed footing.

Issue 5 Does the CS provide sound strategic guidance on the environment?

3.35 CP4 and the accompanying paragraphs are sound in most respects. However, there are four exceptions.

3.36 Firstly, the nationally-protected High Weald AONB covers 70% of the Borough and is a central part of the spatial vision of the CS. It is therefore surprising that the strategy conveys so little of the unique character of the designated area. The Council suggests that a brief description of the area's ancient and essential defining characteristics (taken from the AONB Management Plan) be added to paragraph 5.94. I find this a necessary change to make the CS effective in identifying the particular distinctive features of this nationally-designated landscape.

3.37 Secondly, CP4(3) is confusingly worded in that it suggests that the application of a hierarchical approach to protection of designated nature conservation sites will *in itself* result in no net loss of biodiversity and geodiversity. This is an oversimplification, and not necessarily the case. A small amendment of the Council's suggested change will bring the necessary clarity on this point.

3.38 Thirdly, CP4(2) refers to the use of landscape character assessment to manage, conserve and enhance the Borough's landscapes as a whole. The Borough Landscape Character Area Assessment (2002) is a thorough piece of work: it not only identifies the geographical extent and key characteristic features of the various local sub-types within the nationally-identified character areas (the High and Low Weald areas) but also summarises the particular elements which detract from each of them and the opportunities for enhancement. CP4(2) appropriately indicates that the Assessment will be used as a tool for managing, conserving and enhancing the entirety of the Borough's landscape. This approach is in tune with PPS7, which indicates that policies based on techniques such as landscape character assessment should provide sufficient protection for landscape which is highly-valued locally but outside nationally-protected areas such as AONB.

3.39 The adopted SEP superseded the Kent & Medway Structure Plan and removed the policy foundation for the Special Landscape Areas (SLAs), county-based designations which afforded protection to areas of land beyond the AONB. Against this background the CS fails to convey the status of SLAs effectively. Table 1, concerning Regulation 13(5), confirms that policy CP4 will supersede Local Plan policy EN27 when the CS is adopted, yet the strategy makes many misleading references (at 2.2, 2.3, 2.12, 5.95, 5.97, 5.276 & 5.288) to *'currently designated'* SLAs. These paragraphs give the impression that SLAs will have a continuing status, or be retained in some form yet to be identified or justified.

3.40 TWBC recognises the need to delete references to SLAs, but its suggested changes to paragraph 5.97 refer to future work aimed at considering the justification for resurrecting SLAs in some form, either unilaterally or on a bilateral basis with other authorities. It is not clear that the neighbouring authorities share that ambition and, in any event, in my experience it is difficult to devise a meaningful policy for sub-AONB locally-designated landscapes which is capable of practical application. Such an approach is almost bound to downgrade the rest of the landscape to 3rd class status, a particularly pertinent matter in an authority where so much of the land area is nationally protected and a substantial part of the rest has been in SLAs.

3.41 All parts of the Borough's landscapes have their own important local distinctiveness and a more appropriate outcome is likely to be gained by careful District-wide operation of landscape character assessment techniques, aimed at retaining and repairing the characteristic elements of every carefully analysed landscape sub-type. As that is effectively what CP4(2) proposes, in line with policy C4 of the SEP, I conclude that change is needed to paragraph 5.97 in order to clarify and underpin the role of landscape character assessment and delete reference to the possible continuation of SLAs.

3.42 Turning finally to paragraph 5.99, as noted at paragraph 2.5 of this report, the CS was subject to Appropriate Assessment (AA). The AA recognised that because the Borough has a high ratio of accessible natural green-space, its residents enjoy access to many outdoor recreational destinations closer than Ashdown Forest (a SAC/SPA). Nonetheless, it concluded that a proportion of the additional residents would be likely to be drawn to the Forest by its intrinsic and historic appeal. Since much of any potential impact would be outside the direct control of TWBC, the AA made two recommendations. The first was for TWBC to monitor progress on Wealden District Council's management strategies for the SAC/SPA, and be ready to apply any required cross-authority management measures through a future DPD or SPD. Paragraph 5.99 reflects most of the findings of the AA, but TWBC's proposed additional text would make the CS fully consistent with this recommendation.

3.43 The AA's second recommendation was that new areas of accessible natural green space should be identified in the Borough (at a rate of at least 1ha/1000 new residents) if new housing reduced the present ratio. However, the substantial quantity of green space in the Borough makes it unnecessary for the CS to refer to this recommendation.

3.44 **Recommendation 4** To secure the soundness of the CS, changes are necessary to CP4, paras 2.2-3, 2.12, 5.94-97, and 5.99, all as set out in Appendix 1.

Issue 6 Does the CS provide sound strategic guidance for achieving sustainable design and construction?

3.45 CP5 and the accompanying text consist mainly of cross-references to other policy sources and practice guidance and add relatively little locally-distinctive material to national and regional policy. However, with the exception described in the following paragraph, this part of the CS is not unsound. Critically, TWBC confirmed that the CS does not seek to introduce any sustainability standards or codes in advance of the national programmes for improvements in such matters. This is an appropriate approach, in line with the PPS1 supplement on Climate Change, because future development sites in the Borough are likely to be fairly dispersed and of comparatively limited scale, so there are unlikely to be substantial opportunities for radical local departures from existing and future proposed national norms.

3.46 However, the introduction to CP5 is unclear: it does not appear to acknowledge that it can sometimes be necessary to recognise and resolve potential conflicts between heritage objectives of retaining 'the unique character of the Borough' and the aim of applying sustainable design principles in order to adapt to and/or mitigate climate change. In my view the Council's suggested change is not entirely successful in recognising the potential for tension between these aims, so some further clarification is needed to make the CS effective in this respect.

3.47 **Recommendation 5** To secure the soundness of the CS, a change is required to CP5 as set out in Appendix 1.

Issue 7 Does the CS provide sound strategic guidance on the provision of housing to 2026, including affordable housing?

3.48 As discussed in more detail under issue 2, it was agreed that the CS should provide certainty by stating the actual number of houses to be provided at each identified location as well as its proportion of the overall Borough growth. To give effect to this, the Council produced two tables, one showing the distribution of the numerical shares and the other stating the numbers of dwellings remaining to be identified at each place, as at 2008. The inclusion of these tables (along with appropriately amended explanatory text) provides a clear brief for the nature of the task to be met though the ADPD and TCAAP and would make the CS clear and effective, and therefore sound, in this respect.

3.49 Turning to the housing trajectory (figure 3), this shows a substantial degree of detail about the types of sites expected to contribute to the Borough's housing provision, based on the SHLAA's assessments of the 5 year deliverability and 10 & 15 year developability status of every individual site.

3.50 I accept that TWBC undertook consultation on the methodology of the SHLAA. However, it was unclear that much consultation with land-owners occurred at the stage of assessing and making judgements

about the availability and achievability of individual sites (stage 7 of the SHLAA Practice Guidance, July 2007). In my view figure 3 presents an over-optimistic view of site deliverability/developability, founded on too many favourable assumptions and best-case-scenarios.

3.51 Many of the larger sites are still in active use (often public use) and/or affected by multiple ownerships. The timescale for overcoming a variety of constraints, relocating existing occupiers to new premises, and bringing sites to the point at which development can be ready to commence seems likely in many cases to be more extended than assumed by the SHLAA. A major example, among others, is that a number of the sites are well-used car parks of considerable current importance to the functioning of RTW or the other centres in which they are located. As I have concluded at issue 4 above, the CS lacks a clearly integrated, long-term vision linking transport and development and there is no evidence of any adopted strategy to reorganise or reduce town centre parking spaces without causing damage to the economy of the centres. It is therefore difficult to have confidence in the SHLAA's identification of so many car parks as an early source of housing development of this quantity, nor in its overall conclusion that development of the great majority of the sites identified in appendix 4g of the SHLAA will be able to commence by 2013, and the greater part of the remainder by 2018.

3.52 I have taken account of the formation of the Tunbridge Wells Regeneration Company, a John Laing/TWBC joint venture working to promote development projects on 38 PDL sites in RTW/Southborough, Paddock Wood and Cranbrook. This may import greater property development experience into the process and generate increased impetus behind some of the sites in the SHLAA, but it does not alter my overall conclusion about the undue optimism portrayed in the CS about the timeframe for developing so many of the identified PDL sites.

3.53 Despite the above, appendix 4g includes sites with a broad potential residual capacity of 6117 dwellings (7151 minus 1034 completions). This is comfortably greater than the required residual Borough total of 4966 (6000 minus 1034 completions). It is also noteworthy that the site-by-site housing yields of these sites, as quoted in the SHLAA, often assume modest densities well below the national indicative minimum despite the current absence of a locally-defined density policy in accordance with paragraphs 46-47 of PPS3. The above factors provide confidence that this body of sites, supplemented by any others identified during the preparation of the ADPD/TCAAP, will enable those DPDs to identify a sufficient supply of rigorously assessed housing land to meet the Borough requirement. Consequently, the shortcomings of the SHLAA are not fatal to the soundness of the CS.

3.54 On the other hand, I do not consider the SHLAA sufficiently robust and credible to validate the present detailed content of the submitted form of the housing trajectory at figure 3. In this form the trajectory would be potentially misleading in the degree of detail which it purports to

show about the types and timing of PDL/non-PDL sites, and it would therefore provide an unsatisfactory information brief for the ADPD and TCAAP. It is therefore necessary to substitute the Council's redrawn trajectory. This is a simplified version containing considerably less detail. However, taken in conjunction with the new tables referred to above, these two sources of information provide an effective position statement for the guidance of future DPDs.

3.55 Affordable Housing (AH) The CS sets a target of a net increase in affordable homes of 100pa, well below the level of need for AH calculated in the SHMA (290pa). However, it regards this as the maximum number likely to be realistically achievable, having regard to the Borough's overall housing requirement set by the SEP (300pa) and the unlikely viability of providing a greater quantity. The CS aims to achieve its AH target by seeking 35% provision on schemes of 15 or more in RTW/Southborough and 10 or more elsewhere, supplemented by 100% provision on rural exceptions sites.

3.56 An Affordable Housing Viability Assessment of the CS proposals was completed in August 2009, some months after publication of the strategy. The study was undertaken by BNP Paribas Real Estate, experienced practitioners in this field, in conjunction with Christopher Marsh & Co. The consultants appraised 10 schemes on sites widely-distributed through the Borough, some on different types of sites in the main urban area of RTW/Southborough, one site in each of the small rural towns, and two sites in villages. The study methodology was a conventional one, in that residual land values generated by the appraised schemes were compared with calculated existing use values.

3.57 The key finding was that the residual land values left scope for up to 35% provision of affordable housing on sites in low value existing uses. The appraisals assumed the existence of no exceptional costs, although it was recognised that if such costs were to arise in individual cases, this could be a factor capable of overriding the conclusion on viability. In any case CP6(5) rightly allows for such factors to be taken into account in individual cases. The study also noted that half (3) of the 6 sites assumed to be developed below the CS thresholds were appraised as able to support affordable housing. All 3 of these were schemes for 7 units. However, the sample size was regarded by the report as too small to provide conclusive evidence for changing the threshold.

3.58 Despite this conclusion in the report, I asked the consultant whether the report's findings were any **more** supportive of retaining the CS higher threshold of 15 in the main urban area of RTW/Southborough than they were of reducing it to 10 and therefore bringing it into line with the threshold across the rest of the Borough. He agreed that they were not. The only factors advanced in favour of the split threshold were that developers of small schemes are often not accustomed to being subjected to open-book reviews of viability and that social housing providers sometimes raise management issues over schemes providing only a small number of units. These are not convincing

factors since they have not prevented the Council from proposing the threshold of 10 throughout the rest of the Borough and a prominent local housing group who are partners with TWBC has welcomed the advertised proposed reduction to 10 in RTW/Southborough.

3.59 The Council estimates that this lowered threshold would result in only a small increase in the annual number of AH units achieved in the main urban area. However, it would at least make some contribution towards the Council's target and therefore have some impact on the very substantial level of need revealed by the SHMA. Since the consultant agreed that the viability assessment does not undermine the case for a single site size threshold, I conclude that the CS would be unjustified and ineffective if this change were not made.

3.60 Turning briefly to rural exceptions sites, CP6(6) needs a small change both to reflect the removal of the 'contiguity' test from CP1 (covered under issue 2 above) and, as discussed, to replace the arbitrary '400m' criterion with a strengthened 'well-related' test, set out in paragraph 5.155 of the CS in the form of appropriate broad parameters for the location of such schemes in relation to their parent village.

3.61 I also consider it necessary to change and amplify paragraphs 5.154-156 to bring clarity and effectiveness to the explanation of the split in rural areas between market-led provision of affordable housing and rural exceptions sites. This includes placing the new advertised paragraph 'after 5.155' before it, also for clarity's sake.

3.62 Other matters I consider three additional changes necessary to make the CS effective, all as discussed at the hearings sessions. First, the Council's Typical Urban Character Area Appraisal cannot form the only input into a local density policy. 5.145 needs to be clear about this. Secondly, as agreed, an additional paragraph requires to be inserted below 5.166, recording that housing needs surveys require adaptation to ensure fuller discovery of the needs for supported accommodation for older people. Thirdly, policy CP6(8) needs amendment (a) to clarify that sites for gypsies, travellers and travelling showpeople will be allocated and safeguarded on the Proposals Map and (b) to avoid posing tests in the final bullet point that may be so hard to meet that the purpose of the policy would be effectively negated. In addition, 5.173 needs amendment in order to confirm that the policy is not intended to conflict with national policy in Circular 01/2006 that gypsy sites are acceptable in the countryside.

3.63 **Recommendation 6** In order to secure the soundness of the CS, changes are required to CP6, 5.139-145 including replacement figure 3, replacement table 6 and new table 7, 5.151-153 (including deletion of submitted table 7), 5.155-156, 5.166 & 5.173, all as set out in Appendices 1&2.

Issue 8 Does the CS provide sound strategic guidance on the provision of land for employment-related uses to 2026?

3.64 Planning Policy Statement 4 (Planning for Sustainable Economic Growth) was issued a few days after the hearing sessions closed. Although the CS took account of the emerging advice in the earlier consultation version of PPS4, some change to paragraph 5.176 is now required for the strategy to align fully with the national definition of economic development.

3.65 In my view the Employment Land Study (ELS) provides a robust and credible evidence base for the CS. The study essentially confirms the need to retain the Economic Development Areas (EDA) defined in the Local Plan, although the CS newly brands them as Key Employment Areas (KEA). Recognising the significance of the RTW hub designation, the CS properly supplements the existing KEAs with an additional one at RTW town centre, the boundaries of which will be defined by the TCAAP. The CS could have provided (and would have been enlivened by) greater strategic guidance on the sought-for future patterns of development and mix at the individual KEAs, building on scenario A in the Stage 2 ELS. However, although the content of the strategy is somewhat timid in that respect, there is some expanded commentary on individual sites under the place-specific policies CP9-CP15 and the CS is not unsound on this point. As for whether the CS should give more advice about the spatial needs of the widened components of economic development under revised PPS4, these are wide and varied. I do not consider that the CS can usefully achieve any more than the guidelines that it already contains and the briefs it sets for the future DPDs.

3.66 Turning to Paddock Wood KEA, CS Appendix 6 defines an area of 3.26ha within a functional flood plain which it is proposed to omit from the KEA as defined on the Proposals Map. This is undoubtedly sound, but it is also relevant to consider whether or not the CS should identify a broad location for replacement land or, alternatively, the ADPD be specifically required to define such a site.

3.67 The SEEPB will not now undertake the previously expected partial review of the SEP to give more guidance in relation to job numbers and employment land. Instead, this will be done as an integral part of the Single Strategy. Although the timing for completion of that work is some way off, the Council intends to review the ELS in time to inform the future ADPD/TCAAP. In my view that will be a more appropriate means of considering any need for replacement of the land proposed for de-allocation.

3.68 I recognise that the land now proposed for omission from the KEA and the area allocated under local plan policy ED4(c) has been part of the Paddock Wood allocation for about 15 years and that take-up has been fettered by practical issues of ownership and access, as well as more recent recognition of the heavy flooding constraint. I also note the remarks of the most recent Local Plan Inspector, concerning the need

to examine the merits of other sites capable of meeting the then strategic requirement, if the allocation did not come forward. However, at present there are some vacant premises and potential redevelopment opportunities in the remaining parts of the Paddock Wood KEA at Eldon Way. Overall, I do not find the evidence base strong enough to demonstrate a need to identify any particular amount of replacement land (if any) or for the CS to identify any particular location for it – either at Paddock Wood or elsewhere. CS paragraph 5.190 states that it will be a key role of the ELS review to establish whether or not there is a requirement to replace the land lost from the KEA and, if so, whether this should be at Paddock Wood or in the form of other suitable development at the Tunbridge Wells Regional Hub. In my view that is the most appropriate approach.

3.69 This conclusion is reinforced by the fact that other land in the Paddock Wood KEA, north of Eldon Way, is equally affected by the functional flood plain to the north of the railway but has been left as part of the KEA and the allocated land covered by the saved local plan policies because it has the benefit of an extant planning permission. The flooding question would require careful consideration if any application were made for renewal of the permission, thus making it all the more important for TWBC to revisit the issue of employment land at Paddock Wood, and the claims of any flood-risk free areas with potential for possible inclusion in the KEA, in the context of the ADPD with the benefit of the reviewed ELS.

3.70 With regard to Gills Green KEA, it was agreed to be appropriate to change the description to 'sidings', rather than 'environs', to avoid giving any misleading impression that this rural KEA may be extended beyond the limits currently defined on the Proposals Map.

3.71 Turning to paragraph 5.191, a textual change is required to reflect the fact that the review of the ELS will be able to take account of the recent document 'South East Plan Supplementary Guidance - Employment and Economic Land Assessments' (February 2010) but, due to timescales, not the Single Strategy.

3.72 Finally, duplication in parts 2&3 of CP7 makes these clauses difficult to interpret. To be effective they need change to clarify that part 2 refers to land within the KEAs and part 3 to sites outside them.

3.73 **Recommendation 7** In order to secure the soundness of the CS changes are required to CP7, 5.176, footnote 19, and 5.191-193.

Issue 9 Does the CS provide sound strategic guidance on the provision to be made for retail, leisure and community facilities to 2026?

3.74 The retail hierarchy in table 10 places RTW in the same category as the town centres of Cranbrook, Paddock Wood and Southborough.

This classification is inconsistent both with the SEP, which (at policy TC1) identifies RTW as a 'primary regional centre' and with the saved policies of the Local Plan which (at 5.21) describes it as the Borough's 'main town centre'. Since paragraphs 5.204 & 5.216 record the SEP's identification of RTW as a primary regional centre, it is unsound for table 10 not to do the same. TWBC accepts that a change is required to that effect.

3.75 The Tunbridge Wells Retail Study 2006, carried out by Colliers CRE, considered all 5 of the 'town centres' that were then identified in the Local Plan. The study described Southborough as the only centre 'struggling to find any particular role other than a very local service function'. Nonetheless, a Local Plan allocation seeks to attract a convenience food supermarket and this ambition is taken forward into the CS. For that reason I consider that table 10 appropriately reflects Southborough's intended enhanced role as a 'town centre'.

3.76 As for Hawkhurst, table 10 identifies this as a District Centre whereas the other two small rural towns (like Southborough) are indicated as 'Town Centres'. Hawkhurst was regarded as a 'Town Centre' in the Local Plan and there is little particular evidence to support its effective demotion in the CS. However, it has the smallest present quantity of retail floorspace of the 3 small rural towns, its identified retail need is marginally the lowest, and it has a generally constrained potential for expansion. In addition, the TCAAP will not be covering Hawkhurst. For these reasons I do not find it unsound for the CS to classify Hawkhurst as a District Centre.

3.77 Following a broadly conventional methodology, the Retail Study estimated a Borough-wide quantitative need for 26,236sq.m (net) or 31,204sqm (gross) of additional comparison goods floorspace by 2017. After allowing for the Local Plan allocation at Southborough, it found no need for any additional convenience floorspace. Using the net figure, these findings are translated into policy in CP8(2) & (3). Having regard to the shifting dynamics of retail economics I consider it appropriate in principle for the CS to restrict its floorspace guidelines to an end-date of 2017. That conclusion is reinforced by the Kent County Council (KCC) Retail Need Assessment 2007 which generated forecasts to 2026 but indicated that findings beyond 2016 should be treated with caution.

3.78 Compared with the Colliers study, the KCC assessments of 2007 and 2008 arrived at somewhat higher forecast needs for comparable future years, the latter estimating a total comparison floorspace need of 48,604sqm (gross) for 2016. Some additional evidence was also made available in the form of a draft report to TWBC by Cushman & Wakefield, critiquing a developer's study of convenience floorspace need in RTW, undertaken in support of a proposed enlarged replacement of the Tesco Store at Pembury. That report largely accepted that there is an identifiable quantitative need, albeit not as clear cut as claimed by the developer, and that RTW has a clear qualitative need for a new main food store.

3.79 The above studies from 2006-09 demonstrate that perceived retail need can fluctuate over time and with the use of slight variations in forecasting methods and inputs, including some of those discussed. However, there was no clear suggestion that the CS should substitute a different set of floorspace guidelines from those in CP9 and I do not find the strategy unsound on this point, provided that it clearly describes the timescale and purpose of the first review of the study.

3.80 Paragraph 5.212 states that the Council will *'monitor the position on comparison and convenience floorspace'* and *'may'* review the retail study *'during the plan period'* if necessary. Since the CS period runs to 2026 and the guideline figures only to 2017, this statement is plainly inappropriate as the study will need review long before 2026, probably several times. In any case, TWBC recognises that there have been changes on the ground since the 2006 study. It therefore intends to update the Retail Study during 2010/11 in time to inform the production of the ADPD and TCAAP so that appropriate allocations may be made if there proves to be a demonstrable need for more provision of comparison and/or convenience floorspace. Change to paragraph 5.212 is therefore required in order for the CS (a) to explain and record the Council's commitment to early review of the study in unambiguous terms and (b) to state how proposals outside the defined centres will be assessed.

3.81 A residual aspect of soundness relating to floorspace needs is the CS expression of the identified needs of the Borough's individual centres in the very exact quantities stated in the Retail Study, down to single square metres. This level of accuracy is both spurious and contrary to the study report which commented that the figures should not be treated as precise targets but as guidelines. In order to avoid the suggestion of unjustified and inappropriate precision I support and recommend the Council's suggested inclusion of rounded figures, together with the phrase 'in the order of' in both policy CP8(2) and the place-specific policies CP9-13 for the individual centres.

3.82 The principal soundness point in CP8 is the wording of the provisos in parts (2) and (3), '.....unless a different need is identified through a future retail study'. The use of this phrase in part (3) is related to the former PPS6 and is not now consistent with PPS4, which supersedes it. The latter removes the requirement for applicants to demonstrate 'need' for development proposals that are in edge or out of centre locations and not supported by an up-to-date development plan. In those cases the key considerations are the requirements for clear application of the sequential approach and thorough assessment of impact on defined centres.

3.83 Retention of the term 'need' is therefore appropriate in part (2), which is development plan–related, but not in part (3), the focus of which is development control/management. This lack of consistency needs resolution by combining parts (3) and (4) to reflect the PPS4 tests and

altering paragraph 5.212 accordingly. This will bring consistency with national policy.

3.84 Referring briefly to CP8(8), it was agreed that the 'practicability' aspect of this clause requires inclusion of the concept of 'continuing need' in order to achieve clarity and effectiveness.

3.85 **Recommendation 8** To secure the soundness of the CS, changes are required to CP8, table 10, 5.203-206, 5.210, and 5.212 all as set out in Appendix 1.

Issue 10 Does the CS provide sound place-making strategies for Royal Tunbridge Wells and Southborough?

3.86 CP9 (RTW) and CP10 (Southborough) draw together the content of strategic policies CP1-8, generally interpreting and applying them to broad place-shaping visions for the two towns, which together make up the main urban area of the Borough. Although they add comparatively little to the subject matter of CP1-8 these parts of the CS provide appropriate locally-focused guidance for future DPDs and other strategies and for decisions on individual proposals. However, the changes already recommended as necessary to secure soundness to policies CP1-8 also require a number of corresponding changes to CP9-10.

3.87 In the case of CP9 the resulting changes relate to (i) CP9(1) and paragraph 5.235 concerning the Green Belt review, (ii) CP9(2) and paragraph 5.231 on the number of dwellings to be planned for, (iii) CP9(3) and paragraph 5.231 in relation to the threshold for affordable housing, and (iv) CP9(6) and paragraph 5.229 concerning retail floorspace.

3.88 In the case of CP10 the consequent changes relate to (i) CP10(1) on the Green Belt review, (ii) CP10(2) and paragraph 5.328 concerning the number of dwellings to be planned for, (iii) CP10(3) relating to affordable housing, and (iv) CP10(5) on retail floorspace.

3.89 Policy CP9 does little to build up interpretation of the role of RTW as part of the joint regional hub defined in the SEP other than the identification of the new RTW town centre KEA. This is perhaps not surprising given the comparatively late emergence of the joint hub concept in the preparation of the regional strategy. The SEP identifies the two joint hub towns as having complementary roles, Tonbridge as a major transport interchange and RTW as a significant economic and social centre. According to TWBC the identification of the hub has 'increased its ambitions' for RTW and these will have to be worked up in more detail through further policy development of CP7 & CP8 through the TCAAP. They will be implemented in part through the Tunbridge Wells Regeneration Company. I accept that the CS provides an adequate framework for this further work and cannot realistically advance the hub concept further at this stage.

3.90 Issues concerning improvements to the transport links between the two urban areas and their town centres will have to be progressed by collaborative working between the two Councils. Major upgrading of the A21 between the towns is already planned, but there is also an existing need to resolve traffic congestion, impeded public transport links and air quality issues along the overloaded A26 corridor. However, there is no evidence to suggest that definition of the hub will, in itself, lead to identifiable or material worsening of conditions along the A26 in the short term. The detailed implications of the hub definition will need further explanation through the TCAAP or any future review of the CS.

3.91 **Recommendation 9** To secure the soundness of the CS, changes are required to CP9, 5.229, 5.231, 5.235, CP10 and 5.238, all as set out in Appendix 1.

Issue 11 Does the CS provide a sound place-making strategy for Paddock Wood?

3.92 As in the case of CP9-10 for RTW and Southborough, CP11 draws together the content of strategic policies CP1-8 and interprets and applies them to a broad place-shaping vision for Paddock Wood, which will provide appropriate guidelines for future DPDs. However, as in the case of RTW, the changes required to secure soundness to policies CP1-8 also necessitate corresponding changes to CP11. These are to (i) CP11(2) and paragraph 5.249 concerning mention of the actual number of dwellings to be planned for and (ii) CP11(7) and paragraph 5.252 in relation to retail floorspace.

3.93 In addition to these changes there are four place-specific issues to consider. Firstly, CP11 begins by stating that 'the character and appearance of the town will be enhanced by protecting its heritage and strengthening its sense of place.' I found it difficult to ascertain precisely what this means and was unable to gain much clarification about what needed to be done to secure these aims. This indicates that the CS fails to communicate a clear message on this point.

3.94 Paddock Wood's history, based on the arrival of the railway and the growth of hop cultivation, is more recent than that of Cranbrook or Hawkhurst. As a result the town has no conservation areas. Moreover, the final report of the Paddock Wood and Surrounding Areas Community Action Plan 2007, prepared by Paddock Wood Succeed, identified that 'the town has few distinctive buildings and lacks character as a result of piecemeal development over the years.'

3.95 This points to the need for a locally-distinctive design identity to be defined for Paddock Wood. This would provide the town, especially its centre, with a stronger sense of place and identity while also seeking to identify its most valued existing features and giving prominence to

any such 'heritage' elements. I conclude that the introduction to the policy requires some change to make this point effectively, while the supporting text at paragraph 5.245 needs to be more explicit in making it the role of the TCAAP to engage the community in the task of defining these matters and provide a vehicle for taking the matter forward in a more positive and determined fashion.

3.96 Secondly, 10% of the Borough's housing growth is allocated to Paddock Wood, 600 dwellings. In view of the limited opportunities for residential development on previously developed land within the town and the major constraints of Green Belt to the west and floodplains to the north, the CS states (paragraph 5.248) that *'a modest extension to the east or south of the town…..may be necessary during the course of the Plan period.'* However, as the Council accepts, this statement does not set out adequately clear terms of reference for the upcoming ADPD on the provision that it needs to make at Paddock Wood. It is clear from the evidence that (a) an extension 'will' (rather than 'may') be necessary and (b) it is potentially misleading to describe the necessary extension as 'modest'. While future monitoring will define the precise number of dwellings to be allocated it may be in the region of 500 or so. This is not 'modest' in the context of Paddock Wood. In addition, it is evident that a more accurate description of the only potential constraint-free growth directions at the town is 'to the east *and/or* south'. If these changes are made the CS will be effective in providing the ADPD with the clear strategic guidance that it needs to pursue this matter successfully.

3.97 Thirdly, and turning to flooding issues, I have dealt under issue 8 above with the proposed deletion from the Proposals Map of part of the Paddock Wood KEA and the associated question of whether it is necessary to replace it. On more general flooding matters, Paddock Wood's Level 2 SFRA indicates that considerable parts of the existing built-up area of the town form an 'area of critical drainage'. This can sometimes suffer flooding from surcharged storm-water sewers caused by backed-up flows due to the presence of constricted culverts under the railway.

3.98 The SFRA indicates that (subject to the provision of appropriate measures in the form of a Sustainable Urban Drainage System), an urban extension to the east and/or south could be accommodated on land free of flooding constraints. The design of the system would need to control the release of water from the site of the extension, not only to prevent flooding of any vulnerable small areas within it but also to take full account of off-site consequences, including any potential for alleviating sewer flooding in the present residential areas.

3.99 CP11(4) recognises that the extension should avoid the flood plain areas close to the town, but the CS does not specifically recognise the need to find means of tackling the wider flooding issues of Paddock Wood. These issues are clearly identified in the Level 2 SFRA and are matters of concern to the Town Council. Although the Council has suggested changes to CP11(4) and paragraphs 5.247 & 5.248 to deal

with this point, they do not express the policy-related points made in the SFRA with sufficient clarity, so some further change is required to make the CS effective on this point.

3.100 Fourthly, CP11(9) and paragraph 5.253 are unclear whether or not a site for a community centre needs to be allocated and provided, especially as the present Local Plan is firm that provision is a requirement. TWBC has now clarified that this is so, and an appropriate change is therefore required.

3.101 **Recommendation 10** To secure the soundness of the CS, changes are required to CP11 and paragraphs 5.245, 5.247-9, and 5.252-3, all as set out in Appendix 1.

Issue 12 Does the CS provide sound place-making strategies for Cranbrook and Hawkhurst?

3.102 Policies CP12 (Cranbrook) and CP13 (Hawkhurst) draw together the content of strategic policies CP1-8 and generally interpret and apply them to broad place-shaping visions for the two towns. Although they add comparatively little to the subject matter of CP1-8 these parts of the CS provide appropriate locally-focused guidance for future DPDs and other strategies and for decisions on individual proposals.

3.103 Changes have previously been identified as required to secure the soundness of policies CP1-8, and so corresponding changes are needed to CP12-13. At Cranbrook these are to (i) CP12(2) and paragraph 5.257 concerning mention of the actual number of dwellings to be planned for, (ii) paragraph 5.259 with regard to affordable housing, and (iii) CP12(5) and paragraph 5.262 relating to retail floorspace.

3.104 In the case of Hawkhurst the corresponding changes relate to (i) CP13(2) concerning mention of the actual number of dwellings to be planned for, (ii) paragraph 5.269 in relation to affordable housing, and (iii) CP13(4) and paragraph 5.271 on retail floorspace.

3.105 In addition, the Council agreed that (i) the wording of the introduction to both policies needs to be consistent with the roles of the two towns set out in the spatial strategy in box 3, (ii) the explanatory text to both policies requires change to make it consistent with the relevant part of the two policies dealing with the provision of community facilities and (iii) the references in paragraphs 5.256 and 5.266 should now be to PPS4 rather than PPS7.

3.106 Finally, the Council explained that part 4 of CP12 is a very indirect reference to a particular scheme and accepted that it is unclear and misleading because the need for an increased quantity of supported accommodation will not be confined to Cranbrook. CP12(4) therefore requires deletion. Effective treatment of this matter is best dealt with

by the change to paragraph 5.166 already referred to under issue 7 concerning the design of housing needs surveys.

3.107 **Recommendation 11** To secure the soundness of the CS, changes are required to CP12 & CP13 and paragraphs 5.256-7, 5.259, 5.262, 5.264, 5.266, 5.269, 5.271, and 5.273 all as set out at Appendix 1. [Changes concerning the numbers of dwellings to be planned for at Cranbrook and Hawkhurst are set out in the Council's Minor Changes table at appendix 4.]

Issue 13 Does the CS provide sound clear place-making strategies for the villages and rural areas?

3.108 Save in one respect, I consider that CP14 and CP15 (together with related paragraphs 5.274 to 5.285) strike a justified balance between countryside protection and the local pressures and needs which arise from agriculture, recreation, the environment, and socio-economic considerations. They are also generally aligned with PPS4 and PPS7.

3.109 However, in a presentational sense, the policies give rise to confusion because they appear to treat the villages and rural areas as separate sealed entities in housing terms. Unsurprisingly, this caused people to misunderstand the way in which the two policies are intended to work together. With 180 dwellings allocated to the villages and 180 to the rural areas, the impression can be gained that the latter are to be widely dispersed through *'other rural locations'* [CP15(6], far from villages. However, the intention is for only limited development to be planned for in the LBD of villages, bearing in mind the amount of completions that have already taken place. This stance is to be complemented by small allocations for affordable housing on rural exceptions sites close to the LBDs.

3.110 The paragraphs accompanying the two policies also contain some material that appears to be displaced (that is, connected with the 'wrong' policy - eg 5.280-281). The Council has addressed these presentational issues by merging the two policies into one, followed by a re-ordered, slightly edited text which clarifies the policy on housing and re-arranges the accompanying text into a logical, holistic and user-friendly format. With this change, the CS will be sound and effective in communicating its message. However, as agreed by TWBC, the reference to the affordable housing threshold should be placed in part 1 of the revised policy rather than part 3 since the latter is concerned with exceptions sites rather than general needs housing.

3.111 Referring to the threshold for affordable housing at villages, the evidence on viability assessment does not positively support its reduction to 5. As for the location criteria for exceptions schemes, these are adequately covered under policy CP6.

3.112 Finally, the paragraphs concerning economic development in rural areas seem to me generally consistent with policy E12 in newly-issued national policy in PPS4 and therefore sound.

3.113 **Recommendation 12** To secure the soundness of the CS change is required to delete the submitted text of CP14 & CP15 and paragraphs 5.274 to 5.304 and replace them with the single merged and edited policy and the re-ordered and edited supporting text set out in Appendix 3 to this report.

Issue 14 Does the CS contain sound arrangements for monitoring its implementation?

3.114 Appendix 1 to the CS (Implementation and Monitoring) provides a set of national and local indicators, together with targets. Monitoring of these indicators and targets through the Annual Monitoring Report should reveal the degree of progress being made in achieving the aims and objectives of the CS through the identified plans, programmes and strategies by which they are to be delivered.

3.115 However, two matters require change to make the tables in Appendix 1 effective. Firstly, it is not clear that the 'Key Specific Projects' in column 3 of tables 11-18 are those projects identified in the IDP as being of either 'high' or 'medium' risk to the CS. An explanatory note at the foot of every page of the table would make this clear. Secondly, change is required to the reference to high-risk flood zones in table 15 in order to bring alignment with PPS25.

3.116 **Recommendation 13** To secure the soundness of the CS, changes are required to tables 11-18 of Appendix 1 to the CS, as set out in Appendix 1 of this report.

4 Minor Changes

4.1 During the hearings TWBC listed a number of minor changes that it wishes to make to correct, clarify and update various parts of the CS. These changes are set out in Appendix 4. Although they are not related to soundness, I endorse them on a general basis in the interests of clarity and accuracy.

4.2 The changes recommended at Appendices 1-3 may necessitate some further editing of the numbers of paragraphs, tables and figures. I leave this editing to the Council.

5 Overall Conclusion

5.1 Subject to the inclusion of the necessary changes set out in Appendices 1-3 to this report, I conclude that the Tunbridge Wells Core Strategy satisfies the requirements of s20(5) of the 2004 Act and is sound within the definition set out in PPS12.

Roy Foster

INSPECTOR

APPENDIX 1	**Schedule of changes required to make the CS sound**
APPENDIX 2	**Revised indicative housing trajectory required to make the CS sound**
APPENDIX 3	**Merged and re-ordered version of CP14 & CP15, required to make the CS sound**
APPENDIX 4	**Schedule of minor changes put forward by TWBC**

APPENDIX 1

INSPECTOR'S RECOMMENDED CHANGES, REQUIRED TO MAKE THE TUNBRIDGE WELLS CORE STRATEGY SOUND

The changes below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying a change in words in *italics*.

The page and policy/paragraph numbers below refer to the "Track Changes" Version of the Core Strategy and do not take account of any pagination/paragraph alterations that will flow from the deletion or addition of text in these recommendations.

Page	Policy/ Paragraph	Recommended Change
5	2.2	*[last sentence]* "The town is subject to considerable constraint, such as its location within the Metropolitan Green Belt and the High Weald Area of Outstanding Natural Beauty (AONB) ~~and the Kent Special Landscape Area~~."
5	2.3	*[last sentence]* "Along with Royal Tunbridge Wells, Southborough is constrained by the Metropolitan Green Belt and the High Weald AONB ~~and the SLA~~.
7	2.12	*[first sentence]* "Approximately 70% of the Borough is designated as High Weald AONB and 22% as Metropolitan Green Belt ~~and currently 82% is designated as Kent Special Landscape Area~~.
14	Box 2	*[Add footnote beneath Box 2]* The sets of objectives in boxes 1 and 2 are of equal importance, and the positions of individual objectives within each set imply no particular order of priority.
14	SD3	To ensure that development is consistent with the principle of living within environmental limits by conserving ~~conserve, wherever possible,~~ finite non-renewable resources, including land, energy, water, soil and air quality wherever possible and ensuring that any trade-offs are made in an explicit and transparent way.
14	SD4	To avoid making adverse contributions to ~~ensure that development has regard to the potential impacts of~~ climate change, having regard to the potential impacts of already-unavoidable long-term changes and (where possible) mitigating such impacts. ~~and to its long-term implications~~
19	4.21	*[insert after 4th sentence]* The conclusion of the Infrastructure Delivery Plan (IDP) is that the Core Strategy does not place undue reliance on critical elements of infrastructure for which funding is unknown. There is also a reasonable prospect of such critical elements being delivered in the plan period.
20	CP1	In pursuit of the Spatial Strategy set out in Box 3 (Chapter 4) and to ensure that development is delivered in a managed way, the ~~following provisions will apply~~ Borough Council will allocate sufficient sites in the Allocations DPD and Town Centres Area Action Plan DPD to meet the Borough's known development needs as set out in Core Policies 6-15. ~~Site Allocations~~ ~~The Borough Council will seek to allocate sufficient sites to meet the Borough's known development needs as set out in Core Policies 6-15. To be allocated, sites must be located as follows:~~ ~~- be within the Limits to Built Development (LBD) of all settlements with a LBD or~~ ~~- be contiguous with the LBD of the main urban area or the small rural~~

Page	Policy/ Paragraph	Recommended Change
21	5.3	~~towns as defined in the Settlement Hierarchy (Box 4, Chaper 4)~~ 1 Priority will be given to the allocation and release of previously developed land within the LBD of settlements. Selected greenfield sites within and/or adjacent to the LBD of settlements in the main urban area and small rural towns will also be allocated and released as appropriate to maintain a sufficient phased supply of deliverable and developable land. Sites adjacent to or outside the LBD of villages will not generally be allocated or released. 2 Exceptionally, allocations may be made or sites be released ~~Sites~~ in locations other than as specified in Core Policy 1(1) above ~~will not generally be allocated for development. An exception may be considered~~ where an identified need for any of the following types of uses cannot be met on such sites: - affordable housing (for local needs only) at the villages where the need cannot be met on a site within the LBD in accordance with Core Policy 6: Housing Provision - employment uses in the rural areas in accordance with Core Policy 14: Development in the Villages and Rural Areas - recreational uses in accordance with Core Policy 8: Retail, ~~and~~ Leisure and Community Facilities Provision ~~**Release of Allocated Sites**~~ 3 [delete] 4 [delete] ~~**Unallocated Sites**~~ 5 [delete] 6 [delete] 3 The Allocations DPD and Town Centres Area Action Plan DPD will establish broad phasing arrangements for the release of allocated sites. Progress on implementation will be monitored through the Annual Monitoring Report and, if necessary, action may be taken to manage the delivery of housing sites in accordance with the principles set out in PPS3, particularly paragraphs 62-67. **Development Contributions** ~~7~~ 4 Developments on a~~A~~ll allocated and unallocated sites will be required either to provide, or to contribute towards the provision of, the services, facilities and infrastructure for which they create a need. To fulfil the requirements of PPS3, the Borough Council has undertaken a Strategic Housing Land Availability Assessment (SHLAA) 2009, which ~~identified a sufficient number of suitable sites that could potentially be developed to~~ demonstrated the potential for the Allocations DPD and Town Centres Area Action Plan DPD to allocate sufficient sites to deliver the Borough's needs for housing during the period to 2026 (see Core Policy 6: Housing Provision for further information). It is anticipated that additional sites for a variety of other uses will be identified during the preparation of the Town Centres Area Action Plan DPD and the Allocations DPD.

Page	Policy/ Paragraph	Recommended Change
21	5.4	In practice, the ~~potential~~ sites assessed ~~that are identified~~ in the SHLAA ~~the Borough Council has identified (and will continue to identify)~~ are not equally suitable for development, either in terms of the aims of the Spatial Strategy, or in terms of their individual characteristics. It ~~is~~ will therefore be appropriate to carefully assess their relative merits and prioritise their development. ~~use and~~ Core Policy 1 provides the basis for ~~does~~ this in two main ways: - by seeking the ~~to~~ allocation~~e~~ of the most appropriate and sustainable sites for development ~~in order to test their relative merits formally through the planning process~~ - by giving guidance on the way ~~controlling the order~~ in which allocated sites are released over the lifetime of the Plan.
22	5.10	Core Policy 1 therefore prioritises ~~Priority will be given to~~ the allocation of sites on previously developed land located within the existing Limits to Built Development (LBD). The current extent of the LBDs, as ~~existing LBDs were~~ defined by the Tunbridge Wells Borough Local Plan 2006 ~~and their extent~~ is shown on the adopted Proposals Map, but the LBDs will be reviewed during preparation of the Allocations DPD. On the basis of currently known land availability (and making no allowance for ~~but assuming that there will be no~~ windfall development – see paragraphs 5.18~~9~~, 5.21~~3~~ and 5.22 ~~5.24~~ further) it will also be necessary to allocate greenfield sites and/or sites outside the existing LBD in order to maintain a sufficient supply of deliverable and developable land to accommodate the Borough's identified development needs. Core Policy 1 therefore allows for allocations on both previously developed and greenfield land and it will be necessary for the Allocations and Town Centres Area Action Plan DPDs to consider both sources. ~~Core Policy 1(3) requires these sites to be released after previously developed sites inside the LBD.~~
22	5.11-12	*[Combine as follows under subheading 'Greenfield Sites outside the existing Limits to Built Development']* Where it is necessary to draw on ~~G~~greenfield sites they will only be allocated where they are adjacent to the main urban area or the small rural towns and their allocation is ~~specifically~~ required to meet the Borough's ~~an~~ identified needs for development. Such sites will be selected on the basis of their relative sustainability credentials, their comparative ~~their ; and where it is no longer necessary to retain them for their~~ public or visual amenity value and the extent of their contribution to ~~or to retain~~ the character of the surrounding area. Allocations beyond the LBD of villages will not be made except in accordance with policy CP1(2)~~. By *allocating* the greenfield sites that may be needed during the Plan period, the Borough Council will be able to maintain a greater degree of control over their use and the timing of their release through a phasing policy in the DPD in which they are allocated. Sites outside the existing Limits to Built Development 5.12 Outside the LBD, sites will only be allocated if they are located at the main urban area or the small rural towns, and not at the villages.~~ This approach reflects the respective roles of Royal Tunbridge Wells and Southborough ~~these settlements~~ as part of a Regional Hub and the other towns as local hubs, as expanded under policies CP9-13. ~~To avoid sporadic development and unnecessary encroachment into the countryside, sites that are allocated outside the LBDs of these settlements must be contiguous with (share a common border) the existing LBD. Changes to the existing LBD may be made, if necessary, as development on sites that are allocated in subsequent DPDs is completed.~~
23	5.14	*[second and third sentences combined]* This ~~is the same size~~ threshold is the same as that used ~~at which the Borough Council sought~~ to identify sites for assessment in ~~through~~ the SHLAA and represents a reduction ~~. This was lowered~~ from the 0.4ha threshold used to allocate sites in the Local Plan 2006 on the basis that …….
23	5.14	*[final sentence]* While development on unallocated sites above 0.2ha in area may ~~come forward~~ be permitted during the Plan period ~~and be permitted under Core Policy 1(5)-1(7)~~, the Borough Council will have particular regard to how the~~se~~ above issues are addressed. ~~and it must be satisfied that the benefits of~~

Page	Policy/ Paragraph	Recommended Change
		~~the development would outweigh the departure from the plan-led approach.~~
23	5.15	There are clear advantages in allocating sites for the whole of the Plan period. However, in order to husband scarce land resources in a heavily constrained area and take account of unexpected circumstances~~, however, and to avoid over-development at any single point in time~~, it is also important to manage land release in accordance with the Plan, Monitor, Manage (PMM) approach. The land release strategy given by Core Policy 1 will ensure that development is driven in accordance with the Spatial Strategy and that the objectives of this Core Strategy are met. The principal phasing ~~information~~ for individual sites, or groups of sites, will be set out ~~provided~~ in the Allocations DPD and Town Centres Area Action Plan DPD ~~in which they are allocated~~. Sites in different settlements may be released simultaneously. This will help to support the roles identified in the Core Strategy for the various settlements. The quantity of land to be released in each settlement will depend, however, upon its position in the Settlement Hierarchy, as set out in Box 4 (Chapter 4).
23	5.16	~~The land release strategy in Core Policy 1 applies to allocated sites, and also to unallocated sites, to the extent that they may be developed in accordance with Core Policy 1(5) 1(7). It favours~~ Core Policy 1(1) prioritises the release of previously developed land within the existing defined LBD of the Borough's settlements, both to facilitate access to services while minimising the need to travel and to protect valuable features of the countryside and open space.
23 23	5.17	~~**Release of Allocated Sites**~~ ~~Sites within the Limits to Built Development~~ [delete]
24	5.19	~~It should be noted that u~~Unallocated 'windfall' sites have contributed a very significant amount of development in the Borough in recent years and the great majority of these have been sites on previously developed land within the LBD. The Core Strategy makes no allowance for windfalls in terms of the number of dwellings for which allocations need to be made in the Allocations DPD and TCAAP DPD. ~~It would therefore be detrimental to the objectives of the Core Strategy to overlook any future contribution from this source and therefore Core Policy 1(6) explains how they~~ However, such sites will be counted towards the land supply once planning permission for them has been granted.
24	5.20	[delete]
24	5.21	*[first sentence]* Core Policy 1(2) sets out three specific circumstances in which it may be appropriate to consider allocating and releasing sites outside the LBD that are not ~~contiguous with~~ adjacent to the LBD of the main urban area or the small rural towns.
24	5.22	[delete]
24	5.23	[delete]
24	5.24	[delete]
26	CP2	*[part 2]* A long term land reserve (designated in this plan as 'Rural Fringe') will be maintained and a review of land within that category will be conducted in parallel with the preparation of the Allocations Development Plan Document to ensure that Green Belt boundaries will endure thereafter until 2031. ~~not need to be altered at the end of the plan period~~.
27	5.31	It remains the Borough Council's intention to maintain the general extent (i.e. the broad overall coverage) of the Green Belt in accordance with Government guidance that, once Green Belt boundaries have been established, they should be

Page	Policy/ Paragraph	Recommended Change
		altered only exceptionally, to ensure that ~~it's~~ the primary ~~functions~~ purposes of the Green Belt and its main attribute ~~the~~ of ~~maintaining~~ openness ~~and preventing the coalescence of settlements~~ are retained.
27	5.32	~~In terms of the detailed inner Green Belt boundaries around the settlements in the Borough,~~ However, the South East Plan states, in the supporting text to Policy AOSR8: Tonbridge/Tunbridge Wells Hub, that "*there may be a ~~likely~~ need for small scale Green Belt review at Tunbridge Wells*" in order to be able to accommodate sufficient development here to support its Regional Hub status ~~(Secretary of State's Proposed Changes)~~. This is capable of being an exceptional circumstance for a review of the inner boundaries of the Green Belt ~~, in which the boundaries could be reviewed~~ (PPG2, paragraphs 2.6-2.7). Any release of land from the Green Belt, following a review would be dependent on there being no suitable non-Green Belt sites available to support the requirements of the Regional Hub. The Borough Council would then consider the release of sites within the Green Belt that are adjacent to ~~contiguous with~~ the Limits to Built Development (LBD) of Royal Tunbridge Wells and Southborough where this would least compromise the purposes ~~function~~ of the Green Belt.
27	5.33	~~The Borough Council's Strategic Housing Land Availability Assessment (SHLAA) and Annual Monitoring Report (AMR) will help to monitor whether there are sufficient non-Green Belt sites to support the Regional Hub status.~~ On the basis of currently known land availability, as set out in the SHLAA 2009, there may be no need to release Green Belt sites for development during the period to 2026. However, in parallel with the preparation of the Allocations DPD a review will be undertaken of the adequacy or otherwise of the stock of safeguarded non-Green Belt land outside the LBD, designated as Rural Fringe in previous Local Plans. This is because compliance with PPG2 requires there to be a sufficient stock of developable Rural Fringe sites to permit housing development to continue in 2026-31 at the same annual rate as in 2006-26 without further review of the Green Belt. ~~The first SHLAA, completed in early 2009, showed that Green Belt sites should not need to be released during the Plan period. As stated in paragraph 5.32, any small-scale review of the Green Belt at Tunbridge Wells would be dependent upon there being no suitable non-Green Belt sites~~. This review of Rural Fringe sites will not take place at ~~In~~ locations other than Royal Tunbridge Wells and Southborough~~, no Green Belt sites will be allocated or released during the Plan period (see also Core Policy 9: Development in Royal Tunbridge Wells and Core Policy 10: Development in Southborough)~~.
28	5.38	As indicated at paragraphs 5.32-33 above, t~~T~~he Borough Council will retain ~~maintain~~ a stock of safeguarded land reserved as Rural Fringe to extend beyond the Plan period to 2031. The existing Rural Fringe sites ~~will~~ were not~~, however, have been~~ excluded from consideration in the first SHLAA and ~~could, therefore, be considered for future development to form part of the Borough's development land supply.~~ their relative merits (including their 5 year deliverability and 10 year developability) will need to be considered against those of other candidate sites in the process of preparing the Allocations DPD/TCAAP. ~~The 5-year deliverability and 10-year developability suitability, availability and viability of Rural Fringe sites will be assessed against that of other greenfield sites contiguous with the LBD.~~ In accordance with Core Policy 1: Delivery of Development, Rural Fringe sites, like other sites outside the LBD, will not be released unless they are allocated in a DPD.
28	5.39	~~In circumstances where there is a need to utilise~~ If it is necessary to allocate existing Rural Fringe sites, the SHLAA, together with the Landscape Character Assessment and Capacity Study 2009, will help to identify suitable ~~broad~~ areas for ~~to inform the~~ designation ~~of~~ as replacement Rural Fringe sites through the Allocations DPD ~~to replenish the long-term land reserve~~.
37	CP4(3)	~~Net loss of biodiversity and geodiversity will be prevented by applying a hierarchical approach to conserving and enhancing the network of nationally, regionally and locally designated sites and habitats.~~ A hierarchical approach to nature conservation and the protection of biodiversity and geodiversity will be applied across the sites and habitats of national, regional and local importance within the Borough. The objective will be to avoid net loss of biodiversity and

Page	Policy/ Paragraph	Recommended Change
		geodiversity across the Borough as a whole.
38	5.94	*[from third sentence onwards]* The High Weald AONB Management Plan 2004 (2nd edition adopted March 2009) sets out the following: "Time depth and objective analysis has defined the High Weald AONB as characterised by dispersed settlement, particularly historic farmsteads, ancient tracks and routeways, an abundance of ancient woodland, wooded heaths and shaws with a heritage of woodland industries and iron working and small, irregularly shaped and productive fields. These are all draped over a deeply incised and ridged landform of clays and sandstones with numerous gill streams, and are closely related to socio-economic characteristics that have roots extending deep into history. The essential character of the High Weald was established by the 14th century and has survived major historical events and social and technological changes. It is considered to be one of the best surviving coherent medieval landscapes in Northern Europe. This fundamental and largely immutable character is the essence of the natural beauty of the AONB". The High Weald AONB Management Plan is structured around the five key components of this character: geology, landform, water systems and climate; settlements; routeways; woodland; and field and heath~~.objectives for each of the identified components of Natural Beauty~~ and the Borough Council will have particular regard to these ~~objectives~~ in determining development proposals affecting the High Weald.
38	5.95	*[first sentence]* '…..including largely unspoilt areas of countryside ~~currently designated as Special Landscape Areas (SLA)~~, ~~the~~ Ancient Woodland and the Rural Lanes, will be conserved and enhanced. Within the Limits to Built Development there are ~~also other~~ locally identified….'
38	5.96	*[last sentence]* This is also supported by Planning Policy Statement ~~7: Sustainable Development in Rural Areas (PPS7) 2004~~ 4: Planning for Sustainable Economic Growth, 2009, which aims to protect the countryside 'for the sake of its intrinsic character and beauty'.
38	5.97	*[final sentence]* ~~This will be used by the Borough Council in both strategic and development control decisions and will be updated in due course to consider the justification of the retention of local landscape designations such as the currently designated Kent Special Landscape Areas.~~ "The assessment will be used as a key tool to guide decisions in the preparation of all plans and strategies, development control decisions, and other decisions bearing on the management of land.
39	5.99	*[from third sentence]* '……..outside the Borough boundary at Dungeness SAC/Dungeness to Pett Level SPA and Hastings Cliffs SAC. However, the Borough Council will monitor progress with the ongoing assessment and recreational management strategies being undertaken in respect of Ashdown Forest by Wealden District Council, and is prepared to participate in any collaborative cross-authority management plan or associated scheme which results from these studies. Any measures that need to be applied by the Borough Council will be incorporated in future DPDs and SPDs.
42	CP5	*[first sentence]* ~~The unique character of the Borough will be maintained and the impacts of climate change adapted for and mitigated against by applying sustainable design principles and encouraging best practice in sustainable design and construction.~~ The Council will apply and encourage sustainable design and construction principles and best practice in order to combat avoidable causes of climate change and adapt to and/or mitigate already-unavoidable impacts of climate change, while also recognising the aim of CP4 to conserve and enhance the unique urban and rural heritage characteristics of the Borough.
47	CP6(4)	Affordable housing will be provided as a proportion of the total number of dwellings to be delivered in the Borough and will ~~. Affordable housing will~~ be required on sites capable of delivering 10 dwellings or more. ~~a given number of~~ dwellings~~, which varies by location. Location-specific thresholds are provided in Table 87 and in the place-shaping policies, Core Policies 9-15~~. Where proposals are made for fewer than 10 dwellings ~~a number of dwellings below the relevant threshold~~, the Borough Council may have regard to whether the size of the site would make it ~~in considering whether it is~~ capable of accommodating more than

Page	Policy/ Paragraph	Recommended Change
		that number.
47	CP6(6)	*[third sentence]* Sites must ~~either~~ be well-related to ~~contiguous with, or within 400m of,~~ the Limits to Built Development (LBD) of the village they are intended to serve. Housing development on such sites will: - provide affordable housing to meet a local housing need in perpetuity, and - not prejudice ~~any element of~~ the development strategy for the Borough, as set out in Chapters 4 and 5 of this Core Strategy~~, or conflict with any LDF policy.~~
48	CP6(8)	*[Introduction: first sentence]* Sites will be identified ~~and, where possible~~, allocated and safeguarded to accommodate the number of pitches required to address the unmet need as identified in the South East Plan.
48	CP6(8)	*[fourth bullet]* that development should not prejudice ~~any element of~~ the development strategy for the Borough, as set out in Chapters 4 and 5 of this Core Strategy.~~, or conflict with any LDF policy~~
49	5.139	*[second sentence onwards]* The SHLAA has demonstrated the general potential for the Allocations DPD and TCAAP DPD to identify an adequate number of sites without making an allowance for windfall sites. However, as individual housing growth locations to 2026 are likely to be dispersed and relatively small-scale it has been unnecessary to identify broad geographical locations in this strategy except at Paddock Wood~~. identified sites with sufficient capacity to meet requirements i-ii above and therefore it has been neither necessary for the Borough Council to identify broad areas for growth in years 11-15 (2020/21-2024/25), nor for it to make an allowance for windfall sites in the first 10 years of its housing land supply~~
49	5.140	Sites will be allocated and phased in the TCAAP and Allocations DPD as necessary to provide housing in sustainable locations and ~~in supporting~~ support the Spatial Strategy set out in Box 3, Chapter 4. ~~In seeking to provide housing in sustainable locations and in supporting the Spatial Strategy, it will be delivered on sites to be allocated and released in accordance with Core Policy 1: Delivery of Development. Sites will be allocated in the TCAAP and Allocations DPD as appropriate~~ U~~u~~ntil such time as these DPDs are adopted, the allocations provided by the Local Plan 2006 will continue to apply. ~~Core Policy 1 seeks to prioritise the development of sites within the existing LBD of the Borough's settlements and of those comprised of previously developed land~~. The indicative housing trajectory to 2026 shown in Figure 3 below, prepared for the Core Strategy period on the basis of the findings of the first SHLAA, demonstrates the way in which the Borough's housing requirement will be met over the Plan period. It includes completions during the period 01 April 2006 to 31 March 2008, extant consents at 01 April 2008 and the extent of the allocations needing to be made in the future DPDs ~~that this approach is operable in practice~~. ~~The red line on the trajectory indicates the 6000 dwellings required by the South East Plan.~~
49	Figure 3	[Replace with the revised indicative trajectory at Appendix 2 of this report]
49	5.141	*[second sentence onwards]* Core Policy 1 seeks to prioritise the development of previously developed land within the existing Limits to Built Development (LBD) of the Borough's main urban area and other rural towns. The first SHLAA indicates that development in the Borough should be able to achieve a target of at least 65% on such sites. ~~65% of the total housing potential identified by the first SHLAA (on sites within the settlements or on sites contiguous with the LBD of the main urban area or small rural towns) is on previously developed land and, w~~While this is lower than delivery from this source ~~historically~~ in the recent past (approximately 96% during the period 01 April 2003-31 March 2008), the position is skewed by (a) the SHLAA's identification of a large number of greenfield sites for consideration in the ADPD and TCAAP ~~;~~ and (b) the non-inclusion of ~~because the trajectory does not include~~ a specific allowance for windfall development. Given the ~~provisions of Core Policy 1(6) and the~~ likelihood that development on windfall sites will continue, albeit at a reduced rate, it is anticipated that development on previously developed land will exceed the 65% target over the course of the Plan period. ~~The housing trajectory indicates that~~

Page	Policy/ Paragraph	Recommended Change
		~~greenfield sites should not need to be released before 2015.~~
50	5.142	*[third sentence]* This process, combined with progress monitoring in the Annual Monitoring Report, will enable the Borough Council to ~~phase allocated sites forward or back in the trajectory as necessary, to ensure that only the most suitable sites are released in accordance with Core Policy 1; and that the Borough Council is~~ be aware of any issues that may threaten future housing delivery and make any necessary and appropriate adjustments to the phasing arrangements in the Allocations DPD and TCAAP in order to more appropriately manage the 5 and 10 year supplies of deliverable/developable land.
50	5.143 and replaced table 6	*[third sentence onwards]* Table 6 below sets out the share ~~proportion~~ of the Borough's total housing requirement for 6,000 net additional dwellings that is expected to be provided in each settlement over the Plan period 2006-2026. Recent delivery rates for the period 2003-2008 are provided for comparison: Table 6 Past and Future Housing Distribution by Settlement Settlement | Expected Share~~Proportion~~ 2006-2026 ~~(%)~~ (total 6,000) | Actual Share ~~Proportion~~ 2003-2008 ~~(%)~~ (total 1,999) Royal Tunbridge Wells | 4,200 (70%) | 1,528 (76%) Southborough | 300 (5%) | Paddock Wood | 600 (10%) | 59 (3%) Cranbrook | 300 (5%) | 22 (1%) Hawkhurst | 240 (4%) | 65 (3%) Villages & Rural Areas | 360 (6%) ~~3~~ | 325 (17%) ~~9~~ ~~The Rural Areas~~ | ~~3~~ | ~~8~~
50	5.144 and new table 7	The expected ~~proportions~~ shares for the period 2006-2026 take account of the findings of the SHLAA in terms of the location of deliverable/developable sites; of recent delivery rates; and of the intended future role of each settlement in accordance with the Spatial Strategy. The proportions are repeated in Core Policies 9-13 and are illustrated spatially on the Key Diagram. Taking account of completions during the period 01 April 2006 to 31 March 2008 and extant consents at 01 April 2008, Table 7 below shows how much housing remained to be provided at each settlement from 01 April 2008 to meet the South East Plan target by 2026 in accordance with the amounts set out in Table 6 above. Table 7: Remaining Housing Requirements | | 1 | 2 | 3 | 4 |

	1	2	3	4

Page	Policy/ Paragraph	Recommended Change

Settlement	Core Strategy Requirement 2006-2026 (from Table 6)	Completions 2006-2008	Potential from extant consents at 01 April 2008 (including on existing allocations)	New development required 2008 - 2026 (column 1 minus columns 2 and 3)
Royal Tunbridge Wells	4,200	860	739	2,601
Southborough	300	19	66	215
Paddock Wood	600	21	20	559
Cranbrook	300	7	7	286
Hawkhurst	240	10	38	192
Villages and Rural Areas	360	118	195	47
Total	6,000	1,035	1,065	3,900

50	Below 5.144	Column 4 of table 7 provides an indication of the outstanding amount of housing for which it will be necessary to allocate sites in the Allocations DPD and Town Centres Area Action Plan DPD. The outstanding amount will change annually as more completions occur and as more planning permissions are granted. Table 7 above will therefore be updated annually as part of the Annual Monitoring Report.
50	5.145	*[last sentence]* The findings of the TUCAA will provide one of the inputs into ~~inform~~ a detailed density policy consistent with point 3 of the policy above, in the Development Control Policies DPD.
52	5.151	In seeking to achieve this, the Borough Council will require market sites capable of providing 10 or more ~~a number of~~ dwellings ~~above a given threshold~~ to provide 35% of the total number of units as affordable homes in line with the indicative regional percentage ~~required across the region~~, as set by the ~~emerging~~ South East Plan. This is an increase from the 30% required by the ~~The~~ Local Plan 2006 ~~only required 30%~~. ~~Table 7 below sets out the dwelling number thresholds that will trigger the requirement to provide 35% affordable housing, by place.~~
52	Table 7	*Delete submitted table*
52	5.152	*[sentences 1-3]* ~~The Local Plan 2006 set a 15 dwelling threshold across the Borough. A lower threshold is now set outside the main urban area to take account of the likelihood that smaller sites will come forward in the smaller settlements.~~ It should be noted that development for market housing will not

Page	Policy/ Paragraph	Recommended Change
		generally be permitted outside the LBD of the villages or in the rural areas, but should such development take place, the 10 dwelling threshold~~s in Table 7~~ will apply.
52	5.153	~~Analysis of the estimated housing potential on individual sites in the trajectory at Figure 3 above indicates that applying the dwelling number thresholds in Table 7 to trigger the~~ The 35% requirement will come very close to delivering the amount of affordable housing required to meet the Housing Strategy target, falling just short over the Plan period. On the basis of the Affordable Housing Viability Assessment carried out by the Council in August 2009, there would be weak justification for lowering the thresholds further. ~~current evidence provided by the SHLAA, however, lowering the thresholds in Table 7 further makes little difference to the total number of affordable homes delivered on market sites over the Plan period.~~
52	Above 5.155	*[New paragraph]* Core Policy 1 does not preclude allocations for market housing on sites adjacent to the LBDs of the small rural towns of Cranbrook, Hawkhurst and Paddock Wood as defined in the Local Plan 2006. This is a change from Local Plan policy and will result in the delivery of more affordable housing from market sites in these areas than has occurred in the recent past. Some of the local need for affordable housing in the rural areas will therefore be met through market developments. The residual amount of affordable housing required to meet the rural target of 20 units per annum will be met by the development of rural exceptions sites as set out in para 5.155 below. However, since the majority of the 6% housing target (approximately 360 dwellings) set for the villages and rural areas by the Core Strategy has already been provided, affordable housing on rural exceptions sites will largely be in addition to this 6% provision.
52	5.155-56	*[Combine as follows]* PPS3 allows the local planning authority to develop a Rural Exceptions Site policy to enable small sites within, or on the edge of, rural settlements to be developed for 100% affordable housing in perpetuity to meet specific local identified needs. As such sites are subject to restraint policies, planning permission would not normally be granted ~~These small sites, in particular those located outside the LBD, would not normally be granted permission~~ for other forms of development. ~~5.156 The Local Planning Authority will consider, where possible, allocating small sites for development as Rural Exception Housing Sites as an exception to the general land release strategy in Core Policy 1.~~ Proposed sites for these rural exception schemes should be well related to~~, and not more than 400 metres from, the LBD of~~ the village they are intended to serve, have safe pedestrian ~~and should possess good access~~ links to local services, and normally not be more than 400m from the edge of the LBD. Approval to develop Rural Exception Sites will only be granted where the Borough Council is satisfied that a particular scheme will meet a local need that has already been demonstrated by a comprehensive local survey.
53	Below 5.166	*[New paragraph]* Future DPDs will give consideration to the need for supported accommodation schemes across the Borough. When assessing older persons' housing needs, survey methods will need to recognise the difficulties in engaging older persons. The approach adopted by Housing Needs Surveys will need to be adapted to ensure that as wide a proportion as possible of the population is reached. This will help to ensure that older persons' housing needs are fully recognised when developing housing strategies to meet their needs.
55	5.173	*[New sentence at the end]* CP6(8) is not intended to be in conflict with Circular 01/2006 which indicates that gypsy sites can be acceptable in the countryside.
56	CP7(2)	*[Introduction]* 'The retention ~~and maintenance~~ of existing floorspace and the encouragement of new floorspace ~~particularly~~ in the Key Employment Areas on allocated sites~~;~~ and vacant sites and through the intensification or redevelopment of existing sites…….'
56	CP7(2)	*[bullet 6]* Gills Green – former Hawkhurst Railway Station and ~~environs~~ sidings.

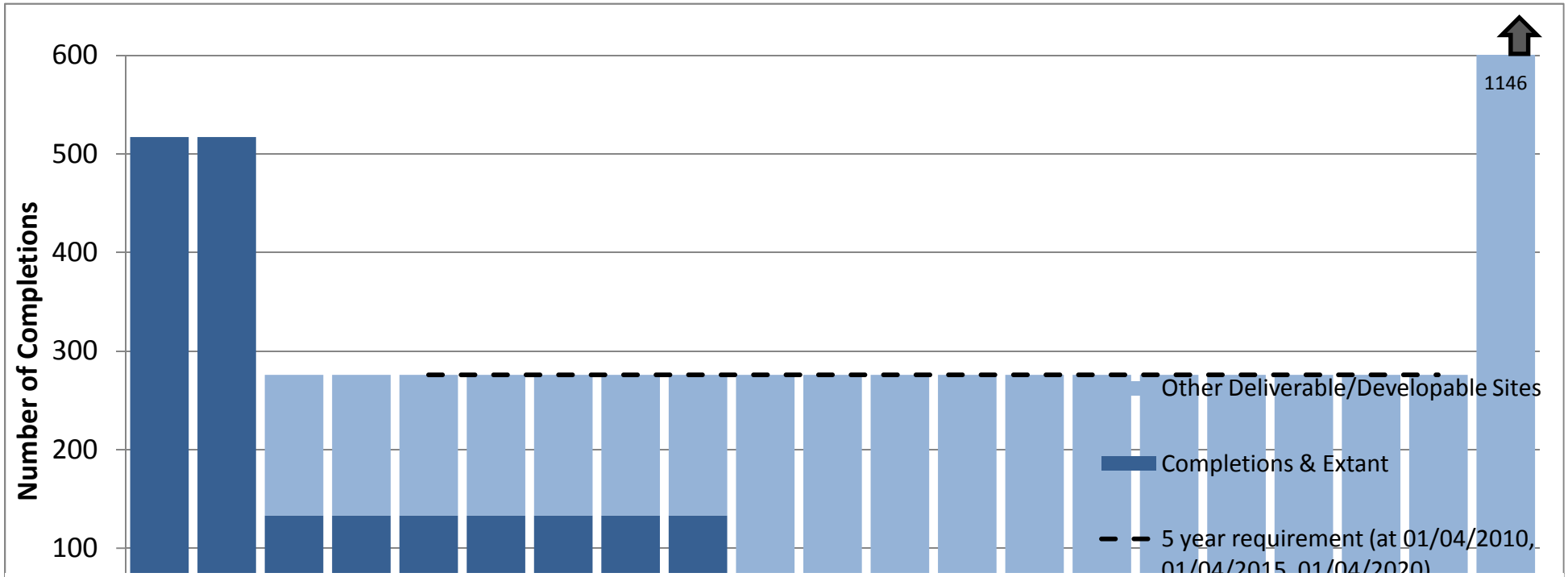
Page	Policy/ Paragraph	Recommended Change
56	CP7(3)	Safeguarding for employment use ~~the Key Employment Areas defined in Core Policy 7(2) and~~ areas and buildings in existing employment use across the Borough, if they:…….
56	CP7(5)	The allocation of new employment sites ……at the regional level ~~through the early review of the South East plan~~ cannot be met…….
57	5.176	*[from second sentence]* However, ~~the consultation paper on~~ new Planning Policy Statement 4: Planning for ~~Prosperous Economies~~ Sustainable Economic Growth (PPS4) defines economic development (for the purposes of the PPS) to include development within the B Use classes, public and community uses and main town centre uses. It also includes ~~and~~ other development which achieves at least one of the following objectives: ~~either~~ ~~provides~~ provision of employment opportunities, ~~generates~~ generation of wealth or ~~produces or generates~~ production or generation of an economic output or product~~s~~.
57	Footnote 19	*[Delete]*
61	5.191	[first sentence] The review of the ELS will accord with the approach set out by the SEEPB in their South East Plan Supplementary Planning Guidance – Employment and Economic Land Assessments (February 2010) ~~: Employment Land Reviews~~ consultation and any emerging ~~the~~ findings of the new Single ~~Regional~~ Strategy in relation to employment provision.
61	5.192	[last sentence] It is recognised in Planning Policy Statement ~~7: Sustainable Development in Rural Areas (PPS7) 2004~~ 4: Planning for Sustainable Economic Growth 2009, that diversification……..
61	5.193	~~PPS7~~ PPS4……..
64	CP8(2)	Appropriate proposals for new retail development will deliver in the order of 26,500sqm ~~the need for 26,236sqm~~ net of comparison floorspace to 2017 identified by the Tunbridge Wells Retail Study 2006, unless a different need is identified through a future Retail Study. Development will be directed……Planning Policy Statement ~~6~~ 4.
64	CP8(3)	[delete]
64	CP8(4)	Proposals for main town centre uses (as defined in PPS4) on sites not within the defined centres will not be permitted unless it has been demonstrated that (a) there are no sequentially preferable sites and (b) there are no adverse impacts on the defined centres. ~~Future out-of-town retailing that would adversely affect the defined centres as set out in Table 10 will be resisted.~~
64	CP8(8)	~~As far as practicable, t~~ The loss of community facilities will be resisted as far as practicable and where there is a demonstrable continuing need and the provision……
65	Table 10	[Include Tunbridge Wells in a separate category - 'primary regional centre']
65	5.203	National guidance is set out in Planning Policy Statement ~~6: Planning for Town Centres (PPS6) 2005~~ 4: Planning for Sustainable Economic Growth (December 2009). ~~and the proposed changes set out in consultation Planning Policy Statement 4: Planning for Prosperous Economies (May 2009). These documents state~~ This document states that the Government's key objective is to promote the vitality and viability of centres by planning for the growth and development of existing centres. Also, the promotion and enhancement of existing centres should continue by focusing development in such centres and encouraging a wide range of services in a good environment, accessible to all. ~~The proposed changes in the new PPS4 remove the 'Needs Test', removing the requirement for an applicant to demonstrate the need for retail development outside of a defined centre. It is intended that this will be replaced by a wider 'Impact Assessment', which any proposals for retail development outside the defined centres will need to undertake.~~ The new PPS4 removes the previous "Needs Test" which required an applicant to demonstrate the need for retail development outside of a defined

Page	Policy/ Paragraph	Recommended Change
		centre, although this is replaced by a wider "Impact Assessment". Further guidance on this assessment will be set out within the Development Control Policies DPD.
65	5.204	Policy TC1 of the South East Plan identifies Royal Tunbridge Wells, together with Tonbridge , as a Primary Regional Centre, which will be the focus for the town centre uses set out in ~~PPS6~~ PPS4.
65	5.205	……set out in ~~Annex A of PPS6~~ Annex B of PPS4.
65	5.206	……set out in ~~PPS6~~ PPS4 and demonstrate…..
66	5.210	The study considers……to meet additional quantitative and qualitative need. The study identified a requirement in the order of 26,500sqm ~~for 26,236sqm~~ net of additional comparison (non-food) floorspace for the Borough over the period to 2017. This is ~~further~~ broken down within the Retail Study which sets a guideline comparison floorspace requirement……..
66	5.212	The Borough Council……Study ~~may~~ will be reviewed from time to time ~~during the plan period if~~ as necessary. The first review will be undertaken in time to inform the retail content of the Allocation DPD and Town Centres Area Action Plan. ~~Additionally, i~~If a proposal is made for additional floorspace outside the Borough's defined centres ~~qualititative need is identified and demonstrated for additional floorspace to provide a different retail offer in the Borough during the course of the plan period~~ any such proposals will be assessed against the tests in CP9 and other criteria that will be set out within the Development Control policies DPD.
70	CP9(1)	The general extent of the Green Belt will be maintained for the Plan period unless it is necessary to replenish the stock of Rural Fringe sites required to provide a long-term supply of land to meet future growth requirements to 2031. This will be established by the review to be undertaken in accordance with policy CP2.
70	CP9(2)	Approximately 4200 net additional dwellings ~~70% of the Borough's total housing requirement~~ will be delivered……..
70	CP9(3)	Sites accommodating ~~15~~ 10 or more dwellings will be required…….
70	CP9(6)	CP9(6) In the order of 23,500sqm ~~23,403sqm~~ (net) comparison retail…….
71	5.229	*[first sentence]* In accordance with the recommendations of the Borough Council's Retail study 2006, ~~the~~ provision of in the order of 23,500sqm ~~23,403sqm~~ (net) of comparison retail floorspace……
71	5.231	In order to support a sustainable settlement and, taking account of the findings of the SHLAA, it is anticipated that approximately 4200 net additional dwellings ~~70% of the Borough's total requirement for housing during the Plan period~~ will be provided at Royal Tunbridge Wells, which is consistent with recent delivery rates over the period 2003-2008. New development should provide a mix of housing types and sizes, as set out in Core Policy 6: Housing Provision and should seek to address local affordability issues. Sites capable of accommodating 10 ~~15~~ or more dwellings will be required to provide 35% of the total number of dwellings as affordable homes.
72	5.235	*[second sentence]* ~~See paragraphs 5.32 and 5.33 of Core Policy 2: Green Belt for further information.~~ As indicated in paragraphs 5.32 and 5.33, a review of the inner boundaries of the Green Belt will be undertaken in parallel with the preparation of the Allocations DPD in order to ensure that the stock of Rural Fringe sites is replenished as necessary to provide a long-term supply of land safeguarded to meet growth requirements to 2031.
73	CP10(1)	The general extent of the Green Belt will be maintained for the Plan period unless it is necessary to replenish the stock of Rural Fringe sites required to provide a long-term supply of land to meet future growth requirements to 2031. This will be established by the review to be undertaken in accordance with policy CP2.
73	CP10(2)	Approximately 300 net additional dwellings ~~5% of the Borough's total housing requirement~~ will be delivered……..

Page	Policy/ Paragraph	Recommended Change
73	CP10(3)	Sites accommodating ~~15~~ 10 or more dwellings will be required…….
73	CP10(5)	In the order of 500sqm ~~422sqm~~ (net) comparison floorspace …….
74	5.238	Therefore, approximately 5% of the Borough's total housing requirement (or about 300 dwellings) ~~proportion of housing requirements~~ will be delivered..
75	CP11	*[introduction]* ~~During the Plan period the character and appearance of the town will be enhanced by protecting its heritage and strengthening its sense of place.~~ A locally-distinctive design identity will be defined for the town, particularly the town centre, in partnership with the local community. New development should contribute to the furtherance of that identity as well as paying particular attention to the integration of the townscape and the surrounding landscape with a view to enhancing the quality of the local environment. At Paddock Wood:
75	CP11(2)	Approximately 600 net additional dwellings ~~10% of the Borough's total housing requirement~~ will be delivered……..
75	CP11(4)	Development within the town and at the planned urban extension will be located in accordance with the Strategic Flood Risk Assessment and PPS25, including the sequential test as appropriate, together with the requirement for site-specific FRAs. Opportunities will be taken to integrate flood risk management with the planning and delivery of new development including, wherever possible, the reduction of existing flood risks in the town.
75	CP11(7)	In the order of ~~882~~ 900sqm (net)……..
75	CP11(9)	A site for a community facility will be allocated and a facility provided ~~and a site will be allocated if a need is identified~~ during the Core Strategy period.
75	5.245	*[add at the end]* The plan will define a locally-distinctive design identity for the town centre in partnership with the local community and give guidance on the ways in which new development in the town centre will be required to contribute to enhancing its sense of place, including the provision of appropriate landmark buildings and the identification, retention and improvement of local heritage elements and other valued features.'
76	5.247	*[second sentence]* The Strategic Flood Risk Assessment (SFRA) ~~2007~~ Level 2 2009 indicates…….
76	5.247	*[add after second sentence]* The built-up parts of the town, south of the railway, are identified in the Strategic Flood Risk Assessment as an 'area of critical drainage' which can suffer flooding from storm-water sewers due to surcharging caused by constricted culverts under the railway. As a result proportionate flood risk assessments will be required for proposed developments in that area of the town. A Flood Risk Management Strategy will also be developed to identify relatively low cost options to alleviate flooding to existing properties and provide mechanisms for the delivery of such schemes.
76	5.248	*[final sentence]* In order to address local housing choice and affordability, therefore, an ~~modest~~ extension to the east and/or south of the town outside the areas of flood risk ~~may~~ will be necessary during the course of the Plan period. Since the SFRA indicates that this development may offer opportunities to assist in alleviating the existing flood risks in the town built-up area, this is another matter which will be taken forward in the context of the Allocations DPD and the Flood Risk Management Strategy referred to above.
76	5.249	*[second sentence]* This would result in the provision of approximately 600 net additional ~~10% of new~~ dwellings during the plan period ~~to be provided~~ at Paddock Wood.
76	5.252	*[penultimate sentence]* ……recommends a net increase of ~~882sqm~~ in the order of 900sqm of comparison floorspace……
76	5.253	During the lifetime of the Core Strategy, a~~A~~s additional housing is developed in Paddock Wood, a site for additional community facilities will be identified and developed in order to support the local community and enable appropriate access

Page	Policy/ Paragraph	Recommended Change
		to community facilities~~, it may prove necessary to provide additional community facilities. During the lifetime of the Core Strategy it may therefore be appropriate to allocate sites for a community facility within Paddock Wood~~.
78	CP12	*[introduction]* Development at Cranbrook during the plan period will ~~secure its long term viability and vitality~~ support and strengthen its role as a small rural town with its own character.
78	CP12(2)	Approximately 300 net additional dwellings ~~5% of the Borough's total housing requirement~~ will be delivered……
78	CP12(4)	[Delete]
78	CP12(5)	In the order of 1150sqm ~~1118sqm~~ (net) additional comparison retail floorspace……..
78	5.256	*[first sentence]* ~~Planning Policy Statement 7: Sustainable Development in Rural Areas (PPS7) 2006~~ Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4) 2009 recommends locating development……
79	5.259	~~The Strategic Housing Market Assessment (SHMA) 2008 recommends that, to facilitate the delivery of affordable housing in rural areas, flexible site thresholds may be applied.~~ In accordance with Core Policy 1: Delivery of Development, market housing development may be allocated ~~would be permitted~~ on sites within~~,~~ and/or ~~contiguous with,~~ adjacent to the LBD of Cranbrook. All developments of 10 or more dwellings ~~The lower site threshold of 10 or more dwellings will be applied on all eligible sites. All sites that meet the threshold~~ will be expected to deliver affordable housing in accordance with Core Policy 6: Housing Provision.
79	5.262	*[second sentence]* A need for in the order of 1150sqm ~~1118sqm~~ (net) of new comparison retail floorspace was, however, identified up to 2017.
79	5.264	*[second sentence]* In order to support the local community and enable appropriate access to community facilities, it is currently considered that it will be necessary ~~may therefore prove necessary~~ to provide additional community facilities.
80	CP13	*[introduction]* New development will contribute to ~~securing the long term vitality and viability~~ supporting and strengthening the role of Hawkhurst as a small rural town serving the wider area. At Hawkhurst:
80	CP13(2)	Approximately 240 net additional dwellings 4~~% of the Borough's total housing requirement~~ will be delivered…….
80	CP13(4)	In the order of 450sqm ~~411sqm~~ (net) additional comparison retail floorspace…….
80	5.266	*[last sentence]* This approach is consistent with ~~Planning Policy Statement 7: Sustainable Development in Rural Areas (PPS7) 2006~~ Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4) 2009 and…….….
81	5.269	~~The Strategic Housing Market Assessment (SHMA) 2008 recommends that, to facilitate the delivery of affordable housing in rural areas, flexible site thresholds may be applied.~~ In accordance with Core Policy 1:Delivery of Development, market housing development may be allocated ~~sought~~ on sites within~~,~~ and/or ~~contiguous with,~~ adjacent to the LBD of Hawkhurst and ~~therefore the lower site threshold of 10 or more dwellings will be applied on all eligible sites.~~ All developments of 10 or more dwellings will be expected to provide affordable housing in accordance with policy CP6.
81	5.271	*[first sentence]* ……healthy in terms of its vitality and viability, although a need for in the order of 450sqm ~~411sqm~~ (net) of new comparison retail floorspace up to 2017 was identified.
81	5.273	*[first sentence]* …it is currently considered that it will be ~~may prove~~ necessary to provide additional community facilities.
82-88	CP14& CP15 5.274-5.304	Delete the submitted text; replace it with the single merged and edited policy and the re-ordered and edited paragraphs set out in Appendix 3.

Page	Policy/ Paragraph	Recommended Change
i-xv	Appendix 1 Tables 11-18	[Include footnotes at the foot of each page] - 'Key Specific Projects' are those identified in the Infrastructure Delivery Plan as being of high or medium risk to the CS
viii	Table 15	No development with ~~detrimental impact~~ unacceptable effect on groundwater, surface water or water quality; and no development ~~within the high risk flood zones~~ in areas at high risk from flooding will be permitted contrary to EA advice or without measures acceptable to EA to protect it and prevent the increased risk of flooding elsewhere.


600
500
400
300
200
100
Number of Completions
1146
Other Deliverable/Developable Sites
Completions & Extant
5 year requirement (at 01/04/2010,

APPENDIX 3 – MERGED/EDITED VERSION OF CP14 and CP15

Core Policy 14

Development in the Villages and Rural Areas

~~At the villages~~: Development in the Villages and Rural Areas:

1. Approximately ~~6% of the Borough's total housing requirement~~ 360 net additional dwellings will be delivered in the villages and rural areas on sites to be allocated and released in accordance with Core Policy 1: Delivery of Development. Sites capable of accommodating 10 or more dwellings will be required to provide affordable housing in accordance with Core Policy 6(5).
2. New development will generally be restricted to sites within the Limits to Built Development (LBD) of the villages in accordance with Core Policy 1: Delivery of Development. Development will be appropriate to the scale and character of the settlement
3. ~~Approximately 3% of the Borough's total housing requirement will be delivered in the villages on sites to be allocated and released in accordance with Core Policy 1: Delivery of Development~~
4. 3. Outside the LBD of the villages, affordable housing to meet an identified local need in perpetuity may be allowed in accordance with Core Policy 1(2) ~~and 1(4) and Core Policy 6(6). All other housing sites, other than those provided under Core Policy 14(3), will be required to provide affordable housing in accordance with Core Policy 6(5) if they are capable of accommodating 10 or more dwellings~~.
5. 4.Village centres will be enhanced to provide a focus for communities. The loss of local services will be resisted and the development of facilities, including community facilities, to meet local needs will be encouraged. The rural economy will be strengthened and its long-term sustainability safeguarded by providing opportunities for commercial activities that utilise rural buildings and resources appropriately, including rural buildings that are no longer required or suitable for agricultural use. Employment uses related to the land will be encouraged, including appropriate forms of tourism, agriculture, forestry and equestrian activity
6. 5. Designated buildings and areas of historic or environmental importance will be conserved and enhanced to ensure the special character of the villages is maintained
7. ~~Non-motorised modes of transport within and between the villages and higher order settlements will be encouraged by ensuring that the existing network of public footpaths and bridleways is protected, maintained and improved~~

~~1.~~ 6.The ~~natural environment~~ countryside will be protected for its own sake and a policy of restraint will operate in order to maintain the landscape character and quality of the countryside

~~2.~~ 7.The interrelationship between the natural and built features of the landscape will be preserved, enhanced and, where necessary, restored, this being the principal determinant of the character of the rural areas. Development will maintain the local distinctiveness of particular localities

~~3.~~ 8.Non-motorised modes of transport between the rural settlements and within the rural areas will be encouraged by ensuring that the existing network of public footpaths and bridleways are protected, maintained and improved. Opportunities for new green routeways within, and between, settlements, and between settlements and areas of recreation, will be identified and planned for to encourage ~~non-vehicular~~ non-motorised modes of transport and to enhance biodiversity

~~4. The hierarchy of settlements consisting of small rural towns, villages and settlements in the countryside will be maintained and the Borough Council will work with its partners to improve access between them~~

5.275~~4~~ The rural areas are characterised by a thriving network of towns, villages and hamlets. There are 17 villages within the Borough, as listed in Box 4: Settlement Hierarchy (Chapter 4)~~. Each of these settlements has~~, each with a defined LBD, together with a number of smaller hamlets. The diverse nature of the rural areas is highlighted by the different settlement types it accommodates and their various functions, all being located within a predominantly high quality rural landscape. Future development should aim to strengthen the interrelationship of the rural settlements, both within and outside the Borough boundaries.

5.276~~5~~ Many of the issues that affect the rural areas of the Borough are covered elsewhere in the Core Strategy, but there are some particular issues that need specific reference.

The Villages

5.277~~6~~ The strategy for the villages is to promote a sustainable economy while maintaining and enhancing their distinctive character and environment and also that of the surrounding countryside. All the villages have some general facilities that serve local residents, such as a primary school, shop, public house, doctors surgery and church, together with basic recreational facilities; for example, a village or community hall, recreation ground and children's play area. Most of the villages are located within the Green Belt and/or the Area of Outstanding Natural Beauty ~~or the currently designated Special Landscape Area~~. These rural settlements often lack a variety of local employment sources and suffer from poor public transport provision that at best can be sporadic and costly, leading to social and economic isolation among

those sections of the community without regular access to private modes of transport.

5.278~~7~~ Key issues for the rural villages, which are highlighted in other chapters in this strategy relating to the rural areas, include:

- meeting local needs for affordable housing
- the loss of local facilities such as schools, village shops, pubs and rural employment opportunities
- a limited supply of employment opportunities
- ongoing decline in agriculture and rural industries
- poor and expensive public transport and isolation for people who do not drive
- growing demands for recreation

~~Economic vitality of the villages~~

The Rural Areas

5.279 The Borough contains a significant amount of high quality countryside and it is essential that the Core Strategy seeks to conserve and enhance this resource for existing and future generations, while supporting a thriving rural economy. Core Policies 11: Paddock Wood, 12: Cranbrook, and 13: Hawkhurst~~ and 14: The Villages~~ provide additional principles for development in the rural towns ~~and in the villages~~. The overall thrust of these policies will be to provide flexibility to enable development to meet the individual needs and support the individual identities of the small rural towns ~~areas~~, while recognising the overall importance of the landscape quality and character.

5.280~~8~~ As identified in Chapter 2: Context for Development, the Borough's rural landscape is of a high quality and a large percentage of the Borough is covered by the High Weald Area of Outstanding Natural Beauty (AONB) ~~and currently designated Special Landscape Areas (SLAs)~~. The diverse, locally distinctive and historic landscape has been formed over a long period of time and is identified by a patchwork of agriculture, woodland, heathland and rural settlements intersected by lanes and routeways. This intrinsic character and the attractive appearance of the countryside is one of the Borough's principal assets, making a significant contribution to the special landscape character of the Borough's rural areas and quality of life to those living, working in and visiting the Borough. These assets can also be used to facilitate economic development and tourism.

5.281~~9~~ The Landscape Character Assessment and Capacity Study 2009 will be used to inform possible future expansion around the settlements in the main urban area and small rural towns. The study defines the relative capacity of the landscape to accommodate housing and/or business development around these

settlements. The findings of the study will be considered in conjunction with other background evidence and policies to enable the boundaries of any future development to be determined and to identify the landscape infrastructure required to integrate development proposals into the existing landscape character.

5.282~~90~~ Within AONBs, it is Government policy to conserve and enhance their natural beauty, while having due regard to social and economic considerations. Restoring and maintaining the interrelationships between the natural, social and built features of the landscape and recognising biodiversity and cultural heritage and the impacts these have had on the development of the rural landscape, plays a significant part in this management. It is vital to identify and encourage these interrelationships in order to maximise the potential of the rural assets in promoting long-term sustainability in the rural areas and to maintain the natural and built features. Major development within the rural areas should not take place except where it can be demonstrated that exceptional circumstances apply. ~~Within the areas that have been identified as being of particular landscape character importance, development will only be permitted if it would conserve or enhance the natural beauty and special character of the landscape.~~

5.283~~91~~ The extensive network of rural lanes and Public Rights of Way that intersect the rural areas are considered to be one of the most attractive and readily appreciated features of the Borough. The network of routeways, which includes historically important droveways and sunken lanes, is a key component of the High Weald landscape, both reflecting its historical context and being an integral part of its present-day character. Improving access to, and within, the rural areas by these routes will increase their desirability for tourist and other recreational activities and encourage the use of more sustainable modes of transport more generally. It is also important to maintain and enhance their essentially undeveloped character. Core Policy 4: Environment sets out the importance of green links to the enhancement of biodiversity.

5.284~~92~~ The landscape of the High Weald is characterised by a dispersed pattern of historic farmsteads, visually distinctive clusters of oasts and Wealden hall houses. It is important that the potential of the historic buildings and the historic and social context that created the settlement patterns are recognised, as they form an intrinsic part of the landscape character that can, in turn, be used as an asset to facilitate rural development.

5.285~~93~~ Within the Borough there are a number of Historic Parks and Gardens that are an important part of the national and local heritage. A positive approach to the management and maintenance of these Historic Parks and Gardens is encouraged. The Borough Council is currently working with Kent County Council and the Kent Gardens Trust to update the Kent Gardens Compendium that was originally compiled in 1992 and first updated in 1996. Gaining a

wider knowledge and understanding of these heritage assets and making the information available to landowners and the wider public, will help to ensure that the cultural and landscape importance of the Historic Parks and Gardens is recognised and will facilitate a recognition and an understanding of their future management requirements.

Housing in the Villages and Rural Areas

5.286 Approximately ~~3%~~ 6% of the Borough's total housing requirement will be delivered in the rural areas; that is, on sites located outside the ~~main~~ urban areas and small rural towns. ~~small rural towns and villages as listed in the Settlement Hierarchy shown in Box 4 (Chapter 4)~~ ; ~~almost one third less than in recent years~~ This rate represents *approximately* 360 dwellings **over a 20-year period**, which is a significantly lower rate than over the last five years (2003/08), during which period 17% of the Borough's housing occurred at the villages and in the rural areas, representing 325 dwellings in total. The justification for this proposed lower level of housing development in these areas is that, within the rural areas and outside of the villages with a defined LBD, development or conversions for new residential development will not generally be allowed. One of the few exceptions to this may be for the development of a permanent dwelling that is required to support an existing agricultural or forestry activity to enable such workers to live at, or very close to, the site of their work. It will be necessary to demonstrate that having a person living within close proximity is essential for the running of the agricultural activity throughout the year.

~~**Previously para 5.282 New para number 5.286**: Within the LBD of the villages, development should accord with Core Policy 1: Delivery of Development and will be limited to schemes that are considered appropriate to the scale and character of the settlement. The SHLAA will inform the Allocations DPD, ensuring that appropriate sites within the villages are identified and, where possible, allocated for housing over the period of the Core Strategy. This development will help to ensure the vitality and viability of the villages.~~

5.287 Table 7 in Core Policy 6 indicates that, after taking into account housing completions ~~after~~ from 01 April 2006 to 31 March 2008 and the housing potential from extant consents, the majority of the 6% housing required (approximately 360 dwellings) allocated by the Core Strategy to the villages and rural areas has been provided. Within the LBD of the villages, development will be limited to schemes that are considered appropriate to the scale and character of the settlement. Small-scale allocations may be made to accommodate market and/or affordable housing. Outside the LBD of villages, affordable housing to meet local identified housing needs in perpetuity may be allowed in accordance with Policy CP1(2). As stated in paragraph 5.155 (CP6: Housing Provision), the

affordable housing delivered from market housing development in the small rural towns of Cranbrook, Hawkhurst and Paddock Wood will absorb some of the local housing needs in the rural areas. Any residual local housing needs within other parts of the Borough will be met through the development of rural exception housing sites.

Rural Exceptions Housing

5.288~~3~~ Paragraph 5.153 ~~5.154~~ of Core Policy 6: Housing Provision gives details of the level of housing need within the rural areas of the Borough. It is recognised both by Central Government (for example, in Planning Policy Statement 3: Housing) and by Tunbridge Wells Borough Council (for example, in the Borough Housing Strategy 2006-2011) that there is a need for more affordable housing within the rural areas. Such provision will enable local people on modest incomes to remain in, or move back to, the local community in which they already live or work, or with which they have strong local connections.

5.289 ~~4~~ The approach to housing development in rural areas will be one that seeks to sustain rural communities, recognising the need within rural areas for both market and affordable housing and a choice of tenures. The Borough Council has developed the 'Rural HeLP Project' to work in partnership with the Parish/Town Councils and Action with Communities in Rural Kent to address the issue of the lack of affordable homes in the rural areas to meet local needs. This will help the Local Authority to identify small sites for local needs affordable housing where it is required. Such sites may otherwise be subject to policies of restraint (such as Green Belt) and would not be released for market housing. Sites must, however, be contiguous with the LBD of the village they are intended to serve, or be well related to that village. Core Policy 6: Housing Provision sets out the Borough Council's policy for providing such sites.

Economic vitality of the villages

5.290~~5.278~~ While many of the villages still provide a variety of services for their communities, the range in some of the villages is limited. It is important that existing local services are encouraged and supported by policies to ensure that these facilities remain and continue to meet the needs of local communities. Economic development within rural settlements that would assist in creating thriving and sustainable rural communities will be encouraged.

5.291~~9~~ The South East Plan recognises the importance that small rural market towns play within the countryside by acting as a focal point for the surrounding rural areas. These settlements have, in recent years, been successful in economic and social terms and their role as local hubs will be supported. The local character and identity of these settlements should be reinforced and enhanced, as

it is recognised that their individuality is a key component of their success.

5.292 Paragraph 5.226~~5~~ of Core Policy 8: Retail and Leisure Provision sets out how community facilities can be developed to serve a broad range of local needs that may not be met by more formal service providers. In the smaller villages that are less well served, the development of community facilities will ensure a wider service provision, providing an economic and social focus for the village.

The wider rural economy

5.293~~80~~ Although agriculture (including hunting, horticulture, forestry and fishing) only provides 3% of employment within rural Kent as a whole, it remains an important part of the Borough's rural economy and is also instrumental in protecting the character and appearance of the landscape. ~~The complex relationship between the natural, social and built features of the Borough's landscape is discussed in Core Policy 15: Development in the Rural Areas~~. The rural economy has been changing during the past decades, with a trend towards rural businesses diversifying from traditional rural activities, primarily through the re-use of farm and other rural buildings for commercial, non-agricultural purposes. This has not only helped to retain economic activity within rural areas, but has also enabled some farms to remain operational, as the diversified activities financially support the remaining farming business.

5.294~~81~~ The Council's approach towards economic development, including tourism, within the rural areas is set out in Core Policy 7: Employment Provision ~~and Core Policy 15: Development in the Rural Areas~~. The main approach will be to strengthen the rural economy and encourage employment uses related to the land. A balanced approach to farm diversification, including the conversion of redundant rural buildings for business uses, will continue to be taken. As discussed in Core Policy 7: Employment Provision, paragraph 5.200~~199~~ (Visitor Attractions), the development of tourist and recreational facilities within the rural areas that utilise existing rural resources and attractions will be encouraged.

5.295 ~~4~~ The development of a range of locally-based commercial enterprises will provide a range of employment opportunities and underpin a strong local economy. Within the rural areas, the local settlements are often at the heart of a rural community providing essential services and facilities. The Tunbridge Wells Economic Strategy 2006-2009 recognises that developing the local economy while maintaining and improving existing local services will encourage sustainable development within the rural areas. Locally-based economic development will help to address pockets of deprivation that exist within the rural areas, while encouraging vibrant rural communities.

5.2965 Agriculture, horticulture and forestry have an important and varied role in the rural economy, including the maintenance and management of the countryside. Land management will need to follow best practice to ensure that the conservation of biodiversity is a priority. Core Policy 4: Environment sets out how biodiversity can be enhanced through policies to ensure that this approach is followed. Within the context of economic development, farmers should be encouraged to be more competitive and more sustainable and, where appropriate, to diversify into new agricultural and commercial ventures, including renewable energy crops, in order to ensure a farm's viability and to maximise opportunities to strengthen the rural economy, while maintaining the character of the rural landscape.

5.2976 Development of sites for commercial uses within the rural areas will need to follow the criteria set out in Core Policy 1: Delivery of Development. Part (2) of Core Policy 1 states that an exception to the Land Release strategy may be considered where a need has been identified that provides employment in the countryside. Such commercial development would be required to demonstrate a direct link to the land and/or utilise rural resources and buildings. The re-use and adaptation of redundant rural buildings that are worthy of retention can be an important resource for meeting the needs of new and expanding rural enterprises, while encouraging farmers to diversify their operations. Consideration will need to be given to the retention of these buildings for future agricultural related development, but, where conversion is appropriate, priority should be given to business use, including tourism, where suitable.

5.2987 Parts of the rural areas of the Borough within, or adjoining, the High Weald AONB are characterised by a distinctive dispersed settlement pattern of historic farmsteads. In recent years, structural changes in the farming industry have meant that there is often no longer a use for these buildings within modern agriculture, or the buildings have been separated from the land and agricultural enterprise that they would traditionally have served. The future of these historic groups of buildings, that both reflect the changes in the rural economy over past centuries and are also considered to be an important component of the High Weald landscape, is largely dependent on a use being found to ensure that it is economically viable to maintain them. In light of the previous paragraph, consideration should primarily be given for their commercial use, including tourism where appropriate.

5.2998 Due to the unavailability of suitable land and to environmental constraints within or adjoining the small rural towns of Cranbrook and Hawkhurst, brownfield land at the former Hawkhurst railway station in Gills Green was allocated in the Local Plan 2006 for Class B1, B2 and B8[1] use, subject to the uses causing

[1] The Use Classes Order defines B8 uses as storage and distribution

no significant harm to the amenities or character of the area. There is still some unused capacity at this site that could provide economic development opportunities for the surrounding area, while utilising previously developed land.

5.300~~299~~ Forestry operations mostly lie outside the scope of planning controls, although the planning system is the principal means for regulating the rate at which land is transferred from woodlands to other rural and urban uses. The Government's forestry policy, set out in the England Forestry Strategy 1999 has two main aims: (i) the sustainable management of existing woods and forests; and (ii) a continued steady expansion of woodland area to provide more benefits for society and the environment. Regard will be given to those aims when determining planning proposals.

Retail, Leisure, Community Facilities and Tourism

5.301~~0~~ Paragraphs 5.225 and 5.226 ~~5.224 and 5.225~~ in Core Policy 8: Retail and Leisure Provision refer to 'Community Facilities', their importance in providing a wide range of facilities for the local community and their role in sustaining the local community, particularly in the smaller, more remote, areas of the Borough that are not otherwise well served. The retention and development of such facilities will be actively encouraged and a policy will be provided in the Development Control Policies DPD. In those rural areas that currently lack local retail facilities, the establishment of social enterprises such as 'community shops' will be encouraged.

5.302~~1~~ Tourism and recreation can provide important sources of employment and income to the rural areas, while also contributing to the maintenance and development of existing local services. Appropriate land management will ensure that the high quality rural landscape is maintained and improved, providing an important environmental resource that will also support a wide range of rural-based recreational activities, including walking, fishing, golf and horse riding. It is important to ensure that the level and intensity of such activities does not have a detrimental impact upon the character of the rural areas. In the appropriate circumstances, existing rural buildings worthy of retention and in suitable locations could be converted to provide tourist accommodation.

5.303~~2~~ Horse riding and other equestrian activities are popular forms of recreation in the countryside that can fit in well with farming activities and help to diversify rural economies. It is important to ensure that all equestrian development, whether domestic or larger commercial activities, is of an appropriate scale and design to reflect its rural location. Careful attention should be given to siting and landscaping details to ensure that proposals do not detract from the locality's character and appearance. Farm diversification schemes could include schemes for the re-use of rural buildings to accommodate small-scale equestrian development.

~~Housing~~

~~5.282 Within the LBD of the villages, development should accord with Core Policy 1: Delivery of Development and will be limited to schemes that are considered appropriate to the scale and character of the settlement. The SHLAA will inform the Allocations DPD, ensuring that appropriate sites within the villages are identified and, where possible, allocated for housing over the period of the Core Strategy. This development will help to ensure the vitality and viability of the villages.~~

~~5.283 Paragraph 5.154 of Core Policy 6: Housing Provision gives details of the level of housing need within the rural areas of the Borough. It is recognised both by Central Government (for example, in Planning Policy Statement 3: Housing) and by Tunbridge Wells Borough Council (for example, in the Borough Housing Strategy 2006-2011) that there is a need for more affordable housing within the rural areas. Such provision will enable local people on modest incomes to remain in, or move back to, the local community in which they already live or work, or with which they have strong local connections.~~

~~5.284 The approach to housing development in rural areas will be one that seeks to sustain rural communities, recognising the need within rural areas for both market and affordable housing and a choice of tenures. The Borough Council has developed the 'Rural HeLP Project' to work in partnership with the Parish/Town Councils and Action with Communities in Rural Kent to address the issue of the lack of affordable homes in the rural areas to meet local needs. This will help the Local Authority to identify small sites for local needs affordable housing where it is required. Such sites may otherwise be subject to policies of restraint (such as Green Belt) and would not be released for market housing. Sites must, however, be contiguous with the LBD of the village they are intended to serve, or be well related to that village. Core Policy 6: Housing Provision sets out the Borough Council's policy for providing such sites.~~

~~The Natural and Built Environment~~

~~5.285 Core Policy 4: Environment discusses the Borough's distinctive rural landscape characteristics and its variety of heritage assets. The villages are located within this rural setting and many contain a number of heritage assets (as defined in Core Policy 4: Environment) and/or designated conservation areas. Development proposals will need to demonstrate that the character of the designated conservation areas and/or heritage assets will be conserved and enhanced and key open spaces and areas of landscape importance protected. These natural and built assets are an important resource for local recreation and tourism; their careful~~

~~management will ensure that this source of rural income is retained.~~

~~Core Policy 15~~

~~Development in the Rural Areas~~

~~In the rural areas:~~

5. ~~The natural environment will be protected for its own sake and a policy of restraint will operate in order to maintain the landscape character and quality of the countryside~~
6. ~~The interrelationship between the natural and built features of the landscape will be preserved, enhanced and, where necessary, restored, this being the principal determinant of the character of the rural areas. Development will maintain the local distinctiveness of particular localities~~
7. ~~The rural economy will be strengthened and its long-term sustainability safeguarded by providing opportunities for commercial activities that utilise rural buildings and resources appropriately, including rural buildings that are no longer required or suitable for agricultural use. Employment uses related to the land will be encouraged, including appropriate forms of tourism, agriculture, forestry and equestrian activity~~
8. ~~Non-motorised modes of transport between the rural settlements and within the rural areas will be encouraged by ensuring that the existing network of public footpaths and bridleways are protected, maintained and improved. Opportunities for new green routeways within and between settlements will be identified and planned for to encourage non-vehicular modes of transport and to enhance biodiversity~~
9. ~~The hierarchy of settlements consisting of small rural towns, villages and settlements in the countryside will be maintained and the Borough Council will work with its partners to improve access between them~~
10. ~~Housing development will generally be restricted to the small rural towns and villages in accordance with Core Policies 11-14. No more than 3% of the Borough's total housing requirement will be met in other rural locations and any sites capable of accommodating 10 or more dwellings will be required to provide affordable housing in accordance with Core Policy 6(5)~~

~~Environment~~

~~5.286 The rural areas are characterised by a thriving network of towns, villages and hamlets. The diverse nature of this part of the Borough is highlighted by the different settlement types it accommodates and their various functions, all being located within a predominantly high quality rural landscape. Future development should aim to strengthen the interrelationship of the rural settlements, both within and outside the Borough boundaries.~~

~~5.287 The Borough contains a significant amount of high quality countryside and it is essential that the Core Strategy seeks to conserve and enhance this resource for existing and future generations, while supporting a thriving rural economy. Core Policies 11: Paddock Wood, 12: Cranbrook, 13: Hawkhurst and 14: The Villages provide additional principles for development in the rural towns and in the villages. The overall thrust of these policies will be to provide flexibility to enable development to meet the individual needs and support the individual identities of the rural areas, while recognising the overall importance of the landscape quality and character.~~

~~5.288 As identified in Chapter 2: Context for Development, the Borough's rural landscape is of a high quality and a large percentage of the Borough is covered by the High Weald Area of Outstanding Natural Beauty (AONB) and currently designated Special Landscape Areas (SLAs). The diverse, locally distinctive and historic landscape has been formed over a long period of time and is identified by a patchwork of agriculture, woodland, heathland and rural settlements intersected by lanes and routeways. This intrinsic character and the attractive appearance of the countryside is one of the Borough's principal assets, making a significant contribution to the special landscape character of the Borough's rural areas and quality of life to those living, working in and visiting the Borough. These assets can also be used to facilitate economic development and tourism.~~

~~5.289 The Landscape Character Assessment and Capacity Study 2009 will be used to inform possible future expansion around the settlements in the main urban area and small rural towns. The study defines the relative capacity of the landscape to accommodate housing and/or business development around these settlements. The findings of the study will be considered in conjunction with other background evidence and policies to enable the boundaries of any future development to be determined and to identify the landscape infrastructure required to integrate development proposals into the existing landscape character.~~

~~5.290 Within AONBs, it is Government policy to conserve and enhance their natural beauty, while having due regard to social and economic considerations. Restoring and maintaining the~~

~~interrelationships between the natural, social and built features of the landscape and recognising biodiversity and cultural heritage and the impacts these have had on the development of the rural landscape, plays a significant part in this management. It is vital to identify and encourage these interrelationships in order to maximise the potential of the rural assets in promoting long-term sustainability in the rural areas and to maintain the natural and built features. Major development within the rural areas should not take place except where it can be demonstrated that exceptional circumstances apply. Within the areas that have been identified as being of particular landscape character importance, development will only be permitted if it would conserve or enhance the natural beauty and special character of the landscape.~~

~~5.291 The extensive network of rural lanes and Public Rights of Way that intersect the rural areas are considered to be one of the most attractive and readily appreciated features of the Borough. The network of routeways, which includes historically important droveways and sunken lanes, is a key component of the High Weald landscape, both reflecting its historical context and being an integral part of its present-day character. Improving access to, and within, the rural areas by these routes will increase their desirability for tourist and other recreational activities and encourage the use of more sustainable modes of transport more generally. It is also important to maintain and enhance their essentially undeveloped character. Core Policy 4: Environment sets out the importance of green links to the enhancement of biodiversity.~~

~~5.292 The landscape of the High Weald is characterised by a dispersed pattern of historic farmsteads, visually distinctive clusters of oasts and Wealden hall houses. It is important that the potential of the historic buildings and the historic and social context that created the settlement patterns are recognised, as they form an intrinsic part of the landscape character that can, in turn, be used as an asset to facilitate rural development.~~

~~5.293 Within the Borough there are a number of Historic Parks and Gardens that are an important part of the national and local heritage. A positive approach to the management and maintenance of these Historic Parks and Gardens is encouraged. The Borough Council is currently working with Kent County Council and the Kent Gardens Trust to update the Kent Gardens Compendium that was originally compiled in 1992 and first updated in 1996. Gaining a wider knowledge and understanding of these heritage assets and making the information available to landowners and the wider public, will help to ensure that the cultural and landscape importance of the Historic Parks and Gardens is recognised and will facilitate a recognition and an understanding of their future management requirements.~~

~~Economic development in the rural areas (including agriculture)~~

~~5.294 The development of a range of locally-based commercial enterprises will provide a range of employment opportunities and underpin a strong local economy. Within the rural areas, the local settlements are often at the heart of a rural community providing essential services and facilities. The Tunbridge Wells Economic Strategy 2006-2009 recognises that developing the local economy while maintaining and improving existing local services will encourage sustainable development within the rural areas. Locally-based economic development will help to address pockets of deprivation that exist within the rural areas, while encouraging vibrant rural communities.~~

~~5.295 Agriculture, horticulture and forestry have an important and varied role in the rural economy, including the maintenance and management of the countryside. Land management will need to follow best practice to ensure that the conservation of biodiversity is a priority. Core Policy 4: Environment sets out how biodiversity can be enhanced through policies to ensure that this approach is followed. Within the context of economic development, farmers should be encouraged to be more competitive and more sustainable and, where appropriate, to diversify into new agricultural and commercial ventures, including renewable energy crops, in order to ensure a farm's viability and to maximise opportunities to strengthen the rural economy, while maintaining the character of the rural landscape.~~

~~5.296 Development of sites for commercial uses within the rural areas will need to follow the criteria set out in Core Policy 1: Delivery of Development. Part (2) of Core Policy 1 states that an exception to the Land Release strategy may be considered where a need has been identified that provides employment in the countryside. Such commercial development would be required to demonstrate a direct link to the land and/or utilise rural resources and buildings. The re-use and adaptation of redundant rural buildings that are worthy of retention can be an important resource for meeting the needs of new and expanding rural enterprises, while encouraging farmers to diversify their operations. Consideration will need to be given to the retention of these buildings for future agricultural related development, but, where conversion is appropriate, priority should be given to business use, including tourism, where suitable.~~

~~5.297 Parts of the rural areas of the Borough within, or adjoining, the High Weald AONB are characterised by a distinctive dispersed settlement pattern of historic farmsteads. In recent years, structural changes in the farming industry have meant that there is often no longer a use for these buildings within modern agriculture, or the buildings have been separated from the land and agricultural enterprise that they would traditionally have served. The future of these historic groups of buildings, that both reflect the changes in the rural economy over past centuries and are also considered to be~~

~~an important component of the High Weald landscape, is largely dependent on a use being found to ensure that it is economically viable to maintain them. In light of the previous paragraph, consideration should primarily be given for their commercial use, including tourism where appropriate.~~

~~5.298 Due to the unavailability of suitable land and to environmental constraints within or adjoining the small rural towns of Cranbrook and Hawkhurst, brownfield land at the former Hawkhurst railway station in Gills Green was allocated in the Local Plan 2006 for Class B1, B2 and B8[2] use, subject to the uses causing no significant harm to the amenities or character of the area. There is still some unused capacity at this site that could provide economic development opportunities for the surrounding area, while utilising previously developed land.~~

~~5.299 The South East Plan recognises the importance that small rural market towns play within the countryside by acting as a focal point for the surrounding rural areas. These settlements have, in recent years, been successful in economic and social terms and their role as local hubs will be supported. The local character and identity of these settlements should be reinforced and enhanced, as it is recognised that their individuality is a key component of their success.~~

~~5.300 Paragraphs 5.224 and 5.225 in Core Policy 8: Retail and Leisure Provision refer to 'Community Facilities', their importance in providing a wide range of facilities for the local community and their role in sustaining the local community, particularly in the smaller, more remote, areas of the Borough that are not otherwise well served. The retention and development of such facilities will be actively encouraged and a policy will be provided in the Development Control Policies DPD. In those rural areas that currently lack local retail facilities, the establishment of social enterprises such as 'community shops' will be encouraged.~~

~~5.301 Tourism and recreation can provide important sources of employment and income to the rural areas, while also contributing to the maintenance and development of existing local services. Appropriate land management will ensure that the high quality rural landscape is maintained and improved, providing an important environmental resource that will also support a wide range of rural-based recreational activities, including walking, fishing, golf and horse riding. It is important to ensure that the level and intensity of such activities does not have a detrimental impact upon the character of the rural areas. In the appropriate circumstances, existing rural buildings worthy of retention and in suitable locations could be converted to provide tourist accommodation.~~

~~[2] The Use Classes Order defines B8 uses as storage and distribution~~

~~5.302 Horse riding and other equestrian activities are popular forms of recreation in the countryside that can fit in well with farming activities and help to diversify rural economies. It is important to ensure that all equestrian development, whether domestic or larger commercial activities, is of an appropriate scale and design to reflect its rural location. Careful attention should be given to siting and landscaping details to ensure that proposals do not detract from the locality's character and appearance. Farm diversification schemes could include schemes for the re-use of rural buildings to accommodate small-scale equestrian development.~~

~~5.303 Forestry operations mostly lie outside the scope of planning controls, although the planning system is the principal means for regulating the rate at which land is transferred from woodlands to other rural and urban uses. The Government's forestry policy, set out in the England Forestry Strategy 1999 has two main aims: (i) the sustainable management of existing woods and forests; and (ii) a continued steady expansion of woodland area to provide more benefits for society and the environment. Regard will be given to those aims when determining planning proposals.~~

~~Housing development in the Rural Areas~~

~~5.304 Approximately 3% of the Borough's total housing requirement will be delivered in the rural areas, that is on sites located outside the main urban areas, small rural towns and villages as listed in the Settlement Hierarchy shown in Box 4 (Chapter 4); almost one third less than in recent years. The justification for this proposed lower level of housing development in these areas is that, within the rural areas and outside of the villages with a defined LBD, development or conversions for new residential development will not generally be allowed. One of the few exceptions to this may be for the development of a permanent dwelling that is required to support an existing agricultural or forestry activity to enable such workers to live at, or very close to, the site of their work. It will be necessary to demonstrate that having a person living within close proximity is essential for the running of the agricultural activity throughout the year.~~

Examination of Tunbridge Wells Core Strategy

APPENDIX 4 SCHEDULE OF TWBC's SUGGESTED MINOR CHANGES

The changes below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying a change in words in *italics*.

The page and policy/paragraph numbers below refer to the "Track Changes" Version of the Core Strategy and do not take account of any pagination/paragraph alterations flowing from the deletion or addition of text as a result of either (a) the content of the table below or (b) the Inspector's recommendations on soundness.

Page	Policy/ Paragraph	Suggested Change
13	Heading before 3.13	Strategic Objectives and Sustainable Development Objectives
16	Table 3	*Existing employment land will be maintained and the position reviewed in light of the ~~forthcoming Partial Review of the South East Plan~~ review of the South East Plan through the production of the Single Strategy.*
29	Core Policy 3	*In the 1st point, bullet point 3:* …and enhance ~~pedestrian~~ routes for non-motorised users, including pedestrians and equestrians
29	Core Policy 3	*In the 1st point, bullet point 4:* …to ensure that they ~~remain~~ are convenient and safe for users
33	5.66	*In the 2nd sentence:* The introduction of PIPKIN (Prioritising Investments Programmes for Kent's Integrated Network), which has since been updated to the Scheme Prioritisation System, requires…
33	5.67	*In the last sentence:* Any widening improvements will need to be the subject of a ~~PIPKIN~~ Scheme Prioritisation System submission…
33	5.71	*In the last sentence:* All would be included in the 2010/11 ~~PIPKIN~~ Scheme Prioritisation System process.
34	Cycling and Walking	*Alteration to the heading Cycling and Walking:* ~~Cycling and Walking~~ Cyclists, Walkers and Equestrians
35	5.79	As mentioned in Core Policy 8: Retail, ~~and~~ Leisure and Community Facilities Provision.
35	5.80	*Additional sentence to be added at the end of paragraph:* The needs of all non-motorised users will be considered before new routes are created so that the best choice of status for a new route is made.
35	5.82	As stated in Core Policy 4: Environment and Core Policy 8: Retail, ~~and~~

Page	Policy/ Paragraph	Suggested Change
		Leisure and Community Facilities Provision, the Council…
35	New paragraph after 5.82	*Add additional paragraph after 5.82:* In many areas of the Borough, equestrians have to use the roads. Although people ride or drive horses primarily for leisure and exercise, they may also ride or drive as part of their work in the industry, or in order to reach services such as farriers, veterinary surgeries and riding schools, to travel to and from school or for weddings and funerals. Equestrian routes will be safeguarded, developed and enhanced to maximise safety and sustainability.
37	Core Policy 4, part 5	The Borough's heritage assets, including Listed Buildings, Conservation Areas, Scheduled Ancient Monuments and Historic Parks and Gardens will be preserved and enhanced and ~~positive~~ special regard will be had to their settings
40	5.105	~~The draft Heritage Protection Bill 2008, however, sets out a new approach to the preservation and enhancement of heritage features and will give further clarification to the heritage planning system, which will be incorporated into a new Heritage Planning Policy Statement. The draft Bill currently proposes grouping together features of "*special historic, archaeological, architectural or artistic interest*" under the term 'heritage assets'.~~
43	5.114	*Insert space between 'and' and 'manage':* …and manage flood risk
43	5.116	*Delete inverted comma:* …produced by Environment Agency~~"~~.
46	5.132	~~The design of developments must be integral to improving legibility.~~ Developments should contribute to a sense of place and create places that are easy to navigate; through the use of landmark buildings and recognisable routes, for example. The environment should be easy to move within, having clear distinctions between public and private spaces and putting the needs of ~~pedestrians and cyclists~~ non-motorised users before motor vehicles.
56	Core Policy 7, introductory wording	Sufficient good quality employment land will be provided for strategic and local requirements, as set out within the ~~emerging~~ South East Plan and the relevant Tunbridge Wells Borough Employment Land Study. The Borough Council will, if necessary, review its Employment Land Study ~~following the early partial review of the South East Plan~~ to refine job numbers and identify any further sectoral requirements in light of new information provided at the regional level. Employment provision in the Borough during the Core Strategy period will be achieved by:
57	5.175	Unemployment in the Borough remains very low, with 2.0% unemployment at October 2009 (ONS/Kent County Council) ~~2.1% unemployment at February 2009 (March figures to be released in April, ONS/Kent County Council).~~
58	5.180	This document is currently being reviewed and will be replaced by the West Kent Investment Strategy in ~~late 2009~~ 2010.
59	Table 9	*Second to last row:* Other Services (e.g. personal services, tourism and media)

Page	Policy/ Paragraph	Suggested Change
61	Heading	~~Other Employment Generating Uses~~
62	5.197	The Tunbridge Wells Hotel Futures Study 2005-2021, undertaken by Tourism Solutions, reviews hotel needs and development potential in the Borough. It identified a need for approximately 483 new hotel bedrooms by 2021. The study concludes…
71	5.228	*In the penultimate sentence:* …on the provisions of Core Policy 8: Retail, ~~and~~ Leisure and Community Facilities Provision in relation…
71	5.229	*In the first sentence:* Expansion of Royal Victoria Place, which ~~was~~ is allocated in saved policies in the Local Plan 2006.
71	5.229	*In the penultimate sentence:* …within the town centre and local neighbourhood centres (as defined in Core Policy 8: Retail, ~~and~~ Leisure and Community Facilities Provision).
72	5.232	*In the final sentence:* The TCAAP DPD and Allocations DPD will take this further…
74	5.239	*In the 1st sentence:* …opposite its junction with Western Road, ~~was~~ is allocated in saved policies in the Local Plan 2006.
79	5.255	*In the third sentence:* It has a high concentration of listed buildings, particularly in the central area, which means that these buildings play a ~~cumulative~~ vital role in the town's character and appeal.
78	5.257	*After second sentence:* Approximately 5% of the Borough's total housing requirement will be delivered at Cranbrook. This rate represents *approximately* 300 dwellings and is higher ~~slightly more~~ than in ~~recent years~~ the last five years 2003/08 during which period 1% of the Borough's housing occurred at Cranbrook, representing 22 dwellings in total.
80	Core Policy 13, part 1	All new development will have particular regard to ~~preserving~~ conserving and enhancing…
80	5.267	*After second sentence:* Approximately 4% of the Borough's total housing requirement will be provided in Hawkhurst. This represents *approximately* 240 dwellings compared with the last five years 2003/08 during which period 3% of the Borough's housing occurred at Hawkhurst, representing 65 dwellings in total.
iii	Table 13, column 6	CP3a: Completion of Key Specific Projects identified in the Plans; Programmes; and Strategies column
ix	Table 15, column 6	CP5b: Completion of Key Specific Projects identified in the Plans; Programmes; and Strategies column
x	Table 16,	NI155: 1,800 (~~excluding~~ including rural exceptions sites)

Page	Policy/ Paragraph	Suggested Change
	column 6	
x	Table 16, column 6	NI159: Maintain rolling five-year supply of deliverable housing sites (100%)
xii	Table 17, column 7	Review of the Employment Land Study in light of ~~partial review of the South East Plan in relation to job numbers~~ the findings of the Single Strategy