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# **Report to Tunbridge Wells Borough Council**

**by Rynd Smith** LLB MA MRTPI FRSA

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

**Date 09 June 2016**

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO THE  
TUNBRIDGE WELLS SITE ALLOCATIONS  
LOCAL PLAN**

Document submitted for examination on 8 June 2015

Examination hearings held between 10 November and 9 December 2015

File Ref: PINS/M2270/429/7

## **Abbreviations Used in this Report**

AA	Appropriate Assessment
AAP	Area Action Plan
AoC	Area of Change
AONB	Area of Outstanding Natural Beauty
CS	Core Strategy
DtC	Duty to Co-operate
HRA	Habitats Regulations Assessment
KCC	Kent County Council
LBD	Limits to Built Development
LDS	Local Development Scheme
LP	Local Plan
LSE	Likely Significant Effect
MM	Main Modification
NR	Network Rail
PW to H	The Paddock Wood to Hawkhurst rail alignment
rLP	Replacement Local Plan
SALP	Site Allocations Local Plan
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SW	Southern Water
TW to E	The Royal Tunbridge Wells to Eridge rail alignment
UDF	Urban Design Framework
WRSE	Water Resources in the South East

## **Non-Technical Summary**

This report concludes that the Tunbridge Wells Site Allocations Plan (SALP) provides an appropriate basis for the planning of the Borough, providing a number of modifications are made to the plan. Tunbridge Wells Borough Council has specifically requested me to recommend modifications necessary to enable the plan to be adopted.

All of the modifications were proposed by the Council but where necessary I have amended detailed wording and/or added consequential modifications where necessary and I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- a policy seeking to safeguard land for an expansion of Bewl Water reservoir is deleted, as the proposal which justified the policy will not be implemented within the timescale of the plan;
- policies are modified to reflect progress made on an urban design framework for Royal Tunbridge Wells;
- land allocation policies for areas of change in Royal Tunbridge Wells are changed and in some instances sub-divided to provide greater outcome clarity through master-planning and delivery on complex town centre sites with distinct characters and constraints;
- a policy relating to Former Plant and Tool Hire, Eridge Road in Royal Tunbridge Wells is amended to enable retail and/or employment development outcomes in this town centre site and to address sewerage capacity issues;
- a land allocation policy in Paddock Wood town centre is modified to apply a similar approach to that used for town centre area of change policies in Royal Tunbridge Wells and to provide greater outcome clarity for master-planning and delivery;
- policies at Church Farm, Mascalls Court Road and Mascalls Farm in Paddock Wood are modified to provide greater outcome clarity for master-planning and delivery, including improved references to planning for flooding and drainage and to ensure good responses to ancient woodland; and
- a policy in Hawkhurst is amended to provide greater outcome clarity for master-planning and delivery and to address sewerage capacity issues.

## Introduction

1. This report contains my assessment of the Tunbridge Wells Site Allocations Local Plan (SALP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the SALP's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the SALP is sound and whether it is legally compliant. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the Tunbridge Wells Borough Council (the Council) has submitted what it considers to be a sound plan. The basis for my examination is the submitted draft SALP for consultation (February 2015) which is substantively the same as the document submitted for examination.
3. My report deals with the main modifications that are needed to make the SALP sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act, the Council requested that I should recommend any modifications needed to rectify matters that make the SALP unsound. These main modifications are set out in the Appendix.
4. The Main Modifications that are necessary for soundness all relate to matters that were discussed at the examination hearings and all relate to the effectiveness and deliverability of the proposed allocations in the SALP. Following discussions during the hearings, the Council prepared a schedule of proposed main modifications and carried out sustainability appraisal and this schedule was subject to public consultation for six weeks between 8 February and 21 March 2016. I have taken account of the consultation process and the responses arising from it in coming to my conclusions in this report.
5. I have changed the presentation of some policies as consulted upon in the Appendix to this report, to set out the proposed policy texts of the recommended changes which emerged in separate stages during the examination as consolidated changes: integrating changes that were initially proposed by the Council before or during the examination hearings with changes proposed as actions arising from the hearing process. None of these amendments alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken.

## Assessment of Duty to Co-operate

6. Section s20(5)(c) of the 2004 Act reinforced by paragraphs 178 – 181 of the National Planning Policy Framework (NPPF) requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the SALP's preparation. This refers primarily to the Duty to Co-operate with other relevant bodies (the DtC).
7. I considered whether it would be necessary to allocate more land than had been brought forward in the SALP because it did not make express provision to meet housing need and related development pressure which might arise from neighbouring local authorities or from Greater London.

8. The Council's DtC Statement [CD3.31] and related evidence [TWBC/PS/16] recorded cooperative actions taken in the formulation of the SALP and of the adopted Core Strategy (CS). It summarised the current position, recording that the SALP 'does not allocate any sites which will have impacts beyond the borough's boundaries' [paragraph 4.6] and set out the Council's view that there are no outstanding housing-related concerns from relevant public authorities. Nor did any such authorities seek any changes to the plan to respond to the DtC.
9. Taking all of the evidence provided into account, I have concluded that the DtC has been met. As this plan is not the adopted CS and has been developed within the policy framework provided by the adopted CS, it must provide housing within the strategic framework that the CS sets. It will be for the intended replacement Local Plan (rLP) to address emerging evidence since the adopted CS and deal with the issues that arise.

## **Assessment of Soundness**

### **Main Issues**

10. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings, I have identified three main issues upon which the soundness of the SALP depends. The main issues are as follows:
  - A. Policy, strategy and methodology – the CS relationship
  - B. Mixed-use and Area of Change (AoC) allocations
  - C. Infrastructure policies, delivery & implementation
11. However, the SALP responded to the adopted CS strategic framework with chapters and policies making site specific allocations set out within a geographical framework. On this basis, I have reported on site specific matters as follows:
  - D. Royal Tunbridge Wells and Southborough allocations
  - E. Green Belt and rural fringe allocations
  - F. Paddock Wood allocations
  - G. Cranbrook allocations
  - H. Hawkhurst (Highgate), The Moor and Gills Green allocations
  - I. Villages and rural areas allocations

### **Issue A: Policy, Strategy and Methodology – the CS relationship**

12. The SALP is an allocations plan, prepared within the strategic framework of an adopted Core Strategy (CS) for the period 2006-2026. The role of the SALP, its relationship to the CS and the approaches taken to the development of the evidence base both for the SALP and for local plan-making in the borough as a whole gave rise to the following issues:
  - the consistency of the SALP in relation to the adopted CS, evidence base and national policy and whether it has been positively prepared;
  - the approach taken to the Metropolitan Green Belt; and
  - the approach taken to allocations affecting ancient woodland.

***The consistency of the SALP in relation to the adopted CS, evidence base and national policy and whether it has been positively prepared***

13. Tunbridge Wells Borough is a place which has to deliver sustainable development that responds to the pressures brought about by economic prosperity and growth, an extensive and attractive historic built environment, large areas of land containing natural environment assets and or of landscape value and subject to policies and designations including the Metropolitan Green Belt and the High Weald Area of Outstanding Natural Beauty. Planning to allocate land for sustainable development in this context involves the careful balance of a wide range of competing considerations.
14. Regulation 8(4) of The Town and Country Planning (Local Planning)(England) Regulations 2012 specifies that the policies contained in a local plan must be consistent with the adopted development plan. It has been prepared within the framework provided by a CS adopted on 17 June 2010, preceding the publication of the National Planning Policy Framework (NPPF) by nearly two years. The adopted CS identifies the overall economic, social and environmental objectives for the borough and the amount, type and broad location of development needed to fulfil these objectives. However, in the years that have passed since its adoption, new evidence has arisen and new policies have been articulated which suggest additional needs and new directions of travel, which are proposed to be met by a replacement Local Plan (rLP) which is also under active preparation.
15. I have considered whether the SALP complies with Regulation 8(4). There are instances in which the precise pattern of allocated sites differs marginally from the geographical pattern of development anticipated by the CS. The Council explained [TWBC/PS/17 & 18] that it had delivered development land (and specifically housing sites to which I return below) 'based on the approximate numbers set out in Core Policies 9-14'<sup>1</sup>, whilst also addressing site specific issues and constraints that emerge when allocating land.
16. Events have proceeded, for example enabling a minor over-provision of housing in the settlement of Paddock Wood over that which was proposed in the CS, in turn responding to development opportunities available in and around that settlement, whilst also responding to the presence of constraints in other parts of the borough. Additionally, the housing anticipated by the CS

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<sup>1</sup> TWBC/PS/18 at para 17.

to be provided in the Villages and Rural areas had by 2015 largely been provided through individual applications for planning permission, meaning that substantial additional allocations were not sought in the SALP.

17. Taking these minor variations into account, on balance I agree that the allocations are generally consistent with the CS. The geographic variations observed are within the bounds of general consistency and will deliver the CS strategy. Further, having regard to the availability of land suitable for sustainable development in a borough subject to the extensive constraints discussed above, there will be circumstances in which the allocation of land requires a measure of geographic pragmatism, in order to ensure that other subject-matter policies arising from both the CS and the NPPF are met.
18. Further to representations focussed on the delivery of land for housing development and for provision for the elderly, I have also considered whether the nature of the changes in evidence and policy that have taken place since 2010 mean that the SALP should allocate additional land that would have the effect of materially modifying the strategy in the adopted CS, or alternatively be withdrawn. However, having regard to the Wokingham judgment (and the recent finding in the Court of Appeal on the Tandridge case which confirms the correct approach)<sup>2</sup> there is no basis in law for me to consider this matter further.
19. I have not considered any additional land for allocation (omissions sites) over and above that proposed to be allocated in the SALP, on the basis that the SALP meets the land requirements of the CS and there have been no circumstances in which my consideration of individual proposed site allocations in the remainder of this report have led to a shortfall of land against the requirement set out in the CS.
20. Finally, in terms of consistency with national policy, I have considered whether the SALP adequately responds to the needs of disabled people, within the framework provided by the CS. I conclude that it does and so do not recommend any modifications in this respect.

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<sup>2</sup> Judgment of the Court in *Gladman Development Limited v. Wokingham Borough Council* [2014] EWHC 2320 (Admin) and the subsequent Court of Appeal consideration of the same point in *Oxted Residential Limited v. Tandridge District Council* [2016] EWCA Civ 414.

### ***The approach taken to the Green Belt***

21. The SALP has not proposed a review of the Metropolitan Green Belt boundary engirdling Royal Tunbridge Wells and Southborough, because in the Council's view, the land requirements for those settlements that cannot be met within the existing LBD, can be met when land is allocated from within rural fringe sites (a long term reserve of safeguarded land located between the LBD and the Metropolitan Green Belt Boundary).
22. Having taken this position into account, together with paragraph 83 of the NPPF, I am satisfied that the CS housing land requirement can be met from land within the LBD and land proposed to be allocated from within the rural fringe sites. In reaching this position, I have taken account of the proposed allocations in Royal Tunbridge Wells and Southborough, and in the rural fringe. Subject to matters of detail reported on further below, I find that these allocations are sound. On this basis, there is not a shortfall of allocated and deliverable land in Royal Tunbridge Wells and Southborough and the rural fringe. It follows that I do not accept a need to allocate any land currently in the Green Belt.
23. In reaching this view I have considered whether an argued shortage of or lack of diversity in housing for the ageing population is capable of constituting the exceptional circumstances necessary to trigger an alteration to the Green Belt boundary, but again observe that the role of the SALP in relation to the adopted CS means that I should not recommend the allocation of land in the Green Belt when this direction has not been sought in the CS.
24. It follows that I agree the approach that the SALP has taken to the Metropolitan Green Belt and I have not recommended that any land currently within the Green Belt should be allocated.

### ***The approach taken to allocations affecting ancient woodland***

25. A particular characteristic of the SALP has been the approach taken to the protection and management of ancient woodlands potentially affected by proposed allocations. The borough contains extensive areas of land subject to planning policies and legislative requirements limiting built development. It also contains very extensive areas of woodland, some of which is ancient. It is necessary for the future sustainable development needs of Tunbridge Wells that some new development will have to be located in fairly close proximity to ancient woodland. The means by which this proximity is managed is key to the success of such a policy approach.
26. In this context, the Council had sought to plan positively for circumstances in which it has proposed to allocate land for development close to ancient woodland. Rather than leaving such woodland close to but outside proposed allocations, it has incorporated some areas of woodland or woodland margin into allocated sites and included policies framing how the development process can contribute to the conservation and effective management of this woodland going forward.
27. Key amongst the locations where this strategy was proposed for large allocations were Knights Wood in Royal Tunbridge Wells (policy AL/GB2), Church Road, Mascalls Court Road (policy AL/PW3 as originally proposed) and



Mascalls Farm (AL/PW4) in Paddock Wood and the proposed Crane Valley (policy AL/CR4) allocation in Cranbrook. The thrust of these policies was to specify that:

- a detailed landscape and ecological assessment should be carried out to inform the design of built development, responding to its woodland setting;
  - a larger than typical area of public open space should be provided, within which woodland assets would be preserved or augmented; and
  - a management plan should be provided for retained woodland and landscape features and for necessary ecological and landscape mitigation.
28. I have considered whether this approach to allocation policy drafting for major development could threaten the nature conservation interest of ancient woodlands, contrary to national policies. The Woodland Trust had objected to the SALP on this basis and prepared a Statement of Common Ground with the Council, [TWBC/PS/10], as a consequence of which some changes to policies were agreed. The purpose of these changes was broadly to ensure that good woodland and ecological management practices were adopted and secured through the master-planning and development processes.
29. Developers whose land interests included policies of this nature in large part did not object to them. Nor was evidence brought to suggest that this type of allocation policy might have any unwarranted adverse effect on the viability or deliverability of development.
30. I am satisfied that the policy approach in the SALP to ancient woodland is both necessary and proportionate. I have considered it against the requirements of NPPF policy in paragraphs 109 and 118 and consider that it does protect and enhance valued landscapes whilst also minimising impacts on biodiversity and offering considerable opportunities for net gain through the establishment of coherent ecological networks.

#### **Issue B: Mixed-use and AoC Allocations**

31. I examined the SALP's mixed-use and area of change (AoC) allocations, on the basis that a number of these were for large sites. Masterplans were required to be prepared by developers, but the extent of some of these sites meant that it would be unlikely that developers would come forward together or be able to prepare a comprehensive masterplan. As such, the masterplan requirement for these sites appeared to constrain their future development. I recommend individual changes below where necessary to reinforce the masterplan process for these sites.
32. A related matter was that where these sites are large, they contain areas of very different townscape or urban character, or had distinct built heritage considerations that needed to be addressed at a finer grain than was achieved by the submitted policies. For these reasons, a number of main modifications are proposed, mainly in relation to sites in Royal Tunbridge Wells, to ensure that allocations are deliverable and that they respond to historic built environment and preserve or enhance the character or appearance of conservation areas. The detail of these modifications is addressed further below in the consideration of site specific allocations.

## **Issue C: Infrastructure Policies, Delivery & Implementation**

33. The SALP included allocations seeking to safeguard former rail alignments in two different locations for re-use both as a railway and as a green infrastructure corridor. It included an allocation safeguarding land for a possible expansion of Bewl Water reservoir. I also examined the degree to which infrastructures were required to be provided to enable the implementation of the SALP and whether it included sufficient provision for the identification and delivery of these.

### ***Rail strategic safeguarding***

34. Policy AL/STR3 in the SALP proposes the safeguarding of two alignments:
- Tunbridge Wells Central (the Network Rail (NR) station currently known as Tunbridge Wells) to Eridge (TW to E); and
  - Paddock Wood to Hawkhurst (PW to H).
35. The TW to E alignment includes a disused and de-tracked section connecting Tunbridge Wells station via a tunnel to the former Tunbridge Wells West station and an operating alignment from the former Tunbridge Wells West station to Eridge, currently used by the heritage Spa Valley Railway. The policy aims to preserve the opportunity to re-use this entire alignment as part of the NR network, improving service options by reconnecting Tunbridge Wells Station to the existing NR network at Eridge and by linking the existing London to Uckfield and London to Hastings main rail routes. Opportunities to increase rail commuting and reduce car-borne trips are anticipated. Alternatively and in the interim, retention of the alignment as a green corridor is sought.
36. Having examined the delivery implications of this aspect of the policy in detail and taken account of its implications for existing town centre use and development, I am content that it is sound in its current form without any modifications.
37. Policy AL/STR3 in the SALP also proposes the safeguarding of a disused former rail alignment from Paddock Wood to Hawkhurst (PW to H). This largely rural route traverses much of the central area of the borough from north to south. Whilst it accesses the NR network at its northern end in Paddock Wood, its southern terminus does not connect to the NR network. Unlike the TW to E alignment, this is proposed to be safeguarded solely as a green infrastructure alignment, envisaging use as a 'rail trail' by cyclists and walkers.
38. During the examination, it became apparent that elements of this alignment are no longer physically present, due for example to the disposal of sections of the former track bed and the removal of bridge spans, raising potential deliverability issues. The Council clarified [TWBC/PS/40 & 69] that its policy intention was to indicatively safeguard the general alignment. Suitable alternative routes and links may be required and these would be negotiated with landowners in due course. It proposed an alteration to the explanatory text of the SALP to communicate this intention. I am satisfied that this change does not need to be a main modification. I am also satisfied that the policy as clarified is sound.

### ***Bewl Water strategic safeguarding***

39. Policy AL/STR4 in the SALP proposes the safeguarding of land adjacent to the part of the existing Bewl Water reservoir to facilitate a future increase to the capacity of that facility that could be brought about by raising the dam. The reservoir area is shared between Tunbridge Wells, Rother and Wealden council areas.
40. In the examination, it was confirmed that whilst the proposal had been included in the former South East Plan and in the adjacent Rother Local Plan Core Strategy, adopted as recently as 29 September 2014, it no longer formed a preferred programme option for the infrastructure owner, Southern Water (SW). SW confirmed [IPWR03] that, as a consequence of the likely high environmental and social costs associated with raising Bewl Water, together with the availability of alternative options with lower costs and greater benefits, its Water Resources Management Plan (WRMP) for the period 2015-2040 did not include Bewl Water as a preferred option. Key considerations included the situation of the reservoir in the High Weald Area of Outstanding Natural Beauty (AONB), its nature conservation interest, effects on existing recreational use and foreshore access and disruption to landowners. The Water Resources in the South East (WRSE) group did consider Bewl Water as one of a range of options in 2013, but it was not adopted amongst the 76 strategic options identified in the WRSE 2013 report.
41. SW confirmed that whilst it could not dismiss the possibility of raising Bewl Water being considered as a potential long term option to address future wider resilience requirements, its current focus was to deliver a major water re-use scheme at Aylesford and a number of other smaller interventions to serve its water requirement projected forward to 2040. It did not consider that there were circumstances in which a modification to the SALP to delete safeguarding policy AL/STR4 would give rise to concerns about the delivery of its water services, taking the best account that it could of all growth projections available for its service area. It did not request any alternative safeguarding provision to be included in the SALP.
42. Taking these matters into account, it appears that policy AL/STR4 would not be implemented in the SALP period or for the foreseeable future and so was neither justified nor effective (NPPF para 182). Its retention was unnecessary and could also result in harm due to uncertainty affecting use and development decisions on adjacent land. The policy is unsound on that basis. The Council consulted on a main modification to that effect and no new issues arose from this process. On that basis, I recommend a main modification **MM1** to delete policy AL/STR4.

### ***Local infrastructure planning***

43. Local infrastructure issues were raised including drainage and flooding concerns in Royal Tunbridge Wells and in Paddock Wood. Having taken account of advice from KCC, the Environment Agency and SW, modifications to policies in both of these settlements are recommended to ensure that development on individual allocated sites provide for appropriate flood management and drainage management measures. Where necessary, the addition of a bullet point to policies seeking the connection of development to

the closest element of the sewer network with adequate capacity has been sufficient to secure agreement that concerns about the adequacy of sewer capacity can be met. These modifications are reported individually below.

#### **Issue D: Royal Tunbridge Wells and Southborough Allocations**

44. Royal Tunbridge Wells is a distinctive historic urban centre, which the adopted CS identifies as the primary settlement in the borough. The SALP contains land allocations to give effect to its role as a focal point for a mix of employment, retail and complementary uses including housing. When the CS was adopted, both it and the LDS anticipated that an Area Action Plan (AAP) would be prepared to undertake this role in the town centre. However, since that time, the Council has commenced its movement towards the district wide Local Plan model preferred by NPPF paragraph 153. As part of this process it decided not to progress an AAP, but rather to include necessary design, area of change (AoC) and mixed use allocations policies in the SALP. Following a revision to reflect this, the LDS 2015 [CD3.37] no longer provides for an AAP.
45. A number of representations to the submission version of the SALP arose at least in part from this decision, as some stakeholders had considered an AAP for the town centre to be necessary, or that in the absence of an AAP, changes were required to the SALP to ensure that it was sufficiently clear and effective in the town centre area. Work had been carried out by the Council to prepare an Urban Design Framework (UDF) for Royal Tunbridge Wells. This had progressed since the deposit version of the SALP was prepared and the SALP required clarification to ensure its effectiveness and that of the plan. The SALP allocates substantial areas of land in Royal Tunbridge Wells town centre as 'Areas of Change' (AoCs) and for mixed use development. It also contains housing, employment and retail policies for Royal Tunbridge Wells and for the associated centre of Southborough.

#### ***The UDF***

46. When the submitted SALP was prepared, references to the UDF for Royal Tunbridge Wells town centre reflected the fact that this document had yet to be prepared. Submitted policy AL/RTW1 sought to frame the role and applicability of the UDF, but did so in generic terms, referring to a document that would be prepared and to what it might contain, rather than providing a clear policy basis for its implementation through development management. In this form, the policy led to doubts about the effectiveness of the SALP and the UDF. Because the policy itself was drafted using prospective and conditional language in relation to a document that had yet to be written, it was unclear what applicants for planning permission in the town centre must do to respond to it. It was not an effective policy. Since that time, the UDF has been prepared, made subject to consultation and will shortly be adopted as SPD [CD3.64].
47. The policy did not refer expressly to the conservation area appraisals that were made in 2000 and in 2003 and had been adopted as SPD for the town centre area [CS3.48a&b]. Design and development objectives for the town centre were loosely framed in the policy, which referred to them merely as examples of what development might possibly achieve, rather than concrete expectations.

48. I recommend a main modification **MM2** to policy AL/RTW1, as proposed and consulted on by the Council is required to ensure that this policy is effective, by directly referring to the UDF and to the Conservation Areas Appraisal for Royal Tunbridge Wells and Rusthall (2000) as material considerations for town centre applications, whilst also setting out clear policy objectives arising from the UDF.

### ***AoC allocations***

49. The submitted SALP identifies AoCs over substantial areas of land in the town centre. The first AoC under consideration is at Crescent Road/Church Road (AL/RTW2). As submitted, the main issue with the effectiveness of this policy was the fact that it related to a very large area of land: in effect to two separate strategic sites, both of which gave rise to very different urban design and historic built environment considerations and which were unlikely to come forward as a single comprehensive redevelopment. As the policy had been prepared for such a large area, there was the potential that it did not sufficiently respond to the very particular built environment conservation issues arising on the Crescent Road site, which contains the listed civic complex alongside other notable and landmark buildings. Some stakeholders expressed concerns that the policy did not pay sufficient regard to evidence about the value of the historic built environment or the character and appearance of the conservation area (NPPF paragraph 169). Stakeholders were also concerned that any masterplans should respond to urban design principles and opportunities that had been identified for the AoC, through the UDF process.
50. In response to these concerns, the Council [TWBC/PS/42] proposed that this policy could be made effective by splitting the area of change into two parts: AL/RTW2A including the civic complex, and AL/RTW2B, the former cinema site, which by the time of the examination had already been cleared. This would provide a much clearer basis for the preparation of separate site masterplans, most realistically to be prepared by separate developers and at different times. These separate plans would respond to much more clearly articulated policy requirements for each part of the AoC, enabling concerns about urban design and conservation area responses to be met. Key views and opportunities for the creation of new public open space would be identified and protected. Both revised policies would also make specific provision for coordinating the masterplan process, should the scale of the sites mean that more than one developer was active within each site.
51. I agree that the changes proposed and consulted upon by the Council are necessary for soundness on the basis that it is most unlikely that an effective masterplan could be prepared for the entire AL/RTW2 AoC site and respond to it in urban design and historic built environment terms. The proposal to subdivide the area into two and clarify the policy will overcome this issue and is recommended as main modifications **MM3-A** (The Civic Complex) and **MM3-B** (The former Cinema Site).
52. Some stakeholders remained opposed in principle to elements of the policy for this AoC, taking the view that civic and administrative uses should be retained on the Civic Complex, and the policy as submitted or as proposed to be changed did not do enough to achieve this. Whilst I can appreciate that some

members of the local community would wish to see civic uses retained, these concerns have not been raised in terms that run to the soundness of the SALP. There is no clear planning policy basis to constrain the Council and other public sector service providers' use of their existing property portfolios.

53. An AoC is proposed at Vale Avenue (AL/RTW3). The Council has proposed changes to this policy to conform to the approach taken to policy AL/RTW2 and to address concerns raised by SW [IPWR04] to ensure that development is connected to the sewerage network at the nearest point of adequate capacity. I recommend that these changes are necessary for soundness for the same reasons as changes to that policy and to ensure that sewerage infrastructure can meet demand arising from the proposed development. They form main modification **MM4**.
54. An AoC was proposed at Eridge Road (AL/RTW4). The Council has again proposed changes to this policy to conform to the approach taken to policy AL/RTW2 and to address concerns raised by SW [IPWR04] to ensure that development is connected to the sewerage network at the nearest point of adequate capacity. The site is again a large one, which divides between existing town centre frontage (centred on Union House, which is a large office building potentially available for re-development) and land which is occupied by a car park and Montacute Gardens, older residential development in garden land, some of which does not appear to be immediately available for re-development. The application of a common masterplan requirement again appears likely to provide an impediment to development and, given the nature of the two parts of the site, there is no strong need for coordination. On this basis, I recommend the subdivision of this allocation into two separate mixed use sites, Policy AL/RTW4A Eridge Road **MM5-A** and Policy AL/RTW4B Montacute Gardens **MM5-B**. I also recommend removal of the AoC designation as it does not describe the process that will be undertaken to enable the development objectives for these sites to be met.
55. Policy AL/RTW6 Former Plant and Tool Hire, Eridge Road, is a town centre site currently proposed to be allocated for a mix of uses, which are identified as including housing retail and employment uses. Specific policy provision is also required to address concerns raised by SW [IPWR04] to ensure that development is connected to the sewerage network at the nearest point of adequate capacity. I recommend main modification **MM6** to address these points.
56. **MM7** and **MM8** relate to allocations in Royal Tunbridge Wells for uses including a hotel and for recreation open space respectively with which the Council no longer proposes to proceed and which are proposed to be deleted. Nothing arises from these deletions or from consultation on them that leads to any soundness considerations.
57. Individual concerns were raised in respect of other allocations in both Royal Tunbridge Wells and Southborough. However, having regard to the evidence submitted and my site inspections, no other matters arose that affect the soundness of the SALP and so no further main modifications are recommended.

## **Issue E: Green Belt and Rural Fringe Allocations**

58. For reasons set out in paragraphs 21 – 24 above I consider that the Council has taken an appropriate approach to the allocation of land in the rural fringe. It follows that the proposed allocations in this part of the SALP are sound. The CS does not support and no justified case has been made for the allocation of land in the Green Belt.

#### **Issue F: Paddock Wood Allocations**

59. Paddock Wood is a relatively new settlement in comparison with many others in the borough, largely developed since the arrival of the railway in the 19<sup>th</sup> century. It has an existing function as a local service centre and good rail connections. Its existing built area is relatively unconstrained in historic built environment terms (in comparison with villages in the nearby High Weald). Whilst there is little brownfield land, land immediately surrounding the settlement is not constrained by Metropolitan Green Belt and AONB designations to the same extent as at Royal Tunbridge Wells and Southborough.
60. The key constraints affecting Paddock Wood are flooding and drainage. South of the railway line, the main built area of the town was identified in the Strategic Flood Risk Assessment 2009 (SRFA) [CD3.39-40] as an 'area of critical drainage' and has been the subject of the Paddock Wood Flood Alleviation Study (KCC 2015) [CD2.7].
61. CS Core Policy 11 seeks to support and strengthen the local hub role of the settlement, providing for approximately 600 net additional dwellings and additional comparison retail floor space, community facilities and the provision of flexible employment floor space. Allocations to deliver this strategy are required to respond to the SRFA, integrating flood risk management and using new development to reduce existing flood risks. The policies in the SALP divide between those seeking to define and develop the town centre, those providing land for additional residential development and those providing for employment development, community facilities and landscape protection.

#### ***The town centre***

62. Soundness issues arose in relation to Land off Station Road (Policy AL/PW1), proposing a significant mixed used development area in the town centre, providing additional active-frontage retail, food and drink development opportunities whilst retaining town centre parking provision. Concerns arose from the fact that this site was not in a single ownership, but it was not clear how redevelopment proposals arising on parts of the site would enable the policy objectives to be met in the absence of a coordinating mechanism. Landowner interests also sought greater flexibility to address market needs, highlighting that a less flexible policy may not lead to deliverable outcomes.
63. Given the scale of housing development proposed in this settlement under other policies, it is important that the retail / town centre improvement policy is deliverable and does provide for town centre uses. In this respect, I agree with the Council that sufficient residential development opportunities are provided elsewhere in this settlement, that the addition of a main residential component to this policy could reduce the opportunity to achieve the other town centre development components sought and that residential

development should remain a secondary component in this policy.

64. **MM9** is recommended to make the policy effective. It improves the coordination of development outcomes between different land ownerships and the commercial responsiveness of the policy. It does so by importing the master-plan process used for AoC and mixed use allocations in Royal Tunbridge Wells Town Centre, by identifying primary town centre development outcomes that the master plan and proposals are expected to deliver and additional outcomes that can be delivered. Greater flexibility is provided in respect of the means of and location for delivering access and replacement parking.

### ***Housing, flooding, drainage and ancient woodland***

65. Two large allocations (AL/PW3 and AL/PW4) provide for housing development on green field land at Paddock Wood. These led to concerns about the extent of housing development proposed, the degree to which this could sufficiently address the flooding and drainage issues and the degree to which the site boundaries and public open space content had sufficiently addressed concerns about the effects of development on ancient woodland and associated habitats and species.
66. The land within AL/PW3 is divided into two distinct and separate sites: Church Farm and Mascalls Court Road. They are separated by Church Road, where the two sites have only the briefest of common road frontage on opposite sides of the road. Their landscape characters are distinct: Church Farm is low lying and open, whilst Mascalls Court Road moves south into rising land that marks the transition to the Weald and has a stronger sense of landscape enclosure provided by established trees and hedgerows. Church Farm gives rise to a need for policy changes that ensure that flooding and drainage issues are appropriately managed. Mascalls Court Road requires greater policy specification to address landscape character and public open space. Each site is currently the subject of separate development proposals and that for Church Farm is well advanced. It is most likely that the development of each site will proceed independently and no harm would be done in terms of NPPF or CS policy if this were to occur: it is likely to facilitate swifter delivery of housing. There is little likelihood or practical benefit in the preparation of a common masterplan for both sites, whereas delivery could be reinforced by the preparation of distinct masterplans for each site, each responding more closely to site specific issues.
67. The flood and drainage issues arising on these sites are acknowledged. However, on examination of the evidence I agree that they are capable of sustainable technical solutions, to be secured through planning conditions and / or obligations pursuant to individual planning applications. I am satisfied that, with the modifications proposed, these policies can bring forward applications on these sites that will result in appropriate flood and drainage mitigation measures and that these will address the issues raised and comply with NPPF policy. It should be noted that this position is supported by the Environment Agency, KCC, SW and the internal drainage board.
68. For these reasons, **MM10** proposes the deletion of AL/PW3 and its replacement with two separate policies, designated as AL/PW3A for Church



Farm **MM11-A** and AL/PW3B for Mascalls Court Road **MM11-B**. The modification ensures that the sites can be developed separately whilst necessary flooding and drainage measures are provided.

69. The modifications to Mascalls Farm policy AL/PW4 **MM12** also address concerns about the relationship between housing allocations and ancient woodland and ensure that potential natural environment impacts on the adjacent Foal Hurst Wood Local Nature Reserve are mitigated.

### **Issue G: Cranbrook Allocations**

70. Cranbrook is a small historic town in a relatively remote part of the borough, located in the High Weald AONB. It has a strongly established historic character, many historic buildings and a large central conservation area. CS Core Policy 12 recognises the role of Cranbrook as a housing and service centre for its large rural hinterland, which poses a challenge to ensure that mixed use (including retail and office) development and housing development is delivered in a manner that responds appropriately to the landscape, natural and historic built environment values of the town and its setting. Approximately 300 net additional dwellings are sought by the CS.
71. The existing developed area of Cranbrook contains a number of small brownfield sites appropriate for re-development. Policies AL/CR1, CR2, CR3, CR5 and CR6 allocated such sites in a manner that responds appropriately to the need to provide sustainable development opportunities that are respectful of their built, natural and landscape setting. No modifications are needed to these policies. However, they provide land for in the region of 30 houses, making clear that land outside the current limits to built development is required to enable a substantial body of the housing sought by the CS to be delivered. The Council's response to this requirement has been a proposal to allocate a substantially undeveloped site adjacent to the Crane Valley (AL/CR4) for the provision of up to 250 dwellings.
72. An issue was raised about whether the release of this land for development represents an appropriate response to housing need, given its green field location in the AONB. I have accorded great weight to the need to conserve landscape and scenic beauty (NPPF paragraph 115), including considering whether this allocation should not proceed.
73. The CS has established a strategic need for a housing allocation of this scale to serve Cranbrook – a policy position which took account of the AONB designation that pre-dated it. The Council's evidence assures me that it has considered possible alternative allocations and found that the proposed site is the best strategic option with which to meet that need. I am satisfied that, given the extent of the designated AONB, it would not be possible to deliver locations to enable the CS policy for housing delivery at Cranbrook to be met on any other sites, without causing greater harm to the AONB and to the substantial historic built environment significance of the existing settlement. I am also satisfied that alternatives which led to this housing being delivered outside the AONB would be so far removed from the settlement as to not enable its continued sustainable social or economic development or to meet CS policy for it. They would cease to provide sustainable development outcomes in terms of travel, transport and access to services and facilities. It

would not be in the public interest to fail to meet housing need in what is one of a small number of service centres for the AONB.

74. My accompanied site inspection makes clear that the proposed allocation is in a self-contained landscape area which facilitates a sustainable extension to Cranbrook with the lowest achievable impact on landscape. The selection of the allocation site, which is largely self-contained in landscape terms serves to moderate the harm that development of this scale in any alternative site would cause to both the AONB and the historic town centre.
75. Taking these factors into account, I agree that the considerations raised by NPPF policy at paragraph 116 have been met. The need for housing in Cranbrook meets the exceptional circumstances test in that policy and is in the public interest. It follows that it is appropriate to include an allocation policy providing for major development. I do not recommend any changes as the allocation is sound.

#### **Issue H: Hawkhurst (Highgate), The Moor and Gills Green Allocations**

76. Hawkhurst and its surrounding settlements are located in the High Weald AONB. Housing and employment development is proposed on brownfield land, which provides sustainable development opportunities that are respectful of their built, natural and landscape setting. The Former Springfield Garden Centre AL/HA1 provides the main housing allocation. Proposals for phased delivery suggest that it will be important to provide that whilst part of the site can be developed, individual proposals must not prejudice the development of the site as a whole and a development framework plan is proposed as a main modification to meet this objective. SW have requested that the development shall provide a connection to the sewerage system at the nearest point of adequate capacity and this again forms part of **MM13**.

#### **Issue I: Villages and Rural Areas Allocations**

77. I have examined the allocations proposed in the villages and rural areas. I note the Council's position that the housing anticipated as needed to meet the CS target for this area has already been provided. The Council makes clear in the SALP (at paragraph 8.6) that local needs and affordable housing will continue to be delivered, over and above the CS target. It will be for the rLP to review and consider the housing land requirements for the villages and rural areas moving forward.

### **Assessment of Legal Compliance**

78. My examination of the compliance of the SALP with the legal requirements is summarised in the table below. I conclude that the SALP meets them all.

<b>LEGAL REQUIREMENTS</b>	
Local Development Scheme (LDS)	The SALP is identified within the approved LDS 2015 [CD3.37] which sets out an expected adoption date of March / April 2016. The Local Plan's content and timing are broadly compliant with the LDS.

Statement of Community Involvement (SCI) and relevant regulations	The SCI [CD3.35] was adopted in July 2006 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM).
Sustainability Appraisal (SA)	SA [CD3.63] has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (December 2014) [CD3.52b] screens the plan for likely significant effects (LSE) on the Ashdown Forest SPA/SAC and concludes that there is no mechanism for likely significant effects for HRA purposes on those designations. The spatial distribution of allocations ensures that the SPA/SAC is not approached by major development that could lead to likely significant effects.
National Policy	The Local Plan complies with national policy except where indicated and modifications are recommended.
2004 Act (as amended) and 2012 Regulations.	The Local Plan complies with the Act and the Regulations.

## Overall Conclusion and Recommendation

- 79. The SALP has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.**
- 80. The Council has requested that I recommend main modifications to make the SALP sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the SALP satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.**

*Rynd Smith*

Inspector

This report is accompanied by the Appendix containing the Main Modifications.



## **APPENDIX**

### **Schedule of Main Modifications**

Recommended main modifications arising from the examination process and hearing matters are set out below. References to SALP are to the submitted Tunbridge Wells Site Allocations Local Plan. References to IR are to the Inspectors Report.

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
Policy AL/STR4: Infrastructure – Bewl Water Reservoir	MM1	<p><b>“Policy AL/STR4</b>  <b>Infrastructure</b>  <b>Bewl Water Reservoir (that part of the Reservoir located within Tunbridge Wells Borough)</b></p> <p>The land adjoining Bewl Reservoir situated within Tunbridge Wells Borough will be safeguarded to allow for the provision of additional storage capacity in the future.”</p>	<p>Deletion of Policy AL/STR4:</p> <p><del>“Policy AL/STR4</del>  <del>Infrastructure</del>  <del>Bewl Water Reservoir (that part of the Reservoir located within Tunbridge Wells Borough)</del></p> <p><del>The land adjoining Bewl Reservoir situated within Tunbridge Wells Borough will be safeguarded to allow for the provision of additional storage capacity in the future.”</del></p>
Policy AL/RTW1: Urban Design Framework	MM2	<p>“The Council will seek to prepare and implement an Urban Design Framework for the town centre. This will incorporate detailed guidance on matters such as:</p> <ul style="list-style-type: none"> <li>• accessibility: defining and enhancing arrival points to the town and developing a clear movement strategy</li> <li>• connection and linkages: improved connectivity within the centre, including pedestrian priority streets. Enhancing the physical and visual connections between character areas within the town</li> <li>• improved public realm: creating high quality streets and public spaces using a clear, locally distinctive palette of materials and details. Recognising the role of green infrastructure and key green spaces and the Arcadian character of the town</li> <li>• improving quality: through including features such as a public art strategy, lighting, and protecting key views and landmarks</li> </ul> <p>This framework will be prepared in consultation with</p>	<p>Amendments as follows:</p> <p>“The Council <del>will seek to prepare</del> <u>has prepared</u> and <u>will</u> implement an Urban Design Framework for <del>the</del> <u>Royal Tunbridge Wells</u> town centre. <del>This will incorporate detailed guidance on matters such as:</del> <u>The framework seeks to promote local distinctiveness and incorporates guidance on matters such as accessibility, connections and linkages and improved quality of the public realm and townscape.</u> <u>Development within Royal Tunbridge Wells town centre will be expected to improve:</u></p> <ul style="list-style-type: none"> <li>• accessibility: <u>through</u> defining and enhancing arrival points to the town and developing a clear movement strategy</li> <li>• connection and linkages: <u>through</u> improved connectivity within the centre, including <u>creating</u> pedestrian priority streets. Enhancing the physical and visual connections between character areas within the town</li> <li>• <del>improved quality of the</del> public realm: <u>through</u></li> </ul>

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		key agencies, including Kent County Council and other town centre stakeholders. It is anticipated that new development will be required to conform with, and contribute towards the delivery of, the framework.”	<p>creating high quality streets and public spaces using a clear, locally distinctive palette of materials, <del>and details</del> <u>and appropriate street furniture</u>. Recognising the role of green infrastructure and key green spaces and the Arcadian character of the town</p> <ul style="list-style-type: none"> <li>• <del>improving</del> <u>improving</u> quality <u>of the townscape</u>: through including features such as <del>a</del> <u>a</u> public art <del>strategy</del>, <u>architectural</u> lighting, <u>and</u> protecting key views and landmarks</li> </ul> <p><u>The Urban Design Framework Supplementary Planning Document is a material consideration in determining planning applications and in the implementation of transport schemes and public realm works. This framework will be prepared in consultation with key agencies, including Kent County Council and other town centre stakeholders. It is anticipated that a</u> New development will be required to conform with, and contribute towards the delivery of, the framework. <u>The framework should also be read alongside the Conservation Areas Appraisal for Royal Tunbridge Wells and Rusthall 2000 (or any update to these appraisals) and the guidance contained within these appraisals.</u>”</p>
Policy AL/RTW2: Crescent Road/Church Road Area of Change	MM3-A	<p><b>“Policy AL/RTW 2</b>  <b>Crescent Road/Church Road Area of Change</b></p> <p>The area shown on the Royal Tunbridge Wells &amp; Southborough Proposals Map is designated as an Area of Change.</p> <p>A masterplan shall be prepared by the developer(s) in cooperation with the Borough Council, stakeholders and the local community. The</p>	<p><b><u>“Policy AL/RTW2A: Civic Complex/Crescent Road Area of Change</u></b></p> <p><u>The area shown on the Royal Tunbridge Wells &amp; Southborough Proposals Map is designated as an Area of Change.</u></p> <p><u>A masterplan shall be prepared by the developer(s) with the involvement of the Borough Council, stakeholders and the local community. The masterplan shall indicate the distribution, scale and</u></p>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<p>masterplan shall set out areas for built development and the quantum of development, to include all proposed built development, open space and inter-connected green spaces to provide informal and formal recreation areas, hard and soft landscaping, access roads into and within the site and any other land uses.</p> <p>A comprehensive scheme for the redevelopment and refurbishment of sites, buildings and spaces will be prepared to cover all of the areas included within Policy AL/RTW2. Proposals will be expected to deliver the following:</p> <p><b>Policy AL/RTW2A (Town Hall Site, the 'Civic Complex')</b></p> <ul style="list-style-type: none"> <li>• Civic, educational, cultural and leisure uses: these shall include library, museum, adult education and theatre facilities, including the facilities to be provided by the Cultural and Learning Hub. There shall be no loss of existing educational, cultural and leisure facilities, or public or ceremonial civic functions, from the Area of Change. Any proposals for combining a number of uses within a single facility, or relocating existing uses to new or refurbished buildings within the Area of Change, must clearly demonstrate that they will secure continued or enhanced provision</li> <li>• Retail development: incorporating at least 15,000sqm (net) additional comparison retail floorspace (A1). Opportunities should be explored for the provision of additional retail floorspace in the form of a new department store and other units of varying sizes</li> <li>• Restaurants and Cafés: development shall</li> </ul>	<p><u>quantum of proposed uses together with areas of open space/public realm, vehicular access, parking provision and pedestrian routes into and within the site. Proposals will be expected to deliver:</u></p> <ul style="list-style-type: none"> <li>• <u>civic, educational, cultural and leisure uses: these shall include library, museum, adult education and theatre facilities, including the facilities to be provided by the Cultural and Learning Hub. There shall be no loss of existing educational, cultural and leisure facilities, or public or ceremonial civic functions from the Area of Change unless suitable alternative provision has been secured elsewhere in the town centre</u></li> <li>• <u>retail development: incorporating approximately 15,000sqm (net) additional comparison retail floorspace (A1) which may include a new department store and other units of varying sizes. Retail uses should be provided on the ground floor to ensure active retail frontages</u></li> </ul> <p><u>Other uses may also be delivered as part of the redevelopment and refurbishment of sites within the area. Appropriate uses could include:</u></p> <ul style="list-style-type: none"> <li>• <u>restaurants and cafés: development could provide restaurant and café facilities</u></li> <li>• <u>market facilities: development could provide enhanced market facilities, which may include the provision of permanent facilities</u></li> <li>• <u>hotel and conference facilities</u></li> <li>• <u>office (B1): high quality (B1) office space</u></li> <li>• <u>residential use: supplementary to the other uses</u></li> <li>• <u>parking: any development should reinstate at least the same amount of public car parking spaces within the Area of Change, with the</u></li> </ul>



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		<p>provide an increased level of restaurant and café facilities as part of the mix of development</p> <ul style="list-style-type: none"> <li>• Market facilities: development shall provide enhanced market facilities and explore opportunities for the provision of permanent facilities</li> <li>• Parking: opportunities will be explored to increase the amount of public car parking provided within the Area of Change (subject to the findings of the Council's most recent study of parking requirements). There shall be no net loss of existing public car parking spaces from within the Area of Change</li> <li>• Transport improvements: development shall contribute to transport improvements, to include the Royal Oak junction Bayhall Road, Church Road/Mount Pleasant junction, Church Road/A26 (London Road) junction, and Garden Road/Victoria Road/Camden Road junction</li> </ul> <p>Other uses may also be delivered as part of the redevelopment and refurbishment of sites within the area. Appropriate uses could include:</p> <ul style="list-style-type: none"> <li>• Hotel and conference facilities</li> <li>• Employment uses: proposals should explore opportunities to provide additional high quality office (B1) space as part of the redevelopment proposals. There shall be no net loss of office space from within the Area of Change, unless it can be demonstrated that alternative high quality office provision will be made within the Area of Change</li> </ul>	<p><u>provision to include additional or fewer spaces as considered necessary, subject to the latest available evidence</u></p> <p><u>Development shall contribute to transport improvements, to include the Royal Oak junction Bayhall Road, Church Road/Mount Pleasant junction, Church Road/A26 (London Road) junction and Garden Road/Victoria Road/Camden Road junction</u></p> <p><u>Proposals for redevelopment and refurbishment within the Civic Complex/Crescent Road Area of Change shall accord with the following principles:</u></p> <ul style="list-style-type: none"> <li>• <u>a Conservation Statement must be produced to inform the masterplan and guide the redevelopment and refurbishment of sites, buildings and spaces within the Area of Change. This will focus on the heritage assets within the area (including listed buildings such as the Assembly Hall Theatre, Police Station, Magistrates' Court, Town Hall, War Memorial and Nos 9-10 Calverley Crescent) and also address any potential Local Heritage Assets</u></li> <li>• <u>proposals must be of a high quality design and shall demonstrate how they conserve and enhance the Conservation Area</u></li> <li>• <u>proposals must be accompanied by an Air Quality Assessment and appropriate mitigation measures</u></li> <li>• <u>any proposals affecting the Town Hall will be expected to retain significant features, such as the main entrance, staircase and Council Chamber in situ and allow their continued use for civic functions and other compatible uses</u></li> <li>• <u>key views into, and within, the Area shall be</u></li> </ul>

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		<ul style="list-style-type: none"> <li>Residential use: redevelopment for residential use will be supported where it is supplementary to the above uses and would not compromise the overall aims of the masterplan</li> </ul> <p><b>Policy AL/RTW2B (former cinema site and surrounding area)</b></p> <ul style="list-style-type: none"> <li>Development of the former cinema site for a mix of uses, including retail floorspace on the ground floor of approximately 3,500sqm (net)</li> </ul> <p>Other uses may also be delivered as part of the redevelopment and refurbishment of sites within the area. Appropriate uses could include:</p> <ul style="list-style-type: none"> <li>Hotel and conference facilities</li> <li>Employment uses: proposals should explore opportunities to provide additional high quality office (B1) space as part of the redevelopment of the former cinema. There shall be no net loss of employment space from within the Area of Change, unless it can be demonstrated that alternative high quality office provision will be made within the Area of Change</li> <li>Residential use: redevelopment for residential use will be supported where it is supplementary to the above uses and would not compromise the overall aims of the masterplan</li> <li>Transport improvements: development shall contribute to transport improvements, to include the Royal Oak junction Bayhall Road, Church Road/Mount Pleasant junction, Church Road/A26(London Road) junction, and Garden Road/Victoria Road/Camden Road junction</li> </ul> <p>Proposals for redevelopment and refurbishment within the Crescent Road/Church Road Area of</p>	<p><u>protected. These are likely to include views of the main Town Hall entrance and views down Mount Pleasant Road</u></p> <ul style="list-style-type: none"> <li><u>opportunities should be explored to create a series of new public spaces and interlinking routes to promote better access for cycling and walking</u></li> <li><u>development will be expected to provide or enhance green infrastructure links within the area and to provide public art, which may include water features</u></li> <li><u>proposals shall promote the use of high quality, locally distinctive materials and features</u></li> <li><u>proposals should explore the potential to enhance the lighting of the area to promote public safety and improve the night-time setting of historic buildings and the associated public realm</u></li> </ul> <p><u>Proposals for developing part of the Area of Change shall not compromise the wider aims and comprehensive redevelopment of Policy AL/RTW2A and wider Core Strategy objectives.”</u></p>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<p>Change, both for Policy AL/RTW2A and Policy AL/RTW2B, shall accord with the following principles:</p> <ul style="list-style-type: none"> <li>• a Conservation Statement must be produced to inform the masterplan and guide the redevelopment and refurbishment of sites, buildings and spaces within the Area of Change. This will focus on the heritage assets within the area (including listed buildings such as the Assembly Hall Theatre, Police Station, Magistrates' Court, Town Hall, War Memorial and Nos 9-10 Calverley Crescent) and also address any potential Local Heritage Assets</li> <li>• proposals must be of a high quality design and shall demonstrate how they conserve and enhance the Conservation Area</li> <li>• proposals must be accompanied by an Air Quality Assessment and appropriate mitigation measures</li> <li>• any proposals affecting the Town Hall will be expected to retain significant features, such as the main entrance, staircase and Council Chamber in situ and allow their continued use for civic functions and other compatible uses</li> <li>• key views into, and within, the Area shall be protected. These are likely to include views of the main Town Hall entrance and views down Mount Pleasant Road</li> <li>• opportunities should be explored to create a series of new public spaces and interlinking routes to promote better access for cycling and walking</li> <li>• development will be expected to provide or enhance green infrastructure links within the area and to provide public art, which may</li> </ul>	

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		<p>include water features</p> <ul style="list-style-type: none"> <li>proposals shall promote the use of high quality, locally distinctive materials and features</li> <li>proposals should explore the potential to enhance the lighting of the area to promote public safety and improve the night-time setting of historic buildings and the associated public realm</li> </ul> <p>Proposals for developing part of the Area of Change shall not compromise the wider aims and comprehensive redevelopment of Policy AL/RTW2 and wider Core Strategy objectives."</p>	
	MM3-B	See Policy AL/RTW2: Crescent Road/Church Road Area of Change above	<p><b><u>"Policy AL/RTW2B: Former Cinema Site Area of Change</u></b></p> <p><u>The area shown on the Royal Tunbridge Wells &amp; Southborough Proposals Map is designated as an Area of Change.</u></p> <p><u>A masterplan shall be prepared by the developer(s) with the involvement of the Borough Council, stakeholders and the local community. The masterplan shall indicate the distribution, scale and quantum of proposed uses together with areas of open space/public realm, vehicular access, parking provision and pedestrian routes into and within the site.</u></p> <p><u>The following uses would be acceptable as part of a mixed use scheme:</u></p> <ul style="list-style-type: none"> <li><u>retail development of approximately 3,500sqm (net) additional A1 comparison to include the creation of an active retail frontage to Mount Pleasant Road</u></li> <li><u>hotel and conference facilities</u></li> </ul>

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			<ul style="list-style-type: none"> <li>• <u>office (B1): high quality (B1) office space</u></li> <li>• <u>restaurants and cafes</u></li> <li>• <u>residential use: supplementary to the other uses</u></li> <li>• <u>transport improvements: development shall contribute to transport improvements, to include the Royal Oak junction Bayhall Road, Church Road/Mount Pleasant junction, Church Road/A26 (London Road) junction and Garden Road/Victoria Road/Camden Road junction</u></li> </ul> <p><u>Proposals for redevelopment and refurbishment within Policy AL/RTW2B shall accord with the following principles:</u></p> <ul style="list-style-type: none"> <li>• <u>proposals must be of a high quality design and shall demonstrate how they conserve and enhance the Conservation Area</u></li> <li>• <u>proposals must be accompanied by an Air Quality Assessment and appropriate mitigation measures</u></li> <li>• <u>development will be expected to provide public art, which may include water features</u></li> <li>• <u>proposals shall promote the use of high quality, locally distinctive materials and features</u></li> <li>• <u>proposals should explore the potential to enhance the lighting of the area to promote public safety and improve the night-time setting of historic buildings and the associated public realm</u></li> </ul> <p><u>Proposals for developing part of the Area of Change shall not compromise the wider aims and comprehensive redevelopment of Policy AL/RTW2B and wider Core Strategy objectives”</u></p>
Policy AL/RTW3: Vale	MM4	“Policy AL/RTW 3	“ <u>Policy AL/RTW 3: Vale Avenue Area of Change</u>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
Avenue Area of Change		<p><b>Vale Avenue Area of Change</b></p> <p>The area shown on the Royal Tunbridge Wells &amp; Southborough Proposals Map is designated as an Area of Change.</p> <p>A masterplan shall be prepared by the developer(s) in cooperation with the Borough Council, stakeholders and the local community. The masterplan shall set out areas for built development and the quantum of development, to include all proposed built development, open space and inter-connected green spaces to provide informal and formal recreation areas, hard and soft landscaping, access roads into and within the site and any other land uses.</p> <p>Within this area, a comprehensive scheme for redevelopment and refurbishment of sites, buildings and spaces will be prepared. Proposals will be expected to deliver the following:</p> <ul style="list-style-type: none"> <li>• Employment use: proposals should explore opportunities to provide additional high quality office (B1) space as part of the redevelopment of the area. There shall be no net loss of employment provision from within the Area of Change, unless it can be demonstrated that alternative high quality office provision will be made within the Area of Change</li> <li>• Retail use: existing convenience retail floorspace shall be retained or re-provided within the area</li> <li>• Parking: the existing amount of public car parking spaces within the Area of Change will be maintained and additional car parking spaces</li> </ul>	<p><u>The area shown on the Royal Tunbridge Wells &amp; Southborough Proposals Map is designated as an Area of Change.</u></p> <p><u>A masterplan shall be prepared by the developer(s) with the involvement of the Borough Council, stakeholders and the local community. The masterplan shall indicate the distribution, scale and quantum of proposed uses together with areas of open space/public realm, vehicular access (including any necessary improvements to the A26 (London Road)/Vale Avenue junction), parking provision and pedestrian and cycle routes into and within the site. The following uses would be acceptable as part of a mixed use scheme:</u></p> <ul style="list-style-type: none"> <li>• <u>employment use: proposals should explore opportunities to reprovide existing employment uses in the form of high quality (B1) office space</u></li> <li>• <u>retail use: existing A1 convenience retail floorspace shall be retained or re-provided within the Area of Change</u></li> <li>• <u>hotel and conference facilities</u></li> <li>• <u>residential use: redevelopment for residential use will be supported where it is supplementary to the other uses</u></li> <li>• <u>parking: any development should reinstate at least the same amount of public car parking spaces within the Area of Change, with the provision to include additional or fewer spaces as considered necessary, subject to the latest available evidence. Parking provision for the railway station within the Area of Change should meet the requirements of Network Rail</u></li> <li>• <u>transport improvements: development shall contribute to transport improvements, to include</u></li> </ul>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<p>will be provided to serve the residential, office and hotel uses</p> <ul style="list-style-type: none"> <li>Transport improvements: development shall contribute to transport improvements, to include the A26 (London Road)/Vale Avenue junction, Vale Road/Grove Hill Road junction, the A26 (London Road)/High Street junction and the A26 (London Road)/Church Road junction</li> <li>Servicing of the site (for all uses) shall be from London Road</li> </ul> <p>Other uses may also be delivered as part of the redevelopment and refurbishment of sites within the Area. Appropriate uses could include:</p> <ul style="list-style-type: none"> <li>Hotel and conference facilities</li> <li>Residential use: approximately 250 dwellings. Office (B1) use, however, would be considered as an acceptable alternative to residential use</li> </ul> <p>Proposals for redevelopment and refurbishment within the Area of Change shall accord with the following principles:</p> <ul style="list-style-type: none"> <li>a townscape assessment must be produced to inform the masterplan and guide redevelopment and refurbishment within the Area of Change. This will focus on the heritage assets within and adjacent to the Area, and on enhancing the Conservation Area and the setting of Tunbridge Wells Common</li> <li>proposals must be accompanied by an Air Quality Assessment and appropriate mitigation measures</li> <li>redevelopment shall incorporate enhanced pedestrian and cycle access routes to the railway station</li> <li>development proposals will be expected to:</li> </ul>	<p><u>the A26 (London Road)/Vale Road junction, Vale Road/Grove Hill Road junction, the A26 (London Road)/High Street junction and the A26 (London Road)/Church Road junction</u></p> <ul style="list-style-type: none"> <li><u>servicing of the site (for all uses) shall be prioritised from London Road</u></li> </ul> <p><u>Proposals for redevelopment and refurbishment within the site area shall accord with the following principles:</u></p> <ul style="list-style-type: none"> <li><u>a townscape assessment must be produced to inform the masterplan and guide redevelopment and refurbishment within the site area. This will focus on the heritage assets within and adjacent to the site, and on enhancing the Conservation Area and the setting of Tunbridge Wells Common</u></li> <li><u>proposals must be accompanied by an Air Quality Assessment and appropriate mitigation measures</u></li> <li><u>the development shall provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by the service provider</u></li> <li><u>redevelopment shall incorporate enhanced pedestrian and cycle access routes to the railway station</u></li> <li><u>development proposals will be expected to:</u> <ul style="list-style-type: none"> <li><u>enhance the public realm in the area, in particular to include the railway station forecourt, station frontage and southern end of Mount Pleasant Road</u></li> <li><u>provide public art, which may include water features, create and enhance green infrastructure links within the site area,</u></li> </ul> </li> </ul>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<ul style="list-style-type: none"> <li>○ enhance the public realm in the area, in particular to include the railway station forecourt, station frontage and southern end of Mount Pleasant</li> <li>○ provide public art, which may include water features, within the Area of Change</li> <li>• create and enhance green infrastructure links within the Area of Change, including to The Common</li> <li>• provide sufficient parking for railway station users that could enable the release of the station car park located adjacent to the station building and also the station car park accessed from Grove Hill Road for redevelopment</li> </ul> <p>Proposals for developing part of the Area of Change should not compromise the overall aims and comprehensive redevelopment of Policy AL/RTW3 and wider Core Strategy objectives.”</p>	<p><u>including to The Common</u></p> <p><u>Proposals for developing part of the Area of Change should not compromise the overall aims and comprehensive redevelopment of Policy AL/RTW3 and wider Core Strategy objectives.”</u></p>
Policy AL/RTW4: Eridge Road Area of Change	MM5-A	<p><b>“Policy AL/RTW 4</b></p> <p><b>Eridge Road Area of Change</b></p> <p>The area shown on the Royal Tunbridge Wells &amp; Southborough Proposals Map is designated as an Area of Change.</p> <p>A masterplan shall be prepared by the developer(s) in cooperation with the Borough Council, stakeholders and the local community. The masterplan shall set out areas for built development and the quantum of development, to include all proposed built development, open space and inter-connected green spaces to provide informal and formal recreation areas, hard and soft landscaping, access roads into and within the site and any other</p>	<p><b><u>“Policy AL/RTW 4A: Eridge Road</u></b></p> <p><u>This site, as shown on the Royal Tunbridge Wells &amp; Southborough Proposals Map, is allocated for mixed use development.</u></p> <p><u>The following uses would be acceptable as part of a mixed use scheme:</u></p> <ul style="list-style-type: none"> <li>• <u>office (B1): high quality (B1) office space</u></li> <li>• <u>hotel and conference uses (C1)</u></li> <li>• <u>leisure and cultural uses</u></li> <li>• <u>retail use: the re-provision of comparison retail floorspace in the areas closest to the Pantiles</u></li> <li>• <u>residential use: the provision of approximately 130 units</u></li> <li>• <u>parking: any development should reinstate at</u></li> </ul>



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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<p>land uses.</p> <p>Within this area, a comprehensive scheme for redevelopment and refurbishment of sites, buildings and spaces will be prepared. Proposals will be expected to deliver the following:</p> <ul style="list-style-type: none"> <li>• Employment use: opportunities should be explored to re-provide floorspace for employment generating uses, which may include office (B1) use, hotel and conference (C1), leisure and entertainment (D2) facilities. These uses shall be located towards the eastern part of the Area of Change.</li> <li>• Retail use: opportunities should be explored to re-provide the existing amount of comparison retail floorspace in the areas closest to the Pantiles</li> <li>• Parking: redevelopment proposals should seek at least to reprovide the existing level of public car parking spaces in addition to the parking that will support new uses. Any proposed increase in parking spaces should reflect the findings of the Council's most recent study of parking requirements while also considering the sensitive location of this site, being an 'entrance' into the centre of the town immediately adjacent to Tunbridge Wells Common and The Pantiles</li> <li>• Transport improvements: development shall contribute to transport improvements, to include traffic mitigation along the A26 (Eridge Road and London Road) within the vicinity of the Area of Change</li> </ul> <p>Other uses may also be delivered as part of the redevelopment and refurbishment of sites within the</p>	<p><u>least the same amount of public car parking spaces with the provision to include additional or fewer spaces as considered necessary, subject to the latest available evidence. The siting of any parking will need to consider the sensitive location of this site, being an 'entrance' into the centre of the town immediately adjacent to Tunbridge Wells Common and The Pantiles, and including land with Village Green status.</u></p> <ul style="list-style-type: none"> <li>• <u>transport improvements: development shall contribute to transport improvements, to include traffic mitigation along the A26 (Eridge Road and London Road)</u></li> </ul> <p><u>Proposals for redevelopment and refurbishment shall accord with the following principles:</u></p> <ul style="list-style-type: none"> <li>• <u>a townscape assessment must be produced to inform and guide redevelopment and refurbishment within the site area. This will focus on enhancing the Conservation Area and the setting of Tunbridge Wells Common</u></li> <li>• <u>proposals must be accompanied by an Air Quality Assessment and appropriate mitigation measures</u></li> <li>• <u>the development shall provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by the service provider</u></li> <li>• <u>development proposals will be expected to:</u> <ul style="list-style-type: none"> <li>○ <u>deliver public realm improvements that will enhance the pedestrian route between Linden Park Road and The Pantiles, through the site to the West Station/Sainsbury's and Homepage area, and also linking to Tunbridge Wells Common and its car park</u></li> </ul> </li> </ul>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<p>Area. Appropriate uses could include:</p> <ul style="list-style-type: none"> <li>Residential use: approximately 160 units. This capacity includes the potential opportunity for development along the northern boundary of Linden Park Road, taking account of the need to maintain the amenities of the dwellings in Montacute Gardens and the existing tree/hedge boundaries along Linden Park Road and Nevill Terrace</li> <li>Leisure uses: a spa hotel, beauty, health and fitness</li> </ul> <p>Proposals for redevelopment and refurbishment within the Area of Change shall accord with the following principles:</p> <ul style="list-style-type: none"> <li>a townscape assessment must be produced to inform the masterplan and guide redevelopment and refurbishment within the Area of Change. This will focus on enhancing the Conservation Area and the setting of Tunbridge Wells Common and The Pantiles</li> <li>proposals must be accompanied by an Air Quality Assessment and appropriate mitigation measures</li> <li>development proposals will be expected to: <ul style="list-style-type: none"> <li>deliver public realm improvements that will include the creation of a pedestrian route across Linden Park Road between The Pantiles, through the Area of Change to the West Station/Sainsbury's and Homebase area, and also linking to Tunbridge Wells Common and its car park</li> <li>create active frontages along the pedestrian routes</li> <li>create green infrastructure links within the</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>○ <u>create active frontages along the pedestrian routes</u></li> <li>○ <u>create green infrastructure links within the site and to Tunbridge Wells Common and The Pantiles</u></li> <li>○ <u>provide public art, which may include water features, within the site</u></li> </ul> <p><u>Proposals for developing the site shall not compromise the wider aims and development proposals of Policy AL/RTW4B and wider Core Strategy objectives."</u></p>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<p>Area of Change and to Tunbridge Wells Common and The Pantiles</p> <ul style="list-style-type: none"> <li>○ provide public art, which may include water features, within the Area of Change</li> </ul> <p>Proposals for developing part of the Area of Change shall not compromise the wider aims and comprehensive redevelopment of Policy AL/RTW4 and wider Core Strategy objectives.”</p>	
	MM5-B	[See Policy AL/RTW4: Eridge Road Area of Change shown above]	<p><b><u>“Policy AL/RTW4B: Land at Montacute Gardens</u></b></p> <p><u>This site, as shown on the Royal Tunbridge Wells &amp; Southborough Proposals Map, is allocated for mixed use development.</u></p> <p><u>The following uses would be acceptable as part of a mixed use scheme:</u></p> <ul style="list-style-type: none"> <li>• <u>office (B1): high quality (B1) office space</u></li> <li>• <u>hotel and conference uses (C1)</u></li> <li>• <u>leisure and cultural uses</u></li> <li>• <u>residential use: the provision of approximately 30 units</u></li> <li>• <u>parking: any development should reinstate at least the same amount of public car parking spaces with the provision to include additional or fewer spaces as considered necessary, subject to the latest available evidence. The siting of any parking will need to consider the sensitive location of this site, being an ‘entrance’ into the centre of the town, close to Tunbridge Wells Common</u></li> <li>• <u>transport improvements: development shall contribute to transport improvements, to include traffic mitigation along the A26 (Eridge Road and London Road) within the vicinity of the site</u></li> </ul>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
			<p><u>Proposals for redevelopment and refurbishment shall accord with the following principles:</u></p> <ul style="list-style-type: none"> <li>• <u>a townscape assessment must be produced to inform and guide redevelopment and refurbishment within the site area. This will focus on enhancing the Conservation Area and the setting of Tunbridge Wells Common and The Pantiles</u></li> <li>• <u>proposals must be accompanied by an Air Quality Assessment and appropriate mitigation measures</u></li> <li>• <u>the development shall provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by the service provider</u></li> <li>• <u>development proposals will be expected to:</u> <ul style="list-style-type: none"> <li>○ <u>deliver public realm improvements that will enhance the pedestrian route between Linden Park Road and The Pantiles, through the site to the West Station/Sainsbury's and Homebase area, and also linking to Tunbridge Wells Common and its car park</u></li> <li>○ <u>create active frontages along the pedestrian routes</u></li> <li>○ <u>create green infrastructure links within the site and to Tunbridge Wells Common and The Pantiles</u></li> <li>○ <u>provide public art, which may include water features, within the site</u></li> </ul> </li> </ul> <p><u>Proposals for developing the site shall not compromise the wider aims and development proposals of Policy AL/RTW4A and wider Core Strategy objectives.</u></p>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
Policy AL/RTW6: Former Plant and Tool Hire, Eridge Road	MM6	<p><b>“Policy AL/RTW 6</b></p> <p><b>Former Plant &amp; Tool Hire, Eridge Road</b></p> <p>This site, as shown on the Royal Tunbridge Wells &amp; Southborough Proposals Map, is allocated for residential development (C3) providing approximately 37-60 dwellings.</p> <p>Development on the site will be subject to the following:</p> <ul style="list-style-type: none"> <li>• a site-specific Flood Risk Assessment shall be carried out in support of any application, identifying whether the site is at risk of flooding from sources other than fluvial</li> <li>• proposals shall be accompanied by an Air Quality Assessment and appropriate mitigation measures</li> <li>• areas of the site that lie within the functional floodplain shall comprise non-habitable floorspace at current ground level</li> <li>• vehicular access shall be provided onto Eridge Road, with additional pedestrian access to the rear of the site adjacent to Nevill Terrace”</li> </ul>	<p>Additions to state:</p> <p><b>“Policy AL/RTW 6</b></p> <p><b>Former Plant &amp; Tool Hire, Eridge Road</b></p> <p>This site, as shown on the Royal Tunbridge Wells &amp; Southborough Proposals Map, is allocated for residential development (C3) providing approximately 37-60 dwellings <u>or for a range of uses to include residential and/or A1 retail and/or employment uses</u></p> <p>Development on the site will be subject to the following:</p> <ul style="list-style-type: none"> <li>• a site-specific Flood Risk Assessment shall be carried out in support of any application, identifying whether the site is at risk of flooding from sources other than fluvial</li> <li>• <u>the development shall provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by the service provider</u></li> <li>• proposals shall be accompanied by an Air Quality Assessment and appropriate mitigation measures</li> <li>• areas of the site that lie within the functional floodplain shall comprise non-habitable floorspace at current ground level</li> <li>• vehicular access shall be provided onto Eridge Road, with additional pedestrian access to the rear of the site adjacent to Nevill Terrace”</li> </ul>
Policy AL/RTW 24: Land off Grove Hill Road, 8-16 Grove Hill	MM7	<p><b>“Policy AL/RTW 24</b></p> <p><b>Land off Grove Hill Road, 8-16 Grove Hill Road</b></p>	<p>Delete policy as follows:</p> <p><b><del>“Policy AL/RTW 24</del></b></p>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
Road (subsequent policies to be renumbered)		<p>This site, as shown on the Royal Tunbridge Wells &amp; Southborough Proposals Map, is allocated for mixed use development comprising:</p> <ul style="list-style-type: none"> <li>• either a hotel (C1) of approximately 100 bedrooms, in the region of 200sqm (net) additional comparison retail floorspace and 100 car parking spaces, or</li> <li>• approximately 2,000sqm leisure (D2) floorspace, 1,100sqm (net) comparison retail (A1) floorspace and 2,400sqm office (B1) floorspace, or</li> <li>• retention of the existing quantum of comparison retail (A1) floorspace and providing a minimum of 200 additional car parking spaces</li> <li>• residential (C3) use above ground floor level may also be suitable</li> </ul> <p>Development on the site will be subject to the following:</p> <ul style="list-style-type: none"> <li>• existing railway station car parking shall be provided on site, or at a suitable alternative location within close proximity to the railway station</li> <li>• retail uses should be provided on the ground floor to ensure a consistent retail frontage within this section of the Primary Shopping Area</li> <li>• service access to the railway line shall be retained, but the main vehicular access shall be from the eastern part of the site, away from the junction at the foot of Grove Hill Road</li> <li>• the existing landscaped boundaries to the north, east and south shall be maintained and</li> </ul>	<p><del>Land off Grove Hill Road, 8-16 Grove Hill Road</del></p> <p><del>This site, as shown on the Royal Tunbridge Wells &amp; Southborough Proposals Map, is allocated for mixed use development comprising:</del></p> <ul style="list-style-type: none"> <li>• <del>either a hotel (C1) of approximately 100 bedrooms, in the region of 200sqm (net) additional comparison retail floorspace and 100 car parking spaces, or</del></li> <li>• <del>approximately 2,000sqm leisure (D2) floorspace, 1,100sqm (net) comparison retail (A1) floorspace and 2,400sqm office (B1) floorspace, or</del></li> <li>• <del>retention of the existing quantum of comparison retail (A1) floorspace and providing a minimum of 200 additional car parking spaces</del></li> <li>• <del>residential (C3) use above ground floor level may also be suitable</del></li> </ul> <p><del>Development on the site will be subject to the following:</del></p> <ul style="list-style-type: none"> <li>• <del>existing railway station car parking shall be provided on site, or at a suitable alternative location within close proximity to the railway station</del></li> <li>• <del>retail uses should be provided on the ground floor to ensure a consistent retail frontage within this section of the Primary Shopping Area</del></li> <li>• <del>service access to the railway line shall be retained, but the main vehicular access shall be from the eastern part of the site, away from the junction at the foot of Grove Hill Road</del></li> <li>• <del>the existing landscaped boundaries to the north,</del></li> </ul>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<p>enhanced and green infrastructure links provided, linking the High Street/Grove Hill Road/Mount Pleasant Road area to The Grove</p> <ul style="list-style-type: none"> <li>Development proposals must include an assessment of the capacity of the Vale Road/Mount Pleasant/Grove Hill Road roundabout to accommodate additional traffic movements generated by the proposed development."</li> </ul>	<p><del>east and south shall be maintained and enhanced and green infrastructure links provided, linking the High Street/Grove Hill Road/Mount Pleasant Road area to The Grove</del></p> <ul style="list-style-type: none"> <li><del>Development proposals must include an assessment of the capacity of the Vale Road/Mount Pleasant/Grove Hill Road roundabout to accommodate additional traffic movements generated by the proposed development."</del></li> </ul>
Policy AL/RTW31: Recreation Open Space	MM8	<p><b>Recreation Open Space</b></p> <p>"Land is allocated for sports pitches and other outdoor recreation facilities at the following locations, as defined on the Royal Tunbridge Wells &amp; Southborough Proposals Map:</p> <ul style="list-style-type: none"> <li>Land adjacent to Hawkenbury Recreation Ground, Royal Tunbridge Wells</li> <li>Land adjacent to Rusthall Recreation Ground, Royal Tunbridge Wells</li> </ul> <p>Land is allocated for equipped children's playspace at the following locations, as defined on the Proposals Map:</p> <ul style="list-style-type: none"> <li>Land at Southview Road, Royal Tunbridge Wells</li> </ul> <p>Land at Julian Hewitt Grounds, Farmcombe Road, Royal Tunbridge Wells"</p>	<p>Amendments as follows:</p> <p><b>Recreation Open Space</b></p> <p>"Land is allocated for sports pitches and other outdoor recreation facilities at the following locations, as defined on the Royal Tunbridge Wells &amp; Southborough Proposals Map:</p> <ul style="list-style-type: none"> <li>Land adjacent to Hawkenbury Recreation Ground, Royal Tunbridge Wells</li> <li>Land adjacent to Rusthall Recreation Ground, Royal Tunbridge Wells</li> </ul> <p><del>Land is allocated for equipped children's playspace at the following locations, as defined on the Proposals Map:</del></p> <ul style="list-style-type: none"> <li><del>Land at Southview Road, Royal Tunbridge Wells</del></li> <li><del>Land at Julian Hewitt Grounds, Farmcombe Road, Royal Tunbridge Wells"</del></li> </ul>
Policy AL/PW1: Land off Station		Policy AL/PW1 text shown in Submission Draft Site	Policy AL/PW1 text as shown in TWBC/PS/47:

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
Road/Commercial Road and Commercial Road West Car Park	<p>MM9</p> <p>(This main modification consolidates changes that were consulted upon as three main modifications to policy AL/PW1. However, the consolidated text does not change from the text on which consultation took place.)</p>	<p>Allocations DPD:</p> <p><b>“Policy AL/PW 1</b></p> <p><b>Land off Station Road/Commercial Road and Commercial Road West Car Park</b></p> <p>This site, as shown on the Paddock Wood Proposals Map, is allocated for mixed use development.</p> <p>Development on the site will be subject to the following:</p> <ul style="list-style-type: none"> <li>• The meeting of retail (A1) requirements, including at least 400sqm of comparison retail, and at least 200sqm of convenience retail. Alternative proposals of an appropriate scale will also be considered if they broaden the qualitative retail offer in the town</li> <li>• At least the same provision of public parking shall be provided as within the existing Commercial Road Car Park</li> <li>• Pedestrian and vehicular access shall be provided from Commercial Road with servicing from Station Road</li> <li>• The northern part of the site shall provide a mix of uses, including comparison and convenience retail (A1), restaurants and cafés (A3), drinking establishments (A4) on the ground floor and residential on the upper floors (C3). Residential development will be supplementary to other uses and shall not compromise the capacity of the site to provide a mix of town centre uses, including retail</li> </ul>	<p><b>“<u>Policy AL/PW 1</u></b></p> <p><b><u>Land off Station Road/Commercial Road and Commercial Road West Car Park</u></b></p> <p><u>This site, as shown on the Paddock Wood Proposals Map, is allocated for mixed use development.</u></p> <p><u>A masterplan shall be prepared by the developer(s) with the involvement of the Borough Council, Town Council, stakeholders and the local community. The masterplan shall indicate the distribution, scale and quantum of proposed uses, together with areas of open space / public realm, vehicular access, parking provision and pedestrian routes into and within the site.</u></p> <p><u>Proposals will be expected to deliver:</u></p> <ul style="list-style-type: none"> <li>• <u>retail development to meet retail (A1) requirements, including at least 400sqm (net) of comparison retail and at least 200sqm (net) of convenience retail</u></li> <li>• <u>restaurants and cafés (A3)</u></li> <li>• <u>drinking establishments (A4)</u></li> <li>• <u>at least the same provision of existing public parking, unless this can be re-provided at a suitable alternative location within the town centre boundary</u></li> </ul> <p><u>Other town centre uses are considered acceptable in principle, subject to inclusion not prejudicing the</u></p>



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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<ul style="list-style-type: none"> <li>Development must be of a high quality and act as a focal point for the Town Centre and respect the amenity of adjoining uses</li> <li>Proposals for redevelopment of part of the site and mix of uses must not prejudice the eventual development of the whole site for provision of new town centre facilities”</li> </ul>	<p><u>delivery of the above uses, including:</u></p> <ul style="list-style-type: none"> <li><u>leisure (D2), office (B1a) and health and community uses (D1)</u> <ul style="list-style-type: none"> <li><u>residential (C3) as part of a mixed use development</u></li> </ul> </li> </ul> <p><u>Development on the site will be subject to the following:</u></p> <ul style="list-style-type: none"> <li><u>development must be of a high quality and act as a focal point for the town centre</u></li> <li><u>proposals for redevelopment of part of the site must not prejudice the wider comprehensive aims for the redevelopment of this allocation</u></li> <li><u>the masterplan shall be informed by a vehicular, cycle and pedestrian access strategy for the central area of Paddock Wood”</u></li> </ul>
AL/PW3: Land at Church Farm and Land at Mascalls Court Road	<p style="text-align: center;">MM10</p> <p>(This main modification supports the replacement of this single allocation with two separate allocations, AL/PW3A Land at Church Farm and AL/PW3B Land at Mascalls Court Road.)</p>	<p>Policy AL/PW3 text shown in Submission Draft Site Allocations DPD:</p> <p><b>“Policy AL/PW 3</b></p> <p><b>Land at Church Farm and Land at Mascalls Court Road</b></p> <p>These sites, as shown on the Paddock Wood Proposals Map, are allocated for residential development (C3) with the capacity to provide approximately 650 dwellings, as well as a new primary school (2 Form Entry).</p> <p>A masterplan shall be prepared by the developer(s) in cooperation with the Borough Council, Town</p>	Policy deleted

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<p>Council and the local community. The masterplan shall set out areas for built development and the quantum of development, including residential and non-residential uses, open space and inter-connected green spaces to provide informal and formal recreation areas, landscape buffers, access roads into and within the site and any other land uses.</p> <p>In relation to the Church Farm site, the masterplan shall:</p> <ul style="list-style-type: none"> <li>• show an open space buffer in the northern part of the site in order to reduce flood risk and mitigate any risks to ecology. No development shall occur on the northern section falling into Flood Zone 3b</li> <li>• direct development to the western and central areas of the site</li> <li>• be carefully designed, particularly in the eastern area, to respect the rural edge of the settlement and the rising ground and orchard in this part of the site</li> <li>• show the main access into the site from Church Road</li> </ul> <p>In relation to the Mascalls Court Road site, the masterplan shall:</p> <ul style="list-style-type: none"> <li>• direct built development to the central and northern parts of the site and shall not extend to the southern section of higher ground which will be reserved as a buffer to the surrounding countryside and shall only be used for landscape mitigation and recreation as shown on the Proposals Map</li> </ul>	

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<ul style="list-style-type: none"> <li>• ensure that any development respects the historic farmstead, Mascalls Court Farm, to the east of the site and a buffer area shall extend to respect the setting of this building</li> <li>• keep fragmentation of existing hedgerows within the site to an absolute minimum</li> <li>• demonstrate that any need for ecological mitigation is adequately addressed</li> <li>• show the main access to the southern part of the allocated site from Green Lane</li> <li>• ensure that there shall be no direct vehicular access to the site from Mascalls Court Road; any access from this road will be for emergency vehicles only</li> </ul> <p>The masterplan shall show phasing of development; the latter phases are likely to fall outside the Plan period (beyond 2026).</p> <p>In addition, proposals for the whole allocated site will be expected to deliver the following:</p> <ul style="list-style-type: none"> <li>• where development is phased, proposals for development of any one part of the site must not prejudice the overall capacity of the area covered by the allocation</li> <li>• flood mitigation measures to reduce flood risk on the sites, reduce surface-water run off and reduce existing flood risks in Paddock Wood. A site-specific Flood Risk Assessment will be required to accompany any planning application and shall include a detailed drainage strategy, which shall have particular regard to the Surface Water Management Plan (2011)<sup>(2)</sup> or any update to the Plan. The masterplan must include use of Sustainable Drainage Systems</li> </ul>	

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<p>(SuDS) within the overall development</p> <ul style="list-style-type: none"> <li>enhanced biodiversity by providing opportunities for green infrastructure linkages and areas of open space. Adjacent green infrastructure, including woodlands and streams, shall be respected, with suitable buffers and landscape treatment</li> <li>enhanced bus services provided to and within the site</li> <li>the provision of pedestrian and cycle routes, providing linkages to surrounding residential areas, railway station and schools</li> <li>development shall contribute to transport improvements, to include the Maidstone Road/Mascalls Court Road and Maidstone Road/Badsell Road junctions and Badsell Road</li> <li>proposals for the siting of a primary school within the site (approximately 2ha) shall be agreed with the Local Education Authority and contributions towards provision of this facility shall be made</li> <li>the Wesley Centre is allocated for community use (Policy AL/PW2). Additional community facilities will be required during the Plan period and options should be explored for providing this within the allocated sites. Alternatively, contributions should be sought for the provision of community facilities within the town</li> <li>a detailed Management Plan will be required to be submitted and approved as part of the planning application process setting out how open spaces and natural environment within the site will be managed over the long term"</li> </ul>	

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
New Policy AL/PW3A: Land at Church Farm	<p>MM11-A</p> <p>(This main modification consolidates changes that were consulted upon as three main modifications to policy AL/PW3 – 3A. However, the consolidated text does not change from the text on which consultation took place.)</p>	None	<p>Policy AL/PW3A text as consolidated:</p> <p><b><u>“Policy AL/PW 3A</u></b></p> <p><b><u>Land at Church Farm</u></b></p> <p><u>This site, as shown on the Paddock Wood Proposals Map, is allocated for residential development (C3) with the capacity to provide approximately 300 dwellings.</u></p> <p><u>A masterplan shall be prepared by the developer with the involvement of the Borough Council, Town Council, and the local community. The masterplan shall set out areas for built development and the quantum of development, open space and inter-connected green spaces to provide formal and informal recreation areas, landscape buffers, access roads into and within the site, flood mitigation measures and any other land uses.</u></p> <p><u>The masterplan shall show:</u></p> <ul style="list-style-type: none"> <li><u>• the main access into the site from Church Road</u></li> <li><u>• no built development on land falling into Flood Zone 3b</u></li> <li><u>• an open space buffer in the northern part of the site</u></li> <li><u>• built development focused in the western and central areas of the site, development in the eastern area should respect the rural edge of the settlement, and rising ground and orchard to the south</u></li> <li><u>• provision of a sustainable drainage system</u></li> </ul>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
			<ul style="list-style-type: none"> <li>• <u>phasing of development</u></li> </ul> <p><u>In addition, proposals will be expected to deliver the following:</u></p> <ul style="list-style-type: none"> <li>• <u>measures to mitigate flooding, reduce flood risk, reduce surface-water run-off and provide betterment to reduce existing flood risks to development in Paddock Wood. Any planning application should include a Flood Risk Assessment setting clear objectives for the surface water drainage strategy for the site. Particular regard should be had to the Surface Water Management Plan 2011 and Paddock Wood Flood Alleviation Study 2015, or any subsequent updates. A Surface Water Management Plan shall be required, setting out the long term arrangements for the management of the surface water drainage system</u></li> <li>• <u>the development shall provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by the service provider</u></li> <li>• <u>green infrastructure linkages and areas of informal open space. Adjacent green infrastructure, including woodlands and streams, shall be respected, with suitable buffers and landscape treatment</u></li> <li>• <u>provision of pedestrian and cycle routes, providing linkages to surrounding residential areas, railway station and schools</u></li> <li>• <u>an equipped children's play area to LEAP standard</u></li> <li>• <u>a detailed Management Plan setting out how</u></li> </ul>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
			<p><u>open spaces, children's play area and communal features such as community orchards, woodlands or allotments within the site will be managed over the long term</u></p> <p><u>Provision of and / or contributions towards the following will also be sought (to be a shared and proportionate requirement with allocations AL/PW3B and AL/PW4):</u></p> <ul style="list-style-type: none"> <li><u>highways improvements, to include: Church Road / The Cedars / The Ridings / Old Kent Road junction; Badsell Road / A228 roundabout; Maidstone Road / Mascalls Court Road / Badsell Road junction; Church Road between junctions with The Cedars and 1 Church Road; extension of the 30mph speed limit</u></li> <li><u>walking and cycling improvements, to include: upgrading Public Footpath WT254 (between Church Farm and The Cedars); providing a public footpath / cycleway crossing on Church Road connecting public footpaths WT257 and WT262; providing a footpath / cycleway south of Mascalls Court Road between junctions with Green Lane and Maidstone Road; improvements to cycle parking and pedestrian access at Paddock Wood station and the Station Approach</u></li> <li><u>enhanced bus services to the site / Paddock Wood (contribution to reflect closer proximity to town centre and reduced need for local bus journeys than AL/PW3B and AL/PW4 allocations)</u></li> <li><u>education facilities including a new primary</u></li> </ul>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
			<p><u>school with nursery facilities (Policy AL/PW3B) and an extension to Mascalls Secondary School (or in other location as agreed with the Local Education Authority)</u></p> <ul style="list-style-type: none"> <li>• <u>increasing the capacity of local primary health care facilities at Woodlands Medical Centre, Paddock Wood and / or Howell Surgery, High Street, Brenchley</u></li> <li>• <u>enhanced community, youth and indoor sport facilities at Putlands Leisure Centre, Wesley Centre (Policy AL/PW2) or other specified locations within the town</u></li> <li>• <u>the provision of youth and adult outdoor recreation facilities within a two mile radius of the site</u></li> <li>• <u>improvements to local library provision</u></li> <li>• <u>improvements to the adjacent Hop Pickers railway line / green infrastructure route”</u></li> </ul>
New Policy AL/PW3B: Land at Mascalls Court Road	<p>MM11-B</p> <p>(This main modification consolidates changes that were consulted upon as three main modifications to policy AL/PW3 – 3B. However, the consolidated text does not change from the text on which consultation took place.)</p>	N/A	<p>Policy AL/PW3B text as consolidated:</p> <p><b><u>“Policy AL/PW 3B</u></b></p> <p><b><u>Land at Mascalls Court Road</u></b></p> <p><u>The site, as shown on the Paddock Wood Proposals Map, is allocated for residential development (C3) with the capacity to provide approximately 350 dwellings, as well as a new primary school (2 Form Entry).</u></p> <p><u>A masterplan shall be prepared by the developer with the involvement of the Borough Council, Town Council, and the local community. The masterplan shall set out areas for built development and the</u></p>



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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
			<p><u>quantum of development, including residential and non-residential uses, open space and inter-connected green spaces to provide formal and informal recreation areas, landscape buffers, access roads into and within the site, flood mitigation measures and any other land uses.</u></p> <p><u>The masterplan shall show:</u></p> <ul style="list-style-type: none"> <li><u>the main access to the site from Green Lane: there shall be no direct vehicular access from Mascalls Court Road to serve residential development, any access from this point to residential development should be for emergency vehicles only</u></li> <li><u>built development focused in the central and northern parts of the site (currently in agricultural use) and shall generally avoid the southern section of higher ground or ancient woodland which shall be reserved as a buffer to the surrounding countryside and shall primarily be used for landscape mitigation and informal recreation, as shown on the Proposals Map</u></li> <li><u>the location of a new primary school</u></li> <li><u>provision of a sustainable drainage system</u></li> <li><u>minimal fragmentation of existing hedgerows</u></li> <li><u>that any need for ecological mitigation, including buffering of the ancient woodland, is adequately addressed</u></li> <li><u>phasing of development</u></li> </ul> <p><u>In addition, proposals will be expected to deliver the following:</u></p> <ul style="list-style-type: none"> <li><u>measures to mitigate flooding, reduce flood risk,</u></li> </ul>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
			<p><u>reduce surface-water run-off and provide betterment to reduce existing flood risks to development in Paddock Wood. Any planning application should include a Flood Risk Assessment setting clear objectives for the surface water drainage strategy for the site. Particular regard should be had to the Surface Water Management Plan 2011 and Paddock Wood Flood Alleviation Study 2015, or any subsequent updates. A Surface Water Management Plan shall be required, setting out the long term arrangements for the management of the surface water drainage system</u></p> <ul style="list-style-type: none"> <li>• <u>the development shall provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by the service provider</u></li> <li>• <u>green infrastructure linkages and areas of informal open space. Adjacent green infrastructure, including woodlands and streams, shall be respected, with suitable buffers and landscape treatment. Natural England's Standing Advice is that, while development should be kept as far as possible from ancient woodland, a minimum buffer of at least 15 metres in width should be maintained between the ancient woodland and the development boundary. However, there is no 'one size fits all' approach to buffer size and design, since the nature and scale of development must be considered, so each buffer will be unique to its location and the functions it is to fulfil</u></li> <li>• <u>provision of pedestrian and cycle routes, providing linkages to surrounding residential</u></li> </ul>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
			<p><u>areas, railway station and schools</u></p> <ul style="list-style-type: none"> <li>• <u>an equipped children's play area to LEAP standard</u></li> <li>• <u>a detailed Management Plan setting out how open spaces, children's play area and communal features such as community orchards, woodlands or allotments within the site will be managed over the long term</u></li> </ul> <p><u>Provision of and / or contributions towards the following will also be sought (to be a shared and proportionate requirement with allocations AL/PW3A and AL/PW4):</u></p> <ul style="list-style-type: none"> <li>• <u>highways improvements, to include: Maidstone Road / Mascalls Court Road / Badsell Road junction; Badsell Road / A228 roundabout</u></li> <li>• <u>walking and cycling improvements, to include: upgrading Public Footpath WT254 (Between Church Farm and The Cedars); providing a footpath / cycleway crossing at Mascalls Court Road / Green Lane junction and extending 30 mph speed limit; providing a footpath / cycleway south of Mascalls Court Road (between junctions with Green Lane and Maidstone Road); public footpaths to Brenchley and Castle Hill; improvements to cycle parking and pedestrian access at Paddock Wood station and the Station Approach</u></li> <li>• <u>enhanced bus services to the site / Paddock Wood</u></li> <li>• <u>education facilities including an extension to Mascalls Secondary School (or in other location as agreed with the Local Education Authority)</u></li> <li>• <u>increasing the capacity of local primary health</u></li> </ul>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
			<p><u>care facilities at Woodlands Medical Centre, Paddock Wood and / or Howell Surgery, High Street, Brenchley</u></p> <ul style="list-style-type: none"> <li>• <u>enhanced community, youth and indoor sport facilities at Putlands Leisure Centre, Wesley Centre (Policy AL/PW2) or other specified locations within the town</u></li> <li>• <u>the provision of youth and adult outdoor recreation facilities within a 2 mile radius of the site</u></li> <li>• <u>improvements to local library provision”</u></li> </ul>
Policy AL/PW4: Land at Mascalls Farm	MM12	<p>Policy AL/PW4 text shown in Submission Draft Site Allocations DPD:</p> <p><b>“Policy AL/PW 4</b></p> <p><b>Land at Mascalls Farm</b></p> <p>This site, as shown on the Paddock Wood Proposals Map, is allocated for residential development (C3) with the capacity to provide approximately 300 dwellings.</p> <p>A masterplan shall be prepared by the developer(s) in cooperation with the Borough Council, Town Council and the local community. The masterplan shall set out areas for built development and the quantum of development, including residential and non-residential uses, open space and inter-connected green spaces to provide informal and formal recreation areas, landscape buffers, access roads into and within the site and any other land uses.</p>	<p>Policy AL/PW4 text as shown in TWBC/PS/47:</p> <p><b><u>“Policy AL/PW 4</u></b></p> <p><b><u>Land at Mascalls Farm</u></b></p> <p><u>The site, as shown on the Paddock Wood Proposals Map, is allocated for residential development (C3) with the capacity to provide approximately 300 dwellings.</u></p> <p><u>A masterplan shall be prepared by the developer with the involvement of the Borough Council, Town Council, and the local community. The masterplan shall set out areas for built development and the quantum of development, including residential and non-residential uses, open space and inter-connected green spaces to provide formal and informal recreation areas, landscape buffers, access roads into and within the site, flood mitigation measures and any other land uses.</u></p>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<p>The masterplan shall show:</p> <ul style="list-style-type: none"> <li>• an open space buffer on the southern part of the site, as shown on the Proposals Map</li> <li>• an open space buffer between the site and Foal Hurst Wood, a designated Local Nature Reserve with Ancient Woodland, to address the need for ecological mitigation</li> <li>• phasing of development; the latter phases are likely to fall outside the Plan period (beyond 2026)</li> </ul> <p>In addition, proposals will be expected to deliver the following:</p> <ul style="list-style-type: none"> <li>• where development is phased, proposals for development of any one part of the site must not prejudice the overall capacity of the area covered by the allocation</li> <li>• flood mitigation measures in order to reduce flood risk on the site, reduce surface water run off and reduce existing flood risks in Paddock Wood. A site-specific Flood Risk Assessment will be required to accompany any planning application and shall include a detailed drainage strategy, which shall have particular regard to the Surface Water Management Plan (2011) or any update to the Plan. The masterplan must include use of Sustainable Drainage Systems (SuDS) within the overall development</li> <li>• enhanced biodiversity by providing opportunities for green infrastructure linkages and areas of open space</li> <li>• enhanced bus services shall be provided to and within the site</li> <li>• the provision of pedestrian and cycle routes,</li> </ul>	<p><u>The masterplan shall show:</u></p> <ul style="list-style-type: none"> <li>• <u>an open space buffer on the southern part of the site, as shown on the Proposals Map</u></li> <li>• <u>an open space buffer between the site and Foal Hurst Wood, a designated Local Nature Reserve with Ancient Woodland, to address the need for ecological mitigation</u></li> <li>• <u>provision of a sustainable drainage system</u></li> <li>• <u>phasing of development</u></li> </ul> <p><u>In addition, proposals will be expected to deliver the following:</u></p> <ul style="list-style-type: none"> <li>• <u>measures to mitigate flooding, reduce flood risk, reduce surface-water run-off and provide betterment to reduce existing flood risks to development in Paddock Wood. Any planning application should include a Flood Risk Assessment setting clear objectives for the surface water drainage strategy for the site. Particular regard should be had to the Surface Water Management Plan 2011 and Paddock Wood Flood Alleviation Study 2015, or any subsequent updates. A Surface Water Management Plan shall be required, setting out the long term arrangements for the management of the surface water drainage system</u></li> <li>• <u>the development shall provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by the service provider</u></li> <li>• <u>green infrastructure linkages and areas of informal open space. Adjacent green</u></li> </ul>

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POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<p>providing linkages to surrounding residential areas, railway station and schools</p> <ul style="list-style-type: none"> <li>development shall contribute to the provision of education facilities to be provided on land within allocation AL/PW3 or in other such location as agreed with the Local Education Authority</li> <li>development shall contribute to highways improvements, to include the Maidstone Road/Mascalls Court Road and Maidstone Road/Badsell Road junctions and Badsell Road</li> <li>the Wesley Centre is allocated for community use (Policy AL/PW2). Additional community facilities will be required during the Plan period and options should be explored for providing this within the allocated sites. Alternatively, contributions should be sought for the provision of community facilities within the town</li> <li>a detailed Management Plan will be required to be submitted and approved as part of the planning application process setting out how the open spaces and natural environment within the site allocation will be managed over the long term”</li> </ul>	<p><u>infrastructure, including woodlands and streams, shall be respected, with suitable buffers and landscape treatment. Natural England’s Standing Advice is that, while development should be kept as far as possible from ancient woodland, a minimum buffer of at least 15 metres in width should be maintained between the ancient woodland and the development boundary. However, there is no ‘one size fits all’ approach to buffer size and design, since the nature and scale of development must be considered, so each buffer will be unique to its location and the functions it is to fulfil</u></p> <ul style="list-style-type: none"> <li><u>provision of pedestrian and cycle routes, providing linkages to surrounding residential areas, railway station and schools</u></li> <li><u>an equipped children’s play area to LEAP standard</u></li> <li><u>a detailed Management Plan setting out how open spaces, children’s play area and communal features such as community orchards, woodlands or allotments within the site will be managed over the long term, specifically a woodland management plan will be required for Brick Kiln Wood</u></li> </ul> <p><u>Provision of and / or contributions towards the following will also be sought (to be a shared and proportionate requirement with allocations AL/PW3A and AL/PW3B):</u></p> <ul style="list-style-type: none"> <li><u>highways improvements, to include: Maidstone Road / Mascalls Court Road / Badsell Road junction; Badsell Road / A228 roundabout</u></li> </ul>

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			<ul style="list-style-type: none"> <li>• <u>sustainable transport improvements, to include: public footpaths to Brenchley and Castle Hill, improvements to cycle parking and pedestrian access at Paddock Wood station and the Station Approach; enhanced bus services to the site / Paddock Wood</u></li> <li>• <u>education facilities including a new primary school with nursery facilities (Policy AL/PW3B) and an extension to Mascalls Secondary School (or in other location as agreed with the Local Education Authority)</u></li> <li>• <u>increasing the capacity of local primary health care facilities at Woodlands Medical Centre, Paddock Wood and / or Howell Surgery, High Street, Brenchley</u></li> <li>• <u>enhanced community, youth and indoor sport facilities at Putlands Leisure Centre, Wesley Centre (Policy AL/PW2) or other specified locations within the town</u></li> <li>• <u>the provision of youth and adult outdoor recreation facilities within a two mile radius of the site</u></li> <li>• <u>improvements to local library provision</u></li> <li>• <u>the Foal Hurst Wood Local Nature Reserve to address the need for ecological mitigation”</u></li> </ul>
Policy AL/HA1: Former Springfield Garden Centre	MM13	<p><b>Policy AL/HA 1</b></p> <p><b>Former Springfield Garden Centre</b></p> <p>This site, as shown on the Hawkhurst Proposals Map, is allocated for residential development (C3) providing approximately 40 dwellings.</p> <p>Development on the site will be subject to the</p>	<p><b>“Policy AL/HA 1</b></p> <p><b>Former Springfield Garden Centre</b></p> <p>This site, as shown on the Hawkhurst Proposals Map, is allocated for residential development (C3) providing approximately 40 dwellings.</p> <p><u>A development framework plan for the whole site shall be prepared by the developer(s) with the</u></p>

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**SITE ALLOCATIONS DPD SUBMISSION DOCUMENT: RECOMMENDED SCHEDULE OF MAIN MODIFICATIONS**

POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<p>following:</p> <ul style="list-style-type: none"> <li>development shall provide a strong landscape framework informed by a detailed landscape and visual impact assessment</li> <li>new and enhanced green infrastructure links shall be provided within the site and pedestrian links to Hawkhurst (Highgate) should be explored</li> <li>development must reflect an understanding of the unique landscape of the High Weald AONB and respect the character and pattern of the settlement within the AONB</li> <li>the area designated as an Area of Landscape Importance should be retained and reinforced with additional planting and further structural planting should be incorporated within the northern and western boundaries of the site</li> <li>development must be informed by an ecological assessment to identify features of ecological interest and conserve and enhance biodiversity within the site</li> <li>access improvements will be required as part of any development of the site and a new means of access may be required subject to highways specifications</li> <li>works to the highway to facilitate both vehicular and pedestrian access may be required</li> <li>development must include measures to attenuate noise from the sub-station and substantial tree planting will be needed to the west and south of the sub-station to improve visual amenity</li> <li>financial contributions towards community facilities will be sought from this development</li> </ul>	<p><u>involvement of the Borough Council, Parish Council and the local community. The development framework plan shall indicate the distribution, scale and quantum of development, together with areas of open space, vehicular access, parking provision and pedestrian routes into and within the site. Where development is proposed on a phased basis it will be necessary to demonstrate that satisfactory development of the whole site is achievable and will not be prejudiced.</u></p> <p>Development on the site will be subject to the following:</p> <ul style="list-style-type: none"> <li>development shall provide a strong landscape framework informed by a detailed landscape and visual impact assessment</li> <li>new and enhanced green infrastructure links shall be provided within the site and pedestrian links to Hawkhurst (Highgate) should be explored</li> <li>development must reflect an understanding of the unique landscape of the High Weald AONB and respect the character and pattern of the settlement within the AONB</li> <li>the area designated as an Area of Landscape Importance should be retained and reinforced with additional planting and further structural planting should be incorporated within the northern and western boundaries of the site</li> <li>development must be informed by an ecological assessment to identify features of ecological interest and conserve and enhance biodiversity within the site</li> <li>access improvements will be required as part of any development of the site and a new means of access may be required subject to highways</li> </ul>



**TUNBRIDGE WELLS BOROUGH LOCAL PLAN**  
**SITE ALLOCATIONS DPD SUBMISSION DOCUMENT: RECOMMENDED SCHEDULE OF MAIN MODIFICATIONS**

POINT IN SALP	POINT IN IR	SUBMITTED TEXT	RECOMMENDED TEXT
		<ul style="list-style-type: none"> <li>proposals for redevelopment of part of the site must not prejudice the eventual development of the whole allocation”</li> </ul>	<p>specifications</p> <ul style="list-style-type: none"> <li>works to the highway to facilitate both vehicular and pedestrian access may be required</li> <li>development must include measures to attenuate noise from the sub-station and substantial tree planting will be needed to the west and south of the sub-station to improve visual amenity</li> <li><u>the development shall provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by the service provider</u></li> <li>financial contributions towards community facilities will be sought from this development</li> <li>proposals for redevelopment of part of the site must not prejudice the eventual development of the whole allocation”</li> </ul>