

Cranbrook and Sissinghurst Neighbourhood Development Plan: Regulation 16 Consultation Response Report

| Comment Number | Name/ Organisation | Which part of Plan does response refer to? | Response | Do you wish to attend examination hearing? | Would you like to be notified of the Council's decision regarding the outcome of the Cranbrook and Sissinghurst Neighbourhood Plan? | Supporting Documents |
|----------------|--------------------|--|--|--|---|--|
| 1 | Lidl | Infrastructure | On behalf of Lidl GB Ltd, I note the proposed local plan includes provision for the development of infrastructure due to the proposed expansion of the town population. I would like to register our interest in providing the local community with a new discount food store to enable a wider option of food shopping without having to travel further afield. | No | Yes | |
| 2 | Peter V P Mellor | Site LGS14 King George V Field, Sissinghurst | Site LGS14. The western part of the site is NOT part of the George V Field. It is a separate privately-owned grass field currently used for sheep grazing. It is part of the adjacent Mill Farm in Mill Lane. Delineated on the attached Page 56 of the NDP. | No | Yes | See edited version of page 56 of the NDP on page 48 of this document |
| 3 | Southern Water | Policy LN3.5 Local Protection & Enhancement of the Crane Valley | <p>Policy LN3.5 Local Protection & Enhancement of the Crane Valley - Southern Water understands the desire to protect Crane Valley. However, we cannot support the current wording of the policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development.</p> <p>Policy LN3.5 seeks to prevent development in Crane Valley, however this does not take account of the potential requirement for essential utilities infrastructure, or consider the need for any potential future upgrades at Cranbrook Wastewater Treatment Works, which is located adjacent to Crane Brook.</p> <p>Paragraph 177 of the NPPF (2021) states that: When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances</p> <p>As we stated in response to the pre-submission stage of your consultation, Southern Water considers that should the need arise, exceptional circumstances exist in relation to the provision of essential wastewater infrastructure required to serve new and existing customers. This is because there are limited options available with regard to location, as the infrastructure would need to connect into existing networks. The draft National Planning Practice Guidance recognises this scenario and states that 'it is important to recognise that water and wastewater infrastructure can have specific locational needs (and often consists of engineering works rather than new buildings). This means exceptionally otherwise protected areas may have to be considered, where this is consistent with their designation.'</p> <p>Proposed amendments</p> <p>Having regard to the above, we therefore request the following addition to Policy LN3.5 (additional text is shown within square brackets):</p> <p>To protect and enhance the role of the Crane Valley as an area of natural flood management and for the establishment of nature recovery networks, proposals for major development in parts of the Crane Valley beyond the footprint of existing historic farmsteads or previously developed land, as described on High Weald AONB Map "Crane Valley and Its Setting", will not be supported, [unless it is essential to meet specific necessary utility infrastructure needs and no feasible alternative site is available.]</p> | No | Yes | |
| 4 | Southern Water | Additional Policy on the Provision of Infrastructure (Section 9) | <p>Additional Policy on the Provision of Infrastructure (Section 9) - Southern Water is the statutory wastewater undertaker for Cranbrook & Sissinghurst and as such has a statutory duty to serve new development within the parish.</p> <p>Although there are no current plans, over the life of the Neighbourhood Plan, it may be that we will need to provide new or improved infrastructure either to serve new development and/or to meet stricter environmental standards. As we stated in our response to the pre-submission stage of your consultation, it is important to have policy provision in the Neighbourhood Plan which seeks to ensure that the necessary infrastructure is in place to meet these requirements.</p> | No | Yes | |

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| | | | <p>We could find no policies to support the general provision of new or improved utilities infrastructure. The NPPF (2021) paragraph 28 establishes that communities should set out detailed policies for specific areas including 'the provision of infrastructure and community facilities at a local level', and the National Planning Practice Guidance states that 'Adequate water and wastewater infrastructure is needed to support sustainable development'.</p> <p>Although the Parish Council is not the planning authority in relation to wastewater development proposals, support for essential infrastructure is required at all levels of the planning system.</p> <p>Proposed amendments To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy as follows:</p> <p>New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan.</p> | | | |
| 5 | Tunbridge Wells District Committee of CPRE Kent | Those parts of the Neighbourhood Plan mentioned in the comments under item 2. We do not comment on the supporting documents. | <p>CPRE Kent is the Kent Branch of the Campaign to Protect Rural England which is part of the national CPRE network of charities.</p> <p>It is our objective to retain and promote a beautiful and thriving countryside that is valued by everyone. We believe the planning system should protect and enhance the countryside in the public interest for the important contribution it makes to people's physical and mental wellbeing, as well as its vital role in feeding the nation. It is our position that local planning authorities should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that development is sustainable in accordance with national planning policy.</p> <p>General We commend this comprehensive and well-drafted Neighbourhood Plan, which is the result of five years' intensive work by the Parish Council and those residents who contributed to draft Plan at different stages of its preparation. We trust that it will find favour with the Inspector and with the residents of the Parish in a referendum. If adopted, the Plan should help to ensure that local considerations, demonstrated to be important to the local community, are taken into account in the consideration of future planning applications in Cranbrook & Sissinghurst and that future development in the Parish will be guided by the Vision and Policies set out in the Neighbourhood Plan.</p> <p>We have a few, relatively minor comments on the Regulation 16 Consultation Draft of the Neighbourhood Plan, which we trust are of a character which could, without further consultation be incorporated in the version of the Plan to be submitted to the Inspector. We emphasise that we have no desire to subject the Plan to a further process of consultation.</p> <p>Policy LN3.7 It is unclear why paragraph 3.43(a) is limited to development proposals within the settlements of Cranbrook and Sissinghurst and outlying hamlets. The importance of protecting the historic landscape is no less for developments proposed at isolated farmsteads or other locations outside existing settlements. The recent development at Turnden Farmstead is a case in point. Policy HD4.6 deals with developments at historic farmsteads, but covers different ground from Policy LN3.7. We would suggest addressing this point by deleting the words, "within the settlements of Cranbrook and Sissinghurst, and outlying hamlets".</p> <p>Section 4: Heritage and Design: Overall Policy Aims (after paragraph 4.9) The fourth and fifth bullets deal with the setting of Cranbrook and Sissinghurst respectively. It is unclear whether the words "its views" in each bullet point refers to views of or from the respective places, or to both. We suggest that this could be clarified.</p> <p>Policy HD4.3 In relation to protecting and enhancing shopfronts, Paragraph (b) states that the inclusion of features such as, inter alia "signage" will be supported. Some indication of the type of signage that would be supported should be given. We suggest inserting "appropriate", or some other suitable adjective, before "signage".</p> | Yes | Yes | |

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| | | | <p>Policy HD4.11(b) CPRE's view, expressed in its submissions in the course of the examination of the new Local Plan for Tunbridge Wells, is that developments should in all cases use land as efficiently as possible, to limit the amount of greenfield land consumed by development. We accordingly do not agree with the principle that lower densities are appropriate to "make the transition to the edge of the site, away from the core area". We suggest deleting the last sentence of subparagraph (b).</p> <p>Policy HD4.12 We suggest that the supporting text might refer to limiting the hours during which street lighting and other outdoor lighting is used to those which are essential for public safety or security.</p> <p>Section 7: Housing: Introduction We note that paragraph 7.9, which refers to the application for 164-168 homes at Turnden, which was called in for decision by the Secretary of State, is more than 12 months out-of-date and should be updated to reflect the situation pertaining when the Plan is submitted to the Inspector.</p> | | | |
| 6 | High Weald Swift Conservation Group | Policy LN3.2 (e) (page 22) | <p>I support this clause relating to integrated bat and bird boxes, to enhance biodiversity in line with National Planning Policy Guidance (Natural Environment paragraph 023).</p> <p>I request that ""such as swift bricks"" is added to the sentence to match the wording in NPPG paragraph 023.</p> <p>Swift bricks are noted to be a universal nest brick for a range of small birds, for example by NHBC Foundation (section 8.1, page 42):</p> <p>https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf</p> <p>I request that ""installed in line with best practice guidance"" is added. Best practice guidance including locations and numbers is provided by BS 42021:2022, in addition to RIBA Designing for Biodiversity 2013, and CIEEM:</p> <p>https://cieem.net/resource/the-swift-a-bird-you-need-to-help/</p> | No | Yes | |
| 7 | Lichfields obo Berkeley Homes | Policies LN3.5, LN3.8, HD4.4 and HO7.1 | <p>We write on behalf of our client, Berkeley Homes (Eastern Counties) Ltd ('Berkeley Homes'), in response to the above consultation. Berkeley Homes welcomes the opportunity to comment on the new Neighbourhood Plan for Cranbrook and Sissinghurst. Berkeley Homes has an interest in land at Turnden, adjacent to Hartley Road, Cranbrook, which has a draft allocation (AL/CRS 3) in Tunbridge Wells Borough Councils' (TWBC) emerging Local Plan.</p> <p>This letter sets out Berkeley Homes' response to the Regulation 16 stage version of the Cranbrook and Sissinghurst Neighbourhood Plan dated July 2022. The comments are organised by the policy they relate to.</p> <p>Introduction</p> <p>Berkeley Homes has control of land at Turnden which is allocated (AL/CRS 3) in the emerging Local Plan for housing and is also the subject of a live planning application (ref. 20/00815/FULL, APP/M2270/V/21/3273015) which has recently been subject to a Call-in Inquiry and is currently under consideration by the Secretary of State. The application seeks permission for the construction of 165 new dwellings and associated landscape management works, with the remaining 14.5ha of the site given over to landscaping, enhanced green and blue infrastructure, and ecological works.</p> <p>Following a positive recommendation by Officers and resolution of the Planning Committee members to grant permission subject to conditions and completion of a s106 agreement (which was completed on 30 March 2021), the application was</p> | Did not say | Did not say | |

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| | | | <p>called in on 12 April 2021 by the Secretary of State. A 16 day public inquiry was held between September and November 2021 attended by, among others, TWBC, Natural England, and the High Weald AONB Unit.</p> <p>The Inspector's report was issued to the Secretary of State for consideration on 4th April 2022.</p> <p>Development at the Turnden site has been found suitable by TWBC through extensive assessment undertaken in the plan-making process. It is envisaged that the Inspector's report on the Local plan will be published shortly and we understand that TWBC are seeking to adopt the Local Plan by early next year. As stated above it has also been tested through their consideration of the planning application and expert witnesses were called at the recent planning Inquiry. The potential impacts of the development on the character and appearance of the area, the AONB, the capacity of local infrastructure and the landscape have therefore been considered at length and a decision on this is expected in the near future.</p> <p>As you will be aware, a neighbourhood plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies (as outlined in paragraph 13 of the revised National Planning Policy Framework). A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.</p> <p>It is in the context of the above that we make the following comments on the draft Neighbourhood Plan.</p> <p>Policy LN3.5 – Local Protection and Enhancement of the Crane Valley Policy LN3.5 seeks to protect and enhance the role of the Crane Valley as an area of natural flood management and for the establishment of nature recovery networks. The policy states that proposals for major development in parts of the Crane Valley beyond the footprint of existing historic farmsteads or previously developed land will not be supported. Figure 03 demonstrates a 500m buffer from the Crane Brook in which it is understood that the policy will apply.</p> <p>Supporting text in the Introduction of the plan (paras 7.9 – 7.11) sets out that as the outcome is not yet known of the call-in Inquiry, 'TWBC draft Policy AL/CRS3 is in doubt', therefore Policy LN3.5 remains in the plan despite its conflict with this emerging policy. Although the outcome of the call-in Inquiry is not yet known, this is a separate process from the Examination of the TWBC Local Plan and it is incorrect to state that the status of the Inquiry casts doubts on draft Policy AL/CRS3. The supporting text also states that 'robust evidence' was provided by Kent County Council (KCC) during the Regulation 14 consultation, in relation to this policy. This has not been published (it is not included in KCC's response in the Consultation Statement) and is inconsistent with previously published comments by KCC and DEFRA flood maps. It is requested that this evidence is made public and further clarity is provided on this.</p> <p>As stated above, it is important that the Neighbourhood Plan is consistent with the TWBC Local Plan, which is likely to be adopted shortly, in terms of the delivery of strategic policies. Through extensive assessment as part of the Local Plan process, TWBC have found the site at Turnden suitable for major development; its allocation in the emerging Plan is in accordance with these findings and it is expected that the Local Plan Inspector will support this.</p> <p>More specifically, the extensive evidence prepared in relation to the site as part of the Local Plan evidence base and planning application, which was considered in detail at the Call-in Inquiry, demonstrates the acceptability of the land at Turnden for major development, in the context of its location in the Crane Valley and High Weald AONB.</p> <p>The potential impact of development on the character and appearance of the area, including the AONB, have been considered in detail as part of the plan-making process. TWBC's approach is set out in the Development Strategy Topic Paper which forms part of the Local Plan evidence base. Following Regulation 18 consultation, TWBC commissioned HDA to undertake a Landscape Visual Impact Assessment for all 17 draft site allocations considered to be 'major' in AONB terms.</p> | | | |

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| | | | <p>Natural England and the AONB Unit were consulted on the LVIA methodology. The LVIA considered, among other things, that the "existing containment of the site would restrict the visibility of the proposed development", that "the retention of approximately 2/3 of the site as open space allows for some substantial enhancements" and that not only could the development of the site be achieved without residual significant landscape and visual effects, but that "There is also the potential for the proposals within the allocated site to <u>enhance</u> the landscape of the AONB" (emphasis added).</p> <p>With regard to the site's location in the Crane Valley, this has been considered at length at the recent public Inquiry. The proof of evidence submitted by Mr Duckett of HDA on behalf of TWBC considers the question of whether development at the site would have an unacceptable effect on the AONB in general and the Crane Valley in particular. Mr Duckett concludes at paragraphs 10.6.7 – 10.6.9 of his proof that:</p> <p style="padding-left: 40px;">'The town's relationship with the Crane valley has been highlighted in the District-wide landscape assessment as an integral part of the settlement pattern and setting, "The Crane Valley is an integral part of the green infrastructure of the town cutting through the built-up area forming a key element in the setting of the town". The proposed housing would consolidate settlement along the valley side, but do not extend it beyond the permitted Turnden Farmstead development. The wider land holding would provide a permanent and robust rural boundary to the town ensuring the setting to the town and the wider Crane valley would be sustained in perpetuity.</p> <p style="padding-left: 40px;">The in-combination effects of permitted development at Turnden Farmstead and Brick Kiln farm and the application site would not be substantial and would not have a significant effect on the wider AONB.'</p> <p>Mr Duckett also refers to the benefits that would be offered to the valley if development is allowed in accordance with the draft Local Plan allocation.</p> <p style="padding-left: 40px;">Benefits which arise from the scheme include new permissive footpaths which will connect the wider Crane valley and Turnden Farmstead Development through the application site to the Brick Kiln Farm development, with the potential to link to the town centre. The additional permissive routes would ensure that the Crane Valley would continue to be an integral part of the green infrastructure of the town.</p> <p>The above demonstrates that development at the proposed allocation site can be achieved while maintaining the importance of the setting of the Crane Valley and providing benefits such as improvements to the green infrastructure of Cranbrook.</p> <p>There is no such technical evidence, or consideration of benefits that could be delivered through development, to support the policy approach for the Crane Valley that is set out in the draft Neighbourhood Plan.</p> <p>In terms of the Crane Valley's role as an area of natural flood management, the impacts of development at the site in terms of drainage were thoroughly tested at application stage. The Committee Report sets out that KCC, the EA and Southern Water were content with the proposals in relation to drainage and flooding and concluded that overall, there are not considered to be any significant drainage issues at this site which cannot be dealt with by planning conditions (para 10.66). This demonstrates that development at this site can be accommodated without any adverse drainage or flood risk impacts. The Committee Report also sets out that the proposed scheme results in a significant biodiversity net gain and that cohesive ecological management is proposed.</p> <p>In summary, the site at Turnden has a draft allocation in the Local Plan which is at an advanced stage. The development's impact on the Crane Valley including in drainage/flood risk and ecological terms has been thoroughly tested through both the Local Plan process and the application and planning inquiry.</p> | | | |

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| | | | <p>Should the Neighbourhood Plan retain this policy in its current form, it will be inconsistent with the Tunbridge Wells Local Plan. Limited evidence has been provided by the Neighbourhood Plan Group to support this policy allocation.</p> <p>A neighbourhood plan must be in general conformity with, and plan positively to support, the strategic policies of the development plan. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies.</p> <p>The policy for the Crane Valley should therefore be amended to ensure that is in accordance with the Local Plan and draft allocation AL/CRS3.</p> <p>Policy LN3.8 – Green Gaps and Preventing Settlement Coalescence Policy LN3.8 of the Neighbourhood Plan seeks to preserve the integrity of the green gaps between the historic settlements of Cranbrook, Wilsley Green, Sissinghurst and Hartley. The policy sets out that proposals which would result in the coalescence of the historic hamlet and farmstead settlements will not be supported. Berkeley objected to this policy at a Regulation 14 stage, based on the inconsistency with TWBCs Draft Local Plan and the intention through the NP to designate the entire site pursuant to draft allocation AL/CRS4 as open space and a green gap. The amendments to this policy since the Regulation 14 consultation (i.e. removal of the accompanying maps) are welcomed.</p> <p>It was clearly demonstrated at the Inquiry that, by virtue of the safeguarding and management of the wider land holding at Turnden, there would be a Green Gap maintained between Cranbrook and Hartley with development in the Crane Valley.</p> <p>Policy HD4.4 – Protection of Key Views Policy HD4.4 seeks to protect key views including those of buildings, roofscapes and landscapes. The policy sets out that key views have been identified through consultation with residents and through the findings of the Cranbrook and Sissinghurst Landscape Character Assessment. However, the information provided on the criteria for including these views is very limited and does not assess the significance of these views. The policy sets out that proposals need to include details of how potential harm to views of or from heritage assets has been assessed. Figure 06 shows key views to be protected including view 26 which is the from Mount Ephraim looking west, south and southeast, and view 30 which is the view from the ridge on Hartley Road looking east, northeast and southeast.</p> <p>Part (a) of the policy states that the key views ‘should be protected and not harmed by new development’. The policy should be amended to make it clear that new development can take place without harming or failing to protect key views. The following wording is suggested:</p> <p style="padding-left: 40px;">‘New development should have regard to the characteristics and composition of key views. Development proposals should seek to enhance, and not harm, key views in the borough.’</p> <p>This is important as there is a draft allocation in the TWBC Local Plan for the land at Turnden Farm, which falls within key views 26 and 30. As set out above, the impact of development at this site on the local landscape has been thoroughly assessed in the Local Plan process and tested through the planning application and inquiry and the independent LVIA commissioned by TWBC concluded that development at this site has the potential to enhance the landscape of the AONB. It is therefore important that the policy reflects the ability for new development to be located in the vicinity of key views without harm, and that the policy is consistent with the TWBC emerging Local Plan which allocates the site at Turnden for development.</p> <p>Policy HO7.1 – Affordable Homes in Sustainable Locations Berkeley Homes fully support the principle of delivering affordable homes in sustainable locations. This is demonstrated through the planning application at Turnden which proposes a 40% affordable housing provision. Part (b) of this policy states that ‘Affordable housing should be made subject to a local connection test’. This is a duplication of the emerging Local Plan Policy H3 which states that ‘All forms of affordable housing will be provided on the basis of a ‘local connection cascade’.</p> | | | |

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| | | | <p>There is no need for the Neighbourhood Plan to duplicate policies contained in the Local Plan, indeed the NPPF states at paragraph 16(f) that plans should avoid unnecessary duplication of policies that apply to a particular area. Furthermore, the emerging Local Plan is at examination and the Inspector asked the Council to provide a justification for this specific policy (Matter 8, Issue 3, Question 6). The wording of the Local Plan policy may be subject to change, therefore, in order to ensure consistency with the Local Plan, this H07.1 (b) should be removed from the Neighbourhood Plan so as to avoid any conflict with the final wording of Local Plan Policy H3.</p> <p>Concluding Remarks Berkeley Homes welcomes the opportunity to comment on the new Neighbourhood Plan for Cranbrook and Sissinghurst, however have concerns regarding some of the policies and the implications of these on housing land supply for the village. It is important that the Neighbourhood Plan is consistent with the emerging Local Plan and amendments are required to policies LN3.5 and HD4.4 to ensure consistency in particular with emerging policy AL/CRS3 which allocates the land at Turnden for development. It is also important that the Neighbourhood Plan does not duplicate the Local Plan, therefore amendments are required to policy H07.1 which is repeated in the Local Plan. The amendments set out above should be made in order to ensure that the Plan meets the Basic Conditions. Should you require any further information please do not hesitate to contact me or my colleague Simon Slatford at this office.</p> | | | |
| 8 | Bridget Veitch | Policy LN3.11 Local Green Space Designations | The green space at the bottom of Quaker Lane, alongside Angley Road, is known as a Quaker Burial Ground, and therefore should be added to the list of designated green spaces, just as the Golford Cemetery and St Dunstan's graveyard are. | No | Yes | <p>See Historic England Map for Listing Entry 1084838 on page 49</p> <p>Page 328 from The first hundred years of Quakerism in Kent, written by Gillian Draper, held in electronic form on website kentarchaeology.org.uk</p> |
| 9 | Charterhouse | Whole Plan, Basic Conditions Statement, and evidence base webpage | <p>I am writing in response to the submission draft Cranbrook and Sissinghurst Neighbourhood Development Plan ("the draft Plan").</p> <p>Charterhouse Strategic Land ("Charterhouse") welcomes the publication of the submission draft Plan and recognises the efforts of the Steering Group in the preparation of the document. It is further recognised that the draft Plan has been submitted to Tunbridge Wells Borough Council by the Parish Council in its capacity as the qualifying body responsible for preparing the Neighbourhood Plan.</p> <p>Charterhouse appreciates that a Neighbourhood Plan can be narrow or broad in scope, and that any Plan can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted plan has been designed to be distinctive in general terms, and to be complementary to the statutory Development Plan in particular. It identifies a range of environmental and community issues which seek to encapsulate the views expressed by the local community since March 2017.</p> <p>However, Charterhouse's view is that the draft Plan is unnecessarily verbose, could be more concise, and creates unnecessary tension between the underlying aims and objectives of the various draft policies. As such, it is not evident how decision-makers should react to development proposals given the overly protectionist nature in which some policies have been drafted. Further, it has not been possible to have sight of all the evidence base prepared to inform the draft Plan. For example, the link to the Landscape Character Assessment for Cranbrook & Sissinghurst appears to be broken on the evidence page of the Neighbourhood Plan website (See the evidence page of the Cranbrook and Sissinghurst NDP website). As such, it has not been possible for Charterhouse to consider in detail the basis upon which draft Policy HD4.4 and the</p> | Did not say | Did not say | |

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| | | | <p>identified protected views are appropriately justified. We respectfully request that the link be restored and that interested parties be afforded an opportunity to consider the evidence relied upon.</p> <p>The policies proposed within the draft Plan, if ‘made’, will become the basis for local planning and development management decisions. As such, the draft Plan requires a suitably robust evidence base to underpin its policies.</p> <p>Comments on the Basic Conditions Statement In Charterhouse’s opinion, the submitted Statement fails to both properly and adequately set out how the draft Plan prepared meets the required Basic Conditions. It simply addresses how the Plan conforms with national and local planning policy.</p> <p>Charterhouse submits the Basic Conditions Statement needs to go further and explain how the proposed Plan has been prepared in accordance with the statute and how the four basic conditions of neighbourhood planning and other considerations, as prescribed by Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, are considered to have been met.</p> <p>Whilst there is no set structure for a Basic Conditions Statement to follow, a common approach is to briefly summarise how national and local policies and guidance have been considered for each neighbourhood plan policy. It is acknowledged that the author of the Statement has followed this approach for the local policies, but it would assist any appointed examiner if the Statement also followed this approach for national policies and guidance. To assist the examination of the draft Plan it is recommended that the Steering Group update the Statement accordingly. An effective way to do this might be to follow my illustration below: -</p> <table><tr><th>Policy Area</th><th>NDP Policy</th><th>NPPF Para.</th><th>Local Plan Policy</th><th>How conformity is achieved</th></tr><tr><td>Landscape & the Natural Environment</td><td>LN3.1</td><td>174, 175, 179, 180, 181</td><td>EN13, EN15 & CP4</td><td>To ensure new development does not adversely impact the natural environment</td></tr></table> <p>Comments on the draft Plan policies <u>Policy LN3.3</u> Whilst in principle Charterhouse has no objection to the policy as drafted, we are though concerned, and object to supporting paragraph 3.19 where it states <i>inter alia</i> that ancient woodland should be buffered by 50 metres to reduce disturbance.</p> <p>It is acknowledged that Ancient Woodland is an irreplaceable habitat but to be consistent with the national planning policy and Central Government’s standing advice the buffering to such woodland should be described as of at least 15 metres from the boundary of the woodland. Reference to the Woodland Trust recommendation of 50 metres is misguided. The Woodland Trust’s position was based on a 50 metre buffer policy introduced by Natural England only to be withdrawn soon after on the basis that it was unsustainable. Accordingly, it would be wrong for the draft Plan to adopt such a stance.</p> <p><u>Policy LN3.5</u> Policy LN3.5 states <i>inter alia</i> that major development in parts of the Crane Valley beyond the footprint of existing farmsteads or previously developed land will not be supported. The policy’s supporting text implies the basis of the policy is to mitigate against flood risk. Accordingly, it is not clear what purpose the draft policy serves. For example, the parts of the Crane Valley already at risk of flooding cannot be built on without first satisfying the sequential and exceptions tests – near on impossible to satisfy. However, if the intention of the policy is to resist all ‘major’ development beyond the footprint of existing farmsteads or previously developed land then neither is appropriate. It is not the role of a Neighbourhood Plan to frustrate development – the draft Plan cannot anticipate each and every location where development may be acceptable.</p> | Policy Area | NDP Policy | NPPF Para. | Local Plan Policy | How conformity is achieved | Landscape & the Natural Environment | LN3.1 | 174, 175, 179, 180, 181 | EN13, EN15 & CP4 | To ensure new development does not adversely impact the natural environment | | | |
| Policy Area | NDP Policy | NPPF Para. | Local Plan Policy | How conformity is achieved | | | | | | | | | | | | |
| Landscape & the Natural Environment | LN3.1 | 174, 175, 179, 180, 181 | EN13, EN15 & CP4 | To ensure new development does not adversely impact the natural environment | | | | | | | | | | | | |

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| | | | <p>Accordingly, Charterhouse submit LN3.5 should be deleted.</p> <p><u>Policy HD4.4 – Protection of Key Views</u></p> <p>The draft policy at Criterion d) references a document titled ‘Cranbrook and Sissinghurst Neighbourhood Plan – views to be protected’ and states these views are distinctive to the parish. Charterhouse submits this document falls woefully short of what is required by way of evidence. The evidence base must state why these views need to benefit from protection not otherwise afforded by the other draft Plan policies, Local Plan policies or within national planning policy. Further, Charterhouse submits that unless the Steering Group can objectively put a value on each of the identified views (i.e., what makes them so distinctive, rare, or special to the parish) then the draft policy should be deleted or amended to delete views such as 22, 24, 28, 29, 33, 34 & 35.</p> <p>It should be noted that at the time of making this representation Charterhouse has not been able to access online the Landscape Character Assessment for Cranbrook & Sissinghurst via the website so is unable to consider whether such an objective assessment of each of the key views exists in this document. Accordingly, we welcome the opportunity to further consider the unavailable evidence base.</p> <p><u>Policy BE6.1 – Business & Employment Space</u></p> <p>Charterhouse welcomes the policy’s approach for the creation of new business opportunities within the Neighbourhood Plan Area. Charterhouse agrees there is a shortage of small to medium sized businesses units and the permissive policy approach is supported. We further agree with the policy’s sentiment towards residential and community mixed-use clusters.</p> <p><u>Policy BE6.3 – Adult Education & Vocational Training</u></p> <p>Charterhouse supports this policy which is a proactive response to the findings of the 2017 Business and Employment Survey. Further we consider it compliments draft Policy BE6.1.</p> <p>Concluding remark</p> <p>Charterhouse trust that this representation is clear, helpful, and informative. If any further clarification is required as to our comments, then please do not hesitate to contact us.</p> | | | |
| 10 (duplicate of response 5) | CPRE | Those parts of the Neighbourhood Plan mentioned in the comments under item 1a. We do not comment on the supporting documents. | <p>CPRE Kent is the Kent Branch of the Campaign to Protect Rural England which is part of the national CPRE network of charities.</p> <p>It is our objective to retain and promote a beautiful and thriving countryside that is valued by everyone. We believe the planning system should protect and enhance the countryside in the public interest for the important contribution it makes to people's physical and mental wellbeing, as well as its vital role in feeding the nation. It is our position that local planning authorities should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that development is sustainable in accordance with national planning policy.</p> <p>General</p> <p>We commend this comprehensive and well-drafted Neighbourhood Plan, which is the result of five years’ intensive work by the Parish Council and those residents who contributed to draft Plan at different stages of its preparation. We trust that it will find favour with the Inspector and with the residents of the Parish in a referendum. If adopted, the Plan should help to ensure that local considerations, demonstrated to be important to the local community, are taken into account in the consideration of</p> | Yes | Yes | |


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| | | | <p>future planning applications in Cranbrook & Sissinghurst and that future development in the Parish will be guided by the Vision and Policies set out in the Neighbourhood Plan.</p> <p>We have a few, relatively minor comments on the Regulation 16 Consultation Draft of the Neighbourhood Plan, which we trust are of a character which could, without further consultation be incorporated in the version of the Plan to be submitted to the Inspector. We emphasise that we have no desire to subject the Plan to a further process of consultation.</p> <p>Policy LN3.7 It is unclear why paragraph 3.43(a) is limited to development proposals within the settlements of Cranbrook and Sissinghurst and outlying hamlets. The importance of protecting the historic landscape is no less for developments proposed at isolated farmsteads or other locations outside existing settlements. The recent development at Turnden Farmstead is a case in point. Policy HD4.6 deals with developments at historic farmsteads, but covers different ground from Policy LN3.7.</p> <p>We would suggest addressing this point by deleting the words, “within the settlements of Cranbrook and Sissinghurst, and outlying hamlets”.</p> <p>Section 4: Heritage and Design: Overall Policy Aims (after paragraph 4.9) The fourth and fifth bullets deal with the setting of Cranbrook and Sissinghurst respectively. It is unclear whether the words “its views” in each bullet point refers to views of or from the respective places, or to both. We suggest that this could be clarified.</p> <p>Policy HD4.3 In relation to protecting and enhancing shopfronts, Paragraph (b) states that the inclusion of features such as, inter alia “signage” will be supported. Some indication of the type of signage that would be supported should be given. We suggest inserting “appropriate”, or some other suitable adjective, before “signage”.</p> <p>Policy HD4.11(b) CPRE’s view, expressed in its submissions in the course of the examination of the new Local Plan for Tunbridge Wells, is that developments should in all cases use land as efficiently as possible, to limit the amount of greenfield land consumed by development. We accordingly do not agree with the principle that lower densities are appropriate to “make the transition to the edge of the site, away from the core area”.</p> <p>We suggest deleting the last sentence of subparagraph (b).</p> <p>Policy HD4.12 We suggest that the supporting text might refer to limiting the hours during which street lighting and other outdoor lighting is used to those which are essential for public safety or security.</p> <p>Section 7: Housing: Introduction We note that paragraph 7.9, which refers to the application for 164-168 homes at Turnden, which was called in for decision by the Secretary of State, is more than 12 months out-of- date and should be updated to reflect the situation pertaining when the Plan is submitted to the Inspector.</p> | | | |
| 11 | Environment Agency | General | <p>Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the environment. This document sets out the key environmental issues, within our remit, which should be considered.</p> <p>Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available to view here</p> | Did not say | Did not say | |

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| | | | <p>We also recommend your Plan takes account of relevant Local Planning Authority's policies, plans and strategies including Local Planning Authority's Strategic Flood Risk Assessment, flood risk strategies (see here) and the South East River Basin Management Plan (see here) Thames River Basin Management Plan (see here) as appropriate.</p> <p>The information below explains the key issues we would consider in reviewing your Plan. We aim to reduce flood risk, while protecting and enhancing the water environment.</p> <p>Flood risk Development must be safe and should not increase the risk of flooding.</p> <p>Neighbourhood Plans should conform to national and local policies on flood risk: If a Neighbourhood Plan is proposing sites for development please check whether there are any areas of Flood Zones 2 or 3 within the proposed site allocations.</p> <p>You can view a site's flood zone on the Flood Map for Planning on our website here</p> <p>If the proposed allocation is located within Flood Zone 2 or 3 you should consult the Flood Risk and Coastal Change pages of the National Planning Policy Guidance (NPPG) (see here). Here you can determine whether the flood risk vulnerability of the proposed development and the flood zone are compatible. In accordance with national planning policy the Sequential Test should be undertaken to ensure development is directed to the areas of lowest flood risk. This should be informed by the Environment Agency's floodmap for planning and the Local Planning Authority's Strategic Flood Risk Assessment (SFRA), if they have one. We recommend you contact the Local Planning Authority to discuss this requirement further.</p> <p>We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken.</p> <p>It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward.</p> <p>We can provide any flooding information which we have available – such as predicted flood levels and historical flood data. Please note that there may be a charge for this information. Please contact our Customers and Engagement Team at ksle@environment-agency.gov.uk for further details.</p> <p>In addition to the above you should also check with the Local Planning Authority's Neighbourhood Planning team with regards to other sources of flooding (such as surface water, groundwater, sewers and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). The Lead Local Flood Authority (LLFA), now has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map.</p> <p>Climate Change Allowances The Local Authority's Strategic Flood Risk Assessment should indicate the extent of flood zones with likely climate change.</p> <p>On 19 February 2016, we published new guidance for planners and developers on how to use climate change allowances (see here).</p> <p>Flood Defences Areas of your Neighbourhood Plan area, or proposed sites, may be given protection by a flood defence/alleviation scheme. Where this is the case the Plan should acknowledge this and identify the level of protection provided (including any climate change allowance). It should be noted that flood defences are intended to protect existing properties and are not to facilitate</p> | | | |

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| | | | <p>new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.</p> <p>Ecology Proximity to watercourse/ Ecology Main rivers can be viewed on the Environment Agency's map here.</p> <p>We normally require a buffer zone of 8 metres (fluvial) and 16 metres (tidal) between any new development and the top of the bank of the main river. The permanent retention of a continuous unobstructed area is an essential requirement for emergency access to the river for repairs to the bank and for future maintenance and/or improvement works. A buffer between new development and the river wall is also required to ensure no adverse loading which could impact the stability of the channel wall. This buffer zone will help provide more space for flood waters, provide improved habitat for local biodiversity and allows access for any maintenance requirements.</p> <p>Where development is proposed next to the river we recommend that it includes a green buffer strip alongside the watercourse. Where such a buffer strip does not currently exist, we normally seek that it is established. This is a key way in which we carry out our legal duty to further and promote the ecological and landscape value of rivers and land associated with them. In urban areas, in particular, rivers have often been degraded by past development, and we expect that any new development should go some way to redress the balance.</p> <p>The provision of green infrastructure, particularly along rivers, and the inclusion of sustainable drainage techniques can help reduce the risk of flooding. This can also provide recreational and wildlife benefits. Opportunities to incorporate biodiversity in the Plan will be encouraged. In accordance with national policy, any development proposal should avoid significant harm to biodiversity and seek to protect and enhance it; delivering biodiversity net gain. We would not support development proposals if there was shown to be a likely detrimental impact on the water environment.</p> <p>Water Management and Groundwater Protection Local level actions and decision making can help secure improvements to the water environment. This is widely known as the catchment-based approach and has been adopted to deliver requirements under the Water Framework Directive (WFD). It seeks to:</p> <ul style="list-style-type: none"> • deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and • encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment. <p>Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the water environment. Local WFD catchment data can be obtained here:</p> <p>Overall deterioration in water quality and promoting improvement in the ecological status of any water body. Actions to achieve this are listed in the Thames River Basin Management Plan (RBMP) and the South East River Basin Management Plan (see here)</p> <p>Where appropriate, a WFD Assessment should assess any potential impacts on the watercourse and demonstrate that the required enhancements will be delivered. Any development that has the potential to cause deterioration in classification under WFD or that precludes the recommended actions from being delivered in the future is likely to be considered unacceptable to us.</p> <p>Groundwater Quality Development must not cause pollution to the water environment. Aquifers and Source Protection Zones</p> | | | |

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| | | | <p>Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below). SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection guidance (see here).</p> <p>To see if a proposed development is located within a Source Protection Zone, please use our online map.</p> <p>Land Contamination You must consider land contamination when preparing your plan. Managing it during development is key to addressing past contamination and preventing further impacts during development. You can establish if a site may be contaminated in several ways. Your Local Authority may hold a register of sites it knows to be contaminated. A list of potentially contaminated sites can be accessed here.</p> <p>We recommend you contact your Local Authority's Environmental Health team who may hold records on known/potential land contamination. Please note our primary concern is with regards to water quality. Your Local Authority's Environmental Health team will advise you on issues related to human health.</p> <p>Further information can be accessed on the following links:</p> <ul style="list-style-type: none"> • Guiding principles for the Land Contamination • Model Procedures for the Management of Land Contamination • Approach to Groundwater Protection <p>Water supply and foul drainage When allocating sites in you Plan, you will need to consider if the water supply and foul drainage infrastructure can accommodate the development. Your local water company can provide further information about water supply and sewerage capacity.</p> <p>Surface water drainage The inclusion of Sustainable Drainage Systems (SUDS) should always be a consideration within any development to reduce the risk of surface water flooding on and off site. The Lead Local Flood Authority, is the main contact for SUDS issues. However, we have interest in SUDS from a groundwater protection perspective and those area of critical drainage.</p> <p>The collection and dispersal of clean surface water to ground to recharge aquifer units and prevent localised drainage or surface systems flooding in heavy rainfall is encouraged. However, dispersal into the ground through soakaways or other infiltration systems requires a site-specific investigation and risk assessment. Generally, we would accept roof drainage going to soakaway (or other systems), but other surface drainage may need to go through treatment systems or to foul main, for instance vehicle parking. Infiltrating water has the potential to cause mobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of underlying groundwater resources. Where contamination is known or suspected, remedial or other mitigating measures will likely be required so that it can be demonstrated that there is no resultant unacceptable risk to Controlled Waters.</p> <p>We advise applicants to follow our guidance – Groundwater Protection. This is a report that highlights the importance of groundwater and encourages industry and other organisations to act responsibly and improve their practices. This can be found here.</p> <p>The design of the drainage systems should be in line with G1, G9, G12 and G13 position statements (see the position statements)</p> <p>Infrastructure Delivery</p> | | | |

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| | | | <p>We would recommend that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is taken into account if the Plan looks to fund local infrastructure.</p> <p>Environmental Permitting Regulations To see if a proposed development requires an Environmental Permit under the Environment Permitting Regulations please refer to our website:</p> <p>Under the Environmental Permitting (England and Wales) Regulations 2016, a flood risk activity permit (FRAP) may be required for work:</p> <ul style="list-style-type: none"> • in, over or under a main river; • within 8m of the bank of a main river, or 16m if it is a tidal main river; • within 8m of any flood defence structure or culvert on a main river, or 16m on a tidal main river. <p>Flood risk activities can be classified as: exclusions, exemptions, standard rules or bespoke. These are associated with the level of risk the proposed works may pose to people, property and the environment. Local Authorities should advise developers to refer to the flood risk activity permit section of gov.uk for further information.</p> <p>Please note This document is a response to a Neighbourhood Plan consultation and does not represent our final view in relation to any future planning application made in relation to any site. You should seek your own expert advice in relation to technical matters relevant to any planning application before submission.</p> <p>If you have any questions please contact the Kent and South London Sustainable Places team: kslplanning@environment-agency.gov.uk</p> | | | |
| 12 | Historic England | General | <p>We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you to previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here.</p> | Did not say | Did not say | |
| 13 | Kent County Council | Chapters 1, 2, 3, 4, 5, 6, 9, 10 and 12 | <p>1. Introduction</p> <p>Public Rights of Way (PRoW): The County Council is keen to ensure its interests are represented with respect to its statutory duty to protect and improve the PRoW in the county. KCC is committed to working in partnership with local and neighbouring authorities, councils and others to achieve the aims contained within the KCC Rights of Way Improvement Plan (ROWIP) and 'Framing Kent's Future' strategy for 2022-2026. This includes for people to enjoy, amongst others, a high quality of life with opportunities for an active and healthy lifestyle, improved environments for people and wildlife, and the availability of sustainable transport choices.</p> <p>PRoW is the generic term for Public Footpaths, Public Bridleways, Restricted Byways, and Byways Open to All Traffic and the value of the PRoW network is in providing the means to realise many objectives of this Plan. For example, the PRoW network can enhance community connectivity and cohesion; improve local environments by reducing local traffic congestion and improving air quality; support personal health and well-being of individuals and groups; and support local economies, whether in providing passing trade such as with a cafe, or larger supply businesses as with cycle or equestrian users.</p> <p>KCC recognises that various changes to the Plan in respect of PRoW have been made since the Regulation 14 consultation (Appendix A) and welcomes the amendments that have been made.</p> <p>2. Vision & Objectives</p> | Did not say | Did not say | See appendix A on page 50 |

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| | | | <p><u>PRoW</u>: The County Council is supportive of the Plan's vision and objectives, as they will allow considerable opportunity for maintaining and enhancing the local PRoW network and therefore make a significant contribution in delivering the Plan's aims.</p> <p>3. Landscape & the Natural Environment</p> <p><u>Biodiversity</u>: At present, Policies LN3.2, LN3.3 and LN3.4 are repetitive and KCC would therefore recommend these are consolidated.</p> <p><u>Minerals and Waste</u>: The Neighbourhood Planning Area shown on Figure 01 has land-won safeguarded minerals, as confirmed by the extract below from the Tunbridge Wells Minerals Safeguarding Area map in the Kent Minerals and Waste Local Plan (KMWLP) 2013-30.</p>  <p>Sub - Alluvial River Terrace Deposits Sandstone - Tunbridge Wells Sand Formation</p> <p>KCC, as Minerals and Waste Planning Authority, notes that the Plan makes no reference to the presence of safeguarded minerals in the neighbourhood plan area. However, the Plan is not allocating any further development above the emerging Tunbridge Wells Borough Council Local Plan. The County Council would recommend that reference is made to the KMWLP safeguarding policies to ensure consideration in any future development proposals.</p> <p>There are no significant minerals or waste management safeguarded facilities in the locality that would prevent or conflict with the development proposals in the Plan.</p> <p><i>Policy LN3.2 Biodiversity & Ecological Connectivity: Protection & Enhancement</i></p> | | | |

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| | | | <p><u>Biodiversity:</u> The County Council would advise that this policy is amended to avoid repetition in the text. For example, section (c) refers to ecological enhancements, however, section (e) refers to the need for integrated bat and bird boxes. Furthermore, section (h) refers to Biodiversity Net Gain which could also be considered an enhancement, if achieved. KCC would therefore recommend that there is a section on Biodiversity Net Gain specifically stating that the Plan would support development proposals achieving greater than 10% Biodiversity Net Gain and a section on enhancement features that clearly sets out what is expected from the Steering Group.</p> <p>The County Council would also recommend that the Plan uses the most recent version of the Biodiversity Net Gain Metric, as both versions that have been referenced are out of date.</p> <p><i>Policy LN3.3 Protection & Enhancement of Priority Habitats</i></p> <p><u>Biodiversity:</u> KCC would recommend that section (b) is revised to be more precise. For example, ancient woodland and veteran trees are considered irreplaceable habitats in the National Planning Policy Framework (NPPF), however, Orchard and grassland of interest are not referenced in the same way. This section should also be more specific when referring to grassland of interest, as it is not a grassland type.</p> <p><i>Policy LN3.4 Protection of Species and Habitats of Principal Importance</i></p> <p><u>Biodiversity:</u> This section makes reference to habitats of principal importance which are also priority habitats as referred to in Policy LN3.2.</p> <p>The County Council recognises that this policy refers to ecological surveys, however, KCC would recommend that it specifically states that an Ecological Impact Assessment (EclA) is submitted. An EclA is a process of identifying, quantifying and evaluating the potential effects of development on habitats, species and ecosystems, therefore providing all ecological survey information alongside any necessary avoidance, mitigation and compensation proposals within one document. KCC would also recommend that the policy refers to and requests adherence to the mitigation hierarchy (avoid, mitigate, compensate, enhance).</p> <p>Where reference has been made in the Plan to Biodiversity Net Gain, a percentage must be stated. KCC would therefore recommend at least 10%, but would also draw attention to the Kent Nature Partnership who are currently promoting the adoption of an aspiration for up to 20% Biodiversity Net Gain as a target. The County Council would welcome the aspiration for up to 20% to be included in the Plan.</p> <p><i>Policy LN3.7 Protecting the Historic Landscape Character</i></p> <p><u>Heritage Conservation:</u> The County Council welcomes the strengthening of this policy since the Regulation 14 version of the Plan (Appendix A) and in particular, the mention of the Historic Landscape Characterisation of 2017.</p> <p><i>Policy LN3.11 Local Green Space Designations</i></p> <p><u>Heritage Conservation:</u> The text identifies a large number of local green spaces that the Steering Group wishes to conserve and, as the text notes, some of these are of historic importance. The County Council would note that the Kent Gardens Trust has recently assessed a number of green spaces and gardens for their historic significance and the method they used would be helpful for the Steering Group in assessing the importance of the spaces to be protected.</p> <p><u>Sport and Recreation:</u> The County Council supports the Plan's wishes to enable and promote continued access to the countryside and recreational green space. However, KCC would recommend consideration as to how different services can be accessed through active travel.</p> | | | |

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| | | | <p>The County Council is also pleased to note that the Steering Group recognises the importance of activity levels and community and social development, and that reference has been made to the Sport England Active Lives survey.</p> <p><i>Policy LN3.11 Local Green Space Designations</i></p> <p><u>PRoW</u>: KCC recognises that the Plan proposes to designate a variety of Local Green Space sites, seeking in part to protect access to these spaces. Where these happen to include PRoW, the additional regard is welcomed, however, KCC would confirm that protection is already afforded by any PRoW being a public highway.</p> <p>4. Heritage & Design</p> <p><u>Heritage Conservation</u>: The historical review presented in this section is stronger than in the last version of the Plan, however, this could be stronger still. The County Council would recommend that the following text is added after paragraph 4.4:</p> <p><i>“Iron production was greatly expanded during the Elizabethan period when the invention of the blast furnace allowed the rapid expansion of the industry. Many examples of iron working sites survive across the Weald, both as archaeological sites and as place names (e.g. Furnace Farm, Hammer Pond etc) and many more no doubt remain undiscovered. Cranbrook itself is known to have been the site of such a furnace.”</i></p> <p><i>Policy HD4.1 Protect, Conserve & Enhance the Conservation Areas</i></p> <p><u>Heritage Conservation</u>: KCC welcomes this policy. However, it should be noted that the Kent Historic Environment Record will contain historic assets not contained in the resource currently identified. In addition, the Plan area may contain historic buildings and assets that have yet to be identified. The County Council would recommend that text is modified to:</p> <p>“...All designated and non-designated heritage assets referred to in the Cranbrook Conservation Area Appraisal (CCAA) 2010, Wilsley Green Conservation Area Appraisal (WGCAA) 2012 and Sissinghurst Conservation Area Appraisal (SCAA) 2012 of the Tunbridge Wells Borough Local Development Framework, the Historic England list of buildings of historic interest, <u>the Kent Historic Environment Record</u> and the Kent Historic Buildings Index, <u>as well as any which are identified by other means, now or in the future</u>, should be protected, conserved, and enhanced in a manner appropriate to their significance.”</p> <p><i>Policy HD4.6 Protection, Conservation & Enhancement of Agricultural Heritage Assets</i></p> <p><u>Heritage Conservation</u>: The text rightly commits the Steering Group to maintaining the dispersed settlement pattern that is prevalent in the Weald and to permitting a degree of sympathetic development in farmsteads. Historic England, together with KCC and the Kent Downs Area of Outstanding Natural Beauty (AONB) team, has published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character of the countryside.</p> <p><i>Policy HD4.7 Cranbrook Windmill</i></p> <p><u>Heritage Conservation</u>: The County Council welcomes the strengthening of this policy compared with the Regulation 14 version of the Plan (Appendix A), and in particular the commitment to protecting the windmill’s heritage value.</p> <p>5. Access & Movement</p> <p><i>Policy AM5.2 Pedestrian Priority & Public Rights of Way</i></p> | | | |

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| | | | <p><u>PRoW</u>: KCC notes that this policy is the focal point for offroad access and its support for PRoW will help ensure the connection of settlements and green spaces as sought. The policy, however, should be revised in several respects. Firstly, the County Council would recommend that section (b), point 5 is amended to include cycling as well as walking routes.</p> <p>Secondly, the policy should be revised to recognise equestrians. Other than Horse Pond, a pond in Kent, equestrians are only mentioned in paragraph 5.7, recognising their use of roads. This mode should have wider consideration given its importance to rural economies, recreation and well-being. The County Council would also note that equestrians can lawfully use Public Bridleways, Restricted Byways, and Byways Open to All Traffic. All these PRoW exist in the parish; however, they are disjointed and do not form a safe offroad network. It is therefore recommended that the Plan recognises this issue and seeks, when opportunity allows, to either up-grade in status existing suitable PRoW or create new multi-modal routes. KCC would welcome partnership with the Steering Group when opportunities arise. It should be further noted that Bridleways also carry cycling rights.</p> <p>In the Policy Supporting Text, paragraph 5.8 recognises the value of connections between local communities. Whilst off-road improvements will enhance access between the parish's two main settlements, the Plan is encouraged to also support connections to other parts of the parish and settlements outside of the parish. Section (b), point 3 talks of '<i>safeguarding and enhancing</i>' the former Hop Pickers Line and this ambition could be enhanced to connect with both Goudhurst and Hawkhurst. This will have considerable value when a '<i>traffic-free bridle and cycle path between Sissinghurst village and Bedgebury Forest, via Cranbrook town centre</i>' in section (b), point 1 is established, and provide a connection with National Cycle Network Route 18.</p> <p>Specific enhancements to deliver to the Plan's ambitions will require working in partnership with others, often neighbouring parish councils, Tunbridge Wells Borough Council, and KCC. The County Council strongly encourages partnership working between the Steering Group and KCC regarding changes around the PRoW network and would advise that this is referred to within the Plan.</p> <p>6. Business & Employment</p> <p><u>PRoW</u>: The Plan recognises the value of PRoW in supporting many and varied activities and interests. The County Council notes that the local PRoW network can make a significant contribution to the local tourism offer in Policy BE6.2 and can also support the local rural economy mentioned in Policy BE6.4. KCC also notes the interest in local volunteer opportunities in the Plan and would encourage the Steering Group to contact KCC for discussion on how this could be achieved.</p> <p>9. Infrastructure</p> <p><i>Policy IN9.4 Sustainable Drainage</i> <u>Sustainable Urban Drainage Systems (SuDS)</u>: The County Council, as Lead Local Flood Authority, is pleased to note that the risk of flooding is considered sufficiently within the Plan, particularly in regard to the SuDS policy.</p> <p>10. Projects List</p> <p><u>Highways and Transportation</u>: KCC, as Local Highway Authority, notes that the Plan includes a list of projects seeking to improve access and movement in the villages. Whilst developer contributions towards the access and movement projects can be sought where appropriate, the projects could also be included in the parish Highway Improvement Plan if they are not already.</p> <p><u>PRoW</u>: The County Council recognises that the Plan has positively identified opportunities for future funding to deliver projects. The projects identified will help to realise the Plan's vision and objectives and would be delivered using developer contributions. KCC encourages the Steering Group to empower residents to continually suggest additions to PRoW improvements in the area which are compiled into a list accordingly. These can be strategic, such as a multi-modal route to</p> | | | |

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| | | | <p>Hemstead Forest, or local improvement, as with renewing the surface of a footpath to the shops. The County Council would also encourage the Steering Group to keep the list under constant review. Sharing this list routinely thereafter with Tunbridge Wells Borough Council and KCC will, in the event development comes forward, assist in understanding the needs of the communities when allocating funding and priority. Having a list of potential projects readily available will consequently allow the Steering Group to take opportunities and deliver benefits for local communities.</p> <p>For information, the County Council has promoted the following schemes when last consulted on the emerging Tunbridge Wells Local Plan:</p> <ul style="list-style-type: none"> • Policy AL/CRS1: Brick Kiln Farm, Cranbrook Road. Public Footpaths WC94 and WC96 could provide a link to the Cranbrook Centre; • Policy AL/CRS2: Land S of Corn Hall, Crane Valley. Public Footpaths WC94, WC95 and WC96, and Restricted Byway WC118A, could be upgraded for cycle and equestrian use to enhance connectivity; • Policy AL/CRS 3: Turnden Farm, Hartley Road. Public Footpath WC115 could be upgraded for an off-road route to other developments identified; • Policy AL/CRS 4: Cranbrook School. Public Footpaths WC100, WC102, WC98, WC97, WC148 and connecting routes could be affected, offering a great opportunity to improve pedestrian connectivity across the town, possibly cycling too; • Policy AL/CRS 6: Land South of The Street, Sissinghurst. Public Footpath WC104 could be improved to connect into Sissinghurst local amenities of church, hall and pub; • Policy AL/CRS 7: Land at Corner of Frittenden Road and Common Road. Public Footpath WC75 could provide an active travel link to school from both Common Road and Sissinghurst Road. <p>Sport and Recreation: With regard to the Community and Culture projects listed in the Plan, the County Council has a particular interest in the: Community centre Community outdoor space Boxing Club Rugby Club new facilities Cranbrook Football Club new facilities Sissinghurst Cricket Club new facilities</p> <p>The County Council is keen to discuss the developments of sporting facilities to help with design and advice, as well as funding advice and appropriate support.</p> <p>It is noted that Sissinghurst are a prominent cricket club that has recently started girls' cricket, and Kent Cricket are supporting them financially to install a net facility in 2023. Additional growth at the club is expected and their facilities both playing and social are in need of further upgrade. On consultation with key partners such as Kent Cricket, proposals around new community indoor and outdoor spaces at both Cranbrook and Sissinghurst could be an interesting opportunity, as it could be a prime spot for some of their activities.</p> <p>12. Glossary of Terms</p> <p>PRoW: The County Council would note the concept of active travel within the Plan and the contribution that walking and cycling can make to deliver active travel, whilst enhancing the lives of residents and visitors. The County Council would therefore recommend that the Plan's glossary is revised to include a definition of active travel rather than '<i>Active Travel Networks</i>'. This will ensure the various references are consistently interpreted, ensuring that designers of future developments and Tunbridge Wells Borough Council give it due weight in preparing and determining future planning applications. The County Council would therefore draw attention to the definition used in the KCC Active Travel Strategy.</p> | | | |

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| | | | KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me. | | | |
| 14 | Natural England | General | <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on the Cranbrook and Sissinghurst Neighbourhood Plan</p> | Did not say | Did not say | |
| 15 | NHS Kent and Medway | All (including Policy CC8.2) | <p>On 1 July 2022 NHS Kent and Medway Clinical Commissioning Group was replaced by the NHS Kent and Medway Integrated Care Board. NHS Kent and Medway is the NHS organisation that plans and buys healthcare services to meet the needs of 1.9million people living in Kent and Medway. It is our responsibility to ensure health services and all future proposed developments are sustainable from a revenue affordability, capital investment and workforce perspective. We must also ensure that, wherever possible, we maximise the delivery of care closer to where people live. It is therefore vital that any proposals relating to the future provision of health services within Cranbrook must be formally agreed by NHS Kent and Medway.</p> <p>Policy CC8.2 –Provision of Health and Wellbeing Facilities - NHS Kent and Medway can confirm that support in principle (Stage 1 of governance process) has been provided to enable existing general practices to engage in the proposed medical centre project on the Wilkes Field site. A business case and plans will be developed and considered through NHS Kent and Medway governance at the appropriate time.</p> <p>NHS Kent and Medway will continue to work closely with local councils and public health teams to understand the impacts associated with housing developments, including the likely health needs and the future provision of health services. Through this process and as part of the wider healthcare infrastructure strategy, we will continue to identify infrastructure development requirements, including contributions through S106, that support the provision of additional healthcare services and healthcare facilities (including plans associated with maximising utilisation and potential development of existing facilities) for local populations.</p> | No | Yes | |
| 16 | DMH Stallard LLP obo Rydon Homes | Whole plan | <p>1. INTRODUCTION</p> <p>1.1 We are writing on behalf of Rydon Homes Ltd. to provide comments in respect of the Regulation 16 version of the Cranbrook and Sissinghurst Neighbourhood Plan. Rydon Homes have previously made comments in respect of the Regulation 14 version of the Plan which were submitted on their behalf by Sigma Planning Services in December 2020.</p> <p>2. COMMENTS ON OVERALL COMPLIANCE</p> <p>2.1 The main concerns about the Plan as it is currently proposed, are that it is excessively detailed, it unnecessarily repeats existing policies in the Local Plan and National Planning Policy Framework (not always accurately or consistently), it confuses Policy and guidance (which have a different status in the overall planning balance) and it relies to a too great extent on references to other documents which are of background relevance only and are not up-to-date or may become out-of-date during the currency of the Plan period. Such references should be transferred to the explanatory text and/or an appendix. The plan should provide a local dimension and interpretation of planning policy and not simply repeat, and in some cases distort, National and Local Plan Policy. In its present form it adds another layer of planning policy and complicates and confuses objectives rather than simply applying a local perspective.</p> | Did not say | Did not say | |

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| | | | <p>2.2 This issue is heightened in the context of the Levelling Up Bill currently progressing through Parliament, which makes it clear that it is the Government's objective to centralise development management policies in a 'national development management policies' document. It is our view that the Neighbourhood Plan contains far too much detail, which leads to it occasionally misinterpreting national policy and guidance. Consequently, the Neighbourhood Plan as currently drafted does not accord with the general direction of National guidance and should be much more concentrated on policies relating to the amount, type, and location of development in the local area, details of infrastructure or affordable housing requirements and requirements relating to design, which in all cases should be justified by the local context. Going forwards it is our view that large parts of the Neighbourhood Plan will need to be reviewed or will be superseded by, or become in further conflict with, 'national development management policies', once introduced by the Government.</p> <p>2.3 In terms of its compliance with the Development Plan, the Tunbridge Wells Local Plan examination concluded earlier this year and a response from the Inspector carrying out this examination is expected shortly. This has implications for the Neighbourhood Plan because there are serious question marks about one of the sites which the Local Plan seek to allocate within the Neighbourhood Plan area as referenced at Paragraph 7.9 – 7.10. This allocation (Draft Tunbridge Wells Local Plan Policy CRS 3) was subject to a planning application (Tunbridge Wells Ref: 20/00815/FULL) for the erection of 165 dwellings which received significant objection from Natural England and the High Weald AONB Planning Unit, amongst others. Whilst approved by Tunbridge Wells District Council, this Application was called in by the Secretary of State and was subject to a Public Examination at the end of 2021, the Inspector's Report and decision of the Secretary of State are still awaited. If the Secretary of State decides that the Appeal should be refused, this would have serious implications for the housing delivery strategy in Tunbridge Wells and may lead to the Local Planning Authority needing to find other housing allocations within the District, including within Cranbrook and Sissinghurst. It is understood that the Inspector is delaying publication of any findings in respect of the Local Plan until such a time as the 'called-in' Appeal has been determined by the Secretary of State.</p> <p>2.4 With regards to the above it is regrettable that the Neighbourhood Plan does not take the opportunity of allocating small and medium sizes sites which are suitable for housing in their area, consistent with the approach recommended by Paragraph 70 of the NPPF.</p> <p>2.5 Whilst issues around Policy CRS 3 are unresolved, it is our view that it is difficult to ascertain whether the Neighbourhood Plan will be in general conformity with the strategic policies for the area, which may lead to other policies in the Plan (or forfeit of policies) undermining proposals within the Development Plan. It is noted that there is no discussion within the Basic Conditions Statement on how these issues will be resolved. It is important that these issues are addressed because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.</p> <p>2.6 For these and other reasons as set out below, we conclude that in many respects, the Neighbourhood Plan does not currently conform to the Basic Conditions as set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. These include:</p> <ul style="list-style-type: none"> • having regard to the national policies and advice contained in guidance issued by the Secretary of State. • contributing to the achievement of sustainable development. • being in general conformity with the strategic policies contained in the development plan for the area. <p>2.7 In order to meet those Basic Conditions, it is suggested, generically, that the Policies in the Neighbourhood Plan should:</p> <ul style="list-style-type: none"> • be shorter and more succinct, avoiding duplication and distortion of Local Plan Policies unless there is specific local justification. • concentrate solely on policies relating to the amount, type, and location of development in the local area, details of infrastructure or affordable housing requirements and requirements relating to design | | | |

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| | | | <ul style="list-style-type: none"> • accord more closely with National and Development Plan policy • relocate references to Guidance Documents to the explanatory text and/or an Appendix and avoid giving them actual or perceived policy status. • ensure that the policies are positively prepared and contribute to the achievement rather than the frustration of sustainable development. <p>3. COMMENTS ON SPECIFIC POLICY ISSUES</p> <p><i>Policy LN3.1 – Special Sites for Nature Conservation</i></p> <p>3.1 It is not clear why this Policy is necessary because protections for nature conservation sites are already provided within local and national planning policies, guidance, and legislation. It purports to give equal important to all nature conservation sites rather than distinguishing a hierarchy of sites consistent with the NPPF.</p> <p>3.2 The requirement of a 25 m buffer strip set out by Criterion b) to all nature conservation sites goes beyond what is required by local and national policies and guidance and there has been no special justification set out for this. Whilst it is acknowledged that in many cases a buffer would be a sensible approach in other cases there may be very good reasons why it is not practicable. It is considered that this requirement is onerous and would frustrate development that would otherwise sustainable development and should be deleted.</p> <p>3.3 In terms of net gain to biodiversity, this is covered by National and Districtwide policies along with enacted and draft legislation and does not need to be repeated. Ensuring on-going management of biodiversity within development sites in perpetuity by means of planning conditions and obligations is impracticable. The Local Planning Authority does not have the resources to monitor and enforce such widespread obligations. The time period of perpetuity is unrealistic, normally management plans would be required to cover a period of 20-25 years, and this is for the very good reason that this is a period which can be appropriately managed and beyond which there can be no reasonable certainty about prevailing environmental conditions. The Neighbourhood Plan would therefore be out of step with normal planning good practice and the expectations of both National and Districtwide policy (including EN 9 of the draft Tunbridge Wells Local Plan), guidance, and practice.</p> <p>3.4 There is an issue of tying this policy to the aspirations of the High Weald AONB Management Plan. This document was prepared as guidance and to be a material consideration in relation to the determination of planning applications. Furthermore, the reference to aspirations is vague. The inclusion of a requirement to be in line with the High Weald AONB Management Plan aspirations gives that document the status of being a policy of the Statutory Development Plan, which it is not. The wording of this policy therefore creates an unjustified confusion in terms of the status and extent of documents forming part of the Statutory Development Plan.</p> <p>3.5 The policy introduces a requirement that biodiversity net gain is provided within the Parish. This is not consistent with the provisions within the Environment Act 2021 which allows net gain sites to be provided further afield (whilst acknowledging that there is a broader preference that net gain is provided within or as close to a development site as possible).</p> <p>3.6 For the above reasons it is considered that this Policy fails to meet basic conditions a), d) and e).</p> <p><i>LN3.2 - Biodiversity & Ecological Connectivity: Protection & Enhancement</i></p> <p>3.7 This policy proports to apply to all development proposals and requires the identification and assessment of impacts on ecological connectivity in each case (including cumulative impacts). Such an assessment can only be carried out effectively by a qualified expert and it is unduly onerous and draconian to impose such a requirement on all development proposals irrespective of their nature and scale. It is considered that this goes beyond the more proportionate requirements set out within national and local planning policies and guidance.</p> | | | |

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| | | | <p>3.8 Criterion b) is advisory and is not a policy directive of itself. The requirement in Criterion e) to provide bat and bird boxes in all development as a minimum may not be advised by an ecologist in all cases and is an onerous requirement which may not always be the most sustainable option for enhancement.</p> <p>3.9 The reference to management in perpetuity set out by Criterion g) conflicts with current planning guidance and good practice (including Policy EN 9 of the draft Tunbridge Wells Local Plan), is unrealistic and not enforceable in practice.</p> <p>3.10 With regards to Criterion h) it is considered that reference to 'clear and significant' net gains will lead to confusion with regards to what constitutes 'significant' against the defined requirements within the emerging Tunbridge Wells Local Plan Policy EN 9 and The Environment Act 2021 and associated secondary legislation.</p> <p>3.11 The objectives of this policy are generally subsumed in National and Districtwide planning policy and guidance on ecological protection and enhancement. There is no specific local issue that needs to be addressed and therefore the policy is an unnecessary addition to existing policy. It is considered that this policy fails meet basic conditions a), d) and e).</p> <p><i>Policy LN3.3 - Protection & Enhancement of Priority Habitats</i></p> <p>3.12 Areas designated for special protection are covered by relevant legislation and policies in the emerging New Tunbridge Wells Local Plan such as Policy EN 13 Ancient Woodland and Veteran Trees and EN 9 Net Gains for Nature Biodiversity. The policy does not need to repeat this unless there is a specific local requirement.</p> <p>3.13 The extension of priority habitats to include traditional orchards is unjustified and excessive and there is no explanation as to why they are considered to be priority habitats or irreplaceable. This is not in accordance with national and local policy or guidance.</p> <p>3.14 For the above reasons it is considered that this Policy fails to meet basic conditions a), d) and e).</p> <p><i>Policy LN3.4 - Protection of Species and Habitats of Principal Importance</i></p> <p>3.15 It is unduly onerous and unrealistic to expect all planning applications to be supported by reports from qualified Ecologists, irrespective of the scale, nature and type of proposal. Priority Species are already protected by legislation, National policy and Local Plan policies. There is therefore no need for any additional policy. There is no specific local reference for this policy. The reference to management in perpetuity is unduly onerous, impractical and incapable of effective enforcement and not in accordance with the Development Plan.</p> <p>3.16 For the above reasons it is considered that this Policy fails to meet basic conditions a), d) and e) in that it would frustrate otherwise sustainable development.</p> <p><i>LN3.5 - Local Protection & Enhancement of the Crane Valley</i></p> <p>3.17 The Local Protection & Enhancement of the Crane Valley is supported, and it is entirely appropriate for a Neighbourhood Plan to identify the special characteristics of such an area and to seek to protect them. However, it is not reasonable to seek to prevent all types of major development without exception. It is considered that the policy should be re-phrased in order to identify the specific environmental qualities of the Crane Valley that need to be preserved and to set out criteria which limit the types of development that will be appropriate.</p> <p>3.18 Consequently, it is considered that this Policy would fail to meet basic test d) as it may frustrate sustainable development.</p> | | | |

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| | | | <p><i>Policy LN3.6 - Protection of Geodiversity</i></p> <p>3.19 This policy is not justified and is unduly onerous restriction on development activity. It is a level of micromanagement that is excessive and not applied elsewhere. There is no local justification and no clear evidence base that requires all topsoil to be retained on the same site irrespective of whether this is practical, economic or desirable.</p> <p>3.20 It is considered that this Policy fails to have regard to National policies and advice and would unnecessarily frustrate sustainable development. Therefore, it fails to comply with the basic conditions d) and e).</p> <p><i>Policy LN3.8 - Green Gaps & Preventing Settlement Coalescence</i></p> <p>3.21 This Policy is supported but it is considered that the Green Gaps should be identified on a Map as opposed to being left to a text description.</p> <p><i>Policy LN3.9 - Protection of the High Weald AONB and its Setting</i></p> <p>3.22 The generic protection of the High Weald AONB is already adequately addressed in National and Local Plan policy. An additional layer of generic policy is unnecessary and not justified by any specific local circumstances.</p> <p>3.23 Criterion b) seeks to apply advice set out by the AONB High Weald Unit to areas outside of the AONB. The extension of the same level of protection to the setting of the AONB as that which applies within the AONB is unjustified and not in accordance with National Policy Guidance. Whilst the setting of the AONB may be a material consideration in planning decisions, there is no case for applying the same level of restriction as applies within the AONB itself. The proposed blanket approach to the consideration of design issues is also contrary to national policy and guidance.</p> <p>3.24 The reference to the High Weald AONB Management Plan within the Policy itself is inappropriate because this is a guidance and visioning document which has the status of a material consideration and should not be confused with the status of a policy that will form part of the Statutory Development Plan. There is no need to repeat objectives that are already set out in the High Weald AONB Management Plan which is already established as an important material consideration for the interpretation and application of development plan policies. There is no need or specific local justification for a further layer of policy reference within the Development Plan.</p> <p>3.25 Consequently, it is considered that this Policy would fail to meet basic test a) as it adds another layer of policy over and above what is set out within the NPPF.</p> <p><i>Policy LN3.10 - Protection & Enhancement of Sissinghurst Castle Garden</i></p> <p>3.26 The protection and enhancement of Sissinghurst Castle is supported but there is no explanation or justification as to why a further policy is required beyond the protection that the Heritage Asset already enjoys by virtue of national listing and Local Plan policies.</p> <p>3.27 Consequently, it is considered that this Policy would fail to meet basic test a) as it adds another layer of policy over and above what is set out within the NPPF.</p> <p><i>Policy HD4.1 - Protect, Conserve & Enhance the Conservation Areas</i></p> <p>3.28 This Policy does not provide any new local policy beyond that contained within the National and Local Plan Policy. It is therefore unnecessary. The reference to guidance documents, which may become out of date or be superseded, also elevates them incorrectly to the status of policy of the Statutory Development Plan rather than material considerations.</p> | | | |

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| | | | <p>3.29 For the above reasons, it is considered that the Policy therefore fails to comply with d) and e) as it enhances the status of documents which are not Development Plan documents and may frustrate otherwise sustainable development.</p> <p><i>Policy HD4.2 - Protect, Conserve & Enhance the Historic Public Realm</i></p> <p>3.30 Policy DH1.6 Criteria a) and b) are unnecessary because the objective is adequately covered by National and Local Plan Policy. It is also confusing that the wording of the policy, in terms of the approach to any assessment of impact, differs and conflicts with these other policies and is therefore confusing for the user.</p> <p>3.31 With regard to Criterion c), whilst identifying a particular architectural interest of Cranbrook town centre, it is not clear whether any higher order of approach is required or why that is the case. The elevation of Cranbrook town centre to the position of requiring a particular policy reference and different approach from, say, Sissinghurst, is not explained or justified.</p> <p>3.32 For the above reasons, it is considered that the Policy therefore fails to comply with a) as it confuses policies contained within the NPPF and d) as it may unnecessarily frustrate development in Cranbrook Town Centre.</p> <p><i>Policy HD4.4 - Protection of Key Views</i></p> <p>3.33 The policy needs to be made more specific, text should be provided confirming why each view is important with reference to the specific characteristics of that view which need to be protected. References to a supporting document forming part of the evidence base are too remote and may not be easily accessible to the reader. References to the document can be made within the Explanatory Text but information for the reader as to whether a proposed development site lies within a specified important view should be readily available within the document itself.</p> <p>3.34 Criterion c) indicates that the list of views is not exhaustive, which makes it difficult for users to understand whether they are required to comply with this Policy or not. It is considered that the key views should be clearly defined and limited to those listed by the Policy.</p> <p>3.35 Therefore it is considered that this Policy is confusing for the user and as the list of viewpoints is not exhaustive may frustrate otherwise sustainable development contrary to basic condition d). <i>Policy HD4.5 - Protection, Conservation & Enhancement of Heritage Assets outside Conservation Areas</i></p> <p>3.36 This policy is considered to be unnecessary because it adds nothing to existing protection provided by National and Local Plan Policies.</p> <p>3.37 It is also confusing because it raises the question of whether a heritage asset should be given greater value because it is within a Conservation Area, rather than anywhere else. The requirement to comply with High Weald AONB Management Plan raises the status of that document to a policy of the Statutory Development Plan rather than a material consideration and this is excessive.</p> <p>3.38 It is our view that this Policy fails to accord with national policies and guidance as it seeks to differentiate the important of heritage assets inside and outside of Conservation Areas. For this reason, it is considered that it fails to comply with basic condition a) and d).</p> <p><i>Policy HD4.6 – Protection, Conservation & Enhancement of Agricultural Heritage Assets</i></p> <p>3.39 There is no clear explanation or understanding as to why historic farmsteads are singled out as Heritage Assets that deserve particular and special protection beyond that given to Heritage Assets in general. If they are to be singled out, then a clear definition and understanding of what constitutes a “historic farmstead” or other built agricultural Heritage Asset should</p> | | | |

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| | | | <p>be provided. There is potential for this policy to conflict with generic policies in National and Local Plan Policy which deal with the re-use of agricultural buildings in the countryside and the need to ensure future conservation.</p> <p>3.40 It is our view that this Policy fails to accord with national policies and guidance as it seeks to differentiate to elevate the importance of historic farmsteads to heritage assets. For this reason, it is considered that it fails to comply with basic condition a) and d).</p> <p><i>Policy HD4.8 - Retention & Restoration of The Providence Chapel</i></p> <p>3.41 The retention and restoration of the Providence Chapel is supported but the wording of the policy is more akin to a Proposal. It is not clear why this Policy is needed as it does not add anything further to the protections provided by National legislation and policy.</p> <p><i>Policy HD4.9a - Preference for Small Scale Sustainable Development Sites & Design Criteria</i></p> <p>3.42 This policy is vague and reference to small scale is undefined, it is unclear whether this relates to 'minor development', i.e., any development that falls outside the scope of 'major development' as defined in the Town and Country Planning Act 1990, or some other more subjective assessment. It fails to acknowledge that all developments should seek to make an effective use of land (Paragraph 124 of the NPPF) which may not always be compatible with a preference for small scale proposals.</p> <p>3.43 Criterion d) elevates a series of guidance to that of development control policy, most of which only has relevance to parts of the Parish which are located within the AONB. With the passage of time this guidance may become out of date or superseded with other guidance. It is considered that this Criterion should be deleted and any reference to design guidance made within the supporting text.</p> <p>3.44 Consequently, it is considered that this Policy fails to meet basic tests a) and d) as it confused national planning policies and would frustrate otherwise sustainable development.</p> <p><i>Policy HD4.9b - Exceptions for Large Scale Developments & Community Involvement</i></p> <p>3.45 This Policy proports to make exceptions for developments of over 10 dwellings or more subject to certain Criteria, including that they meet the test of exceptional circumstances set out by the NPPF, as well as demonstrating any impacts on the AONB can be mitigated.</p> <p>3.46 In principle we would support a Policy which sets out circumstances where a development of over 10 dwellings would be supported. However, in this context there is no 'exceptional circumstances' test contained within the NPPF that would be relevant. It might be that the Policy refers to the test set out by Paragraph 177 of the NPPF which sets out the circumstances where permission may be granted for major development in the AONB. In this case the Policy does not seem to recognise that not all of the Parish is located within the AONB and therefore it would not be in accordance with national policy to apply such a test.</p> <p>3.47 In addition, the definition of 'major development' is slightly different in this context and is a subjective decision made by the local authority, as opposed to the definition of development set out by national legislation. Defining a development as major for the purposes of the AONB would depend on its context and in some cases developments of fewer than 10 dwellings may be seen as major, or developments of a much greater scale than 10 might be defined as minor.</p> <p>3.48 The Policy as drafted therefore appears to misinterpret national policy and needs to be clarified in order to meet the basic tests.</p> | | | |

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| | | | <p>3.49 Criterion c) and f) incorrectly seeks to elevate design guidance which may become out of date or be superseded to the status of a policy of the Statutory Development Plan, rather than a material consideration in development control decisions.</p> <p>3.50 Whilst the desire to secure community engagement (Criterion d) in design of significant new developments is laudable there are already extensive consultation procedures attached to the planning application process. If additional consultation is being promoted, then this should be through direct encouragement rather than a policy of the Development Plan.</p> <p>3.51 Consequently, it is considered that this Policy fails to meet basic tests a) and d) as it confused national planning policies and would frustrate otherwise sustainable development.</p> <p><i>Policy HD4.11- Making Efficient Use of Land Through Appropriate Densities</i></p> <p>3.52 There are existing National and Local Plan policies in relation to making efficient use of land. This is to be achieved consistent with the maintenance of local character. Densities consistent with local character should be optimised on all potential development sites and some sites will be more suitable for higher densities than others. Each site should be treated on its own merits.</p> <p>3.53 The proposed policy is also confusing in that Part C refers to Affordable Housing provision and the purpose of this inclusion is unclear. If it is to ensure that the standard, density and quality of design of affordable housing should be the same as that for market housing then this should be stated but in any event design policies do not differentiate between the two types of housing and design quality required by National and Local Plan Policy, together with other policies in the Neighbourhood Plan are adequate to ensure high quality development and making the optimum use of sites consistent with local character.</p> <p><i>Policy HD4.12 - Avoidance of Light Pollution</i></p> <p>3.54 This Policy is too onerous, unjustified, and inconsistent with established good planning practice. The reference to 'dark sky friendly lighting' is too vague and is not defined introducing uncertainty for Applicants. Many parts of the Plan area do not lie within the AONB. Therefore, it is not reasonable to expect applicants to incur the expense of employing qualified Ecologists and specialist lighting engineers in relation to a development unless there is a special ecological interest that needs to be protected.</p> <p>3.55 Part B of the policy fails to address the need to consider the balance of provision of lighting between personal safety and environmental impact and should include a requirement for such a balancing operation to be carried out.</p> <p>3.56 It is not reasonable, practical or enforceable to require management of lighting schemes in perpetuity.</p> <p>3.57 It is unclear why '(AONB)' is used to define parts of this policy and this needs to be clarified. Does this mean that these parts of the Policy only apply to AONB areas? If so that needs to be set out more clearly.</p> <p>3.58 Consequently, it is considered that this Policy fails to meet basic tests a) and d) as it confused national planning policies and would frustrate otherwise sustainable development.</p> <p><i>Policy AM5.3- Public Transport & Access to Amenities</i></p> <p>3.59 Policy AM4.2 is generally supported but requires to be more focussed and clarified. Firstly, the policy should not apply to all cases of development. Clearly there will be situations where pedestrian priority is appropriate but in others vehicular priority is required and pedestrian safety needs to be secured. The policy should restrict itself to specific pedestrianisation</p> | | | |

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| | | | <p>projects and generic situations where pedestrian priority over vehicles is practicable and desirable. The term “pedestrian priority” also needs closer definition.</p> <p>3.60 With regard to Part B of the policy, the requirement for development contributions is unlikely to satisfy the requirements of the Community Infrastructure Levy Regulations 2010 Paragraph 122 or Paragraphs 55 and 56 of the NPPF.</p> <p>3.61 Consequently, this Policy would fail to meet basic conditions a) and d).</p> <p><i>Policy AM5.5- Safer Road Conditions</i></p> <p>3.62 It is our view that this Policy is too vague in terms of its application to Development Control matters. An Applicant would be unable to glean precisely what is required of them in the context of their individual planning proposal. The policy does not indicate how it is to be implemented and the suggested improvements achieved. These are primarily matters for the Kent County Council acting as Highway Authority and the specific measures referred to in the policy will either duplicate, conflict with, or confuse with existing guidance set out in National Highways Guidance and that provided at County level. The policy needs to be more focussed and avoid repetition, conflict, or confusion with existing guidance.</p> <p>3.63 Consequently, this Policy would fail to meet basic conditions a) and d).</p> <p><i>Policy AM5.6 - Rural Lanes</i></p> <p>3.64 This policy is very vague, and no definition of a rural lane or identification of such lanes is provided. It is considered that any ‘rural lanes’ worthy of protection should be identified on a map along with justification. Otherwise it is considered that this Policy would frustrate otherwise sustainable development would fail to meet basic condition d).</p> <p><i>Policy AM5.7 - Car Parking Provision</i></p> <p>3.65 It is not clear in what way developments are to be required to contribute to a Parish-wide parking strategy. If this is a financial contribution then this would not, in most cases, comply with national legislation and guidance on conditions and planning obligations. The policy does not make clear what the Parish-wide parking strategy is or which documents can be referenced in order to identify it. Introducing charges for car parking is a matter for the owners of the car parks and is not an appropriate planning policy requirement.</p> <p>3.66 This Policy does not meet the basic condition a) and should be deleted.</p> <p><i>Policy HO7.1 - Affordable Homes in Sustainable Locations</i></p> <p>3.67 It is not clear whether Policy HO7.1 is proposed as an Exceptions Policy where affordable housing is permissible in any location provided it is sustainable, high quality and in keeping with town or landscape settings. If that is the case, then it would conflict with National and Local Plan Strategic Spatial Strategies which aim to focus new development in accordance with a specific settlement hierarchy and to protect the countryside. The policy needs to be clarified with the correct structure and wording if it is to be an Exceptions Policy which would also have to be justified if it does anything other than to repeat Policy H7 of the emerging Tunbridge Wells Local Plan.</p> <p><i>Policy IN9.1 - Provision of Enhanced Broadband & Mobile Data</i></p> <p>3.68 The requirements of Policy IN5.1 are unreasonable. Developers are only able to provide physical infrastructure within buildings to facilitate the installation and use of IT technology. They have no control over the delivery or speed of broadband access which is a matter for the relevant service provider and is not a planning policy consideration.</p> | | | |

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| | | | <p>3.69 Criteria b and c relates to installation of service media which is essentially covered by Permitted Development Rights and therefore the proposed policy wording has no effect.</p> <p>3.70 This Policy does not meet the basic condition a) and should be deleted.</p> <p><i>Policy IN9.2 - Provision of Electric Vehicle Charging Points</i></p> <p>3.71 Developers do not have control of installation of charging points in Parish public car parking spaces and financial contributions to such a requirement would not comply with relevant legislative and policy on planning obligations and the imposition of planning conditions. Part B of the policy should therefore be deleted as it would not be in accordance with National policy and guidance.</p> <p>3.72 This Policy does not meet the basic condition a) and should be deleted.</p> <p><i>Policy IN9.5 - Allotment Gardens</i></p> <p>3.73 It is unreasonable to require all new development proposals on strategic sites to provide additional allotment space – particularly where there are private gardens included within the development. Open space uses should be provided in accordance with the local characteristics of the development itself and this would not necessarily include allotment gardens. The requirement for these to be managed by the Parish Council is inappropriate, excessive, and not lawfully enforceable. The specific design of the allotments is unduly intrusive and controlling of the form and character of allotments which can best be left to individual projects, allotment associations and managers.</p> <p>3.74 It is considered that this Policy would frustrate otherwise sustainable development and therefore would fail to meet basic condition d).</p> | | | |
| 17 | South East Coast Ambulance Service | Section 7, Housing | <p>Following the merger of Surrey, Sussex and Kent NHS Ambulance Services in 2006, SECamb now operates Emergency 999 and NHS 111 Clinical Assessment Service (CAS) across Surrey, Sussex, Kent and North East Hampshire. Having inherited an estate of largely physically, functionally and economically obsolete ambulance stations, SECamb is implementing its more flexible and efficient “Make Ready” operational model – a network of hubs across the region with specialist teams to “make ready” (maintain, deep clean and stock) emergency vehicles and to which crews centrally report to collect a “made ready” vehicle on shift commencement. This ensures the more efficient turnaround of vehicles by specialist teams rather than leaving vehicle preparation to ambulance crews at multiple small traditional ambulance stations. The “Make Ready Centres” (MRCs)/hubs are then surrounded by “spokes” of small ambulance community response posts (ACRPs) across each Make Ready operating unit area. ACRPs provide community-based welfare facilities for crews that are active on shift – often co-located with other blue light or public sector facilities. ACRPs are small flexible facilities which can be relocated and increased/decreased in number as patient demand varies over time. More information on Make Ready is available at this link: https://www.secamb.nhs.uk/what-we-do/aboutus/make-ready/ Our first Make Ready Centre was opened in Paddock Wood in 2011.</p> <p>The proposals within the Cranbrook and Sissinghurst Neighbourhood Development Plan, together with other new housing development across the South East will put pressure on existing MRC capacity meaning that further strategically located MRCs may well be required going forward. In the medium term the existing Paddock Wood MRC (which serves Cranbrook and Sissinghurst), will need to be replaced with a larger facility – and even larger as a result of the 700 plus new homes proposed in the Neighbourhood Development Plan. 700 plus new residential units will generate increased demand on SECamb with the likely need for additional strategically located ACRPs as well as greater MRC capacity. We believe that this emergency service infrastructure requirement should be reflected in the Neighbourhood Development Plan with a view to appropriate developer contributions in due course.</p> | No | Yes | |
| 18 | National Highways | General | Thank you for your notification dated 12 September 2022, inviting National Highways to comment on the Neighbourhood Development Plan Regulation 16 Consultation, seeking a response no later than 14 November 2022. | Did not say | Did not say | |

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| | | | <p>We have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will be concerned with plans and/or proposals that have the potential to impact on the safe and efficient operation of the SRN. In the case of the Cranbrook and Sissinghurst Neighbourhood Plan, our focus will be on any potential impact to the A21 in the vicinity of Flimwell.</p> <p>Cranbrook and Sissinghurst Parish is located within the Tunbridge Wells Borough Council area, consequently the Neighbourhood Plan must be consistent with the policies set out within the Tunbridge Wells Local Plan. The emerging Local Plan is also material to our considerations.</p> <p>The Cranbrook and Sissinghurst Neighbourhood Plan has not allocated any additional sites for residential or business/employment development relative to the current or emerging local plans. Therefore, we do not have any specific comments to make.</p> <p>Given that this is a Regulation 16 consultation, we request that this representation is passed to the appointed independent examiner.</p> | | | |
| 19 | The Coal Authority | General | <p>Thank you for your notification below regarding the Cranbrook and Sissinghurst Neighbourhood Development Plan Consultation.</p> <p>The Coal Authority is only a statutory consultee for coalfield Local Authorities. As you are aware, Tunbridge Wells Borough Council lies outside the coalfield, therefore there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.</p> <p>This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p> | No | No | |
| 20 | National Trust | Policy LN3.10 | <p>The National Trust are the owners and custodians of Sissinghurst Castle Garden and wider estate located to the northeast of Sissinghurst village. We welcome and support the references made to Sissinghurst Castle throughout the plan, and we particularly support the inclusion of a site-specific policy, Policy LN3.10 which seeks to support Sissinghurst Castle's continued viable use as a visitor attraction and to conserve and enhance its heritage and setting.</p> <p>The narrative to the policy is supported and we would like to add an additional sentence as below to the supporting text.</p> <p><i>The National Trust would like to maintain and enhance the visitor offer at Sissinghurst Castle to ensure its sustainable future whilst sensitively caring for its historic significance and sense of place. Visitor enhancements may include additional retail and new visitor welcome space and other improvements to the visitor offer.</i></p> <p>Paragraph 6.12 refers to 'approximately 200,000 people visiting Sissinghurst Castle every year', the figure is currently more in the region of 180,000 annual visitors.</p> | Did not say | Did not say | |
| 19 | Turley obo Taylor Wimpy | Whole Plan | See full response below on page 54 | Yes | Yes | |
| 20 | TWBC | Whole Plan | <p>Tunbridge Wells Borough Council (TWBC) response to Reg 16 edition of the Submission Cranbrook and Sissinghurst Neighbourhood Development Plan (NDP)</p> <p>Thank you for the invitation to TWBC to provide comments on the above.</p> | Yes | Yes | |

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| | | | <p>I am very keen that the detailed comments presented below are not read as criticisms: rather, they are suggestions as to how policies, which are (in the main) supported, could potentially be strengthened.</p> <p>It is also considered most appropriate that the wording and drafting most closely reflects that produced through the neighbourhood planning process, and therefore even if the TWBC approach may be to draft wording slightly differently, comment has only been made if it is felt it is of tangible benefit. For that reason, the absence of comment on particular pages or policies should not be interpreted as not being supportive (or as being critical).</p> <p>General comments: <u>Relationship between NDP and adopted/emerging Development Plan</u></p> <p>TWBC supports and takes an active role in advising and supporting the neighbourhood planning process by sharing evidence and information and ensuring that any emerging NDPs are both in general conformity with the strategic policies of the Development Plan and consistent with national policy.</p> <p>At this time, as you are aware, the Development Plan comprises the TWBC Local Plan (2006), Core Strategy (2010), the Site Allocations Local Plan (2016) and Kent Minerals and Waste Local Plan 2013-30 (2020). The new Local Plan 2020-2038 was subject to Regulation 19 consultation which ran from 26 March to 4 June and was submitted to the Planning Inspectorate 1 November 2021. An Examination in Public (EiP) took place between March and July 2022. TWBC is currently waiting for the Inspector's conclusions.</p> <p>For those NDPs that are already made at the time of adoption of the TWBC Local Plan, the NPPF is clear that, where policies in the NDP are in conflict with the policies in the Local Plan, these will be superseded by the Local Plan policies. An assessment will be made of all policies in made NDPs ahead of the adoption of the Local Plan as to whether the policies within these would be superseded by the policies in the Local Plan.</p> <p>The Cranbrook and Sissinghurst NDP is considered to be a well-produced document, and it is obvious from a review of the evidence base that a huge amount of work has gone into the assessment of sites, views, character, environment etc. TWBC Officers have been particularly impressed with the work and drafting of the policies and supporting text around the policies.</p> <p><u>Detailed comments, broken down by section of the plan:</u></p> <p>[See table on the page below this table]</p> <p>Concluding comments</p> <p>I trust the above is of assistance. It may be pertinent to schedule a meeting in the new year to go through any queries raised by the above comments, including redrafting of any policy wording where appropriate, and to discuss the next steps for the NDP.</p> | | | |

| CSNDP Reg 16 Page no./Policy | TWBC Officer Comments | Reason for recommendation |
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| General comments on whole plan | | |
| Front cover | It may be beneficial having photos of the local area | To give local context to those reading the Plan as well as giving a more localised feel. |
| All policies | It would be clearer to present policies within a box to separate policy criteria from any other text | This will mark the differentiation between the policy itself and the supporting text. |
| General comment on wording of DM policies | <p>The policy requirements in policies which apply to “all developments” are currently onerous and will be difficult to apply/enforce when TWBC makes planning decisions.</p> <p>Clarification on what types of development/scale of development the policy requirements are intended to relate to is required.</p> | To ensure the policies are effective and justified, and that the policy requirement is reasonable in relation to the type and scale of development. |
| Accessibility of document | <p>Alternative text required on images/maps (including all LGS maps). Right click on image, select ‘edit alt text’ and type a description.</p> <p>Merged table cells should be avoided – there is a need to review the LGS ‘Reason for designation’ tables.</p> | To comply with accessibility regulations . |
| Chapter 1 Introduction | | |
| Para 1.2, p9 Intro: Background | Figures provided do not fully agree with those set out in TWBC SLP Policy STR/CRS1. The figures stated do not currently include the 38 dwellings at Sissinghurst; figure should be 453 – 467 (as set out on page 119 of the NDP) | To ensure the text aligns with the Local Plan Strategic Policy for Cranbrook and Sissinghurst (STR/CRS1). |
| Para 1.3, p9 Neighbourhood Plan Area | It may be useful to provide a map of the NDP area here. | To provide context to readers. |
| Para 1.6, p10 Character areas | There are several character areas within the Parish including wooded farmland and forested plateau | For additional information. |
| Para 1.8, p10 Schools | The text refers to three schools in the parish. There are three state primary schools (Cranbrook, Sissinghurst and Colliers Green) and one state secondary school (Cranbrook School). | For accuracy. |

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| Para 1.14, p11 | Reference to National Planning Policy Framework: add in brackets (NPPF) | To clarify use of 'NPPF' in the document |
| Para 1.19, p12 Independent Examination | <p>The examination is likely to be assessed as a desk top study (that will include site visit(s) by the independent examiner). A hearing will only be held if the examiner considers this is necessary.</p> <p>Amend text to reflect extended consultation period for the Reg 16 consultation.</p> <p>Add to end of para/amend text to set out that once 'made' the NDP will be used to inform planning decisions made within the Parish.</p> | For accuracy and clarity. |
| Chapter 2 Vision & Objectives | | |
| Page 16, Buildings for the Future Objective – bullet 4 | It is slightly too prescriptive to be reasonable. Perhaps reference the AONB characterisations of settlement patterns, so not just farmsteads but hamlets as well. | To allow flexibility in the policy. |
| Chapter 3 Landscape and the Environment | | |
| Page 18, Overall policy aims | "To protect and enhance the historic landscape character, natural beauty, and rich ecological biodiversity of Cranbrook and Sissinghurst parish both within the High Weald AONB and its setting." – are these areas outside of the setting? | Clarity. |
| Page 20 Policy LN3.1 Special Sites for Nature Conservation, para 3.5, p20 | <p>Note that the saved policies of the 2006 TWBC Local Plan will be superseded by policies of the emerging Local Plan. New emerging policy numbers are EN 10 Protection of designated sites and Habitats.</p> <p>Part a) – it may be better to reference Natural England as opposed to High Weald maps.</p> <p>Part b) -What is the justification for 25m?</p> <p>Part c) - <u>Planning conditions and obligations will secure the</u></p> | For accuracy, effectiveness and clarity. |

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| | <p><u>protection and appropriate management of nature conservation sites in perpetuity</u>, - The underlined bit is unreasonable as many such sites are owned privately and independently of developers and LPA's conditions cannot then enforce such an action on third party land.</p> | |
| <p>Page 22</p> <p>Policy LN3.2</p> | <p>"d) Functional green infrastructure (including naturalistic ponds and planting of native species known to be beneficial for local biodiversity) around and through new developments which enable permeability for wildlife will be required." - Such policies should be "will be required where possible" as not all development can do this e.g. change of use.</p> <p>"e) As a minimum, all new developments will include integrated bat and bird boxes connected to suitable habitats with sensitive lighting design." - Again "where possible" as not all development can do this e.g. a new access.</p> <p>"h) Development proposals resulting in negative impacts on biodiversity and geodiversity will not be supported unless clear and significant biodiversity gains can be demonstrated as compensation. Biodiversity net gain should be determined by applying, DEFRA's Biodiversity Metric 2.0 calculator, or whatever supersedes it in the future, such as the Biodiversity Metric 3.0 calculator." - This should separate biodiversity and geodiversity and it goes beyond NPPF and Councils policy.</p> | <p>To make the policy criteria less onerous and allow greater flexibility within the wording.</p> |
| <p>Page 25, Policy LN3.3</p> | <p>"b) Development proposals resulting in the loss of irreplaceable priority habitats such as ancient woodland, traditional orchards, grassland of interest and veteran trees</p> | <p>There is a lack of flexibility and justification</p> |

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| <p>Para 3.19</p> <p>3.21</p> | <p>will be refused.” This goes beyond NPPF – there should be provision for exceptional circumstances.</p> <p>Para 3.19 – not just refused but needs to add in exceptional circumstances. A mandatory 50m buffer is not justified and goes against NE standing advice and Council policy</p> <p>Para 3.21 – Again, justification for buffer and lack of flexibility</p> | |
| <p>Page 28, Policy LN3.5 Local Protection & Enhancement of the Crane Valley, policy box</p> <p>Supporting text para 3.33</p> | <p>By setting out to restrict “<i>proposals for major development in parts of the Crane Valley beyond the footprint of existing historic farmsteads or previously developed land</i>”, this policy is in direct conflict with the adopted Site Allocations Local Plan (SALP) and the submitted Local Plan (SLP), currently at Examination.</p> <p>As well as having extant planning permission for major development in this area, both the SALP and the SLP contain development allocations that, either individually or collectively are accepted as major development*.</p> <p>[* While ‘major development’ is not defined in the NDP, it is assumed to be by reference to paragraph 177 of the NPPF. However, it may alternatively be defined as per Town and Country Planning (Development Management Procedure) (England) Order 2015.]</p> <p>“Protection and enhancement of the Crane Valley” as an area of natural flood management and for the establishment of nature recovery networks” is laudable, but should be limited to the identified high flood risk zones, or be consistent with the proposed Local Green Space allocation at LGS9.</p> <p>However the policy goes beyond this in referring to setting which is “<i>as described on High Weald AONB Map “Crane Valley and Its Setting”</i>”. It is not clear how this setting has been defined or indeed</p> | <p>The policy does not take account of existing and consented development and does not conform with the strategic policy for Cranbrook and Sissinghurst in the submitted Local Plan, its allocations, or indeed those in the adopted Site Allocations DPD.</p> <p>It is recommended that the policy be revised to relate to the promotion of natural flood management of the Crane Brook and to support nature recovery measures as part of developments in the Crane Valley and that the buffer zones be deleted.</p> |

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| Para 3.38 | <p>what is meant by setting. What the “<i>setting</i>” plan shows is described in paragraph 3.38 as:</p> <ul style="list-style-type: none"> • 25m – <i>Riparian Buffer Zone to protect the riverbank from erosion and prevent sedimentation and pollution of the watercourse from contaminants.</i> • 100m – <i>Buffer of pasture, woodland, and wetland meadow to act as natural flood defence management measure to slow and capture surface water run-off and provide substantial increase in wildlife habitat. Land to be managed to support invertebrates, amphibians, birds, and small mammals.</i> • 500m – <i>Buffer to safeguard future nesting and/or foraging habitat for large birds such as the Crane.</i> <p>There is no evidence provided to justify each of these zones in terms of actual distance or location and extent.</p> <p>Similarly, it has been accepted through planning processes that the approved and allocated developments, albeit they fall within the area identified as “the Crane Valley and its Setting” on Figure 03, would not adversely impact on flood risk, contrary to the policy presumption and the supporting paragraph 3.33.</p> <p>Supporting text: “...in the town centre due to as increased surface run-off into the stream is channelled into a culvert under the main settlement of Cranbrook....” – amend text in bold as sentence doesn't read well.</p> | For clarity. |
| Page 31, Policy LN3.6 Protection of Geodiversity | “Development proposals will only be supported if a management plan for the retention of topsoil removed during development and its future dispersal on the same site is produced and approved at application stage, providing it can be demonstrated that | As written the policy is too onerous for some developments. |

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| | this will not cause harm to the existing ecology on site." - Such details can be secured by condition. | |
| Page 34 , Policy LN3.8 Green Gaps & Preventing Settlement Coalescence | <p>Would this policy be clearer to understand and implement with an accompanying map to show the gaps listed in the supporting text?</p> <p>The inclusion of farmsteads in part b is a concern as the historical development of the area is founded on a dispersed pattern of historic farmsteads and so almost all development will have some effect on the setting of farmsteads and may lead to coalescence especially with hamlets, which farmsteads, often as a group, coalesce to form a hamlet.</p> | <p>For clarification.</p> <p>For consideration.</p> |
| Starting on page 41, Policy LN3.11 Local Green Space | <p>General comments about designations: Would be of assistance to set out how these designations meet the NPPF tests of being 'demonstrably special'</p> <p>Provide the supporting text for the different LGS designations with para numbers.</p> | For clarity and ease of use. |
| Policy LN3.11 Local Green Spaces, pp 43 to 66. | <p>The Council has the following comments on the following designations:</p> <ul style="list-style-type: none"> - LGS1: It is noted that a small proportion of the southern part of the site is private garden land and should therefore be removed from the designation (TWBC will also be proposing this as a modification to its emerging Local Plan designation). In addition, the northern boundary does not appear to follow the logical boundaries of the site and should therefore be corrected. - LGS2: Matches with TWBC proposed designation (noting that an additional site is proposed in the emerging Local Plan immediately to the north which is also used as allotment land). | For compliance with emerging LP policy. |

| CSNDP Reg 16 Page no./Policy | TWBC Officer Comments | Reason for recommendation |
|---------------------------------|--|---------------------------|
| | <ul style="list-style-type: none"> - LGS3: Matches with TWBC proposed designation. - LGS4: Site not proposed in TWBC emerging Plan; considered that there is insufficient evidence that the site is demonstrably special. - LGS5: Matches with TWBC proposed designation. - LGS6: Matches with TWBC proposed designation. - LGS7: Matches with TWBC proposed designation (although C&S proposed site includes additional parcel of land (the bowling green)). - LGS8: Site not proposed in TWBC emerging Plan; considered to be already sufficiently protected under other Policies. - LGS9: Matches with TWBC proposed designation (albeit a very small parcel is added in the NDP proposed designation at the southern-most point). - LGS10: Matches with TWBC proposed designation. - LGS11: Site not proposed in TWBC emerging Plan; considered that there is insufficient evidence that the site is demonstrably special. - LGS12: Site not proposed in TWBC emerging Plan; considered to be already sufficiently protected under other Policies; noted that TWBC assessed site included the pond only. - LGS13: Matches with TWBC proposed designation. - LGS14: Matches with TWBC proposed designation. - LGS15: As per Reg.14 comments, whilst the triangular | |

| CSNDP Reg 16 Page no./Policy | TWBC Officer Comments | Reason for recommendation |
|---------------------------------|--|---------------------------|
| | <p>area to the south of the extent of Site LGS15 is understood to be well used, the northerly extent running to the Angley Road is not, and this element would be questioned. TWBC would welcome discussions on this point.</p> <ul style="list-style-type: none"> - LGS16: Matches with TWBC proposed designation. - LGS17: Site not proposed in TWBC emerging Plan; considered to be already sufficiently protected under other Policies. - LGS18: Matches with TWBC proposed designation. - LGS19: Matches with TWBC proposed designation. - LGS20: Site not proposed in TWBC emerging Plan; considered to be already sufficiently protected under other Policies. - LGS21: Site not proposed in TWBC emerging Plan; site has restricted public access and is used privately which reduces the local community's recreational benefit for the area (which was identified as the most valued characteristic of the area). - LGS22: Matches with TWBC proposed designation. - LGS23: Matches with TWBC proposed designation. - LGS24: Site not proposed in TWBC emerging Plan; considered that there is insufficient evidence that the site is demonstrably special; noted that only the pond (rather than any surrounding land) was considered in the TWBC Local Plan. <p>It is noted that TWBC also proposes sites 75 (Quaker Burial Ground) and</p> | |

| CSNDP Reg 16 Page no./Policy | TWBC Officer Comments | Reason for recommendation |
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| | 77 (Sissinghurst Primary School Nature Reserve). All TWBC proposed sites in the emerging Local Plan can be found on the Local Green Space Interactive Map . | |
| Page 73 Policy HD4.2 Protect, Conserve & Enhance the Historic Public Realm, part C | Reads: “c) Proposals that enhance the architectural interest of Cranbrook town centre, providing they demonstrate a sensitive and appropriate scheme of exceptional quality which respects local materials, site, and context, will be supported.” Consider deleting ‘of exceptional quality’ as this is felt to add very little to the policy requirement or consider setting out how this is to be judged/determined. | For robustness. |
| Page 76 Policy HD4.4 Protection of Key Views | The policy is a little confusing as it is called Key Views but describes two types of views giving a list of buildings and places (c) but also identifies particular views on plan with corresponding list (d) which are Views to be Protected neither of which are called Key views . It is also not clear which parts of the policy apply to which views. Criteria a) assuming that it applies to Views to be Protected is in conflict with the spatial strategy as views listed on page 28 include consented developments, allocations in the current Local Plan and in the SLP. Those views are: 25.View from Mount Ephraim looking northwest 26.View from Mount Ephraim looking west, south, and southeast 30.View from the ridge on Hartley Road looking east, northeast, and southeast The requirement in criteria a) is in any event too onerous in that it states views “ <u>should</u> be protected and not harmed” which would mean that effectively large areas of land around Cranbrook are sterilised from development. It would be more reasonable and effective if the wording was “where practical” rather than “should”. | For clarity and effectiveness. |

| CSNDP Reg 16 Page no./Policy | TWBC Officer Comments | Reason for recommendation |
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| | <p>Page 76 paragraph (b): The first sentence is fine, but to be consistent, the second sentence should read 'Proposals that would result in harm to <u>that part of the setting of a heritage asset that contributes to its significance</u> should be resisted. <u>Any proposals that may cause harm to significance through change in setting</u> should be robustly justified on the basis of public benefit that could not otherwise be delivered.</p> <p>Paragraph (c): 'Planning applications should demonstrate the impact on vies of relevant buildings and features valued by the community including, but not limited to, the list below, and detail how they will retain visual prominence <u>where that is integral to their appreciation.</u></p> | |
| <p>Page 85, Policy HD4.9</p> <p>Policy HD4.9a Preference For Small Scale Sustainable Development Sites & Design Criteria</p> | <p>Reads: “b) Priority will be given to redevelopment of previously developed sites over greenfield sites” - how does the NDP plan to judge/enforce this?</p> | For effectiveness. |
| <p>Page 86</p> <p>Policy HD4.9b Exceptions For Large Scale Developments & Community Involvement</p> <p>Parts a), c) and d)</p> | <p>Part a: “.....10 or more houses may be considered”</p> <p>Consider it would be better to word as 'supported' instead of “considered”</p> <p>Parts c) and d) suggest these are best moved to supporting text rather than being part of the policy box.</p> | For clarity. |
| Chapter 4 Heritage & Design | | |
| Page 67 – 69 | Add reference to the Council's Historic Environment Review (in the New Local Plan evidence base and referred to as an SPD in the draft heritage policies). | This section is very good and goes into the detail that we can't Borough-wide. It would be helpful to refer to the HER to bolster this in terms of the common heritage asset typologies in the Parish. |
| Page 69 | 'To retain the local historic settlement pattern' – suggest change to 'respect' | It is considered that 'retain' is not fully possible or policy compliant. |
| Page 71 | Reference to Kent Historic England Index needs to be more robust. | Is it easily accessible enough to make this a requirement? Without evidence |

| CSNDP Reg 16 Page no./Policy | TWBC Officer Comments | Reason for recommendation |
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| | | as to its robustness it could be challenged. |
| Page 73 Policy HD4.2 Protect, Conserve & Enhance the Historic Public Realm, part C | Reads: “c) Proposals that enhance the architectural interest of Cranbrook town centre, providing they demonstrate a sensitive and appropriate scheme of exceptional quality which respects local materials, site, and context, will be supported.” Consider deleting ‘of exceptional quality’ as this is felt to add very little to the policy requirement or consider setting out how this is to be judged/determined. | For robustness. |
| Policy HD4.2 | Suggest referencing Historic England’s Streets for All guidance. | To give further weight and national context to the policy. |
| Page 81 Policy 4.6 item (c) | Suggest using some terminology from the farmstead guidance. For instance, the aim is to not alter those local farmstead layout typologies and related field systems which have not been altered to date, rather than using the word curtilage as that has different meanings in law. | To ensure the correct terminology is used. |
| Page 81 Policy 4.6 item (e) | Is this suggesting that conversion of unconverted barns and sheds is discouraged? Sometimes this is the only method for securing their optimum viable use, in terms of buildings coming out of economical as farmsteads cease usage or change farming practice. | For clarification. |
| Page 81 4.26 | Again it would be useful to reference the Historic Environment Review. | The HER picks out the vulnerability of these types of assets. |
| Policy HD4.8 | It would be a good idea to broaden this to a ‘Heritage at Risk’ policy with Providence as the main subject. | This gives a hook for other potential heritage at risk and support for their reuse/repair etc in any proposals. |
| Policy HD4.10 a | This might be too restrictive. And contemporary materials that reflect the colour palette, etc? Also, it has been very, very difficult to resist modern materials which attempt to replicate vernacular materials. | Currently too restrictive – requires flexibility. |

| CSNDP Reg 16 Page no./Policy | TWBC Officer Comments | Reason for recommendation |
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| Page 90 Policy HD4.10 The Design of New Buildings Within or Within the Setting of Conservation Areas Part b) | Reads: “b) Development that would rise above the roofline of existing buildings or contrast negatively in terms of form and choice of materials with the existing roofscape will not be permitted.” Amend to read ‘will not be supported’ | For clarity, given that TWBC is the determining authority for any planning applications. |
| Policy HD4.10 b | The first part of that sentence may be unachievable (rising above the roofline) and is too broad. There may be instances where this would still be appropriate in the context. Suggest expanding the end of the sentence to read ‘contrast negatively in form and materials...’ | To be more specific and achievable. |
| Page 90 4.44 | Other NDPs have included their local lists within the text or as appendices. | This would help the Borough to easily identify these in decision making process rather than waiting for the Borough’s own list to be produced. |
| Chapter 5 Access and Movement | | |
| Page 97 Policy AM5.1 The Pedestrian Environment Supporting text para 5.6 | This lists locations of concerns re pedestrian crossing points – has KCC Highways commented on these locations? | For robustness. |
| Page 100 Policy AM5.2 Pedestrian Priority & Public Rights of Way Part a) | The A229 – beneficial to identify the road name in the document (this policy and in any reference to the A229 plan wide). | For clarity. |
| Page 101 Policy AM5.2 Pedestrian Priority & Public Rights of Way Supporting text, para 5.9 | First sentence: 5.9 “All applications should refer to the Kent County Council Rights of Way Improvement Plan (ROWIP).” Set out what the NDP expects from this – so ‘to inform development proposals’ for example. | For clarity. |
| Policy AM5.2, paragraph a), p100 Policy AM5.3, | Is it referring to all applications or just developers? | Clarification required. |

| CSNDP Reg 16 Page no./Policy | TWBC Officer Comments | Reason for recommendation |
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| Paragraph a), p102 | 'All' new developments are expected to invest... | Suggest rewording, as 'all' may be unreasonable. |
| Policy AM5.3, paragraph b), p102 | Are there specific circumstances to which the contributions will be sought? | For clarity. |
| Policy AM5.5 Paragraph b), p105 | The policy wording "will not be supported" seems a little bit unreasonable, could there be exceptions? | For greater flexibility. |
| Policy AM5.6, p106 | How will the applications demonstrate that they seek to protect and enhance the rural lanes? | Further clarification. |
| Page 107 Policy AM5.7 Car Parking Provision Part a) | Reference to the parish-wide parking strategy – NDP to set out what is expected from developers (e.g. financial contributions towards production of the strategy/findings arising from this?) and clarify which developments will be required to do so. | For clarity. |
| Chapter 6 Business and Employment | | |
| Policy BE6.3, p113 | "and which can demonstrate that they are designed in ways sensitive to their town and/or landscape settings" - is this necessary? | Other policies in the plan cover this element. |
| Chapter 7 Housing | | |
| Page 119, paras 7.9 and 7.10 | These both refer to the Turnden site and associated Public Inquiry. It is suggested that these paragraphs are updated now that the Public Inquiry has taken place and the decision is awaited. | For clarity. |
| Policy HO7.1, paragraph c), p121 | What does actively promote mean, and can entry-level housing be defined? | For clarity. |
| Page 121 Policy H07.1 Affordable Homes in Sustainable Locations Supporting text, para 7.8 | This refers to 1 and 2 bed units and units of 4 bed+ units, for clarity it is suggested that a line be added about any need or otherwise for 3 bed units. | For clarity. |
| Page 122 | This text is a repeat of text in para 7.13 so can be deleted. | Not needed. |

| CSNDP Reg 16 Page no./Policy | TWBC Officer Comments | Reason for recommendation |
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| Policy H07.1 Affordable Homes in Sustainable Locations Supporting text, para 7.14 | | |
| Policy HO7.2, p123 | Paragraph a) This should refer to M4(2) and M4(3) building regulation standards. Viability will also be a consideration. See Policy H6 in the SLP for example wording. The title 'Lifetime Homes' is outdated by the latest Building regulations . We also note that the link provided in the 'Housing Appendix' to Habinteg does not work. | Further detail required. |
| Policy HO7.3, p124 | The first and last bullet points may not be necessary as they are covered by other policies in the plan. | For simplification. |
| Accessible & Lifetime Homes, p126 | This should refer to M4(2) and M4(3) building regulation standards. Viability will also be a consideration. See Policy EN6 in the SLP for example wording. | Further detail required. |
| Chapter 8 Community & Culture | | |
| Policy CC8.3, paragraph b) and c), p131 | All of paragraph b) may be better placed in the supporting text. Paragraph c) "should be sensitive to its built and landscape" is unnecessary as the plan is taken as a whole. | To improve legibility of the policy. |
| Policy CC8.4, p132 | "The space should be sensitive to its built and landscape setting" – Again, it is not necessary to include within the policy as the plan is taken as a whole | To improve legibility of the policy. |
| Policy CC8.5, p133 | Paragraph b) may be better placed in the supporting text. Again, paragraph c) "should be sensitive to its built and landscape setting" is unnecessary to include as the plan is taken as a whole. | To improve legibility of the policy. |
| Page 133, | Requires developer contributions – text needed to set out what | For robustness and clarity. |

| CSNDP Reg 16 Page no./Policy | TWBC Officer Comments | Reason for recommendation |
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| Policy CC8.5 New Village Hall for Sissinghurst Part d) | developments should make this contribution. It is noted that a replacement hall is to be delivered as part of Local Plan Policy AL/CRS6. Planning application 21/03914 is pending decision. | |
| Chapter 9 Infrastructure | | |
| Policy IN9.1, p139 | Paragraph a) – we question if the policy is enforceable – developments won't have any power over mobile companies to increase their coverage. We recommend changing the policy to supporting applications which achieve better mobile data coverage. | To ensure the policy is deliverable. |
| Page 139, Policy IN9.1 Provision of Enhanced Broadband & Mobile Data Part a) | Reference to “adequate mobile data”. This would be better worded as ‘suitable mobile data’ | To ensure policy requirement is worded in a more positive way. |
| Page 140 Policy IN9.2 Provision of Electric Vehicle Charging Points Parts a), b) and c) | Part a) – specify the types of development covered by this policy requirement. Consider removing the word applications at the end of the wording as its unnecessary. Part b) – what is the NDP expecting developers to do/provide? It would be worth stating what type of charger, and also, the fact that double chargers are best practise in public places. Perhaps the wording ‘appropriate charging points’ could be used in the policy with more detail in the supporting text? | For clarity and robustness. |
| Policy IN9.3, p141 | In the context of new development, could the policy be combined with reference to the importance of energy efficient design? i.e. following the fabric first approach? Energy efficient design is one of the objectives of the NDP. “local biomass facilities” – does this biomass facilities that source fuel locally? Could be made clearer for clarification. | To further strengthen the policy. |

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| | The supporting text could have something added in about the importance of tenure blind development here. PV is the most popular choice for developers and a very visible way of distinguishing between market housing and affordable. | |
| Policy IN9.4 supporting text, p142 | Paragraph 9.12 – we recommend mentioning climate change and the need to adapt to worsening problems in the future that we are already committed to. | To strengthen the policy. |

Supporting Information

Response 2 - Peter V P Mellor

Site LGS14

King George V Field, Sissinghurst

- Map reference TQ791376
- This site doesn't lie within the AONB

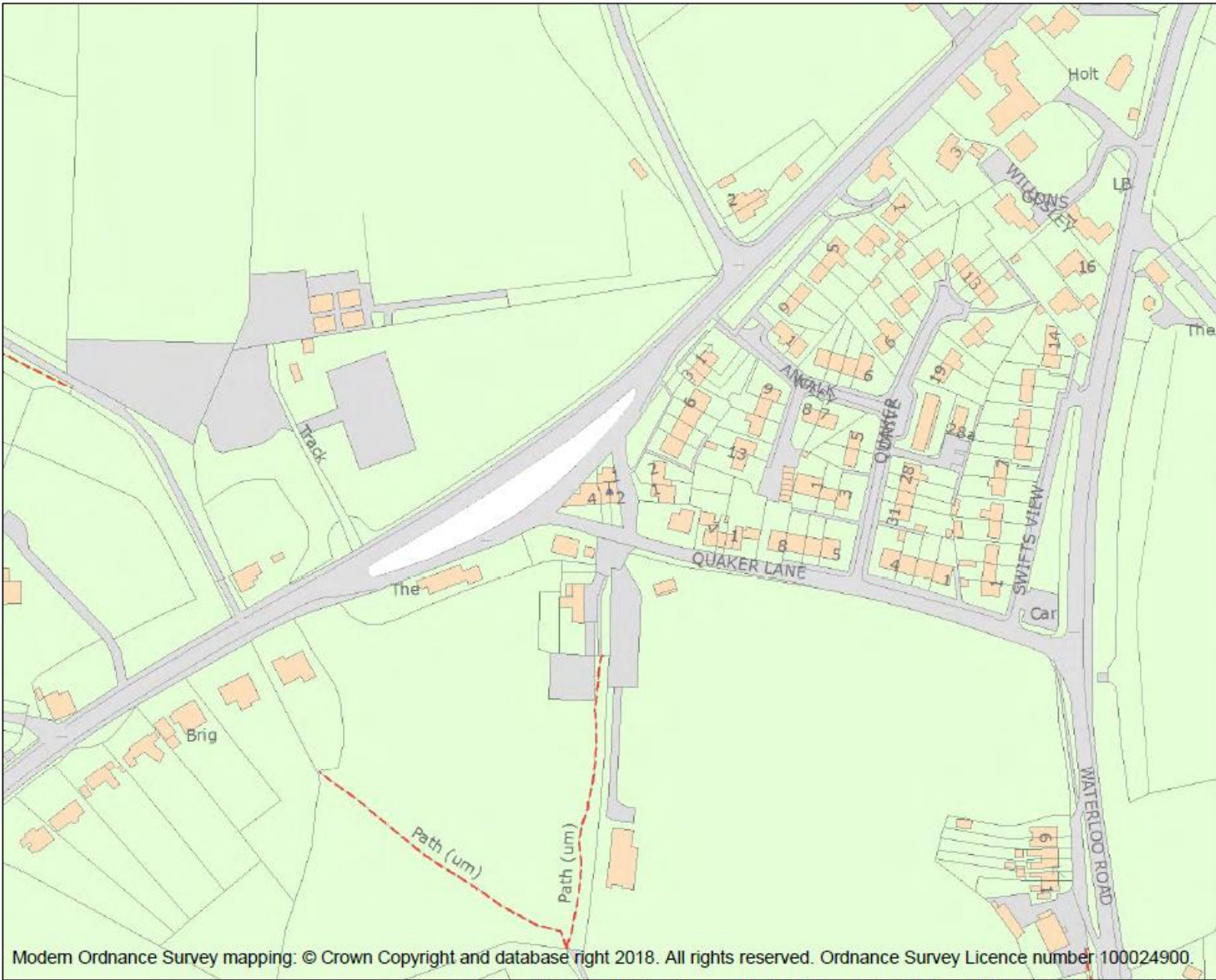
| REASONS FOR DESIGNATION | |
|-------------------------------------|-----------------------|
| <input checked="" type="checkbox"/> | Beauty |
| <input checked="" type="checkbox"/> | Historic Significance |
| <input checked="" type="checkbox"/> | Recreational Value |
| <input checked="" type="checkbox"/> | Tranquillity |
| <input type="checkbox"/> | Richness of Wildlife |

Supporting Text

This space has been designated as a local green space because this area is an open recreational space used for a variety of community activities. It is the home of the Sissinghurst Cricket Club, a venue for boot fairs, used for overflow parking for village events and camping and caravan club events. There is space for football activities.




Response 8 – Bridget Veitch – Historic England Map for Listing Entry 1084838



Name: COURTSTILE
THE ISLAND

This is an A4 sized map and should be printed full size at A4 with no page scaling set.

| | |
|---|----------------|
| Heritage Category: | |
| | Listing |
| List Entry No : | 1084838 |
| Grade: | II |
| County: Kent | |
| District: Tunbridge Wells | |
| Parish: Cranbrook & Sissinghurst | |
| <p>For all entries pre-dating 4 April 2011 maps and national grid references do not form part of the official record of a listed building. In such cases the map here and the national grid reference are generated from the list entry in the official record and added later to aid identification of the principal listed building or buildings.</p> <p>For all list entries made on or after 4 April 2011 the map here and the national grid reference do form part of the official record. In such cases the map and the national grid reference are to aid identification of the principal listed building or buildings only and must be read in conjunction with other information in the record.</p> <p>Any object or structure fixed to the principal building or buildings and any object or structure within the curtilage of the building, which, although not fixed to the building, forms part of the land and has done so since before 1st July, 1948 is by law to be treated as part of the listed building.</p> <p>This map was delivered electronically and when printed may not be to scale and may be subject to distortions.</p> | |
| List Entry NGR: | TQ 77668 36774 |
| Map Scale: | 1:2500 |
| Print Date: | 3 October 2022 |
|  Historic England HistoricEngland.org.uk | |

Re: Cranbrook and Sissinghurst Neighbourhood Plan Pre-submission - Regulation 14 Consultation

Thank you for consulting Kent County Council (KCC) on the Cranbrook and Sissinghurst Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the Neighbourhood Plan.

2. Vision and Objectives

Community Provision

Sport and Recreation: The County Council welcomes the focus on active travel within the Local Plan. Government and Sport England strategies for sport are focussed on tackling inactivity and supporting under-represented groups to be physically active should be considered. The County Council would also recommend consideration is given to Sport England planning guidance and local data around physical activity levels¹.

¹ <https://www.sportengland.org/facilities-planning/planning-for-sport/playing-fields-policy/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/facilities-planning-model/>
<https://www.sportengland.org/facilities-planning/active-design/>

The County Council would also draw attention to the Sport England survey: "Active Lives Adult", which is published twice a year (and replaced the "Active People" Survey) and the "Active Lives Children and Young People", published annually. Both surveys provide a unique and comprehensive view as to physical activity in a neighbourhood, and can be analysed at a local authority level. The latest adult report is available² and data can be explored and filtered³. A summary of the "Active Lives Children and Young People" report is also available⁴.

The latest figures indicate that inactivity significantly impacts on an individual's physical and mental health, as well as social and community development. Therefore, the Neighbourhood Plan should seek to ensure the provision of a mix of formal and informal areas/spaces (indoor and out) where people can be active, including walking and cycling routes, open spaces and water based activity, as appropriate.

3. Landscape and the Natural Environment

Minerals and waste: The County Council, as Minerals and Waste Planning Authority, recommends that reference is made to minerals (land-won) and minerals/waste infrastructure safeguarding, as set out by the policies CSM 5, CSM 7 and CSW 16 of the adopted (and recently partially reviewed) Kent Minerals and Waste Local Plan 2013-30 (KMLWP). The Neighbourhood Plan area has the following safeguarded land-won minerals:

Superficial Deposits - Sub-Alluvial River Terrace Deposits
Crustal deposits - Sandstone -Tunbridge Wells Sand Formation

KCC recognises that the Neighbourhood Plan does not propose any additional allocations for development other than those identified in the emerging Tunbridge Wells Local Plan (TWLP). The need to safeguard minerals of known economic importance that are coincident with development allocations is being considered in the Local Plan process. However, the existence of safeguarded minerals should be referred to within the Neighbourhood Plan as an important consideration for any development in the area.

The only significant safeguarded minerals or waste management infrastructure in the Neighbourhood Plan area is the Southern Water Services Ltd site at Waterloo Road, Cranbrook. Any development within 250m of this site should have due consideration of the KMLWP.

Heritage Conservation: The County Council welcomes the references to the historic aspect of the Cranbrook landscape. The landscape present today is the result of many centuries of interaction between humans and nature and this is evident in the modern landscape in the form of tracks, lanes, field boundaries, woodlands and archaeological sites. The County Council would recommend that reference is made to the Historic Landscape Characterisation dataset (2017)⁵ created by the High Weald AONB Team, Tunbridge Wells Borough Council and KCC. The characterisation is the most detailed assessment of the

² <https://www.sportengland.org/activelivesapr20>

³ [Active Lives Online tool](#)

⁴ <https://www.sportengland.org/news/active-lives-children-and-young-people-survey-academic-year-201819-report-published>

⁵ <https://www.tunbridgewells.gov.uk/planning/planning-policy/local-plan/evidence/environment-and-landscape/historic-landscape-characterisation-2017>

historicity of the visible landscape and is an essential starting point for any consideration of historic landscapes in the area.

Sustainable Business and Communities: The County Council welcomes the focus on sustainability, the environment and climate change throughout the Neighbourhood Plan. Furthermore, KCC welcomes the Neighbourhood Plan's support of Tunbridge Wells Borough Council's net-zero target of 2030, which in turn supports the Kent and Medway Energy and Low Emissions Strategy target of Net Zero for the county by 2050.

The County Council would welcome reference to the Energy and Low Emissions Strategy (ELES). The ELES outlines Kent and Medway's ambition to reduce greenhouse gas emissions to net-zero emissions by 2050. Taking an evidence based approach, it identifies a pathway to reduce greenhouse gas emissions, eliminate poor air quality, reduce fuel poverty, and promote the development of an affordable, clean and secure energy supply for the county.

The County Council notes the consideration of risks resulting from climate change to Cranbrook and Sissinghurst in respect of the potential for flooding. KCC recommends consideration of the Climate Change Risk and Impact Assessment (CCRIA), which provides some more insight into the risks that Kent and Medway face from climate change⁶.

Draft Policy LN7.1 - Special Sites for Nature Conservation

Biodiversity: To provide greater certainty, the County Council recommends that where policy statements refer to 'should', this should be revised to 'will'.

KCC recommends that the information in the 'Green Spaces and Green Networks for People' map should be separated to ensure it can be clearly interpreted. This could either be by dividing up the parish into smaller sections presented in larger scale maps, or by providing two or three maps for the whole parish, with some of the information in each map.

Clarity should be provided within the legend 'Kent Council LNR and RNR', which should identify Local Wildlife Sites and Roadside Nature Reserves and should be separated into two categories. If possible, the map should identify the Roadside Nature Reserve in the parish which lies along the western boundary of Sissinghurst Park Wood and Crane Valley Local Nature Reserve.

The County Council questions the necessity for the buffers within the 'Green Spaces and Green Networks for People' map and the lack of policy reference to these buffers. The County Council recommends that reference to green networks for people is also captured within policy or supportive text to ensure the purpose of the map is clear.

The County Council is in principle supportive of the intention of Draft Policy LN7.1, but proposes the following amendments:

⁶ <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/environmental-policies/kents-changing-climate>

- a) Development proposals which have potential to impact on the statutory and non-statutory designated sites as shown on High Weald AONB Unit Map "statutory and non-statutory designated sites" on page 17 will demonstrate that they have identified and considered their assessed and addressed the potential impacts on the nature conservation interest of the sites.
- b) Proposals adjacent to such sites ~~should~~ will be buffered to avoid and minimise damage including from indirect impacts such as increased recreational pressure, which will be considered alongside more direct impacts.
- c) Such developments ~~should~~ will deliver a net gain in biodiversity. Firstly, within the development site, or if demonstrably not achievable, biodiversity net gain will be delivered within or very close to the parish. Planning conditions and obligations will secure the protection and appropriate management of nature conservation sites in perpetuity, in line with the High Weald AONB Management Plan aspirations.

Draft Policy LN7.2 - Special Ecological Protection & Enhancement

Biodiversity: There is a lack of connection between the aims of this policy and the information presented in the associated map. The supporting text refers to woodlands, ponds, hedgerows and watercourses, but the map shows a wider range of habitats, all of which currently make up the ecological network across the Neighbourhood Plan area. While these habitats are all of ecological value, their importance in the context of this policy could be refined; or, if the intention is to ensure that the habitats presented in the map are considered to all be important ecological assets for the parish (which is presumed is the case), this should be more clearly stated in the supporting text. Clarification of what is meant by ecological networks should also be provided, with geodiversity features indicated on the map. Proposed policy wording amendments are as follows:

- a) Developments which actively support and enable the protection, enhancement and active positive management to conserve and enhance ~~ecological biodiversity and ecological networks and geodiversity~~ will be supported, as identified on High Weald AONB Unit "Green and Blue Infrastructure and Ecological Networks" on page 19.
- b) Development proposals resulting in significant negative impacts on biodiversity and geodiversity will not be supported unless clear and significant biodiversity gains can be demonstrated as compensation. Biodiversity net gain should be determined by applying the biodiversity impact calculator, or whatever supersedes it in the future, such as DEFRA's Biodiversity Metric 2.0 calculator.

Draft Policy LN7.3 - Ecological Connectivity

Biodiversity: The County Council recommends the following proposed policy wording amendments:

- a) ~~In considering~~ All development proposals will identify, consider and address, both individually and cumulatively, impacts on ecological connectivity, both individually and cumulatively. ~~should be identified and considered.~~
- b) Functional green infrastructure (including naturalistic planting of native species known to be beneficial for local biodiversity) around and through new developments

~~should~~ will enable permeability for wildlife ~~both around and through new developments.~~

- c) Where roads create potential barriers to species movement, overarching trees ~~should~~ will be protected to allow the movement of aerial and arboreal species (invertebrates, birds, bats, dormouse etc.)
- d) Planning conditions and obligations ~~should~~ will secure appropriate habitat management and continued ecological connectivity in perpetuity.

Draft Policy LN7.4 - Protection & Enhancement of Priority Habitats

Biodiversity: The intention of clause (a) in the policy is unclear – the County Council proposes the following amendments to provide better clarity, but is happy to discuss further if necessary:

- a) Priority habitats within and adjacent to development proposals will be identified, considered and protected in line with their status. In considering development proposals impacting priority habitats, their nature conservation value should be identified, considered and protected in line with their status.
- b) Development proposals resulting in the loss of irreplaceable priority habitats such as ancient woodland, traditional orchards and veteran trees will be refused.
- c) Development proposals adjacent to such priority habitats ~~should~~ will be buffered to minimise damage. Planning conditions and obligations ~~should~~ will secure the protection and appropriate management of these habitats in perpetuity, in accordance with the relevant designations.

Draft Policy LN7.5 - Protection of Priority Species

Biodiversity: The County Council recommends the following proposed policy wording amendments:

- a) Development proposals ~~should~~ will be supported by complete independent ecological surveys carried out by a suitably qualified ecologist according to nationally accepted standards.
- b) ~~In considering~~ Development proposals ~~impacting~~ will identify and address impacts to ~~consider and protect~~ legally protected and priority species in line with their nature conservation value ~~should be considered and protected in line with their~~ and status. Such developments ~~should~~ will deliver a net gain in biodiversity.
- c) Development proposals will include bat-sensitive lighting design.
- d) Planning conditions and obligations ~~should~~ will secure all necessary avoidance, mitigation and compensation measures to ensure species protection and appropriate habitat management in perpetuity, ~~in accordance with the species designation, and prior to starting development work, developers will be expected to join the district level licensing scheme.~~

The County Council suggests the removal of the last sentence of clause (d) as district level licensing is one option available for great crested newt compensation. Developers are still able to use the traditional licensing approach and this may be more appropriate for some sites.

The County Council recommends reference to bat-sensitive lighting design requirement. Supporting text should be added to refer to the guidance document *Bat Conservation Trust & Institute of Lighting Professionals' Guidance Note 08/18 Bats and artificial lighting in the UK*.

Draft Policy LN7.6 - Biodiversity Enhancements

Biodiversity: The County Council recommends the following proposed policy wording amendments:

- a) Development proposals that include ~~ing~~ biodiversity enhancements (over and above the requirements to avoid, mitigate and compensate for impacts on habitats and species) will be favoured.
- b) As a minimum, new developments ~~should~~ will include integrated bat and bird boxes ~~connected to suitable habitats (including~~ and naturalistic planting of native species known to be beneficial for local biodiversity. ~~with sensitive lighting design.~~ Planning conditions and obligations ~~should~~ will secure biodiversity enhancements on development sites in perpetuity.

Draft Policy LN7.9 - Protecting the Historic Landscape Character

Heritage Conservation: The County Council is generally supportive of this policy. However, clause a) implies that the historic character of the landscape is only visible in the treescape, ancient hedgerow, watercourse network and species-rich roadside verges. The historic landscape has rather more components to it than this, though, and includes the patterns of tracks, lanes, field boundaries and archaeological sites that help define the form of the modern landscape. The patterns of tracks and lanes are particularly important as these show the communications routes that linked communities and those communities in turn with places of work. New development should be encouraged to incorporate these patterns in their masterplans as this helps the new development integrate into the existing communities more effectively.

Draft Policy LN7.13 Local Green Space Designations

Heritage Conservation: The draft text identifies a large number of local green spaces that the Neighbourhood Plan wishes to conserve. As the text notes, some of these are of historic importance. The Kent Gardens Trust has recently assessed a number of green spaces and gardens for their historic significance and the method they used would be helpful for the Neighbourhood Plan in assessing the importance of the spaces to be protected⁷.

4. Design & Heritage

Heritage Conservation: In reviewing the heritage of Cranbrook parish, the text at present begins with the Anglo-Saxon period. It is true that the landscape today is largely a product of the Anglo-Saxon and later periods, and in particular the medieval period, but the earlier use

⁷ <https://www.kentgardenstrust.org.uk/research-projects/reports/?projId=1>

of the landscape of Cranbrook must be included. This has contributed to the historic character of the parish, and archaeological remains relating to these earlier uses can still be found. Numerous Mesolithic and Neolithic flint artefacts have been found across Cranbrook, reflecting the use of the Weald by hunter gatherer populations for thousands of years. The Romans certainly exploited the Weald as evidenced by the Rochester to Hastings Roman road that runs through the parish and which survives archaeologically in many places, for example at Folly Gill. The Romans also began the exploitation of the Weald for iron. Roman iron production is evidenced by the scheduled monument at Little Farningham Farm, which may be the best example of a Roman iron working site, certainly in Kent. There is no other known Roman site in Cranbrook but it is probable that landscape features such as ponds and streams may yet prove to have Roman origins. Iron production was greatly expanded during the Elizabethan period when the invention of the blast furnace allowed the rapid expansion of the industry. Many examples of iron working sites survive across the Weald, both as archaeological sites and as place names (eg Furnace Farm, Hammer Pond etc) and many more no doubt remain undiscovered. Cranbrook itself is known to have been the site of such a furnace.

Section 5.4 of the Tunbridge Wells BC Historic Environment Review reviews the heritage of Roman and Medieval iron working in the Weald which is both extensive and important and should be drawn on for the text.⁸ The Review should indeed be drawn upon much more systematically for the Neighbourhood Plan, as at present the review of the heritage of the parish is very partial and does not underscore the essential contribution that it makes to the character and beauty of the landscape. A clearer period by period review of the heritage, highlighting the known sites and drawing on the Historic Environment Review as appropriate, would enable the heritage of the parish to play its full role in securing the character of Cranbrook in the future, whilst allowing users of the Neighbourhood Plan to understand its conservation needs.

Draft Policy DH1.12 Protection of Agricultural Heritage Assets

Heritage Conservation: The draft text rightly commits the Neighbourhood Plan maintaining the dispersed settlement pattern that is prevalent in the Weald and to permitting a degree of sympathetic development in farmsteads. Historic England (together with KCC and the Kent Downs AONB team) has published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character of the countryside. Consideration and reference should be made to this guidance⁹.

Draft Policy DH1.13 Cranbrook Windmill

Heritage Conservation: The County Council welcomes the incorporation of a policy that relates specifically to the (KCC-owned) Cranbrook Windmill.

⁸ (https://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0008/343808/Historic_Environment_Review.pdf)
⁹ <http://www.kentdowns.org.uk/publications/kent-downs-aonb-farmstead-guidance>

It could be expanded by referring to the authentic design characteristics of the exterior ('character'), the internal milling machinery and records of the former internal layout ('operation') and the historic fabric of the building ('structure').

KCC also welcomes the commitment within the Neighbourhood Plan to protect the mill's wind (clause b) as this is something that is often forgotten leading to the mill's operation being compromised.

5. Access and Movement

Draft Policy AM4.2 - Pedestrian Priority and Public Rights of Way

Public Rights of Way (PRoW): This policy is welcomed and supported, though an additional paragraph should be inserted into the 'Policy Supporting Text' to clearly highlight the Rights of Way Improvement Plan (ROWIP). This is because the ROWIP is a statutory policy document, setting out a strategic approach for the protection and enhancement of PRoW.

The Neighbourhood Plan should ensure that reference to the ROWIP is clearly highlighted. This will enable successful partnership working to continue, helping to deliver improvements to the PRoW network in Cranbrook and Sissinghurst.

Given the value of the PRoW network to the local community, there should be a requirement for development applications to show recorded PRoW on their plans. Where PRoW would be directly affected by new development, proposals should illustrate how the PRoW network will be positively accommodated within the site.

Additional text should be inserted into the policy, recommending that applicants for new developments engage with the KCC PRoW and Access Service at the earliest opportunity. This would allow the County Council to review proposals for access improvements and consider appropriate developer contributions for PRoW network enhancements, which would ensure there are sustainable transport choices available that provide realistic alternatives to short distance car journeys.

The PRoW and Access Service would welcome engagement with the Parish Council to consider local aspirations for access improvements, the delivery of these projects and potential sources of funding for the works.

Glossary of Terms

PRoW should be revised to state:

"A way over which the public have a right to pass and repass, including; Public Footpaths, Public Bridleways, Restricted Byways and Byways Open to All Traffic"

Response 18 – Turley obo Taylor Wimpey (Full Response)

02 November 2022
Delivered by email

Cranbrook and Sissinghurst Neighbourhood Plan
Planning Policy
Tunbridge Wells Borough Council
Town Hall
Royal Tunbridge Wells
Kent TN1 1RS

Ref: TAYS3041

Dear Sir/Madam,

CRANBROOK & SISSINGHURST NEIGHBOURHOOD PLAN: CONSULTATION RESPONSE (TAYLOR WIMPEY)

Thank you for the opportunity to comment on this consultation. We write on behalf of Taylor Wimpey Strategic, who control lands at Frythe Way, Cranbrook (see Document A). Our client has promoted this site as a suitable site for residential allocation (circa 70 homes) through the emerging Tunbridge Wells Local Plan (SHELAA Site Ref: 25). It was categorised as one of the 'reasonable alternative sites' at Table 53 of the Sustainability Appraisal that accompanied the emerging Tunbridge Wells Borough Local Plan (TWBLP)¹, and scored higher in its assessment than many of the sites considered for allocation around Cranbrook in the emerging Local Plan².

At the independent examination into the TWBLP over the summer, there was significant debate over the spatial development strategy proposed by the Council in their emerging Local Plan. In particular, whether the Council's reliance on two large strategic sites to deliver nearly 70% of the boroughs proposed housing allocations was justified. This included concerns from many participants over whether one of these sites, a new free standing garden village, would be delivered within the plan period at the rates proposed. Several participants, including our client, are therefore calling for additional sites to be allocated through the modifications stages of the Local Plan, and distributed in accordance with the Local Plan settlement hierarchy.

Until the Independent Inspector's Report for the TWBC Local Plan is published, there are significant uncertainties therefore over the 'strategic policies' the Neighbourhood Plan should be in general conformity with³. Cranbrook is ranked second only after Southborough in the TWBC's 'Settlement Role and Function Study (TWBC, Feb 2021). Therefore, should the Local Plan Inspector recommend additional sites are found to address housing land supply shortfalls, there is every possibility Cranbrook could be asked to make a further contribution.

¹ Tunbridge Wells Local Plan - Sustainability Appraisal (TWBC,2021).

² Table 54 and Appendix J (Site 25) of Tunbridge Wells Local Plan Sustainability Appraisal (TWBC,2021).

³ Basic Condition e. PPG Paragraph 065 Reference ID: 41-065-20140306

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T 023 8072 4888 [turley.co.uk](https://www.turley.co.uk)

Consequently, until the Inspector's Report on the TWBLP is published, the weight to be placed on the strategic policies in the currently submitted Local Plan is arguably limited. General conformity should be had to the strategic policies in the Development Plan. Until the review TWBLP is adopted, the current adopted Development Plan strategic policies remain relevant for Neighbourhood Plan preparation.

This highlights the potential for conflicts between the strategic policies concerning the quantum and distribution of allocations to the Parish as referred to in the Local Plan, and the policies seeking to manage such growth at the local level through the Neighbourhood Plan. This is highlighted at paragraph 7.11 of the draft Neighbourhood Plan, with respect to the potential for conflict between proposed Neighbourhood Plan Policy LN3.5 and Draft Local Plan Policy AL/CRS3.

Progressing the Neighbourhood Plan to examination and referendum ahead of the release of the Inspectors Report into the TWBLP therefore has inherent risks, particularly if the Inspector finds the Local Plan unsound, and significant changes are required to its strategic policies to render it sound. This could well result in the need for an early review of the Neighbourhood Plan to bring it into general conformity with the strategic policies subsequently adopted. We note the Neighbourhood Plan Steering Group have sought to limit that risk by seeking to conform to both the current adopted Development Plan strategic policies and the emerging ones. However, as indicated above, conflicts already exist and are acknowledged at paragraph 7.11 of the Neighbourhood Plan. For these reasons, and to reduce the potential for abortive time and cost being incurred, we would urge the Neighbourhood Plan Steering Group to wait for the outcome of the TWBLP Inspectors Report before progressing to examination and referendum.

In the interim, our client has examined the draft Neighbourhood Plan and its supporting evidence base and makes the following comments to assist the Neighbourhood Plan Steering Group in finalising its Plan for examination:

Neighbourhood Development Plan (Submission Version – July 2022)

| Paragraph/Policy | Comment |
|------------------|--|
| LN3.1 (b) | It is unclear how the 25m buffer extent has been deduced, with no evidence or guidance referenced in support. The extent and need for buffers can and does vary according to the designation and attributes of such sites and will need to be agreed with the relevant statutory consultees and the LPA. We would therefore recommend this criterion be deleted, as this mitigation is addressed in our view under criterion a. |
| LN3.1 (c) | This policy is more prescriptive than draft Local Plan Policy EN9 with respect to the requirement for BNG to be delivered within the parish. No evidence is presented on why this must be in the parish, or the likely implication of this on the growth required and relied upon at this settlement over the relevant Development Plan period. Unlike draft Local Plan Policy EN9, this lacks flexibility to be effective. Policy EN9 seeks to acknowledge provisions of the Environment Act 2021, anticipated to become mandatory from November 2023, and affords flexibility in the interim to address such requirements in a proportionate and evidenced manner. We would recommend Policy LN3.1 (c) be amended to better reflect Local Plan Policy EN9 or indeed deleted to avoid duplication if by |

| | |
|-----------------|--|
| | <p>doing so it merely replicates this policy. Also, if retained we suggest the reference to ‘<i>supporting text of LN7.2</i>’ should be replaced by ‘<i>supporting text of LN3.2</i>’, to correct what we assume to be a typographical error. Similarly, section 11 of the Neighbourhood Plan we assume should be amended to correct reference to LN7 policies, which presumably should be LN3 policies.</p> |
| LN3.2 (c and h) | <p>These criteria are imprecise with respect to gains required to satisfy such policies. Reference in criterion h) for example to ‘significant biodiversity gains’ could well be construed as above and beyond the 10% assessed as appropriate and deliverable through draft policy EN9 of the emerging TWBLP, or likely to be mandatory next year through provisions in the Environment Act 2021. We are not aware of any evidence having been commissioned to support higher requirements in the Neighbourhood Plan, including the impact this would have on the delivery of development planned for at strategic policy level in the TWBLP. This includes whole plan viability or other assessments to deduce and justify requests beyond current National Policy and Development Plan Policy, ‘biodiversity net gain’ requirements.</p> <p>In addition, the word ‘geodiversity’ is inserted in the policy, with biodiversity gains requested in compensation. We assume this is deduced from draft TWBLP Policies STR8 and EN1, which are clearer in relation to the features of particular interest, with ‘net gain’ sought where possible.</p> <p>Accordingly, we would suggest the following amendment to criterion c):</p> <p>(over and above the requirements to avoid, mitigate and compensate for impacts on habitats and species)</p> <p>Also, the following amendment to criterion h):</p> <p><i>‘Development proposals resulting in negative impacts on biodiversity <u>and or sites of geodiversity geological interest</u> will not be supported unless clear <u>and significant biodiversity</u> gains can be demonstrated as compensation <u>for any potential harm</u>. Biodiversity net gain should be determined by applying, DEFRA’s Biodiversity Metric 2.0 calculator, or whatever supersedes it in the future, such as the Biodiversity Metric 3.0 calculator.</i></p> |
| LN3.3 (b) | <p>The wording lacks flexibility to address particular site-specific circumstances and wider Local Plan policy objectives, that may weigh in favour of loss, particularly where compensatory measures are proposed and deemed acceptable. To accord with</p> |

| | |
|------------------------|--|
| | <p>Policy EN12 and EN13 of the draft Local Plan, this wording should be amended to:</p> <p><i>'Development proposals resulting in the loss of irreplaceable priority habitats such as ancient woodland, traditional orchards, grassland of interest and veteran trees will be refused <u>not normally be permitted, unless for exceptional reasons, as defined in NPPF, and in such circumstances appropriate compensatory measures are provided.</u></i></p> <p>Arguably there is duplication of policy here between Local Plan and Neighbourhood Plan, so this could be deleted entirely given the upper tier policy proposed.</p> |
| Paragraph 3.19 | <p>No evidence is presented to justify a requirement for a uniform buffer in excess of that advocated in current government guidance (https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences). We would suggest reference to 50m be deleted and amended to require the provision of appropriate buffers that account for site specific assessments in line with current government guidance.</p> |
| LN3.5 & Paragraph 3.38 | <p>It is unclear how the stated buffer zones have been deduced and evidenced, given there are noted conflicts (as cited at paragraph 7.11 of the Neighbourhood Plan) between this policy and strategic policies in the Local Plan that seek to allocate land in this area (Draft TWBLP Policy AL/CRS3). The 500m buffer proposed for example seems disproportionate to the intended purpose of this policy, and covers most of the urban area of Cranbrook.</p> <p>Given the Neighbourhood Plan group and Parish Council have signalled their willingness to undertake further discussions with TWBC if needed to find an alternative strategy for smaller more appropriate sites than AL/CRS3 in this area (Paragraph 7.12 of the Neighbourhood Plan), it would seem prudent to ensure such policy buffers are evidenced and attain the correct balance sought between social, economic, and environmental needs of the area.</p> <p>We would recommend these are revisited and the buffers sought evidenced and made specific to the features of interest, with any discrepancies between this and the emerging Local Plan resolved in discussions with Statutory Consultees Natural England and the Environment Agency.</p> |
| LN3.9 (f) | <p>This criterion appears insufficiently flexible, and replicates elements of other Neighbourhood Plan policies relating to biodiversity and ancient woodlands for example, and there is conflict between this and strategic policy EN19 of the draft</p> |

| | |
|-----------|---|
| | <p>TWBLP, which guides the scale, extent, exceptional need, and compensatory aspects of development proposals in the AoNB. If retained, we suggest revisions as follows:</p> <p><i><u>‘Proposals should seek to be sensitive to the topography and landscape features in the parish, and wherever possible support the distinctiveness of individual settlements in the parish and their key characteristics’.</u></i> conserve and enhance the ecology of fields, trees including veteran trees and hedgerows; retains historic fields; and where possible, directs development away from fields that have been in use since the medieval period or earlier, especially where these form coherent field systems with other medieval features.</p> |
| AM5.5 (b) | <p>No evidence is presented to justify such a restrictive policy criterion. Our client commissioned transport consultants i-transport to assess the transport implications of their site at Frythe Way well over two years ago, which included liaison with county highways. This confirmed that the relatively modest proposals tabled by our client, circa 70 homes, are unlikely to have any adverse impact to highway safety. In addition, the site benefits from being a short walk from the centre of Cranbrook, reducing the need for many car-based journeys.</p> <p>Given the Neighbourhood Plan group and Parish Council have signalled their willingness to undertake further discussions with TWBC as needed to find an alternative strategy for smaller more appropriate sites than AL/CRS3 in the area (Paragraph 7.12 of the Neighbourhood Plan); and parishioners support for sites and policies that promote greater active travel in the parish (Paragraph 5.16 of Neighbourhood Plan), it would seem prudent to ensure all sustainable options for suitable and appropriate sites remain open for consideration.</p> <p>Our client’s site and proposals (see Document A) were categorised as one of the ‘reasonable alternative sites’ at Table 53 of the Sustainability Appraisal that accompanied the emerging Tunbridge Wells Borough Local Plan (TWBLP)⁴, and scored higher in its assessment than many of the sites considered for allocation around Cranbrook in the emerging Local Plan⁵.</p> <p>For avoidance of doubt, our client has also commissioned further updates to their transport assessment work in October 2022 (Document B). This is a comprehensive assessment and report, with several recommendations we would be happy to discuss further with the Neighbourhood Plan Steering Group and Parish Council. Consultant engineers i-transport continue to conclude there are no highway safety grounds to omit this sites</p> |

⁴ Tunbridge Wells Local Plan - Sustainability Appraisal (TWBC,2021).

⁵ Table 54 and Appendix J (Site 25) of Tunbridge Wells Local Plan Sustainability Appraisal (TWBC,2021).

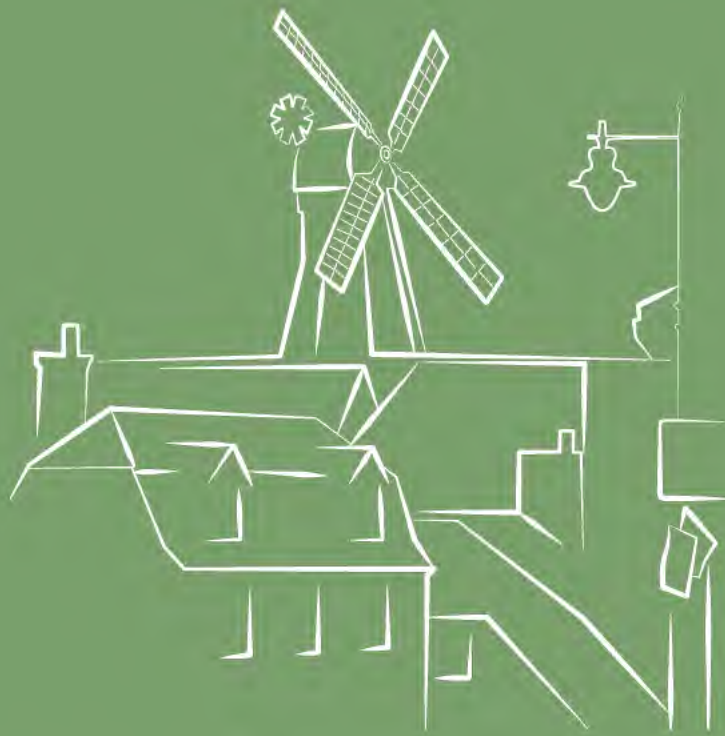
| | |
|-----------|---|
| | <p>consideration, or that would justify the need for criterion b) of Neighbourhood Plan Policy AM5.5.</p> <p>Considering this evidence and the aforementioned context, we respectfully recommend this criterion is deleted.</p> |
| HO7.1 (b) | <p>Whilst we have no objections to the importance of prioritising those with a local connection first, this should afford the flexibility to cascade to surrounding parishes in the borough and wider area should this be required. This would ensure consistency with Draft TWBLP Policy H3, which we contend is a more appropriate and effective approach.</p> |
| IN9.1 (a) | <p>Whilst it would be reasonable to require new development to accommodate the necessary infrastructure on site to enable service providers to make their necessary broadband connections (without the need for subsequent retrofitting), these services and the assured speed of them are beyond the control of the planning applicants themselves.</p> <p>Similarly, the provision of mobile data coverage in the area are elements beyond the applicant's control. This criterion is therefore unreasonable and potentially unimplementable and should be omitted or revised to better align with Draft Policy EN1 of the TWBLP.</p> |

We trust the enclosed comments are useful. Our client would welcome the opportunity to meet representatives of the Neighbourhood Plan Steering Group and Parish Council discuss these matters further prior to the Neighbourhood Plan being formally submitted for independent examination. We would also wish to reserve the right to appear at this examination to elaborate on these matters further.

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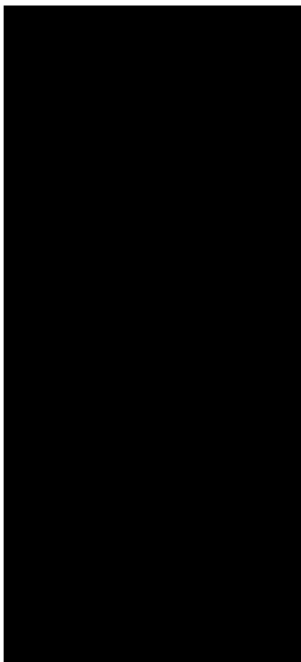
- Document A (Vision Document - Turley, 2021)
- Document B (Transport Appraisal BT/ITB13706-005 TN - i-transport, Oct 2022)



Frythe Way Cranbrook

Vision Document

a development by
**Taylor
Wimpey**



**Taylor
Wimpey**

Turley

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THE VISION

Frythe Way, Cranbrook

Frythe Way, Cranbrook, is a well-connected neighbourhood located in an enclosed landscape setting to the immediate south of Cranbrook Town Centre. Located in the High Weald Area of Outstanding Natural Beauty, the Site has excellent connections to the High Weald Landscape Trail for countryside walks, as well as Royal Tunbridge Wells for shopping and spa days.

Nearby train stations include Staplehurst and Tunbridge Wells, offering connections to Ashford International and London, Charing Cross.

The Site is a ten minute walk to Cranbrook High Street where historical buildings, independent retail and cafes and pubs provide a vibrant town centre setting. Cranbrook Academy School, an Ofsted Outstanding school, is only 15 minutes' walk from the Site.



STAPLEHURST 5
MAIDSTONE 14

Our vision for Frythe Way, Cranbrook is informed by appreciating the landscape and biodiversity character of the surrounding area and understanding its relationship to wider recreational offers. Using these themes and drawing on the best qualities of the Site, we have created a distinct yet appropriate approach to development.

Community Benefits:

- New homes comprising of market and affordable family homes;
 - Publicly accessible open space;
- Provision of a new natural play space located close to the existing homes of Cranbrook;
 - Trim trail for all ages to enjoy outdoor activities;
- Edible landscapes for the benefit of the wider community;
 - Sustainable Urban Drainage; and
 - Landscape and biodiversity enhancements.



About Taylor Wimpey

Taylor Wimpey is a dedicated home building company. The company was formed in 2007 through a merger between George Wimpey and Taylor Woodrow, our combined history dates back to 1880. With over 125 years' experience; we have an unparalleled record in our industry and a strong track record in delivering high quality sustainable developments in London and the South East.

We draw on our experience as a provider of quality homes while setting new standards of customer care in the industry. Our 24 regional businesses in the UK give our operations significant scale and national geographic coverage. In doing so, Taylor Wimpey combines the strengths of a national developer with the focus of small local business units. This creates a unique framework of local and national knowledge, supported by the financial strength and highest standards of corporate governance of a major PLC.

We have expertise in land acquisition, home and community design, urban regeneration and the development of supporting infrastructure. To enable the successful delivery of all our sites, we offer a comprehensive approach to development. We will:

- Promote sites through the planning process;
- Prepare and submit planning applications for the site; and
- Develop the sites thereafter.

We are proud of our history and the legacy that we leave in the homes and communities that we deliver. We continually look at how we can improve to ensure that we create great, sustainable places for people to live, work and enjoy. With unrivalled experience of building homes and communities Taylor Wimpey is at the forefront of the industry in build quality, design, health and safety, customer service and satisfaction.

We have a proven track record of delivering homes for communities and an excellent reputation as a result of this. As a National Housebuilder we have a reliable and stable business model that allows us to make genuine investments that have long term positive benefits for communities. As a FTSE 100 business we operate in all market conditions and invest in all sites we promote, which means that there is a committed purchaser at the end of the promotion journey.

“Taylor Wimpey is one of the leading national house builders operating across England, Scotland and Wales, and is responsible for building approximately 15,000 homes annually.”



“We recognise the importance of creating a well-designed place and in doing so we ensure a long-term legacy”





UNDERSTANDING THE SITE

01

Fig. 3. The Site & its context



Selecting a Sustainable Site

Local Facilities

Access to local facilities is fundamental to the concept of locating sustainable development. New development needs the full range of social, retail, educational, health, transport, and recreational facilities to allow people, especially those with limited mobility, to go about their daily lives without over reliance on a private car.

Building for Life is a tool to assess and compare the quality of proposed neighbourhoods. It is led by the Design Council CABE, Home Builders Federation and Design for Homes.

Whilst Building for Life is usually awarded to completed schemes, the site selection criteria has been applied to this site to demonstrate the sustainability of Frythe Way as a location for a future neighbourhood extension. Building for Life asks:

1. Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafés?
2. Are there enough facilities and services in the local area to support the development? If not, what is needed?

The facilities audit on the following pages demonstrates the Site is a sustainable site location and fully meets the Building for Life criteria through a combination of existing and proposed local facilities.

The Site is well located in proximity to local amenities and transport links meeting the needs of the wider community and making Cranbrook a good location to accommodate sustainable housing growth.

The analysis demonstrates there is a very good range of everyday facilities located within a reasonable walking distance from the centre of the Site. Cranbrook Town Centre is located within 700m of the Site. There is a wider range of social, retail, educational, health and recreational facilities.

There are a number of facilities which are in close proximity of the Site (up to 700m), these include:

- Cranbrook Town Centre retail
- Cranbrook Academy School
- Co-op Food
- Cranbrook Post Office
- A number of Dental Practices
- Lloyds Pharmacy

Other facilities in the town include:

- Cranbrook Church of England Primary School
- The High Weald Academy
- Crane Valley Local Nature Reserve
- Cranbrook Museum
- Cranbrook Library
- The Weald Sports Centre
- Cranbrook Rugby Club
- Angley Park
- Orchard End Surgery
- The Old School Surgery



Building for life is a tool to assess and compare the quality of proposed neighbourhoods.

Fig. 4. A selection of the key local facilities close to the Site clockwise from top left; post office, independent retail, pharmacy, public house, Cranbrook Academy School and a local church.



Connectivity Analysis

i-Transport LLP has been appointed by Taylor Wimpey to provide transport and highways advice in relation to the promotion of Land at Frythe Way, Cranbrook (SHLAA Site Reference: 25). The Site adjoins the existing residential area served from Frythe Way and is located approximately 700m to the south of Cranbrook Town Centre. Freight Lane forms the northern boundary of the Site.

Public Transport Provision

The closest bus stops to the Site are located on Cranbrook High Street approximately 750m north of the Site. The bus stop is located outside the Congregational Church, a short distance from where the WC110 public right of way terminates.

Bus route no. 5 is the main bus service in Cranbrook, which can be easily accessed from the proposed development site.

The closest railway station to the Site is located at Staplehurst, approximately 10.2km to the north of the Site. The station is directly accessible by bus via the no. 5 service with a 20-minute journey time.

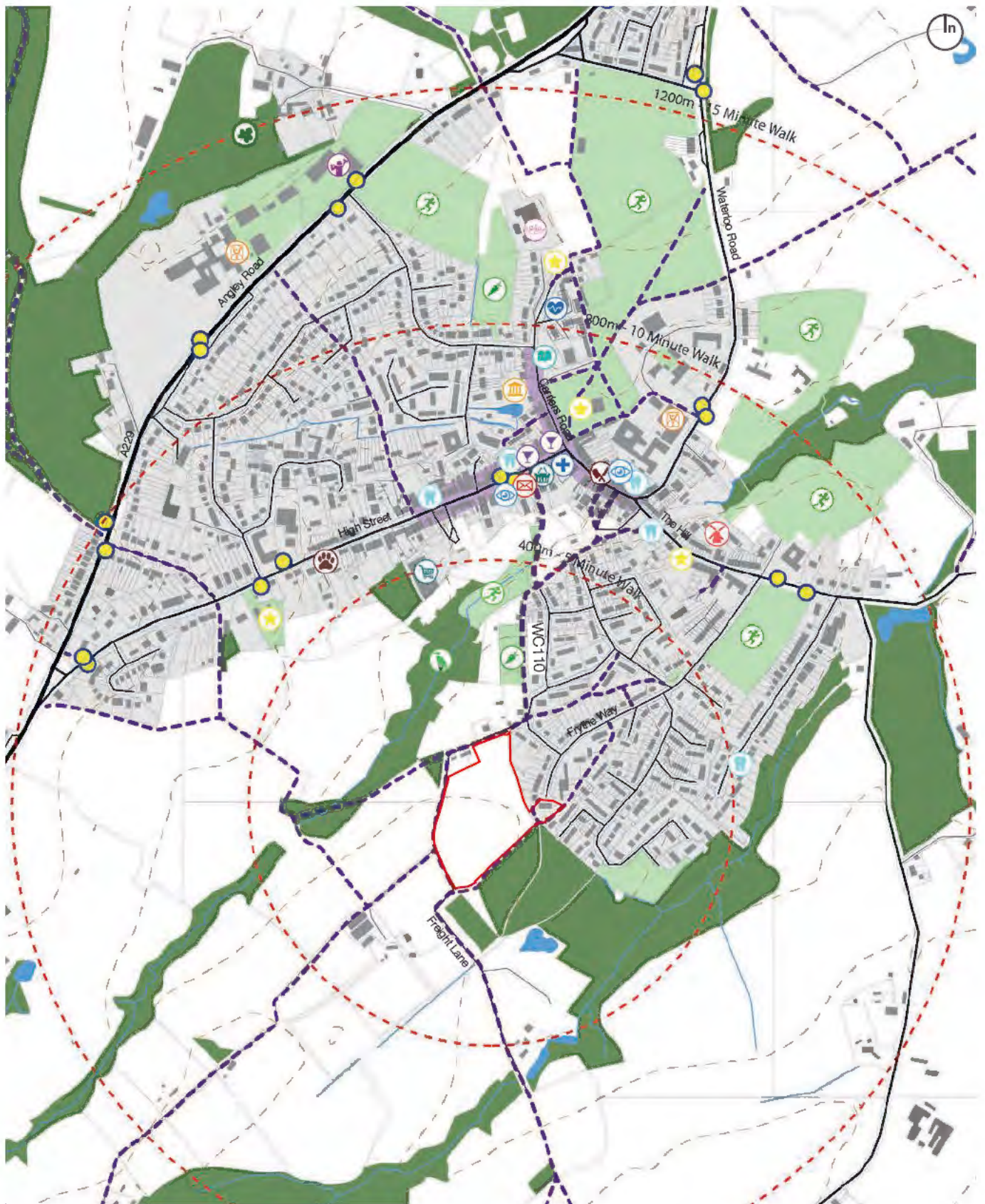
Staplehurst railway station provides two services per hour towards London Charing Cross and two services per hour to Ashford, with hourly services to Ramsgate and Dover. Therefore, coupled with the bus service which operates from early in the morning to late in the evening, this provides an opportunity for linked journeys to destinations further afield for access to a wider range of facilities and services.

Walking and Cycling

The Site offers attractive walking routes to the local facilities outlined on the previous pages and illustrated opposite. The primary desire lines for pedestrians and cyclists from the Site will be to the north towards Cranbrook Town Centre via Frythe Walk / Bramley Drive / St Dunstons Walk and public footpath no. WC110. This route consists of quiet residential roads that are street lit and subject to low vehicle speeds. Continuous footways extend the full length of the route on both sides of the carriageway. Public footpath no. WC110 provides an attractive link to the Town Centre.

-  Site Boundary
-  Bus Stop
-  Public Right of Way (PROW)
-  Cranbrook Town Centre
-  Open Space
-  Woodland
-  Primary School
-  Secondary School
-  Place of Worship
-  Pub
-  Sports Centre
-  Local Food Shop
-  Supermarket
-  Butchers
-  GP Surgery
-  Pharmacy
-  Dentist
-  Opticians
-  Library
-  Post Office
-  Local Nature Reserve
-  Playing Fields
-  Historic Park & Garden
-  Allotments
-  Museum
-  Veterinary
-  Cranbrook Union Windmill

Fig. 5. Local facilities plan



Site Context

Landscape

CSA Environmental has been appointed by Taylor Wimpey to undertake a Landscape Overview of land at Frythe Way, Cranbrook, Kent (the 'Site').

Statutory and Non-Statutory Designations

As shown on the adjacent plan (Fig. 6), the Site and settlement of Cranbrook are located within the High Weald Area of Outstanding Natural Beauty. The Site is not otherwise covered by any additional statutory or non-statutory designations for landscape character or quality. The northern part of the Site, is recognised as a Traditional Orchard Priority Habitat. However, this area has been left unmanaged for years and is publicly inaccessible.

There are a limited number of designations lying within the wider area around the Site. Crane Valley Local Nature Reserve lies approximately 95m north of the Site. Robins Wood Site of Special Scientific Interest lies approximately 1.4km to the south west of the Site.

Conservation Area and Listed Buildings

Cranbrook Conservation Area lies approximately 590m north of the Site and the intervening tree cover to the north west of the Site and development to the north east prevent intervisibility. The nearest listed building lies just outside the site boundary, north east of the Site. There is no adverse impacts on the setting of listed buildings or the Conservation area envisaged.

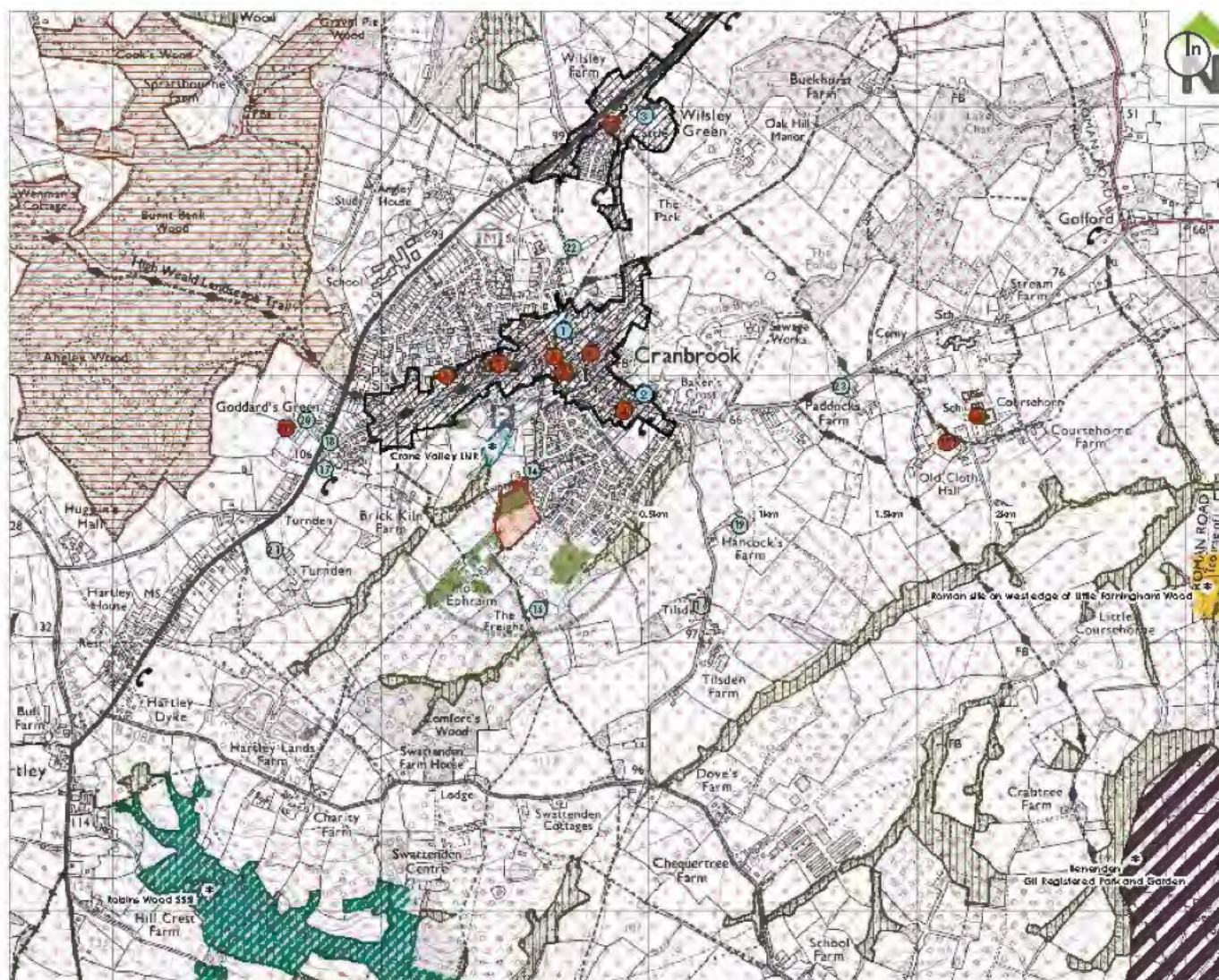
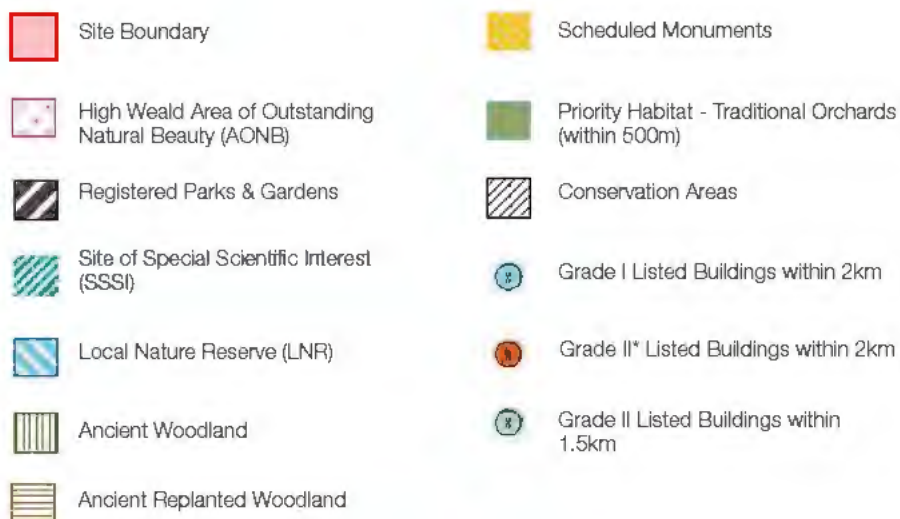


Fig. 6. Landscape Magic Map
extract & heritage plan



Visibility

An assessment of the visibility of the Site was undertaken and a series of photographs taken from public vantage points, rights of way and public highways. The Site was visited in June, when the vegetation was in leaf. Where appropriate, a commentary on likely winter views when vegetation is out of leaf is included. The viewpoints are illustrated on the Location Plan below.

A separate comparative assessment has been undertaken to determine site suitability within the wider context of Cranbrook.

The Site's field boundaries, the trees in the near vicinity and the well wooded wider landscape, provide a good level of screening of the Site. Where views are possible, these are filtered views, often seen in the context of other development close to the Site boundaries. While vegetation on and around the Site are predominantly deciduous, winter views will typically be screened by virtue of the wider wooded landscape.

There are no views of the Site from the wider Cranbrook settlement area, as it is contained in longer distance views by virtue of the adjacent woodland and built form. The topography within the village rises to the north-east, however, intervisibility with the Site remains screened by intervening built form and dense tree cover.

There are no opportunities for views into the Site from the wider landscape due to the nature of the local topography and intervening built form and dense vegetation.

Views of the Site are possible from the housing adjacent to it to the north east and east, Freight Lane, the public footpath which runs adjacent to the southern Site boundary and the public footpath which joins the western Site boundary from Mount Ephraim Farm.



Fig. 7. Aerial photograph - photo locations plan

Conclusion

A sensitive housing scheme, will enable the development to be integrated into the urban edge of Cranbrook, and provide a well-established framework in which to locate new housing. In addition, it will allow improved access to the surrounding public rights of way network and wider countryside to the west, by providing new recreational footpaths within the development.

There is the opportunity to include new planting, including to the Site boundaries, which will reinforce the Site's landscape framework and add to the wider character of the area.

Accordingly, the Site is capable of accommodating development without resulting in significant harm to the landscape character of the surrounding countryside, or to the AONB.



Fig. 8. Photograph 06 - View from entrance to Area B, opposite junction to public footpath WC116, looking north-east into the Site

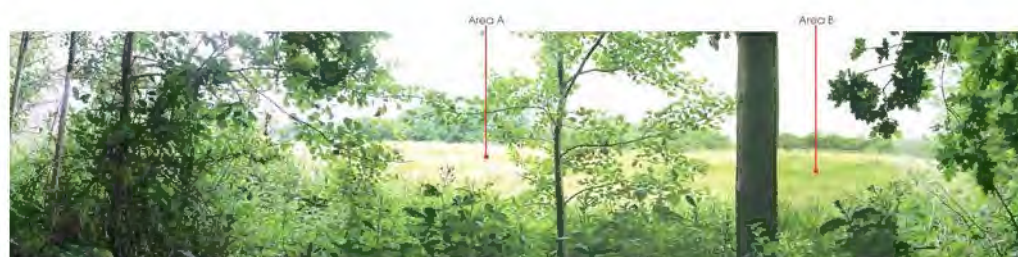


Fig. 9. Photograph 14 - View from public footpath WC114, looking north-west towards the Site



Fig. 10. Photograph 17 - View from centre of Area B, looking north-west

Ecology

Ecological surveys were undertaken at the Site in 2019 in order to ascertain whether the habitats present are used by protected or notable faunal species. Whilst further ecological survey and assessment work is being undertaken to inform the emerging proposals, the work undertaken to date has not identified any overarching ecological constraints associated with development at the Site.

In summary, no ecological constraints have been identified to-date that would inhibit future development and all opportunities will be explored through detailed preparation of the masterplan to provide improved wildlife corridors through the Site.

Technical Considerations

Access

An Access Appraisal was produced in May 2018. A Transport appraisal has also been produced, which concludes the Site is well related to existing facilities and services, with a wide range of key local destinations, including all of Cranbrook Town Centre within a comfortable walking and cycling distance of the Site. Future residents of the Site will have genuine and realistic opportunities to travel by sustainable modes of transport. These are accessible via an existing good quality network of footways and public rights of way in the adjacent built up area.

Vehicular access to the development can be achieved by extending the south western end of Frythe Way into the Site. The proposed site access road will form a 5.0m wide carriageway with a 2.0m wide footway on both sides. This is in accordance with the minimum street width of 5m recommended by British Standard BS5906:2005, which allows a refuse vehicle to

pass a parked car (ref: Manual for Streets (MfS) paragraph 6.8.7).

Adequate forward visibility of 43m, which is in accordance with the guidance set out in MfS for roads with vehicle speeds of 30mph, is achievable along the proposed extension of Frythe Way into the Site. There is a hardened 1.5m – 2.0m wide verge on Frythe Way which accommodates parked vehicles to enable two-way working immediately to the north of the proposed site access.

Taylor Wimpey is working in partnership with local housing association, Town & Country Housing, to deliver these proposals. A suitable access onto Frythe Way is therefore deliverable.

In summary, the proposed site access arrangements therefore provide safe and suitable access for all people in full accordance with the guidance in MfS.

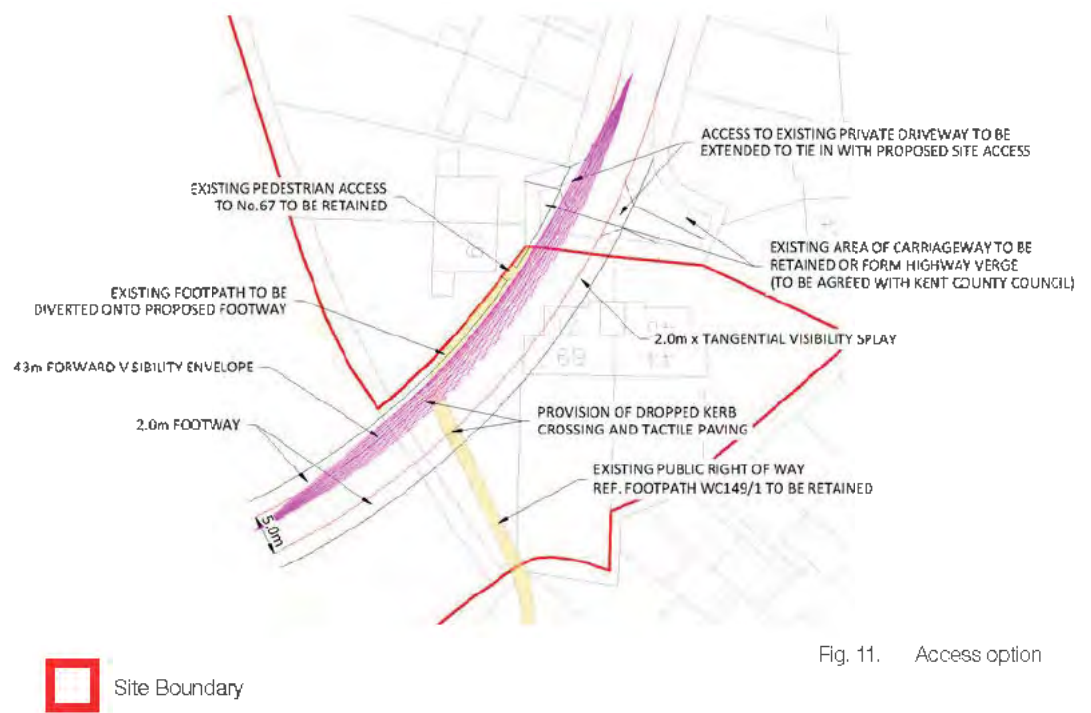

















Fig. 11. Access option

Considerations Summary

The Site is considered suitable and sustainable to accommodate new homes. While there are a few considerations, such as mature trees and hedgerows these can be used as opportunities adding value to the scheme.

-  Site Boundary
-  Built Context
-  Listed Building
-  Public rights of way (Footpath)
-  Public rights of way (By-way)
-  Woodland
-  Ancient Woodland
-  Existing Poor Quality Vegetation
-  Local Nature Reserve
-  Category A Trees
-  Category B Trees
-  Category C Trees
-  Main Entrance
-  Topography Contour Lines
-  Building to be removed

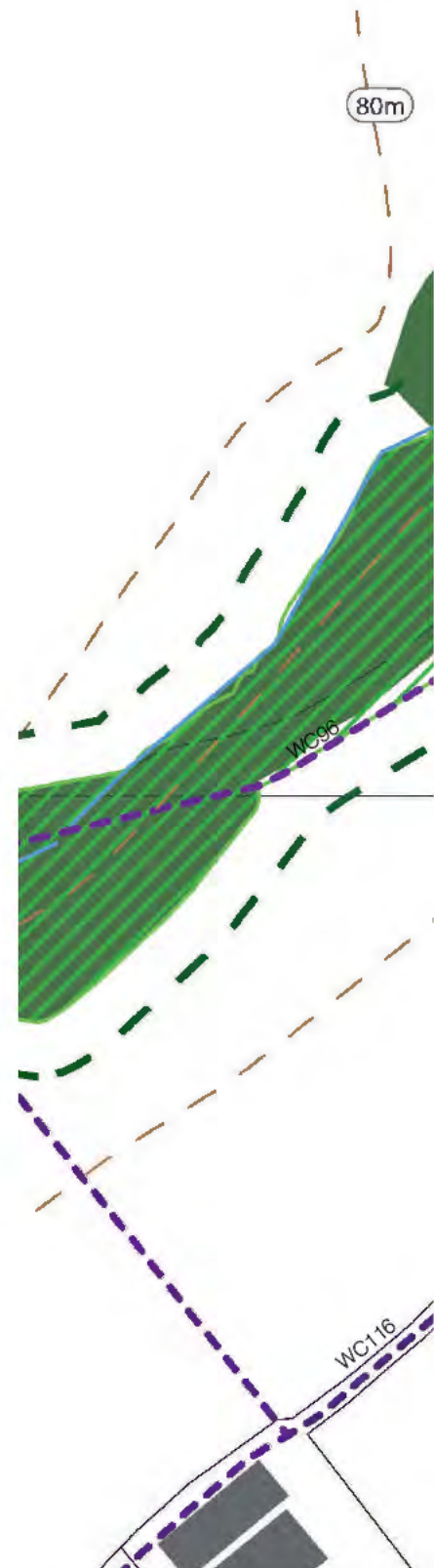


Fig. 13. Opportunities and constraints plan





THE PROPOSALS

02

Design Principles

Locating comprehensive development at Frythe Way provides local benefits including the delivery of market and affordable homes and provision of new high quality open space.

The following diagrams explore the overarching benefits of locating a new residential neighbourhood at Frythe Way.

The Site today

The Site is approximately 2.79 hectares in size, and is located to the west of Frythe Way and south and east of Freight Lane, in Cranbrook.



Maintain and enhance existing natural features

Retain and enhance natural features including mature boundary trees and hedgerows for the benefit of existing habitats and ecosystems. This will help to mitigate the visual impact of future development.

Vegetation on the edges of the Site is predominantly deciduous, views will typically be screened by virtue of the wider wooded landscape.



Create landscape and biodiversity corridors

Creating linear habitats & green corridors will integrate key landscape assets within and on the edge of the Site, creating movement corridors for people and wildlife.

Existing public rights of way & Byways that surround the Site will be integrated through additional pathways connecting to green spaces.



Access To open space & active lifestyles

The Site is well located with existing recreation grounds located to the immediate south east and north.

The introduction of trim trails, green routes and natural play within the Site provides a variety of activity for all age groups.



Edible Landscapes

Areas of fruit trees and berry bushes will be planted throughout the Site to encourage healthy eating and learning about food production.



Access

Vehicular access is provided from Freight Lane via a looped main road within the Site. Pedestrians are prioritised on shared surfaces. A number of connecting paths feature along the boundary edges that link the Site to existing public rights of ways and the wider landscape.



Pedestrian access to Town Centre

The Site is a 10 minute walk using pathways and public rights of way, to cafes, pubs and shops on Cranbrook High Street.



Provide sustainable urban drainage

The natural slope of the Site is from the south west corner to the north east. The proposals use the Sites topography to introduce swales and retention ponds within open space.



Frythe Way, Cranbrook will incorporate open space that encourages active lifestyles and edible landscapes.

Fig. 14. A selection of potential landscape proposals clockwise from top left; berry bushes, wildflowers, natural play, bird boxes and trim trails.



Framework Masterplan

Our vision for Land at Frythe Way, Cranbrook is informed by appreciating the landscape and biodiversity character of the surrounding area and understanding its relationship to wider recreational offers. Using these themes and drawing on the best qualities of the Site, we have created a distinct yet appropriate approach to development.

Community Benefits:

- New homes comprising of market and affordable family homes;
- Publically accessible open space;
- Provision of a new natural play space located close to the existing homes of Cranbrook;
- Trim trail for all ages to enjoy outdoor activities;
- Edible landscapes for the benefit of the wider community;
- Sustainable Urban Drainage; and
- Landscape and biodiversity enhancements.



















-  Site Boundary
-  Public Right of Way
-  Public Right of Way (Restricted By-way)
-  1 Main Access Point
-  2 Main Street
-  3 Secondary Roads/ Shared Surface
-  4 Sustainable Urban Drainage
-  5 Natural Play
-  6 Trim Trail
-  7 Edible Landscape
-  8 Green Corridors for Wildlife
-  9 Retained Trees
-  10 Proposed Trees
-  11 Key Entrance Space
-  12 Public Open Space
-  13 Shared Surface Square for Traffic Calming
-  14 Pedestrian Routes Linking to PRoW
-  15 Cycle & Pedestrian Route Linking to PRoW



Fig. 15. Framework masterplan



Next Steps

Deliverability

As set out within this document, our initial assessments have demonstrated that the Site is free from significant environmental and infrastructure constraints and development on this Site would not cause significant adverse impacts on the countryside or wider landscape.

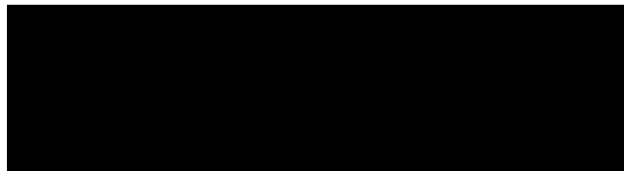
For the reasons set out above, it is considered that the proposal can comprehensively deliver much needed housing, whilst also helping to support Cranbrook's growth strategy by ensuring that there is a sufficient supply of new housing, which can be brought forward within a foreseeable time-frame.

Community Engagement

We believe that the Site should be designed with local stakeholders. We propose to tailor a programme of public engagement in collaboration with key stakeholders, including the Parish.

We believe that the creation of a new neighbourhood presents the perfect opportunity to demonstrate a responsible and transparent approach to community involvement, by setting out a coherent and incremental strategy from the early consultation stages right through to the implementation stages and beyond; indeed, the very nature of the concept will make it necessary to do so.

This process allows for the identification of issues and problems at an early stage, as well as providing the ability to capitalise on and respond to local initiatives, harness the energy and resourcefulness of local stakeholders and incorporate their ideas and ambitions.



Technical Note

Project No: ITB13706
Project Title: Land at Frythe Way, Cranbrook
Title: Transport Appraisal
Ref: BT/ITB13706-005A TN
Date: 7 November 2022

SECTION 1 Introduction

- 1.1.1 Taylor Wimpey has appointed i-Transport LLP to provide transport and highways advice in relation to a proposed residential development on Land at Frythe Way, Cranbrook. The site is capable of accommodating circa 70 dwellings.
- 1.1.2 Tunbridge Wells Borough Council (TWBC) are currently in the process of preparing a new Local Plan, which will form the basis for determining the suitability of development proposals across the borough to 2038. Following Examination of the Local Plan, it is expected that the Plan will be adopted by TWBC in January 2023. The site is identified in the Strategic Housing and Economic Land Availability Assessment (SHELAA) as Site Reference: 25.
- 1.1.3 The transport and highways implications of the proposed development have been subject to discussions with the highway authority, Kent County Council (KCC) in Autumn 2020 to seek to agree there are no highways reason why the site should not be allocated. A copy of the comments received from KCC is provided in Appendix A. This confirms that no highways or transport related objections were raised, including regarding the proposed access arrangements.

1.2 Background

- 1.2.1 Cranbrook and Sissinghurst Parish Council submitted a draft Cranbrook and Sissinghurst Neighbourhood Development Plan to Tunbridge Wells Borough Council on 18 July 2022. The document set out a vision statement and set of objectives for all future development in the parish.
- 1.2.2 These are supported by a set of planning policies and a series of projects to realise the vision and objectives. The plan has been informed by the strategic policies in the Tunbridge Wells Borough Council Local Plan.

- 1.2.3 The emerging policy states **“Developments which propose using Frythe Way as the access route will not be supported.”** No evidence has been produced to support this policy position to demonstrate that additional traffic on Frythe Way would have materially harmful consequences, either in terms of highway capacity or safety or in terms of residential amenity.

1.3 Scope and Structure

- 1.3.1 This Technical Note assesses the development proposal against the three key transport tests set out in paragraph 110 of the National Planning Policy Framework, i.e.:

- 1 Will the opportunities for sustainable transport modes be appropriately taken up?
- 2 Will safe and acceptable access be provided?
- 3 Will the residual traffic impacts be acceptable?

- 1.3.2 In addition, this Technical Note also demonstrates Frythe Way will provide safe access for vehicles, pedestrians and cycles and will be able to satisfactorily accommodate the modest traffic flow increases that would be generated by the proposed development and will not result in a detrimental impact on either highway safety or the living conditions of existing residents along Frythe Way.

- 1.3.3 This note is structured as follows:

- Section 2 outlines the emerging transport policies in the draft Emerging Cranbrook and Sissinghurst Neighbourhood Development Plan;
- Section 3 briefly summarises the existing transport conditions in the vicinity of the site;
- Section 4 set outs the opportunities to undertake journeys by non-car modes;
- Section 5 describes the development proposal and access arrangements;
- Section 6 sets out the potential measures the development can bring forward to assist in promoting sustainable transport;
- Section 7 reviews the potential transport impacts on Frythe Way;
- Section 8 provides an initial assessment of the likely traffic impact of the development proposals;
- Section 9 provides the summary and conclusions.

SECTION 2 Emerging Cranbrook and Sissinghurst Neighbourhood Development Plan

2.1.1 Of the emerging policies relevant to transport contained within the draft Cranbrook and Sissinghurst Neighbourhood Development Plan, a total of seven Access and Movement policies are proposed in relation to new developments.

2.1.2 Policy AM5.1 The Pedestrian Environment states:

"a) New developments will only be supported if they provide safe access for all parishioners to local facilities and public transport links. Safe and convenient access routes should avoid using existing main roads, be of an appropriate width, and use a suitable surface material for all users..."

[...]

b) New safer pedestrian crossings points, or other viable alternatives, will be encouraged and supported."

[...]

2.1.3 Policy AM5.2 Pedestrian Priority and Public Rights of Way states:

"a) All applications should contribute towards creating or enhancing existing streets and thoroughfares with an emphasis on pedestrian safety and priority parish wide."

b) Applications will be supported which seek to protect and enhance PROWs across the parish."

[...]

2.1.4 Policy AM5.3 Public Transport and Access to Amenities states:

"a) All new developments are expected to invest and liaise with stakeholders (including KCC highways, the local planning authority and the Parish Council) to improve public transport services within the parish, especially for the elderly and less mobile, workers, commuters and school children."

b) Applications for development should ensure that businesses and residents should not be dependent on car ownership to access amenities and services. These should be accessible using sustainable access modes."

2.1.5 Policy AM5.4 Cycle Storage and Cycle Parking states:

"a) New residential and commercial developments, or conversions, should provide secure cycle storage."

b) Contributions to secure on-street cycle parking provision within the community spaces will be sought."

2.1.6 Policy AM5.5 Safer Road Conditions states:

"a) Applications for development should demonstrate provision for improving the network of roads, streets and lanes related to that development

[...]

b) Developments which propose using Frythe Way as the access route will not be supported."

2.1.7 The supporting text for this policy seeks to provide further clarification:

"The Frythe Estate is a large cul-de-sac. Many of the roads on the estate including, crucially, the only access along Frythe Way, are already narrow and extremely congested. Any further development would, clearly, make the situation worse."

2.1.8 Policy AM5.6 Rural Lanes states:

"Applications for development that impact any of the network of roads, streets and lanes across the whole parish should seek to protect and enhance the many historic rural lanes, which are characteristic of this area."

2.1.9 Policy AM5.7 Car Parking Provision states:

a) Developments should contribute to a parish-wide parking strategy to promote sustainable travel, reducing the need for short car journeys within the parish and helping to release spaces for parking that can support economic development and tourism related activities.

[...]

SECTION 3 Location and Context

3.1.1 The site adjoins the existing residential area served from Frythe Way and is located approximately 500m to the south of Cranbrook town centre. Freight Lane forms the northern boundary of the site.

3.1.2 The primary desire lines for pedestrians and cyclists from the site will be to the north towards Cranbrook Town Centre via Frythe Walk/Bramley Drive/St Dunstons Walk/Brookside and public footpath no. WC110. This route consists of quiet residential roads that are street lit and subject to low vehicle speeds. Continuous footways extend the full length of the route on both sides of the carriageway, typically 1.8m in width. Footpath WC110 runs parallel to the west of Brookside and is an unsurfaced route approximately 1.2m – 1.5m wide, tying into the existing footway provision to the north and south, and provides an alternative route towards the town centre. To the north of Brookside, public footpath no. WC110 forms a lit route that is generally 1.5m – 1.8m wide and provides an attractive off-road link across The Crane brook to the High Street via Crane Lane.

3.1.3 Footpath no. WC147A also commences at the northern end of Brookside and provides a link to the north-east towards Tanyard car park and Stone Street (via footpath WC111) to form an alternative off-road pedestrian route towards the town centre.

- 3.1.4 The majority of Frythe Way, including the section approximately 80m in length from the site boundary as far as the junction with Frythe Walk, is bounded by dropped kerbs and an area of concrete hardstanding that allows for dedicated off-road parking, adjacent to a footway, which has a total width of approximately 2.9m. The residual footway width when cars are parked is sufficient to accommodate a wheelchair or pushchair, or for two pedestrians to pass each other.
- 3.1.5 The arrangement continues eastwards along Frythe Way as far as the junction with Brickenden Road, where a 1.7m – 1.8m wide continuous footway commences on the southern side of Frythe Way and provides a link to the footways located on both sides of The Hill/Bakers Cross. This route provides an alternative link to the town centre, as well as the facilities to the east of the site, such as the Orchard End Surgery, The Old Brewery Centre, and Cranbrook Union Windmill.
- 3.1.6 Cranbrook High Street provides an attractive environment for pedestrians, with footways on both sides of the carriageway and a 20mph speed limit. Designated on-street parking on both sides of the carriageway further slows the flow of traffic due to a reduction in the width of the carriageway. While there are no designated cycle lanes on the High Street, the low vehicle speeds and restricted traffic flow make cycling an attractive transport alternative through the town centre.
- 3.1.7 Cranbrook School is located east of the High Street along Waterloo Road. A continuous footway is provided on the northern side of the carriageway, varying between c1.0m and c1.5m. Speed cushions have been installed directly outside Cranbrook School to slow traffic speeds along the school frontage.
- 3.1.8 The development will therefore provide a choice of safe and attractive pedestrian routes to Cranbrook Town Centre to the north along with healthcare services and Cranbrook School to the east and north-east respectively.

SECTION 4 Accessibility

- 4.1.1 A detailed assessment of the sustainability of the site in transport terms has been undertaken and is provided in i-Transport report reference ITB13706-003 TN, which forms Appendix B of this note. It also includes a comparative assessment with other development sites being considered within Cranbrook which was undertaken as part of the Sustainability Appraisal in the Draft Local Plan. This document was originally submitted as part of the consultation response made on the site as part of the Tunbridge Wells Draft Local Plan (Regulation 18) and has since been updated to incorporate recent changes in the local area.

- 4.1.2 The analysis demonstrates that the site is located closer to the majority of the local facilities and services located within Cranbrook in comparison to the other SHELAA sites with a wide range of key local destinations, including all of Cranbrook Town Centre located within a comfortable walking and cycling distance of the site. Therefore, future residents of the site will have genuine and realistic opportunities to travel by sustainable modes of transport. These are accessible via an existing good quality network of footways and public rights of way in the adjacent built up area.
- 4.1.3 The closest bus stops are located on Bakers Cross some 580m – 630m from the eastern boundary of the site. These stops are therefore located within the 85th percentile walking distance to bus stops on the basis of data contained within the National Travel Survey. The principal bus service operating from these stops is the no. 297 which provides a two-hourly service between Tenterden and Tunbridge Wells. This also provides a direct link to Tunbridge Well railway station.
- 4.1.4 Additional bus stops are located on the High Street approximately 750m north of the site, a short distance from public footpath no. WC110. The principal bus service operating from these stops is the no. 5 which provides an hourly service between Maidstone and Sandhurst. Staplehurst Railway Station is also directly accessible via this bus service with a journey time of approximately 20-minutes therefore providing an opportunity for linked journeys to destinations such as London and Ashford. The site is one of the best located to provide access to the existing bus services in Cranbrook when considered against the other SHELAA sites.
- 4.1.5 Against this background, as the site is located within 800m of a town centre of settlement classified as the second highest category in the hierarchy across the Borough it is therefore well located to ‘take up’ the opportunities for travel by sustainable modes.
- 4.1.6 Furthermore, if an appropriate walking distance to a town centre is adopted in the scoring methodology adopted in the Sustainability Appraisal, consistent with the approach applied to other purposes, including community and education trips, then SHLAA Site 25 would score more positively.
- 4.1.7 On this basis, the proposed development is in accordance with the current and emerging policy in transport sustainability terms and as such is a suitable site for development and is more sustainably located when compared with the proposed allocated sites in Cranbrook. The site is also in line with the key transport test set out in the National Planning Policy Framework (NPPF) and draft Policy EN2 ‘Sustainable Design and Construction’ in the emerging Local Plan.

SECTION 5 Proposed Development

5.1.1 The technical studies are currently being undertaken to establish the number of dwellings that can be accommodated on the site and that will be applied for as part of any future planning application. The masterplan for the site is currently being prepared. For the purpose of this transport appraisal, it has been assumed the proposed development has a capacity of circa 70 dwellings.

5.1.2 A copy of the emerging masterplan framework is provided in Appendix C.

5.2 Site Access Arrangements

Vehicular Access

5.2.1 It is proposed to provide vehicular access to the development by extending the south-western end of Frythe Way into the site. Taylor Wimpey controls the residential block comprising properties no's 44, 46, 69, and 71. This block will be demolished in order to deliver the proposed access into the site.

5.2.2 The proposed site access road will form a 5.0m wide carriageway with a 2.0m wide footway on both sides. This is in accordance with the minimum street width of 5m recommended by British Standard BS5906:2005, which allows a refuse vehicle to pass a parked car (ref: Manual for Streets (MfS) paragraph 6.8.7).

5.2.3 Adequate forward visibility of 43m, which is in accordance with the guidance set out in MfS for roads with vehicle speeds of 30mph, is achievable along the proposed extension of Frythe Way into the site.

5.2.4 i-Transport drawing no ITB13706-GA-008 demonstrate the proposed access road is sufficient to enable a large refuse vehicle to pass a car on the proposed site access road.

5.2.5 As a result of the proposed minor re-alignment of Frythe Way into the site, it is proposed to extend the existing private driveways serving properties 42 and 65 located at the end of the cul-de-sac to the edge of the revised carriageway. Each modified driveway achieves appropriate visibility splays and will be accessed via a dropped kerb crossover style access. Pedestrian access to property no. 67 will also be retained. The redundant area of turning head will be retained or form a highway verge.

5.2.6 A dedicated parking bay with dimensions of 6.0m x 2.0m will be provided on the southern side of the proposed site access road to assist with accommodating any displaced parking that currently occurs at the end of the existing turning head as a result of the proposed site access. It is important to note that the demolition of existing properties no's 44, 46, 69 and 71 is likely to reduce the demand for on-street parking in the vicinity of the proposed access and any replacement dwelling in this location will be served by dedicated off-street parking in accordance with local parking standards.

Pedestrian/Cyclist Access

- 5.2.7 A 2.0m wide footway will be provided on both sides of the proposed site access to provide pedestrian access into the site and will tie in with the footway provision on Frythe Way.
- 5.2.8 The existing footpath, ref: WC149/1 located at the south-western end of the existing turning head will be diverted onto the proposed footway on the northern side of the site access road, with a dropped kerb crossing and tactile paving provided to enable pedestrians to cross the carriageway and continue along the footpath on the other side safely.
- 5.2.9 There is the potential for an additional pedestrian/cycling access onto Freight Lane on the northern boundary of the site to maximise the permeability of the site and provide a more direct route towards Cranbrook town centre for some properties.

5.3 **Stage One Road Safety Audit**

- 5.3.1 A Stage One Road Safety Audit of the proposed access onto Frythe Way has been carried out and it raises no overriding safety issues with the scheme. A copy of the report, along with the designer's response, is provided in Appendix D.
- 5.3.2 In broad terms the safety audit identifies the following:
- The proposed vehicle access via an extension of Frythe Way into the site is acceptable and there are no safety issues resulting from the proposed forward visibility or carriageway widths, subject to:
 - The provision of an off-street parking bay to accommodate any displaced parking in order to reduce the potential impact of parked cars on forward visibility for approaching vehicles; and
 - A large refuse vehicle being able to safely pass a car travelling in the opposite direction along the proposed site access.
 - Adequate tactile paving should be provided on both sides of the site access to allow pedestrians to use the existing the existing Public Right of Way ref: WC149/1 safely; and
 - The relocation of an existing street lighting column on the footway where the proposed access is located should be assessed at the detailed design stage.
- 5.3.3 These comments have been taken on board and the layout presented in drawing no. ITB13706-GA-001 therefore shows the 'safety audit' compliant site access arrangement.

SECTION 6 Promoting Sustainable Transport

6.1 Off-Site Walking and Cycling Improvements

6.1.1 The proposed development can assist in birnging forward off-site infrastructure improvements to the pedestrian routes between the site and Cranbrook town centre and other key local destinations (including to the existing Public Rights of Way within the existing highway limits), either as on site works, off site S278 improvements or through a financial contribution, all of which will also provide a benefit to existing residents in the area.

6.1.2 The key potential improvements are summarised below:

- Upgrade to Public Right of Way footpath WC/110 between Bramley Drive and northern end of Brookside within highway limits, as follows;
 - Provision of formal surfacing;
 - Drainage improvements; and
 - Sensitive lighting scheme;
- Provision of kerb build-out and footway extension on Frythe Way at junction with Bramley Drive, coupled with dropped kerb crossing with tactile paving linking to footpath WC/110
- Surface and drainage improvements to existing Public Right of Way Footpath WC/110/2 between Brookside and High Street within highway limits;
- Proposed Zebra crossing on flat-top hump on The Hill immediately to the west of junction with Tippens Close (to replace existing speed cushions). This directly responds to an issue raised in Policy AM5.1: The Pedestrian Environment of the Cranbrook & Sissinghurst Parish Council Neighbourhood Development Plan);
- Enhanced lighting schemed along Public Right of Way Footpath WC/110/2 on Crane Lane section linking to High Street;
- Surface and drainage improvements to existing Public Right of Way Footpath WC/147A between Brookside and Tanyard car park within highway limits;
- Surface and drainage improvements to existing Public Right of Way ref WC/111/1 and WC111/2 between Tanyard car park and Stone Street within highway limits;
- Dropped kerbs and tactile paving to be provided at several minor road junctions along the route, including:

- Frythe Way / Frythe Walk junction;
- Bramley Drive / Brookside junction;
- Frythe Way / Frythe Crescent junction;
- Frythe Way / Turner Avenue junction;
- Frythe Way / Brickenden Road junction;
- Frythe Way / Frythe Close junction;
- Bakers Cross / The Hill / Frythe Way junction;
- The Hill / Tippens Close junction;
- The Hill / Tanyard Car Park access;
- High Street / Crane Lane junction.

6.1.3 The potential improvement schemes are presented in drawing no's ITB13706-GA-100 – 106 and drawing no's ITB13706-GA-111 – 115, copies of which are provide in Appendix E.

6.1.4 In addition to the improvements set out above, a wayfinding strategy will be implemented to advise existing and future residents in the local area the quickest route to the key destinations within Cranbrook.

6.1.5 The proposed improvements are therefore in accordance with the objectives set out in the emerging Policies AM5.1 and AM5.2 in the Cranbrook & Sissinghurst Parish Council Neighbourhood Development Plan.

6.2 **Accessibility by Public Transport**

6.2.1 KCC's consultation response dated 12 October 2020 requested a contribution of £1,000 per dwelling towards public transport improvements.

6.2.2 On this basis, Taylor Wimpey is therefore willing on a without prejudice basis to agree in principle to a financial contribution of £70,000 (£1,000 x 70 dwellings) towards enhanced bus services in Cranbrook to be secured within a S106 Agreement as part of any future planning application on the site.

6.2.3 The proposed financial contribution is therefore in accordance with the objectives set out in emerging Policy AM5.3 in the Cranbrook & Sissinghurst Parish Council Neighbourhood Development Plan.

6.3 Framework Travel Plan

- 6.3.1 A robust Travel Plan for the site will also be implemented. The Travel Plan will be developed in accordance with KCC's Guidance on Transport Assessments & Travel Plans (2008) or any future guidance that is adopted and will encourage and facilitate travel by walking, cycling and public transport use through a range of measures. In particular, this may include provision of travel vouchers to new residents, which can be used for purchasing public transport season tickets.

SECTION 7 Transport Impacts on Frythe Way

7.1 Existing Conditions

- 7.1.1 Frythe Way is a 550m long residential cul-de-sac, which also provides access to several other culs-de-sac as well as a series of loop roads within the estate. In total it provides access to a circa 480 dwellings.
- 7.1.2 At its north-eastern end, Frythe Way forms the minor arm of a simple priority junction with The Hill / Bakers Cross. There are double-yellow lines on both sides of Frythe Way for the initial 30m back from the junction with The Hill / Bakers Cross, as well as on the mainline carriageway extending over a greater distance. There is an area of hardstanding located on the northern side of the carriageway beyond the double-yellow lines approximately 60m in length which is used to accommodate parked vehicles.
- 7.1.3 For the first 225m, as far as the junctions with Brickenden Road and Turner Avenue, Frythe Way is approximately 6.1m – 6.3m wide. This width is sufficient to enable two HGVs to carefully pass each other (*ref: MfS Figure 7.1*). There is limited frontage development along this section (the few houses that are located along this section are situated approximately 5m above the height of the carriageway and/or are well screened by mature hedgerows) and consequently there will be no material impact on residential amenity (in terms of severance, noise, disturbance, air quality, vibration, or odour) on the busiest section of Frythe Way as a result of the increase in traffic movements associated with the proposed development.
- 7.1.4 The majority of dwellings within the residential area are served via Brickenden Road and Turner Avenue and the section of Frythe Way further to west towards the development site is more lightly trafficked as it serves fewer dwellings directly. Along this section, the carriageway narrows to 4.8m - 5.0m in width and therefore generally accords with the minimum street width of 5m recommended by BS5906:2005, and allows a refuse vehicle to pass a parked car (*ref: MfS paragraph 6.8.7*).

Existing Traffic Flows

- 7.1.5 An Automatic Traffic Counter (ATC) was installed for broadly a one-week period from 10 October 2022 to 18 October 2022 on Frythe Way approximately 140m to the south of the junction with The Hill / Bakers Cross. The ATCs are provided in full in Appendix F.
- 7.1.6 These surveys have established typical traffic flows in the area to identify baseline traffic conditions. The existing traffic flows have been analysed to establish the morning and evening peak hour periods.
- 7.1.7 The 2022 base traffic flows on Frythe Way during the weekday morning and evening peak hour periods, as well as average daily and average weekday traffic flows, are summarised in Table 7.1 below.

Table 7.1: 2022 Existing Traffic Flows on Frythe Way

| | Northbound | Southbound | Two-Way |
|--|------------|------------|---------|
| Weekday 0700-0800 | 122 | 83 | 205 |
| Weekday 0800-0900 | 109 | 85 | 194 |
| Weekday 0900-1000 | 81 | 78 | 159 |
| Weekday 1600-1700 | 113 | 141 | 254 |
| Weekday 1700-1800 | 97 | 124 | 221 |
| Weekday 1800-1900 | 65 | 75 | 140 |
| Average Weekday Traffic (24-Hour) | 1,211 | 1,179 | 2,390 |
| Annual Average Daily Traffic (24-Hour) | 1,107 | 1,070 | 2,177 |

Source: Traffic Surveys

- 7.1.8 The weekday morning peak hour traffic flow on Frythe Way is some 205 two-way vehicle movements between 0700-0800 and 194 two-way trips between 0800-0900. The weekday evening peak hour traffic flows on Frythe Way are some 254 two-way vehicle movements between 1600-1700 and 221 two-way trips between 1700-1800. These flows are low in real terms with a maximum of four movements every minute during the weekday peak hour periods.
- 7.1.9 Frythe Way has an average weekday two-way traffic flow (24-hour) of some 2,390 vehicles.

7.2 Design Guidance

- 7.2.1 There is no restriction on the number of dwellings that can be served by a cul-de-sac in current national design guidance. The current guidance is set out in the DfT's Manual for Streets (MfS) as follows:

"the length of cul-de-sacs or the number of dwellings have been used by local authorities as criteria for limiting the size of a development by a single access route. Authorities have often argued that the larger the site, the more likely it is that a single access could be blocked for whatever reason. The fire services adopt a less-numbers driven approach and consider each application based on a risk assessment for the site, and response time requirements". (ref: MfS paragraph 6.7.3)"

7.2.2 It is therefore perfectly acceptable in accordance with current design guidance to serve an additional 70 dwellings from Frythe Way.

7.3 The Hill / Bakers Cross / Frythe Way Junction

7.3.1 Access from the proposed development to the wider highway network is via The Hill / Bakers Cross / Frythe Way priority junction. The Hill / Bakers Cross is subject to a 30mph speed limit in the vicinity of the junction with Frythe Way. Immediately to the north of the junction the speed limit reduces to 20mph.

7.3.2 ATCs were installed for broadly a one-week period from 10 October 2022 to 18 October 2022 on The Hill / Bakers Cross approximately 20m-25m to both the east and west of the junction with Frythe Way to record vehicle speeds in the vicinity of the junction. The results of this survey are provided in full in Appendix F.

7.3.3 On the basis of the survey undertaken, the 85th percentile vehicle speeds on Bakers Cross are some 30.7mph in the westbound direction to the east of the junction and some 26.6mph on The Hill in the eastbound direction to the west of the junction.

7.3.4 Using the formula set out in the MfS, the observed 85th percentile vehicle speeds require visibility splays of 44m to the right and 36m to the left, i.e., a vehicle approaching along The Hill / Bakers Cross needs to see and be seen from a vehicle emerging from Frythe Way at a distance of 44m and 36m respectively.

7.3.5 i-Transport drawing no. ITB13706-GA-003 demonstrates that the achievable visibility at The Hill / Bakers Cross / Frythe Way junction exceeds the requirements for the observed vehicle speeds to both the left and right within the public highway.

7.3.6 i-Transport drawing no. ITB13706-GA-007 demonstrates a vehicle can safely turn into Frythe Way in the unlikely event a vehicle is waiting to turn out of Frythe Way.

7.4 On-Street Parking on Frythe Way

7.4.1 As set out above, there is limited frontage development for the first 225m of Frythe Way west of the junction with The Hill / Bakers Cross. As a result, there is limited on-street parking for the majority of this section, excluding the dedicated area of hardstanding on the northern side of the carriageway commencing 30m back from the junction.

7.4.2 To the west of the junctions with Brickenden Road and Turner Avenue, the homes that have frontage onto Frythe Way have varying parking within their curtilage, ranging from up to two driveways spaces to no off-street parking. In addition, Frythe Way along this section is bounded by dropped kerbs and an area of concrete hardstanding which is some 1.5m - 1.8m wide and allows for dedicated off-street parking, adjacent to a 1.2m wide footway. This assist in maintaining two-way working for the majority of its length.

7.4.3 A parking beat survey was undertaken on 18 and 19 September 2020 to establish the existing on-street parking demand on Frythe Way during a typical weekday and weekend at expected times of peak residential demand (i.e. the beginning and the end of weekdays and weekends) as well as other times of the day. A summary of the observed parked vehicles is presented in Table 7.2.

Table 7.2: Frythe Way Observed Parking Surveys – 18 and 19 September 2020

| | On-Carriageway | Off-Road* | Total |
|-----------------------------------|----------------|-----------|-------|
| Friday 18 September 2020 | | | |
| 0600 | 14 | 38 | 52 |
| 0830 | 11 | 33 | 44 |
| 1100 | 10 | 30 | 40 |
| 1730 | 12 | 30 | 42 |
| 2030 | 15 | 35 | 50 |
| Saturday 19 September 2020 | | | |
| 0600 | 16 | 35 | 51 |
| 0830 | 17 | 30 | 47 |
| 1100 | 19 | 28 | 47 |
| 1730 | 15 | 27 | 42 |
| 2030 | 16 | 35 | 51 |

Source: Parking Surveys

Note: * Includes pavement parking and area of hardstanding on northern side of Frythe Way immediately to west of junction with The Hill / Bakers Cross

7.4.4 The surveys indicate the peak parking demand is on a weekday morning at 0600. The parking demand during a weekday morning and evening is similar. Some on-street parking is quite typical of streets throughout Cranbrook. Indeed, parking is a key function of many residential streets (Manual for Streets paragraph 8.1.1) and it can assist in slowing vehicle speeds.

7.4.5 The proposed development is very unlikely to increase on-street parking on Frythe Way along the proposed vehicle route into the site as dedicated resident and visitor parking will be provided within the site for the proposed dwellings in accordance with local parking standards.

7.4.6 Furthermore, whilst there is on-street parking activity along Frythe Way and on occasions vehicles travelling in opposite directions will be required to give-way to each other this acts as a form of informal traffic calming and contributes to minimising the speed of passing traffic. The proposed development will not materially increase the potential for two vehicles to give-way to each other.

7.5 Vehicle Tracking

7.5.1 On the basis parked cars are present in all of the observed locations identified during the peak period, i-Transport drawing no's ITB13706-GA-004 and 005 demonstrates there is sufficient carriageway space for two cars to pass each other at least every 40m-50m, with good intervisibility between approaching vehicles travelling in opposite directions where vehicles are required to give-way.

7.5.2 The vast majority of the flow increases associated with the proposed development will be light vehicles such as cars and hence the vehicle composition of traffic on Frythe Way will not be materially altered by the proposal. It is important to note there will be no increase in the number of refuse vehicle movements on Frythe Way as a result of the proposed development – the existing vehicle accessing the existing residential area will also serve the development when built out. The number of large vehicles requiring access to Frythe Way will remain very small and it will continue to be a very infrequent event.

7.5.3 In accordance with MfS1 it is fully acceptable for a refuse vehicle to use the full width of the carriageway to manoeuvre given that Frythe Way have low traffic flows and speeds and as it will only require access a maximum of once per week. This is set out in MfS, as follows:

“The design of local roads should accommodate service vehicles without allowing their requirements to dominate the layout. On streets with low traffic flows and speeds, it may be assumed that they will be able to use the full width of the carriageway to manoeuvre” (ref: MfS1 paragraph 6.8.1)

7.5.4 Notwithstanding this, i-Transport drawing no's ITB13706-GA-006 and 007 demonstrates a large refuse vehicle can pass parked cars and can also pass a large car travelling along Frythe Way for the majority of its length, including on the proposed new site access.

7.5.5 There will be occasional circumstances where a car will be required to give-way to a refuse vehicle (which only visits the area once per week and generally outside of the peak periods when traffic flows are greatest), as happens at the moment, and given the forecast increase in traffic volumes (as set out in Section 7 below) the potential for this to occur will not materially increase as a result of the proposed development and any vehicle that does has to wait will only have to wait for a short period of time, which is not uncommon in many residential areas.

7.6 Highway Safety

- 7.6.1 Personal injury accident has been obtained from Kent County Council for the period between 1 October 2012 and 31 December 2019. This exceeds the five-year period that is normally required. The study area includes the highway network along Frythe Way and the associated streets within the residential area, including the junction with The Hill / Bakers Cross.
- 7.6.2 The data demonstrates there has been one recorded collision along Frythe Way in the last seven year period, where a vehicle travelling northbound opposite the junction with Frythe Close hit a parked car resulting in a slight injury. No collisions involving turning movements have been recorded at The Hill / Bakers Cross / Frythe Way junction in the period assessed.
- 7.6.3 The overall very low number of collisions does not suggest a specific highway safety problem at any particular location for highway users along Frythe Way and it is concluded that the roads and principal junction in the immediate vicinity of the site have a good highway safety record.

7.7 Stage One Road Safety Audit

- 7.7.1 A separate Stage One Road Safety Audit has also reviewed the road safety aspects of the use of Frythe Way to provide access to the proposed development. A copy of the report, along with the designer's response, is provided in Appendix G.
- 7.7.2 In broad terms the safety audit identifies the following:
- The existing double-yellow lines on Frythe Way in the vicinity of the junction with The Hill / Bakers Cross should be refreshed to make it clearer to motorists the extent of the existing parking restrictions to minimise the length of the single-lane working on approach/exit to the junction;
 - Extending the existing parking restrictions on Frythe Way should be explored through the Traffic Regulation Order (TRO) process to further minimise the potential for minor queuing at the junction with The Hill / Bakers Cross;
 - Further to the west, no additional problems have been identified along Frythe Way – junctions located along the route provide a good level of visibility – and the existing highway is considered to be capable of safely accommodating the forecast development generated traffic; and
 - Upgraded dropped kerb crossings and tactile paving should be provided on the pedestrian desire line between the site and Cranbrook town centre.

- 7.7.3 Against this background, the auditor raises no overriding safety issues with the use of Frythe Way to serve the proposed development.

SECTION 8 Traffic Generation and Traffic Impact

8.1 Development Proposal Traffic Generation

- 8.1.1 To establish the potential vehicular trip generation of the proposed development, an assessment has been undertaken using residential trip rates derived from comparable survey data contained within the TRICS trip generation database. To provide a robust assessment of the trip generation potential of the development survey data for residential developments comprising a similar number of privately owned houses located in edge of town locations has been used. The TRICS output data is provided in Appendix H.
- 8.1.2 This is a worst case assessment as it doesn't take into account the close proximity of the site to Cranbrook town centre and the greater opportunity for future residents to undertake journeys on foot than a typical edge of town location. It also does not take any account of the number of apartments or affordable houses that will form part of the development, both of which will exhibit lower trip rates.
- 8.1.3 A summary of the proposed trip rates and resultant traffic generation during the weekday peak hour periods¹ is set out in Table 8.1. These trip rates were agreed with KCC as part of the scoping discussion in Autumn 2020.

Table 8.1: Development Proposal: Traffic Generation

| | Period | Arrivals | Departures | Total |
|-----------------------------------|-----------|----------|------------|-------|
| Trip Rate per Dwelling | 0800-0900 | 0.152 | 0.427 | 0.579 |
| | 1700-1800 | 0.336 | 0.116 | 0.452 |
| Traffic Generation (70 Dwellings) | 0800-0900 | 11 | 30 | 41 |
| | 1700-1800 | 24 | 8 | 32 |

Source: TRICS

- 8.1.4 These trip rates compare well with the observed vehicular trip rate for the morning (0800-0900) and evening (1700-1800) peak hours which can be established by dividing the total inbound and outbound vehicle movements recorded along Frythe Way by the total number of dwellings served via this route (i.e. 480). Indeed, the proposed vehicular trip rate for the morning (0800-0900) is some 30%-40% greater than the observed trip rate and therefore provides a robust basis for the assessment.

¹ Although the weekday peak hour flows on Frythe Way are 0700-0800 and 1600-1700, the local highway network peak hours are 0800-0900 and 1700-1800 and are the periods when the combination of existing flows and development generated flows will be at its greatest.

- 8.1.5 On the basis of these trip rates, the proposed development is likely to generate a maximum of 41 two-way vehicle movements during the weekday peak hour periods, equating to approximately one extra vehicle movement every 1 ½ minutes. Outside of the peak hours these increases will be less.

Traffic Volumes on Frythe Way

- 8.1.6 Table 8.2 summarises forecast weekday peak periods and 24-hour traffic volumes along Frythe Way (at its northern end) using the flow profile from the ATC installed on Frythe Way.

Table 8.2: Frythe Way – Weekday Traffic Flows

| Period | Existing Traffic Flows | Development Traffic Flows (70 dwellings) | Future Traffic Flows |
|----------------|------------------------|---|----------------------|
| | Two-Way | Two-Way | Two-Way |
| 0700-0800 | 205 | 26 | 231 |
| 0800-0900 | 194 | 41 | 235 |
| 0900-1000 | 159 | 25 | 184 |
| 1600-1700 | 254 | 32 | 286 |
| 1700-1800 | 221 | 32 | 253 |
| 1800-1900 | 140 | 26 | 166 |
| 24-Hour | 2,390 | 379 | 2,769 |

Source: Traffic Survey / Consultant's Estimates

Note: * = TRICS data is only available for a 12-hour period between 0700-1900 and therefore the forecast development traffic generation has been multiplied by 1.15 (i.e. the observed ratio between 24-hour and 12-hour flows on Frythe Way)

- 8.1.7 Even when allowing for the traffic generated by the proposed development, the busiest hourly two-way flows along Frythe Way will be less than 300 two-way vehicles/hour, equating to less than five vehicle movements every minute. The forecast flow for the majority of the weekday off-peak period is around 180 movements per hour – this equates to three vehicle movements every minute.
- 8.1.8 It is clear the volumes of traffic flow on Frythe Way following development will remain low in traffic terms and well within the theoretical capacity of the road and will be comparable, or less than, those found elsewhere in many residential areas throughout Tunbridge Wells District and the rest of Kent.

8.2 Distribution / Assignment

- 8.2.1 In order to assign the development generated traffic to the local highway network, an initial assessment has been undertaken on the basis of Census data only. The 2011 Census Journey to Work data for the Tunbridge Wells middle layer super output area (MSOA) ref: 013 (E02005174) has been used as it is directly comparable to the development in terms of location. This area encompasses all of Cranbrook, as well as Sissinghurst, and has been used to derive the likely workplace destinations for future residents of the site and so to provide an initial estimate of travel patterns.
- 8.2.2 To determine the routing of trips to these destinations, trips have been assigned to the road network based on the quickest route from the site to the destination location using the Google Maps 'Directions' Facility. Within the Directions facility, a start time for journeys of 08:00 was utilised to reflect peak period traffic conditions.
- 8.2.3 A summary of the likely distribution of development generated trips (by car driver only) is presented in Table 8.3 overleaf.

Table 8.3: Distribution of Development Generated Trips (Car Driver Only)

| Destination | % of Employment Trips | Principal Route |
|---------------------------------|-----------------------|------------------------------------|
| Cranbrook | 20.5% | High Street |
| Maidstone | 15.8% | Waterloo Road |
| Hawkhurst / Beneden / Sandhurst | 10.6% | High Street / Bakers Cross (South) |
| Tunbridge Wells | 8.8% | Waterloo Road |
| Tunbridge Wells Borough (Other) | 8.6% | Waterloo Road |
| Tonbridge | 6.5% | Waterloo Road |
| East Sussex | 6.3% | Bakers Cross (South) |
| Ashford | 6.1% | Waterloo Road |
| London | 4.7% | Waterloo Road |
| Sevenoaks | 2.5% | Waterloo Road |
| Other | 9.6% | Various |
| Total | 100.0% | - |

Source: Consultant's Estimates

8.3 Off-Site Traffic Impact

- 8.3.1 On the basis of the above analysis, the broad two-way potential traffic flow increases in the weekday morning and evening peak hour periods along the main highway corridors are presented in Table 8.4.

Table 8.4: Development Proposal – Likely Two-Way Traffic Flow Increases: Peak Hour Periods

| Link | Morning and Evening Peak Hour | |
|-------------------------------------|-------------------------------|----------------------------|
| | Two-Way Traffic Increases | Vehicle Increase (approx.) |
| The Hill (North) | +35 | 1 per 1 ¾ minutes |
| Waterloo Road | +25 | 1 per 2 ½ minutes |
| High Street | +10 | 1 per 6 minutes |
| Bakers Cross (South) | +8 | 1 per 7 ½ minutes |
| A268 / A229 Junction (Hawkhurst) | +5 | 1 per 12 minutes |

Source: Consultant's Estimates

- 8.3.2 Table 7.3 demonstrates the development of the site for 70 dwellings is likely to result in an additional vehicle movement approximately every two minutes in the weekday peak hour periods on The Hill (North) towards Cranbrook town centre. Flow increases outside of the peak periods will be lower.
- 8.3.3 The predicted increase on Waterloo Road is also forecast to be approximately one additional vehicle every two minutes during the weekday peak hour periods (vehicles travelling northbound towards the A229 and A262 will use Waterloo Road rather than the High Street). The forecast increase on the High Street is predicted to be one additional vehicle every 7 ½ minutes in the peak hour periods.
- 8.3.4 The forecast increase at the A268 / A229 Junction in Hawkhurst, located approximately 5km to the south-west of the site, is predicted to be one additional vehicle every 12 minutes in the weekday peak hour periods.
- 8.3.5 Overall, these low levels of flows increase are unlikely to be noticeable and will not have a material or adverse impact on the operation or safety of the existing local highway network.
- 8.3.6 The developer is willing to make a proportionate and reasonable financial contribution towards the improvement schemes in the local area identified in the Tunbridge Wells Borough Development Plan Transport Strategy 2015 – 2026 in order to cost effectively limit the significant impacts of the development.

8.4 The Hill / Bakers Cross / Frythe Way Junction Operation Assessment

- 8.4.1 A more detailed assessment of the impact of the proposed development on the performance of the The Hill / Bakers Cross / Frythe Way priority junction has been undertaken using the TRL program Junctions 10. A classified turning count were undertaken at the junction on Wednesday 12 October 2022:

- 8.4.2 An assessment of the impact of the proposed development at the junction has been undertaken for the assumed year of opening, i.e. 2027, when the development could be expected to first become available for occupation.
- 8.4.3 As such, in the first instance the assessment needs to establish 2027 local highway network conditions (without the proposed development), taking into account appropriate background traffic growth.
- 8.4.4 In order to establish appropriate future baselines flows, factors to allow for background traffic growth from 2022 (the date traffic surveys were undertaken) to 2027 have been derived from the National Transport Model (NTM) with adjustments made for local factors derived from the TEMPRO database. It is appropriate to use data relating to Tunbridge Wells middle layer super output area (MSOA) ref: 013 (E02005174) for 'minor roads' using the NTM v7.2 dataset. The growth factors are summarised in Table 8.5.

Table 8.5: Traffic Growth Factors

| Growth Period | Morning Peak | Evening Peak |
|---------------|--------------|--------------|
| 2022-2027 | 1.0327 | 1.0352 |

Source: TEMPRO

- 8.4.5 The TRL program Junctions 10 has been used to assess the capacity of the junction. The results of the operational assessment for the 2022 observed flows and the 2027 with and without development scenarios is presented in Table 8.6. Full Junctions 10 outputs are included in Appendix I.

Table 8.6: Operational Assessment for The Hill / Bakers Cross / Frythe Way Junction

| | Morning Peak Hour | | | Evening Peak Hour | | |
|------------------------------|-------------------|-------|-----------|-------------------|-------|-----------|
| | RFC | Queue | Delay (s) | RFC | Queue | Delay (s) |
| 2022 Observed | | | | | | |
| Bakers Cross (South) | - | - | - | - | - | - |
| Frythe Way | 0.31 | 1 | 12 | 0.20 | <1 | 10 |
| The Hill (North) | 0.16 | <1 | 6 | 0.29 | 1 | 7 |
| 2027 Base | | | | | | |
| Bakers Cross (South) | - | - | - | - | - | - |
| Frythe Way | 0.33 | 1 | 13 | 0.21 | <1 | 10 |
| The Hill (North) | 0.17 | <1 | 6 | 0.31 | 1 | 7 |
| 2027 plus Development | | | | | | |
| Bakers Cross (South) | - | - | - | - | - | - |
| Frythe Way | 0.40 | 1 | 14 | 0.24 | <1 | 11 |
| The Hill (North) | 0.19 | <1 | 6 | 0.36 | 1 | 8 |

Source: Junctions 10

8.4.6 The results demonstrate that the existing The Hill / Bakers Cross / Frythe Way junction is currently operating well within capacity at present with minimal queuing and delay and the additional development generated traffic will have no material impact upon the operation of the junction in terms of queue lengths or delays and will continue with ample spare capacity.

8.4.7 Against this background, there is no justification in highway capacity terms why additional development could not use Frythe Way as their access route.

SECTION 9 Conclusion

9.1.1 Taylor Wimpey propose a potential residential development comprising approximately 70 dwellings on Land at Frythe Way, located approximately 500m to the south of Cranbrook town centre.

9.1.2 This transport appraisal sets out a detailed analysis of the likely transport impacts of the proposed development to demonstrate there are no highway reasons why the site should not be allocated in the emerging Tunbridge Wells Borough Council Local Plan.

9.1.3 In light of the three key transport tests set out in paragraph 110 of the National Planning Policy Framework, the main conclusions of this transport appraisal are that:

- The site is located closer to the majority of the local facilities and services located within Cranbrook in comparison to the other SHELAA sites with a wide range of key local destinations, including all of Cranbrook Town Centre located within a comfortable walking and cycling distance of the site. Therefore, future residents of the site will have genuine and realistic opportunities to travel by sustainable modes of transport;
- The proposed development can assist in bringing forward a number of off-site infrastructure improvements to the pedestrian routes between the site and Cranbrook town centre and other key local destinations in accordance with the objectives set out in the emerging policies in the Cranbrook & Sissinghurst Parish Council Neighbourhood Development Plan. In addition, in order to maximise the take up of sustainable modes of transport, Taylor Wimpey is willing on a without prejudice basis to agree in principle to a financial contribution of £70,000 (£1,000 x 70 dwellings) towards enhanced bus services in Cranbrook. A robust Travel Plan for the site will also be implemented.
- The proposed site access arrangements provide safe and suitable access for all people in full accordance with the guidance in MfS. The proposed access has been subject to a Stage 1 Road Safety Audit which raises no safety issues with the scheme;

- The presence of on-street parking on Frythe Way between the junction with The Hill / Bakers Cross and the proposed site access does not adversely impact on its ability to accommodate the likely vehicle movements generated by the development in a safe and appropriate manner;
- The Stage 1 Road Safety Audit raises no overriding safety issues with the use of Frythe Way to serve the proposed development subject to refreshing the existing double-yellow markings in the vicinity of The Hill / Bakers Cross / Frythe Way junction and exploring the potential of extending the parking restrictions through the Traffic Regulation Order (TRO) process;
- The additional traffic generated by the development will result in modest increases on the key highway corridors in the vicinity of the site and is unlikely to have a significant effect on the operation and safety of the local highway network; and
- It has been demonstrated The Hill / Bakers Cross / Frythe Way junction will continue to operate well within capacity as a result of the additional development traffic with minimal queuing and delay.

9.1.4 Against this background, it has been demonstrated the forecast additional traffic on Frythe Way would not have any materially harmful consequences, either in terms of highway capacity or safety or in terms of residential amenity, and therefore there are no highways reasons why the proposed development should not be allocated in the emerging Tunbridge Wells Local Plan or the Neighbourhood Plan for Cranbrook & Sissinghurst.

FIGURES

DRAWINGS

APPENDIX A. RESPONSE FROM KENT COUNTY COUNCIL

[REDACTED]

From: [REDACTED]
Sent: 12 October 2020 14:31
To: [REDACTED]
Cc: [REDACTED]
Subject: Frythe Way Cranbrook
Attachments: Business case for new bus services V2.pdf

Dear Ben and Tom

Firstly, apologies that this pre-app response is not on headed KCC paper: the software is faulty today but I wanted to get this response to you urgently in line with your request.

Further to our discussions on 8th October and your subsequent revision of the Scoping Note received on the same date, I would like to make the following comments regarding the proposed allocation of this site for future development, and/or subsequent formal planning application.

Proposal

The proposal is for up to 70 dwellings, accessed by demolition of the houses at the end of Frythe Way to enable the road to continue into the development site.

Pedestrian and Cyclist links

- PROW – We discussed improvements to WC110 and the possible diversion of WC149. Please contact the PROW team at your earliest convenience to discuss options: [REDACTED] It may be that the improvements required to allow residents of the proposed development to access the town centre and facilities by these paths will need to be funded by the applicant.
- There is potential for a secondary access for peds/cyds onto Freight Lane. This is a restricted byway with no motor vehicles allowed, and would provide a useful link for residents heading north through the PROW network into the town centre.
- The site would link to the footway network on Frythe Way giving an alternative route into the town.

Public transport

- Good connections for peds to bus stops.
- Should this application be successful, a business case for improvement to the public transport services serving Cranbrook has been drawn up by KCC, and endorsed by TBWC (document attached). This approach has been employed at other sites in Hawkhurst and Cranbrook in order to encourage modal shift from private car use to public transport use, thereby lessening the impact of new developments on congested parts of the local highway network. Developers are asked to make a contribution of £1,000 per dwelling, and applications should be supported by a residential travel plan. The issues of Hawkhurst signalised junction was discussed, and the live appeal/Judicial Review currently ongoing to assess impact here. I will keep you updated on the result of these, and what the implications may be – if any - for your proposal.

Proposed vehicular access

- The proposed access road (a continuation of Frythe Way) will be 5m wide with a 2m wide footway on both sides. Vehicles swept paths and visibility splays have been provided to show this to be an acceptable proposal. An RSA stage 1 has been provided which raises some minor concerns that can be addressed. Some adaptations will be required to service the existing dwellings at the end of Frythe Way following re-alignment to provide access to the site.
- A parking bay is proposed adjacent to the access.
- The existing section of Frythe Way currently serves approximately 480 dwellings on multiple cul-de-sacs. Whilst this is higher than guidance recommends, I am unaware of any issues that have arisen from this arrangement. Depending on the input of the Emergency Services (who will be consulted should a planning application be submitted) Frythe Way is considered to be a suitable approach road for this development.

- A parking beat survey supports the scoping note, and shows expected levels of on-street parking for a residential road of this character and width. It is accepted that parking can assist in slowing vehicle speeds on this road, and there appears to be an established pattern of drivers giving way at gaps between parked vehicles. Crash records show only one 'slight' crash on Frythe Way (April 2015 – outside the normal 5 year requirement). An RSA1 has been undertaken which raised some issues which can be addressed as part of the planning application. One issue of note is the opportunity to extend parking restrictions at the eastern end, which should be investigated. Please note that prior to formal submission of a planning application a speed survey should be undertaken on The Hill at this junction to allow accurate visibility splay calculations to be made (in line with document CA185). The RSA1 should then be repeated.

Impact of proposed trips on existing junctions

- Trip generation and distribution assumptions in the Scoping Note are acceptable.
- Based on these assumptions, the proposal development is likely to generate a maximum of 41 two-way movements during both the weekday peak hours. Of these, it is estimated that approximately 80% will travel northwest via The Hill to the town, and 20% will travel east on Bakers Cross.
- Section 6.1.17-6.1.20 of the Scoping Note looks at the impact of the additional traffic on capacity of The Hill/Bakers Cross. This is based on assumptions re traffic flows owing to the current situation. This section should be revised based on traffic surveys prior to submission of a planning application. The junction of The Hill/Waterloo Road is not referred to in the Scoping Note. It may be that following a traffic survey of The Hill, a capacity assessment of this junction is required.

Internal Layout

- No indication of internal layout has been provided for assessment at this stage. As the proposal progresses it is recommended that early contact is made with the KCC Agreements Team to discuss requirements/adoption etc. The KCC Drainage Team should also be consulted early on in the design process.
- The applicant has indicated that all parking required by the residents of the proposed dwellings will be self-contained within the site. Parking should be in line with the Kent Design Guide: Interim Guidance Note 3 (IGN3) residential parking standards for a 'Suburban Edge/Village/Rural' location. Cycle parking should be in line with the Kent and Medway Structure Plan: Supplementary Planning Guidance 4 (SPG4) standards.

TA layout

This is acceptable thank you, subject to the above comments. Please note 85th percentile speeds and subsequent visibility splays should be calculated with reference to document CA185.

Summary

This site has the potential to deliver up to 70 homes with good pedestrian access to local key facilities and limited impact on the local road network.

Please note that this advice is given to assist but is without prejudice to the formal views of the highway authority at formal application stage.

[REDACTED]

[REDACTED]

APPENDIX B. SUSTAINABILITY APPRAISAL



Technical Note

Project No: ITB13706
Project Title: Frythe Way, Cranbrook (SHLAA Site Reference: 25)
Title: Transport Sustainability Appraisal
Ref: BT/IN/ITB13706-003C
Date: 27 October 2022

SECTION 1 Introduction

1.1 Tunbridge Wells Borough Council (TWBC) are currently in the process of preparing a new Local Plan, which will form the basis for determining the suitability of development proposals across the borough to 2038. Following Examination of the Local Plan, it is expected that the Plan will be adopted by TWBC in January 2023.

1.2 i-Transport LLP has been appointed by Taylor Wimpey to provide transport and highways advice in relation to the promotion of land at Frythe Way, Cranbrook (SHLAA Site Reference: 25). The site adjoins the existing residential area served from Frythe Way and is located approximately 700m to the south of Cranbrook town centre. Freight Lane forms the northern boundary of the site. The Strategic Housing and Economic Land Availability Assessment (SHELAA) identifies site 25 as having a potential yield of 85 dwellings, however, considers it unsuitable for development for the following reasons:

“There is a landscape concern arising from an allocation of this site as well as concern about ability to provide an appropriate means of vehicular access to the site, which is likely to require access through adjacent site.”

1.3 Consequently, the site has not been allocated in the Draft Local Plan.

1.4 However, this is not in line the findings of an Access Appraisal which was prepared for the site (report reference: BT/ITB13706-002 TN) which demonstrates that safe and suitable access can be achieved. Nor is this in line with findings of independent landscape assessments undertaken by CSa Environmental on Taylor Wimpey’s behalf (to be submitted under separate cover).

1.5 In line with Appendix 6 of the Draft Local Plan, comments on a site omission should make reference to the Sustainability Appraisal and relevant SHLAA site assessment sheets. A review of these documents has been undertaken, which has highlighted that the score for the 'travel' sustainability objective for this site does not appear to reflect the sustainable transport opportunities from the site and also appears inconsistent when compared with other proposed allocations in Cranbrook.

1.6 The 'travel' sustainability objective states:

"improve travel choice and reduce the need to travel by private vehicle"

1.7 This is broadly in line with the key transport test set out in the National Planning Policy Framework (NPPF) relating to sustainability, which states:

"appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location" (ref: NPPF paragraph 108)

1.8 Consequently, this report provides a review of the comparative assessment of development sites undertaken as part of the Sustainability Appraisal and provides a more detailed assessment of the sustainability of the site in transport terms. The comparison sites considered within this report are set out below and shown illustratively in **Figure 1**:

- SHLAA 430 / CRS4;
- SHLAA 32 / CRS7; and
- SHLAA 59, 70, 323, 343, 53 / CRS6.

SECTION 2 Draft Local Plan Sustainability Assessment

2.1 Assessment Criteria

2.1.1 A review of the assessment criteria for the 'travel' sustainability objective (objective 17) has been reviewed. An extract of Appendix A from the Sustainability Appraisal is provided in **Table 2.1**, which sets out the decision aiding questions and scoring criteria for the objective:

Table 2.1: Extract of Sustainability Appraisal Appendix A

| Objective | Decision Aiding Question | Weighting | Comments / Limitations |
|--|--|--|--|
| 17. Improve travel choice and reduce the need to travel by private vehicle | support priority transport projects? | | Project identified in the borough's transport and cycling strategies. |
| | prioritise easy access to train stations within and outside the borough? | | 3-5 miles or limited public transport: - 5-10 miles or very limited public transport: - - >10 miles or no public transport --- Positive scores reflect accessibility by various modes of transport for stations within 3 miles. Where a train station can be accessed conveniently and safely on foot a + + + score is applied. |
| | improve rural bus services and retain viability of urban bus services? | LOW Bus users are generally low in borough | Consideration of whether a bus service would be improved or worsened by policy. |
| | support opportunities for active travel including cycling and walking?" | | Desirable travel distances* were considered. Where a site was within desirable walking distance, the following guide was implemented for residential dwellings: <50 dwellings: + >50, <150 dwellings: + + >150 dwellings: + + + Where a site was not well located or outside of desirable walking distance, the following guide was implemented for residential dwellings: <1km - (<50 dwellings), - - (>50 dwellings) >1km - - (<50 dwellings), - - - (>50 dwellings) |

Source: Sustainability Appraisal of the Draft Local Plan

Note: * The appraisal uses CIHT guidance to define desirable walking distances as follows: town centre = 200m, commuting/school = 2000m, elsewhere = 1200m.

2.1.2 The scoring methodology for each objective is based on an eight-point scale of impact, as shown in **Table 2.2**, and is used to determine how well a site contributes to each of the sustainability objectives.

Table 2.2: Sustainability Appraisal Scoring Scale

| Unknown or Mixed | Very Negative | Negative | Slightly Negative | Neutral | Slightly Positive | Positive | Very Positive |
|------------------|---------------|----------|-------------------|---------|-------------------|----------|---------------|
| ? | --- | -- | - | 0 | + | ++ | +++ |

Source: Tunbridge Wells Borough Local Plan Sustainability Appraisal of the Draft Local Plan

- 2.1.3 The travel objective scores for each of the sites considered in this report are summarised in **Table 2.3** below:

Table 2.3: Summary of Travel Sustainability Scores

| | SHELAA 25 | SHELAA 430 / CRS 4 | SHELAA 32 / CRS7 | SHELAA 59, 70, 323, 343, 53 / CRS6 |
|--------------|-----------|--------------------|------------------|------------------------------------|
| Travel Score | 0 / - | 0 / - | 0 / - | - / -- |

Source: Tunbridge Wells Borough Local Plan Sustainability Appraisal of the Draft Local Plan

- 2.1.4 It can be seen that all of the sites considered within this report are considered to have a slightly negative impact, with the exception of 'SHELAA 59, 70, 323, 343, 53 / CRS6' which is deemed to have a negative impact. The assessment for how the score has been derived for each site is not provided within the Sustainability Appraisal. However, it is not agreed that SHLAA Site 25 will have a 'slightly negative' impact. This is outlined in more detail in the following sections of this report.

SECTION 3 Sustainability Appraisal Criteria

3.1 Introduction

3.1.1 This section of the report provides a review of the criteria used for the 'travel' sustainability objective in the Sustainability Appraisal and assesses whether these are appropriate.

3.2 Walking and Cycling Catchments

3.2.1 The sustainability appraisal uses the following decision aiding question to help score a site on the travel objective:

"Does the plan support opportunities for active travel including cycling and walking?"

3.2.2 Scores for this question are based on walking distances set out in the CIHT Guidelines for Providing for Journeys on Foot (2000). The suggested acceptable walking distances, for pedestrians without a mobility impairment for some common facilities is set out below in **Table 3.1**.

Table 3.1: CIHT Suggested Acceptable Walking Distance

| | Town Centre (m) | Commuting / School (m) | Elsewhere (m) |
|-------------------|-----------------|------------------------|---------------|
| Desirable | 200 | 500 | 400 |
| Acceptable | 400 | 1,000 | 800 |
| Preferred Maximum | 800 | 2,000 | 1,200 |

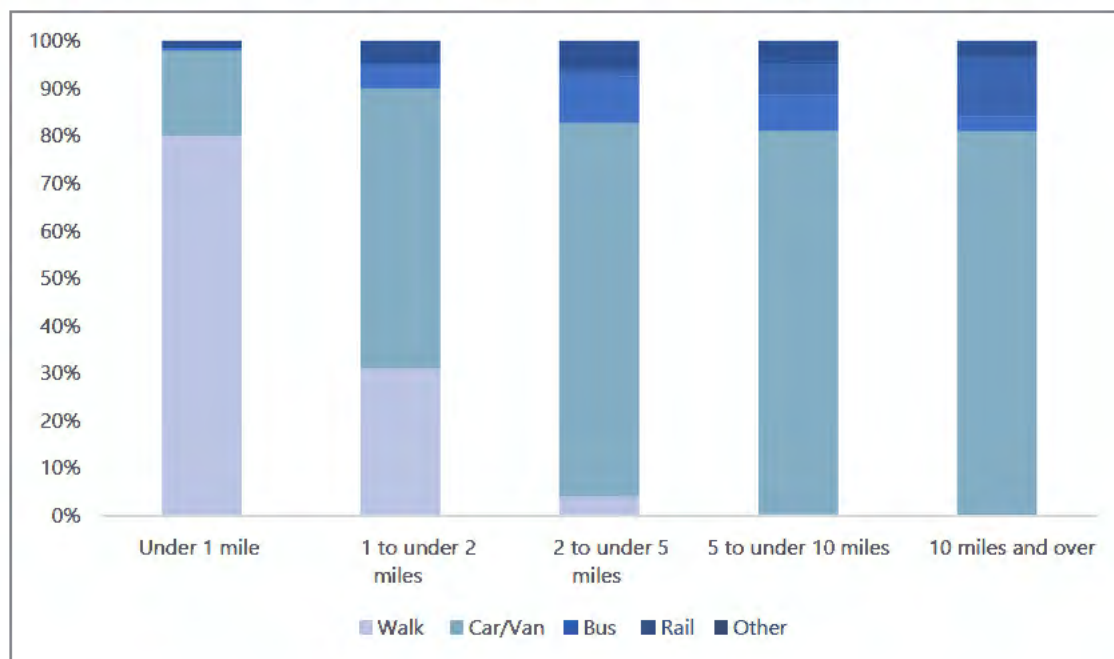
Source: Table 3.2: Suggested Acceptable Walking Distance, CIHT Guidelines for Providing for Journeys on Foot (2000)

3.2.3 It is noted in the assessment undertaken in the Sustainability Appraisal that the 'desirable' distance is used in the assessment for access to town centres (200m) whereas the 'preferred maximum' distances are used for commuting / school and trips elsewhere. As such, the assessment uses an inconsistent approach. If the 'preferred maximum' distance was used for the town centre (i.e. 800m), which still represents a short 10m-minutes walking time in practice and would provide a consistent approach to the assessment, then SHLAA Site 25 would fall within this threshold and as such would score positively (++) for a development of between 50-150 dwellings. Indeed, as set out in Table 4.2, SHLAA Site 25 is located closer to the town centre, which contains the significant majority of services and facilities within Cranbrook, than sites SHELAA 430 / CRS4 and SHELAA 32 / CRS7.

3.2.4 Nevertheless, it is important to note that the distances outlined above are not absolute maximum distances; they are arbitrary figures rather than based on evidence on how far people are prepared to walk.

3.2.5 This is corroborated by the National Travel Survey (NTS) 2019 which identifies the mode share journeys of different lengths (**Image 6.1**):

Image 6.1: Mode Share of Trips by Main Mode for Different Trip Lengths: England



Source: National Travel Survey: England 2019

3.2.6 The vast majority (80%) of trips are undertaken on foot for journeys up to one mile, whilst walking accounts for some 31% of all trips between 1 and under 2 miles (circa 1.6km – 3.2km). Walking trips fall away beyond 2 miles, with journeys of between 2 and 4 miles equating to approximately 4% of all trips.

3.2.7 The one-mile (1.6km) distance is reflected in the Chartered Institution of Highways and Transportation (CIHT) guidance 'Planning for Walking' (2015) which states:

"Across Britain, approximately 80% of journeys shorter than 1 mile are made wholly on foot – something that has changed little in 30 years. The main reason for the decline in walking is the fall in the total number of journeys shorter than 1 mile, which has halved in thirty years. It is not that people are less likely to make short journeys on foot but rather that fewer of the journeys they make can be accomplished on foot. If destinations are within walking distance, people are more likely to walk if walking is safe and comfortable and the environment is attractive."

3.2.8 Therefore, facilities and services within one mile (1.6km) will provide the greatest opportunity for trips to be made by walking.

3.2.9 The Sustainability Appraisal does not provide any scoring assessment for sites being located within cycling distances of local facilities and services and thus suggests that 2,000m is the maximum a site can be located from everyday facilities and services.

3.2.10 The Department for Transport's Cycling and Walking Investment Strategy (2017) states at paragraph 1.16 that:

"... there is significant potential for change in travel behaviour. Two out of every three personal trips are within five miles - an achievable distance to cycle for most people, with many shorter journeys also suitable for walking. For school children, the opportunities are even greater. Three quarters of children live within a 15-minute cycle ride of a secondary school, while more than 90% live within a 15-minute walk or bus journey from a primary school."

3.2.11 The DfT's Gear Change A bold vision for cycling and walking states (page 11) that:

In particular, there are many shorter journeys that could be shifted from cars, to walking, or cycling. We want to see a future where half of all journeys in towns and cities are cycled or walked. 58% of car journeys in 2018 were under 5 miles. And in urban areas, more than 40% of journeys were under 2 miles in 2017-18. For many people, these journeys are perfectly suited to cycling and walking.

3.2.12 The National Travel Survey 2018 (NTS0306) sets out that the average journey distance by bike is some 5.4km, with the current average length of an employment trips some 5.7km (ref: Table NTS0306 of the National Travel Survey 2018). A cycling distance of up to around 5km (3 miles) therefore offers the greatest potential to replace cars trips and is therefore a "reasonable" cycling distance although a number of cycle journeys may be longer at 8km (5 miles). Cycling also frequently forms part of a longer journey in combination with public transport.

Summary

3.2.13 On this basis, the following represent reasonable walking/cycling distances which should be considered within any sustainability appraisal:

- Up to **800m** – A comfortable walking distance;
- Up to **2,000m** – A reasonable walking distance i.e. the distance that "offers the greatest potential to replace short car trips", and where most trips are undertaken on foot;
- Up to **3,200m** – A maximum regular walking distance i.e. the distance within which a significant proportion (circa one-third) of journeys will be on foot;

- Up to **5km** – A reasonable cycling distance, i.e. the distance that offers the greatest potential to replace short car trips; and
- **8km** is a maximum cycling distance for most (non-leisure cycling) journeys.

3.3 Access to Public Transport

3.3.1 The sustainability appraisal also uses the following decision aiding question to help score a site on the travel objective:

“Does the plan prioritise easy access to train stations within and outside the borough?”

3.3.2 Scores for this question are based on the distance to/from a railway station, as set out in **Table 2.1**.

3.3.3 The appraisal gives little consideration to access to bus services, as it is stated that there are typically low levels of bus use within the borough. However, this prevents sites which have good access to bus services and offer a genuine opportunity for future residents to travel by an alternative means of transport other than the private car from contributing towards the objective.

3.3.4 Therefore, sites which have good access to frequent bus services should be considered within the sustainability appraisal. This is in line with draft Policy EN2 ‘Sustainable Design and Construction’, which states:

“1. Prioritise development in locations with frequent and easily accessible public transport services that provide useful links to key facilities such as GP surgeries, train stations, shopping areas, and schools. Where necessary, enhanced public transport services should be provided through contributions”.

SECTION 4 Revised Sustainability Appraisal of Cranbrook Sites

4.1 Introduction

- 4.1.1 Based on the information set out in Section 3 of this Note, a revised sustainability assessment has been undertaken for SHLAA Site 25. A comparison with other development sites in Cranbrook included in the Draft Local Plan has also been undertaken to demonstrate that the proposed site is comparable to, or more sustainable, in transport terms than these sites.

4.2 Journey Purpose

- 4.2.1 In considering accessibility and promoting sustainable travel it is important to consider the reason why future residents of the proposed development will make journeys. The Department for Transport's (DfT) National Travel Survey identifies the proportion of all trips by purpose as set out in **Table 4.1**.

Table 4.1: Proportion of Trips per Year by Journey Purpose

| Journey Purpose | Proportion of Trips |
|-----------------------------|---------------------|
| Leisure | 26% |
| Shopping | 19% |
| Commuting/Business | 18% |
| Education/Escort Education | 13% |
| Personal Business | 9% |
| Other Escort | 9% |
| Other (Including Just Walk) | 6% |

Source: Table NTS0409 of Transport Statistics, Great Britain – 2019 Edition

- 4.2.2 From **Table 4.1** It is evident that travel demand is well spread between a number of journey purposes including leisure, shopping, commuting / business and education / escort education trips which account for around three quarters of all journeys.

4.3 Local Facilities

4.3.1 Cranbrook is identified as a 'small rural town' within Tunbridge Wells Borough Council's Settlement Role and Function Study, February 2017, which forms part of the Tunbridge Wells Borough Core Strategy Study. This is second highest category in the settlement hierarchy across the Borough. The document states Cranbrook:

"...benefits from a range of convenience and comparison shopping facilities, secondary and primary schools, a sports centre and other good recreational facilities (ref. paragraph 3.5)"

4.3.2 The local facilities and services located within Cranbrook and the distances to/from these from SHLAA Site 25 and the other sites identified in the SHLAA is set out in **Table 4.2**.

Table 4.2: Local Facilities




| | Destination | Walking / Cycling Distance (m) | | | |
|---|-----------------------------------|---------------------------------------|-------------------|-------------------|-------------------------------------|
| | | Proposed Development Site (SHLAA #25) | CRS4 / SHLAA #430 | CRS 7 / SHLAA #32 | CRS 6 / SHLAA #59, 70, 323, 343, 53 |
| Education (13% of trips) | Cranbrook School | 850 | 1,800 | 1,125 | 2,800 |
| | Cranbrook CoE Primary School* | 1,100 | 1,900 | 1,475 | 2,900 |
| | The High Weald Academy* | 1,300 | 1,400 | 1,975 | 2,400 |
| Leisure (26% of trips) | Cranbrook Town Centre | 700 | 1,500 | 1,125 | 2,500 |
| | Cranbrook Union Windmill | 700 | 1,800 | 825 | 2,900 |
| | Crane Valley Local Nature Reserve | 850 | 1,500 | 1,375 | 2,500 |
| | Cranbrook Museum | 850 | 1,600 | 1,275 | 2,700 |
| | Cranbrook Library | 900 | 1,700 | 1,275 | 2,700 |
| | The Weald Sports Centre | 1,400 | 1,600 | 1,975 | 2,600 |
| | Cranbrook Rugby Club | 1,800 | 2,000 | 2,075 | 3,000 |
| | Angley Park | 1,900 | 2,100 | 2,275 | 3,100 |
| | White Horse Pub and Restaurant* | 800 | 1,500 | 1,125 | 2,600 |
| | George Hotel Bar and Restaurant* | 800 | 1,500 | 1,075 | 2,600 |
| Retail / Shopping (19% of trips) | Co-op Food* | 650 | 1,400 | 1,375 | 2,400 |
| | Cranbrook Post Office* | 700 | 1,400 | 1,175 | 2,500 |
| | Co-op Food (High Street)* | 700 | 1,400 | 1,175 | 2,500 |

| | Destination | Walking / Cycling Distance (m) | | | |
|---|----------------------------------|---------------------------------------|--------------------|--------------------|-------------------------------------|
| | | Proposed Development Site (SHLAA #25) | CRS4 / SHLAA #430 | CRS 7 / SHLAA #32 | CRS 6 / SHLAA #59, 70, 323, 343, 53 |
| Employment / Business (18% of trips) | Cranbrook Town Centre | 700 | 1,500 | 1,125 | 2,500 |
| Health / Personal Business (9% of trips) | Bupa Dental Centre | 650 | 1,600 | 1,025 | 2,700 |
| | Lloyds Pharmacy | 700 | 1,500 | 1,175 | 2,500 |
| | Crane Dental Surgery* | 750 | 1,300 | 1,275 | 2,400 |
| | Tanyard and Golding Dental Group | 800 | 1,300 | 1,375 | 2,300 |
| | Orchard End Surgery* | 1,000 | 2,400 | 875 | 3,400 |
| Transport | The Old School Surgery* | 1,000 | 1,800 | 1,375 | 2,800 |
| | Bus Stops* | 750 | 470 | 625 | 400 |
| | Staplehurst Railway Station* | 10,200 (6.3 miles) | 10,400 (6.4 miles) | 10,100 (6.3 miles) | 11,500 (7.2 miles) |

Source: Consultant's Estimates

Note: Distances measured from the proposed site access

Key:

| | |
|---|---|
|  | Within 1600m walking distance catchment |
|  | Within 2000m walking distance catchment |
|  | Within 3200m walking distance catchment |

4.3.3 Table 4.2 demonstrates that the proposed site (SHLAA 25) is located closer to the majority of the local facilities and services located within Cranbrook in comparison to the other SHLAA sites and a wide range of journey purposes can be satisfied within a reasonable walking distance and well within a comfortable cycling distance from the centre of the site. This demonstrates that in accordance with the objective set out in TWBC's Sustainability Appraisal, site SHLAA 25 provides the best opportunity to improve travel choice and to reduce the need to travel by private vehicle in Cranbrook.

4.3.4 It is also of note that the proposed site also offers attractive walking routes to the local facilities. The primary desire lines for pedestrians and cyclists from the site will be to the north towards Cranbrook Town Centre via Frythe Walk/Bramley Drive/St Dunstons Walk/Brookside and public footpath no. WC110. This route consists of quiet residential roads that are street lit and subject to low vehicle speeds. Continuous footways extend the full length of the route on both sides of the carriageway, typically 1.8m in width. Footpath WC110 runs parallel to the west of Brookside and is an unsurfaced route approximately 1.2m – 1.5m wide, tying into the existing footway provision to the north and south, and provides an alternative route towards the town centre. To the north of Brookside, public footpath

no. WC110 forms a lit route that is generally 1.5m – 1.8m wide and provides an attractive off-road link across The Crane brook to the High Street via Crane Lane. The town centre itself is subject to a 20mph speed limit.

4.3.5 Future residents of the sites located to the south west of Cranbrook (SHELAA 430 / CRS4 and SHELAA sites 59, 70, 323, 343, 53/ CRS 6), would access the services and facilities via the existing pedestrian provision on the A229 which has an annual average daily flow of circa 10,000 vehicles¹ and is subject to a 40mph speed limit. For much of the route there is only a footway along the southern side of the carriageway and street lighting is intermittent.

4.3.6 Future residents of the site SHELAA 32 / CRS7, would access the services and facilities via Golford Road / Bakers Cross / The Hill and Stone Street. Golford Road is subject to the national speed limit in the vicinity of the site, which reduces to 30mph on approach to the edge of Cranbrook. For much of the route there is only a footway along the southern side of the carriageway (on the opposite side to the site frontage) however street lighting is provided.

4.3.7 As such site SHELAA 25 provides high quality, attractive pedestrian routes that will encourage future residents to travel to and from by sustainable modes more so than the other SHELAA sites in Cranbrook.

4.4 Provision for Public Transport

Bus

4.4.1 The closest bus stops are located on Bakers Cross some 580m – 630m from the eastern boundary of the site. These stops are therefore located within the 85th percentile walking distance to bus stops on the basis of data contained within the National Travel Survey. The principal bus service operating from these stops is the no. 297 which provides a two-hourly service between Tenterden and Tunbridge Wells. This also provides a direct link to Tunbridge Well railway station.

4.4.2 Additional bus stops are located on the High Street approximately 750m north of the site, a short distance from public footpath no. WC110. The principal bus service operating from these stops is the no. 5 which provides an hourly service between Maidstone and Sandhurst. Staplehurst railway station is also directly accessible via this bus service with a journey time of approximately 20-minutes therefore providing an opportunity for linked journeys to destinations such as London and Ashford. The site is

¹ Department for Transport Manual Count 2018 Site number: 46831

one of the best located to provide access to the existing bus services in Cranbrook when considered against the other SHELAA sites.

4.4.3 Although part of the site is outside of the generally preferred maximum walking distance to a bus stop, regard should be had to the particular transport characteristics of the area. As set out in the NPPF, the potential to take up the opportunities for sustainable travel need to allow for the specific characteristics of the site – a ‘one size fits all’ approach is not advocated.

4.4.4 Recent appeal decisions make it clear that a walking distance of 400m is not a ‘cut off’ beyond which people no longer use public transport. Paragraph 5.18 of the CIHT document ‘Planning for Public Transport in Developments’ also states:

“... These standards [the recommended 400m walk distance from local bus stops] should be treated as guidance to be achieved where possible by services that operate at regular frequencies and along direct routes. It is more important to provide services that [are] easy for passengers to understand and attractive to use than to achieve slavish adherence to some arbitrary criteria for walking distance. Residential areas in particular need sensible routes that do not spoil the quality of the place.”

4.4.5 This approach is endorsed by Stagecoach in their document ‘Bus Services & New Residential Developments: General Highways and Urban Design advice to applicants and Highways Authorities’, 2017. Paragraph 2.1 states:

“Stagecoach will always prefer an efficient bus routing strategy, serving the great majority of dwellings well, than one that serves all homes poorly with a low-frequency or indirect service. Thus we support policy approaches offering some degree of flexibility on walking distances to bus stops where this is appropriate.”

4.4.6 Furthermore, while the distance to bus stops is slightly higher than the comparison sites, public transport users are likely to walk further to access a frequent service. Data contained within the National Travel Survey indicates the mean and 85th percentile walking distances to a bus stop are some 580m and 810m respectively, both of which are notably longer than the much quoted CIHT guidance. Attractive high-quality routes are also likely to increase the distance people are prepared to walk to bus stops, and as such the site provides appropriate access to bus services.

4.4.7 A review of the existing bus services operating within Cranbrook and an analysis of whether they are accessible to the SHELAA sites is provided in **Table 4.3** overleaf.

Table 4.3: Summary and Comparison of Bus Services

| Service | Route Description | Frequency (minutes) | | | | | Served by Bus | | | |
|---------|--|---|---------|---------|-----|-----|---------------------------|--------------------|--------------------|--------------------------------------|
| | | Mon to Fri | | | Sat | Sun | Proposed Site (SHEELA 25) | CRS4 / SHELAA #430 | CRS 7 / SHELAA #32 | CRS 6 / SHELAA #59, 70, 323, 343, 53 |
| | | Peaks | Daytime | Evening | | | | | | |
| 5 | Maidstone - Staplehurst - Cranbrook - Hawkhurst - Sandhurst | 60 | 60 | 60 | 60 | 120 | ✓ | ✓ | ✗ | ✓ |
| 297 | Tenterden - Rolvenden - Cranbrook - Goudhurst - Tunbridge Wells | 90 | 90 | 90 | 90 | - | ✓ | ✓ | ✓ | ✗ |
| 349 | Hawkhurst - Bodiam - Hastings | - | - | - | - | 120 | ✓ | ✓ | ✗ | ✓ |
| 267 | Hawkhurst - Cranbrook - Goudhurst - Paddock Wood - Tunbridge Wells Boys' Grammar | School service - 1 inbound & 1 outbound per day | | | - | - | ✓ | ✓ | ✗ | ✓ |
| 268 | Hawkhurst - Cranbrook - Goudhurst - Paddock Wood - Tonbridge Schools | School service - 1 inbound & 1 outbound per day | | | - | - | ✓ | ✓ | ✗ | ✓ |

Key:

- ✓ Access to bus stops / services within 810m of the centre of the site
- ✗ Access to bus stops / services greater than 810m from the centre of the site

4.4.8 Table 4.3 demonstrates that site SHELAA 25 is one of the best located sites to provide access to the existing bus services in Cranbrook when considered against the other SHELAA sites.

4.4.9 Bus route no. 5 is the main bus service in Cranbrook, which can be easily access from the proposed development site as well as SHELAA 430/ CRS4 and SHELAA 59, 70, 323, 343, 53 / CRS6. This provides an hourly service throughout the day Monday to Saturday between Hawkhurst and Sandhurst to the south and Staplehurst and Maidstone to the north. The first available service towards Staplehurst

leaves the bus stop at 06:15 and the last return journey is at 23:22. The earliest service for Maidstone leaves the bus stop at 08:08 arriving at 08:31 and the last return journey is at 21:53.

- 4.4.10 This analysis therefore demonstrates that site SHELAA 25 is well located to regular bus services that provide direct connections to key service centres such as Maidstone, as well as the surrounding rural towns and villages to accommodate a range of journey purposes, including travel to/from work, shopping and leisure trips. SHELAA 25 also provides high quality, attractive pedestrian routes to the closest bus stops to the site.

Rail

- 4.4.11 The closest railway station to the site is located at Staplehurst, approximately 10.2km to the north of the site. The station is directly accessible by bus via the no. 5 service with a 20-minute journey time. Tunbridge Well railway station is also directly accessible by the no. 297 bus service.
- 4.4.12 Staplehurst railway station provides two services per hour towards London Charing Cross and two services per hour to Ashford, with hourly services to Ramsgate and Dover. Therefore, coupled with the bus service which operates from early in the morning to late in the evening, this provides an opportunity for linked journeys to destinations further afield for access to a wider range of facilities and services.

SECTION 5 Revised Travel Sustainability Score

- 5.1 Based on the information set out in the previous sections of this Technical Note, it has been demonstrated that site SHELAA 25 is sustainable in transport terms and provides good access to a wide range of everyday facilities and services that future residents would require, which can be accessed on foot or by bike.
- 5.2 The site is well located to regular bus services that provide direct connections to larger service centres such as Maidstone, as well as the surrounding rural towns and villages for access to a wider range of facilities and services. Staplehurst railway station is also directly accessible by bus to provide an opportunity for linked journeys to destinations further afield such as London or Ashford.
- 5.3 As a worst case, even if the 'preferred maximum' distance to town centre (i.e. 800m), as identified in the CIHT Guidelines for Providing for Journeys on Foot (2000) is adopted, which still represents a short 10m-minutes walking time in practice, then SHLAA Site 25 would fall within this threshold and as such would score positively (++) for a development of between 50-150 dwellings under the scoring methodology adopted in the Sustainability Appraisal. This would also provide a consistent approach to the criteria applied to other purposes, including community and education trips.
- 5.4 Consequently, the proposed development site is in line with the 'travel' sustainability objective set out in TWBC's Sustainability Appraisal and other local and national planning policies.
- 5.5 Furthermore, it has also been demonstrated that site SHELAA 25 is better located in transport terms when considered against the other SHELAA sites.

SECTION 6 Summary and Conclusions

6.1 Summary

- 6.1.1 i-Transport LLP have been appointed by Taylor Wimpey to provide transport and highways advice in relation to the promotion of land at Frythe Way, Cranbrook (SHLAA Site Reference: 25). The site has been omitted from Tunbridge Wells Borough Council Draft Local Plan.
- 6.1.2 In line with Appendix 6 of the Draft Local Plan, comments on a site omission should make reference to the Sustainability Appraisal and relevant SHELAA site assessment sheets. Therefore this Technical Note provides a review of these documents, which highlights that the score for the 'travel' sustainability objective for this site does not reflect the full range of opportunities that future residents will have access to travel by sustainable modes and thus reduce the need to travel by private car. The score does not also appear to reflect the fact the site is more sustainably located when compared with the proposed allocated sites in Cranbrook.
- 6.1.3 The comparison sites considered within this report are set out below:
- SHELAA 430 / CRS4;
 - SHELAA 32 / CRS7; and
 - SHELAA 59, 70, 323, 343, 53 / CRS6.
- 6.1.4 The Technical Note demonstrates that the site is located closer to the majority of the local facilities and services located within Cranbrook in comparison to the other SHELAA sites with a wide range of key local destinations, including all of Cranbrook Town Centre located within a comfortable walking and cycling distance of the site. Therefore, future residents of the site will have genuine and realistic opportunities to travel by sustainable modes of transport. These are accessible via an existing good quality network of footways and public rights of way in the adjacent built up area.
- 6.1.5 The site is within reasonable walking distance of regular bus services operating along the High Street and Bakers Cross. Combined, these provide an hourly service between Maidstone and Sandhurst and a two-hourly service between Tenterden and Tunbridge. The closest bus stops to the site are located within the 85th percentile walking distance of the closest bus stops to the site on the basis of data contained within the National Travel Survey.
- 6.1.6 Staplehurst Railway Station is accessible via a direct hourly bus service with a journey time of approximately 20-minutes therefore providing an opportunity for linked journeys to destinations such

as London and Ashford. Tunbridge Wells railway station is also directly accessible by bus. The site is one of the best located to provide access to the existing bus services in Cranbrook when considered against the other SHLAA sites.

- 6.1.7 Against this background, as the site is located within 800m of a town centre of settlement classified as the second highest category in the hierarchy across the Borough it is therefore well located to 'take up' the opportunities for travel by sustainable modes.
- 6.1.8 Furthermore, if an appropriate walking distance to a town centre is adopted in the scoring methodology adopted in the Sustainability Appraisal, consistent with the approach applied to other purposes, including community and education trips, then SHLAA Site 25 would score positively (++) for a development of between 50-150 dwellings.
- 6.1.9 Consequently, it is suggested that the 'travel' sustainability objective for the proposed site should be re-scored as shown below to reflect its positive sustainable travel opportunities:

Table 6.1: Travel Sustainability Score

| SHELAA 25 | Score in Sustainability Appraisal | Revised Score |
|--------------|-----------------------------------|---------------|
| Travel Score | 0 / - | ++ |

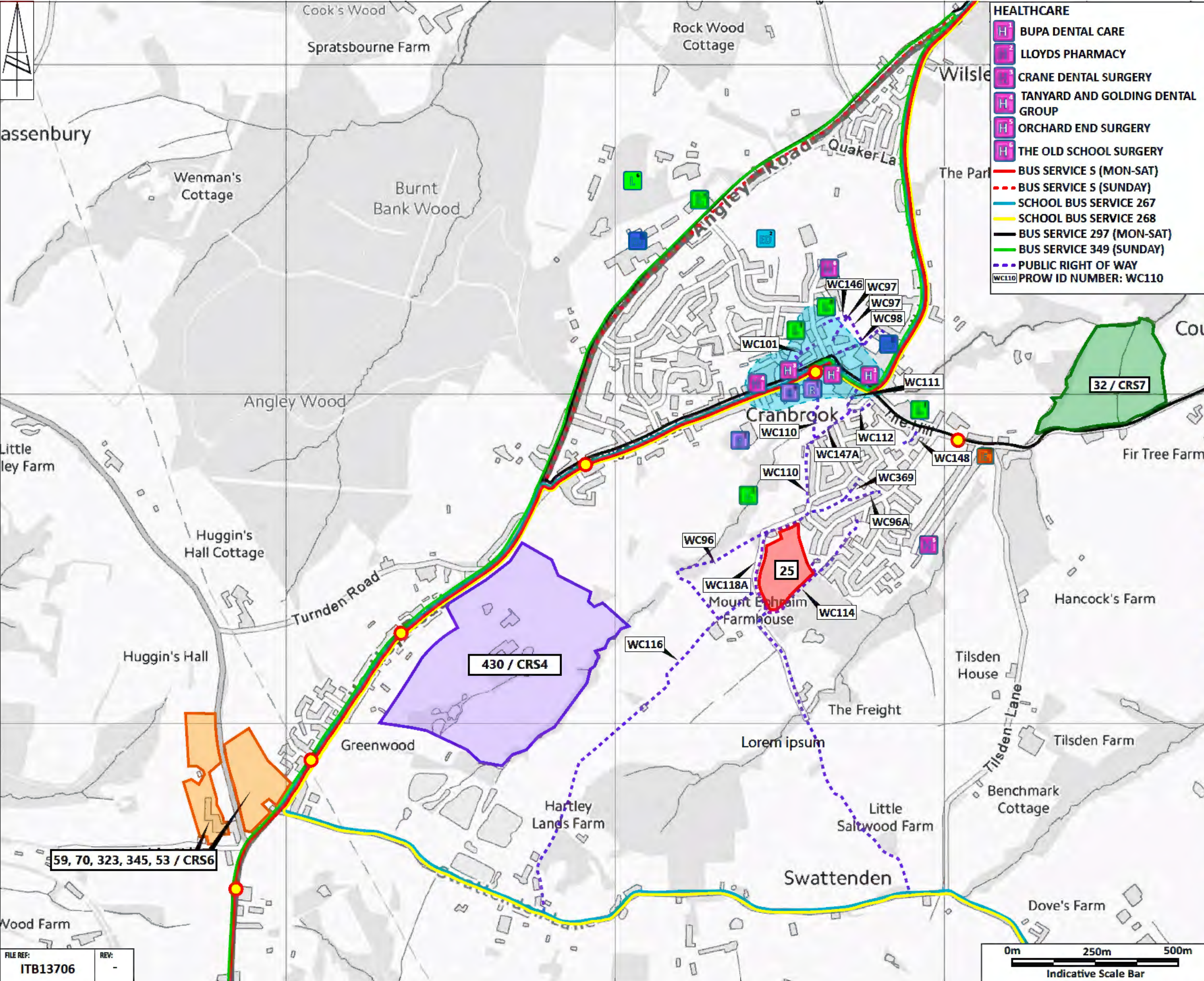
6.2 Conclusion

- 6.2.1 This Technical Note demonstrates that the proposed site (SHLAA 25) is in accordance with Tunbridge Wells Borough Council's 'travel' sustainability objective, which is to:

"Improve travel choice and reduce the need to travel by private vehicle"

- 6.2.2 The site is also in line with the key transport test set out in the National Planning Policy Framework (NPPF) and draft Policy EN2 'Sustainable Design and Construction' in the emerging Local Plan.
- 6.2.3 As such site SHLAA 25 is in accordance with the current and emerging policy in transport sustainability terms and as such is a suitable site for development and is more sustainably located when compared with the proposed allocated sites in Cranbrook.

FIGURES



- HEALTHCARE**
- BUPA DENTAL CARE
 - LLOYDS PHARMACY
 - CRANE DENTAL SURGERY
 - TANYARD AND GOLDING DENTAL GROUP
 - ORCHARD END SURGERY
 - THE OLD SCHOOL SURGERY
- BUS SERVICE S (MON-SAT)**
- BUS SERVICE S (SUNDAY)**
- SCHOOL BUS SERVICE 267**
- SCHOOL BUS SERVICE 268**
- BUS SERVICE 297 (MON-SAT)**
- BUS SERVICE 349 (SUNDAY)**
- PUBLIC RIGHT OF WAY**
- PROW ID NUMBER: WC110**

- KEY**
- SITE BOUNDARY / SHELAA REF 25
 - SHELAA REF 59, 70, 323, 345, 53 / CRS6
 - SHELAA REF 32 / CRS7
 - SHELAA REF 430 / CRS4
 - CRANBROOK TOWN CENTRE INCLUDES:
 - WHITE HORSE INN
 - EC WILKES & SONS BUTCHERS
 - CONGREGATIONAL CHURCH
 - THE GEORGE HOTEL
 - THE HAMMOND OPTICAL PRACTICE
 - BUS STOP
- LEISURE**
- CRANBROOK UNION WINDMILL
 - CRANE VALLEY LOCAL NATURE RESERVE
 - CRANBROOK MUSEUM
 - CRANBROOK LIBRARY
 - THE WEALD SPORTS CENTRE
 - ANGLEY PARK
- EMPLOYMENT**
- CRANBROOK HIGH STREET
 - THE OLD BREWERY BUSINESS CENTRE
- RETAIL**
- CO-OP FOOD
 - CRANBROOK POST OFFICE
 - CO-OP FOOD
- EDUCATION**
- CRANBROOK SCHOOL
 - CRANBROOK CoE PRIMARY SCHOOL
 - THE HIGH WEALD ACADEMY

i-Transport

The Square, Basing View,
Basingstoke, RG21 4EB

Tel: 01256 637 940

www.i-transport.co.uk

TITLE:

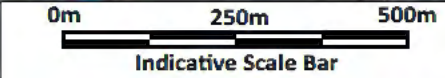
FRYTHE WAY, CRANBROOK SUSTAINABILITY APPRAISAL

FIGURE No:

FIGURE 1

FILE REF: ITB13706

REV: -



APPENDIX C. EMERGING MASTERPLAN FRAMEWORK



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This drawing is for illustrative purposes only and should not be used for any construction or estimation purposes. To be scaled for planning application purposes only. No liability or responsibility is accepted arising from reliance upon the information contained within this drawing.

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- Site Boundary
- Public Right of Way
- Public Right of Way (Restricted By-way)
- 1 Main Access Point
- 2 Main Street
- 3 Secondary Roads/ Shared Surface
- 4 Sustainable Urban Drainage
- 5 Natural Play
- 6 Trim Trail
- 7 Edible Landscape
- 8 Green Corridors for Wildlife
- 9 Retained Trees
- 10 Proposed Trees
- 11 Key Entrance Space
- 12 Public Open Space
- 13 Shared Surface Square for Traffic Calming
- 14 Pedestrian Routes Linking to PRoW
- 15 Cycle & Pedestrian Route Linking to PRoW

CLIENT:

Taylor Wimpey Strategic Land

PROJECT:

Frythe Way, Cranbrook

DRAWING:

Framework Plan

PROJECT NUMBER:

TAYS3041

DRAWING NUMBER:

3000

CHECKED BY:

LM

REVISION:

E

STATUS:

FINAL

DATE:

24.09.20

SCALE:

1:1,250 @ A3



APPENDIX D. STAGE ONE ROAD SAFETY AUDIT – SITE ACCESS

Road Safety Audit Report

**Incorporating
Stage 1 Completion of Preliminary Design; and
Design Organisation Response to items raised.**



Proposed continuation of Frythe way Cranbrook

Client:
i-Transport

Client reference:
ITB13706



Report Status 3

| | | | | | |
|--------------------------|---|--------------------|----|--------------------|--------------|
| Job no | RSA-20-077 | Issue no | 3 | Date | October 2020 |
| Prepared by | JJF | Verified by | FB | Approved by | JJF |
| Filename and Path | Fenley/Road Safety Audits/RSA-20/RSA-20-077-3 | | | | |

1.0 PROJECT DETAILS

| | |
|---|------------------------------|
| Report Title: | Stage 1 Road Safety Audit |
| Date: | September 2020 |
| Document reference and revision: | RSA-20-077-3 |
| Prepared by: | Fenley Road Safety Limited |
| On behalf of the Overseeing Organisation: | Kent County Council |
| Design Organisation: | i-Transport LLP |
| Project Sponsor: | Taylor Wimpey Strategic Land |

| REV | ISSUE PURPOSE | AUTHOR | CHECKED | APPROVED | DATE |
|-----|--|--|---------|----------|---------------------------------|
| 0 | Stage 1 Road Safety Audit drafted for Audit Team discussions | FB | | | 14 th September 2020 |
| 1 | Stage 1 Road Safety Audit finalised and issued to the Design Organisation | JJF | FB | JJF | 28 th September 2020 |
| 2 | Stage 1 Road Safety Audit Report format amended to incorporate a row for inclusion of a Design Organisation Response in order to maintain a concise record of items raised | JJF | | | 28 th September 2020 |
| 3 | Design Organisation Response incorporated | Ben Thomas on behalf of i-Transport | | | 1 st October 2020 |

Contents:

| | | |
|------------|--|----------|
| 1.0 | Project Details | 1 |
| 2.0 | Introduction | 2 |
| 3.0 | Items Raised in any previous Road Safety Audits | 3 |
| 4.0 | Items Raised in this Stage 1 Road Safety Audit | 4 |
| | A.1 Alignment | |
| | A.2 General | |
| | A.3 Junctions | |
| | A.4 Walking, Cycling and Horse Riding | |
| | A.5 Road Signs, Carriageway Markings and Lighting | |
| 5.0 | Audit Team Statement | 8 |

Appendices:

| | | |
|---------|----|--|
| Stage 1 | A1 | Documents and Drawings provided for this Road Safety Audit |
| | A2 | Item Location Plan |
| | A3 | Drawings associated with the Design Organisation Response |

2.0 INTRODUCTION

- 2.1 This report has been prepared by Fenley Road Safety Limited and results from a Stage 1 Road Safety Audit of the proposed continuation of Frythe Way in Cranbrook. The works are to facilitate a residential development consisting of circa 70 dwellings on a parcel of land to the west.
- 2.2 The Audit Brief identifies that the proposals do not include any Departures from Standard, whether related to strategic decisions or otherwise.
- 2.3 The Road Safety Audit was undertaken during September 2020 in accordance with the Road Safety Audit Brief provided, on the 16th September 2020 by the Design Organisation, i-Transport, on behalf of the Project Sponsor, Taylor Wimpey Strategic Land. The Road Safety Audit comprised of a site visit as well as an examination of the documents provided which are identified in **Appendix A1**. The Audit Team were satisfied that the Audit Brief was sufficient for the purpose of the Audit instructed.
- 2.4 The Road Safety Audit has been undertaken by an Audit Team whose qualifications and experience accord with the requirements of GG119. The Audit Team consists of the following members:

Audit Team Leader

Jamie Fenning *BSc(Hons), MIHE, MCIHT, MSoRSA, Highways England RSA Certificate of Competency*
Road Safety / Highway Engineer

Audit Team Member

Farouk Bhatti *MCIHT*
Road Safety Auditor

- 2.5 The site visit associated with this Road Safety Audit was undertaken by the Audit Team Leader and Audit Team Member, during the afternoon of Monday 7th September 2020 between 5:30pm and 6:15pm. The site visit involved walking and driving around the local highway network for a 45-minute period whilst observing local infrastructure and current traffic conditions. The weather during the site visit was overcast, the road surface was dry and visibility was good. A number of pedestrians and cyclists were observed during the site visit. Vehicular traffic to include cars and light goods vehicles were also observed.
- 2.6 The terms of reference of this Road Safety Audit are as described in GG119. The scheme has been examined and this report compiled, only with regard to the safety implications for road users of the scheme as presented. It has not been examined or verified for compliance with any other standards or criteria. However, in order to clearly explain a safety problem or the recommendation to resolve a problem, the Audit Team may on occasion have referred to a design standard for information only. All comments and recommendations are referenced to the design drawings supplied with the Audit Brief and the location of road safety concerns

raised have been illustrated beneath the items along with relevant photographs for clarity, where appropriate, as well as on the Location Plan attached at **Appendix A2**.



Design Organisation Response

- 2.7 In accordance with national standards, this Road Safety Audit was finalised and issued to the Design Organisation as per the Road Safety Audit Report Template within Appendix D of GG119, which can be provided upon request from either the Audit Team or Design Organisation. The format of the Audit Report was subsequently revised to incorporate these paragraphs under the sub-heading as well as sufficient space beneath the items and recommendation, within Section 4, for the inclusion of a Design Organisation Response. This is generally contained within a separate Design Organisation Response Report but is included within this document in order to maintain a single record of all problems, recommendations and responses for the benefit of a concise Road Safety Audit trail to be held on file for Quality Assurance purposes.
- 2.8 The Design Organisation Response has been prepared by:
Name: Ben Thomas
Position / Organisation: Associate Partner, i-Transport LLP
- 2.9 Any drawings or documents associated with the Design Organisation Response are listed at **Appendix A3**, if applicable.

3.0 ITEMS RAISED IN ANY PREVIOUS ROAD SAFETY AUDITS

- 3.1 Fenley Road Safety Limited have not been made aware of any previous road safety audits associated with the proposals.

4.0 ITEMS RAISED AT THIS STAGE 1 ROAD SAFETY AUDIT

| | |
|---|---|
| A.1 | LOCAL ALIGNMENT |
| | <i>No Road Safety Concerns regarding LOCAL ALIGNMENT have been raised at this stage</i> |
| A.2 | GENERAL |
| A.2.1 | PROBLEM |
| Location: | Existing turning head / Proposed continuation |
| Summary: | Parking along the proposed continuation carriageway will limit forward visibility |
| Acc Type: | Vehicle head-on and rear impact type collisions |
| <p>Frythe Way is approximately 5.5 metres wide and forms a residential cul-de-sac that benefits from a turning head. The section of Frythe Way that is subject to the proposed works serves 22 dwellings of which 7 currently benefit from off-road frontage parking. The majority of Frythe Way is bounded by dropped kerbs and an area of concrete hardstanding that allows for parking, adjacent to a footway which is approximately 1.2 metres wide. In addition to the parking alongside the carriageway, the Audit Team observed parking taking place within the turning head. The proposals subject to this Audit, include the demolition of numbers 69 and 71 Frythe Way and the continuation of the carriageway with a 2 metre footway either side, into the application site on a gradual bend that allows for a 43 metre forward visibility envelope to be achieved. The scheme drawings provided with the Audit Brief, identify that the existing turning head is "to be retained or form carriageway verge (to be agreed with Kent County Council)". The removal of part of the turning head to provide the carriageway continuation and part to provide grass verge, removes provision of carriageway currently utilised for on-street parking which is likely to result in parking taking place along the proposed access road. Whilst a 5 metre wide carriageway allows for a vehicle to pass a station car, on-street parking on the inside of the bend will limit the level of forward visibility that is achievable and could give rise to head on collisions as well as rear end impact collisions where a vehicle brakes suddenly.</p> | |
| RECOMMENDATION: | |
| It is recommended that off-street parking is provided accommodate displaced parking. | |
| <p>Location Plan:</p>   | |

DESIGN ORGANISATION RESPONSE provided by i-Transport on the 1st October 2020 following formal issue of this Stage 1 Road Safety Audit on the 28th September 2020

Existing houses no's 44, 46, 69, and 71 located at the end of the turning head will be demolished as part of the proposed development. This will reduce the demand for on-street car parking in the vicinity of the proposed access road. Any new dwellings located in this area will be provided with dedicated off-street parking in accordance with local standards. Notwithstanding this, a dedicated parallel parking bay is proposed on the southern side of the site access which will assist in accommodating any displaced parking as a result of the proposed access arrangements.

A.2.2 PROBLEM

Location: Proposed access road

Summary: An HGV may not be able to pass a car along safely

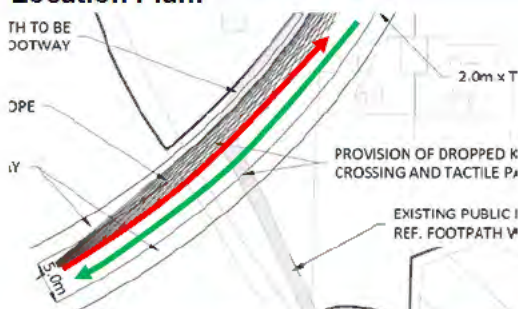
Acc Type: Sideswipes

Frythe Way is approximately 5.5 metres wide and forms a residential cul-de-sac that benefits from a turning head and space off the main carriageway along a concrete hard strip between the carriageway and footway, for parking. The proposals are to continue Frythe Way as a 5 metre carriageway that benefits from a 2 metre footway either side in order to facilitate access to a development of 70 dwellings. A refuse and recycling collection vehicle (RCV) will be required to travel along the proposed access road to serve the development. Due to the gradual bend in the road, there may be insufficient space for an RCV to pass a car resulting in the need for a vehicle to reverse or mount the footway raising the risk of rear end impact, sideswipe and vehicle pedestrian collisions.

RECOMMENDATION:



It is recommended that the proposed access road is adequate for the expected vehicles

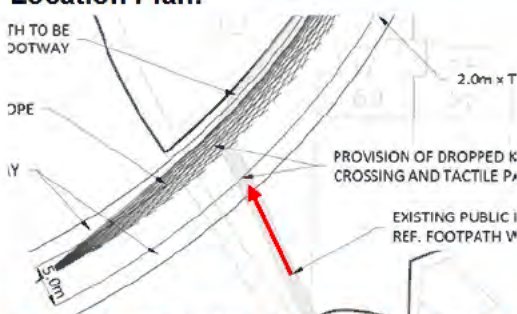
Location Plan:



DESIGN ORGANISATION RESPONSE provided by i-Transport on the 1st October 2020 following formal issue of this Stage 1 Road Safety Audit on the 28th September 2020

i-Transport drawing no. ITB13706-GA-008 demonstrates that a large refuse vehicle can safely pass a car travelling in the opposite direction along the proposed site access.

| | |
|--|---|
| A.2.3 | PROBLEM |
| Location: | Existing turning Head |
| Summary: | Existing street lighting column will become an obstruction |
| Acc Type: | Pedestrian street furniture strike, vehicle pedestrian collision |
| <p>Frythe Way benefits from street lighting with columns situated at the back edge of the footway. The proposals subject to this Stage 1 Road Safety Audit include the continuation of the Frythe Way carriageway into a site that is proposed to accommodate a development of 70 dwellings. The proposed access road is to consist of a 5 metre carriageway with 2 metre footways either side. During the site visit associated with this audit, a street lighting column was observed at the end of the turning head, central to the approaching carriageway. Following implementation of the proposals, the street lighting column is likely to be situated central within the proposed footway to the east and will be an obstruction to pedestrians which could give rise to personal injury as a result of a striking the object or a pedestrian entering the carriageway suddenly and a vehicle pedestrian collision.</p> | |
| RECOMMENDATION: | |
| It is recommended that the street lighting column is relocated | |
| <p>Location Plan:</p>   | |
| <p>DESIGN ORGANISATION RESPONSE provided by i-Transport on the 1st October 2020 following formal issue of this Stage 1 Road Safety Audit on the 28th September 2020</p> <p>The relocation of existing street lighting columns is a matter for detailed highway design stage and S278 technical approval.</p> <p>A note has been added to amended drawings ITB13706-GA-001 Rev E to pick up this point for detailed highway design and subsequent Stage 2 Road Safety Audit.</p> | |
| A.3 | JUNCTIONS |
| | <i>No Road Safety Concerns regarding JUNCTIONS have been raised at this stage</i> |

| | |
|---|---|
| A.4 | WALKING CYCLING AND HORSE RIDING |
| A.4.1 | PROBLEM |
| Location: | Existing footpath |
| Summary: | Pedestrians may enter the carriageway when it is not safe to do so |
| Acc Type: | Vehicle pedestrian collision |
| <p>A public footpath is situated off the southwestern corner of the existing Frythe Way turning head that extends through woodland to Freight Way. The proposals subject to this Stage 1 Road Safety Audit include the continuation of the existing Frythe Way carriageway into a parcel of land to the north of the woodland which replaces the provision of the existing turning head. The existing footpath is to be retained, albeit a section is to be provided along a footway with an uncontrolled crossing point provided to link with the existing footpath through the woods. To the south of the proposed access road, the footpath runs in-line with the proposed crossing point where tactile warning paving is to be provided for a depth of 800mm. A visually impaired pedestrian could have a stride in excess of 1200mm and step across the tactile warning paving into the proposed access road and potentially into the path of an oncoming vehicle.</p> | |
| RECOMMENDATION: | |
| It is recommended that tactile warning paving is provided for a depth of 1200mm | |
| <p>Location Plan:</p>  | |
| <p>DESIGN ORGANISATION RESPONSE provided by i-Transport on the 1st October 2020 following formal issue of this Stage 1 Road Safety Audit on the 28th September 2020</p> | |
| <p>Comments agreed and the depth of the tactile paving has been increased to 1200mm as is shown on amended drawing ITB13706-GA-001 Rev E.</p> | |
| A.5 | ROAD SIGNS, CARRIAGEWAY MARKINGS AND LIGHTING |
| | <i>No Road Safety Concerns regarding ROAD SIGNS, CARRIAGEWAY MARKINGS AND LIGHTING have been raised at this stage</i> |

5.1 We certify that this Road Safety Audit has been carried out in accordance with GG119.

Organisation: Fenley Road Safety Limited
 Date: 28^h September 2020

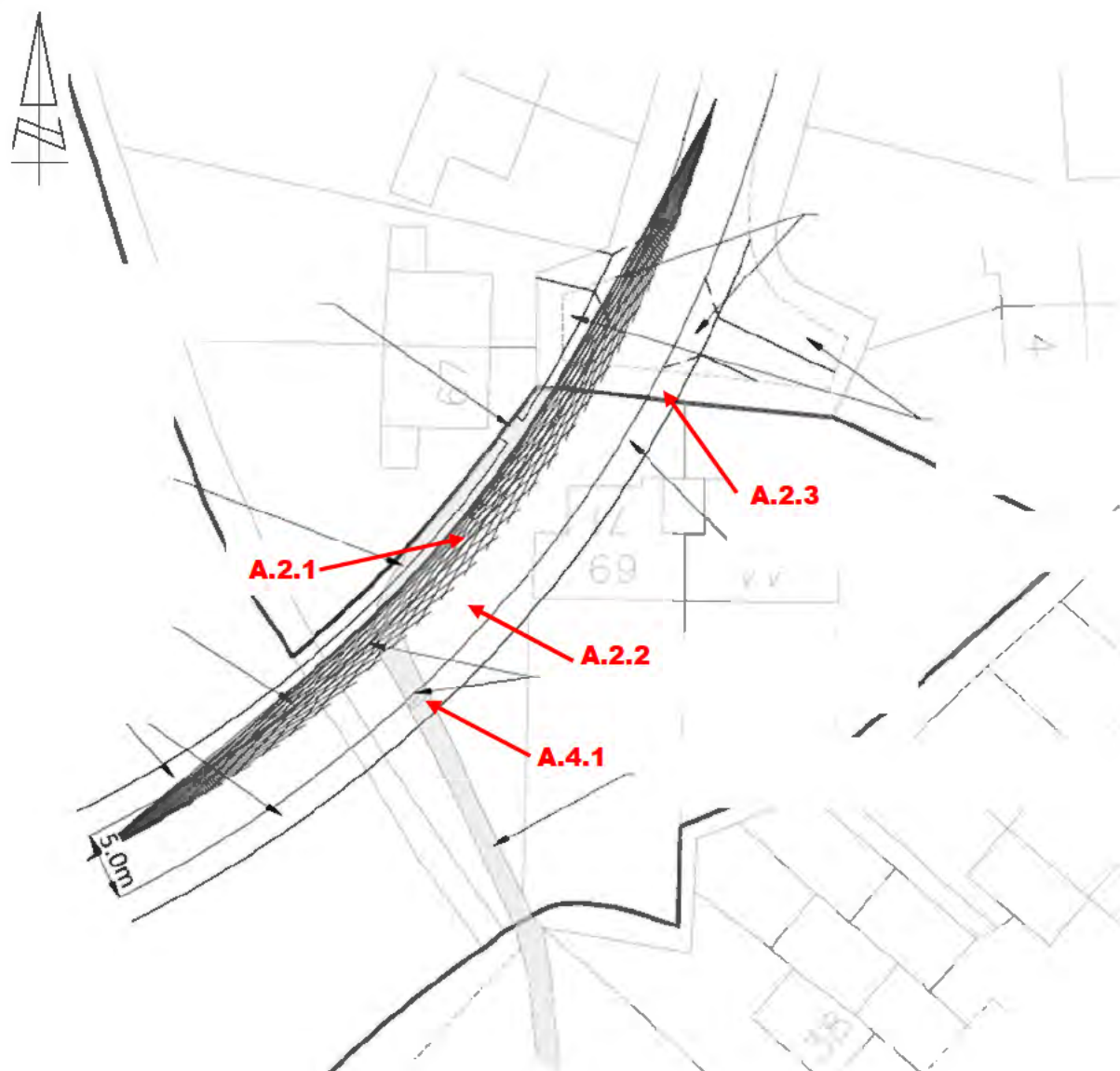
Appendix A1

Documents and Drawings provided for this Stage 1 Road Safety Audit

| <u>Audit Stage</u> | <u>Doc. No.</u> | <u>Rev</u> | <u>Title</u> |
|--------------------|---------------------------------------|------------|----------------------------------|
| Stage 1 | Email dated 16 th Sept '20 | | Road Safety Audit Brief |
| | ITB13706-002 TN | | Access Appraisal |
| | Cranbrook 5 year | | Personal Injury Collision Report |
| | | | |
| | <u>Dwg No.</u> | <u>Rev</u> | <u>Title</u> |
| | ITB13706-GA-001 | D | Proposed Site Access Arrangement |

Appendix A2

Item Location Plan



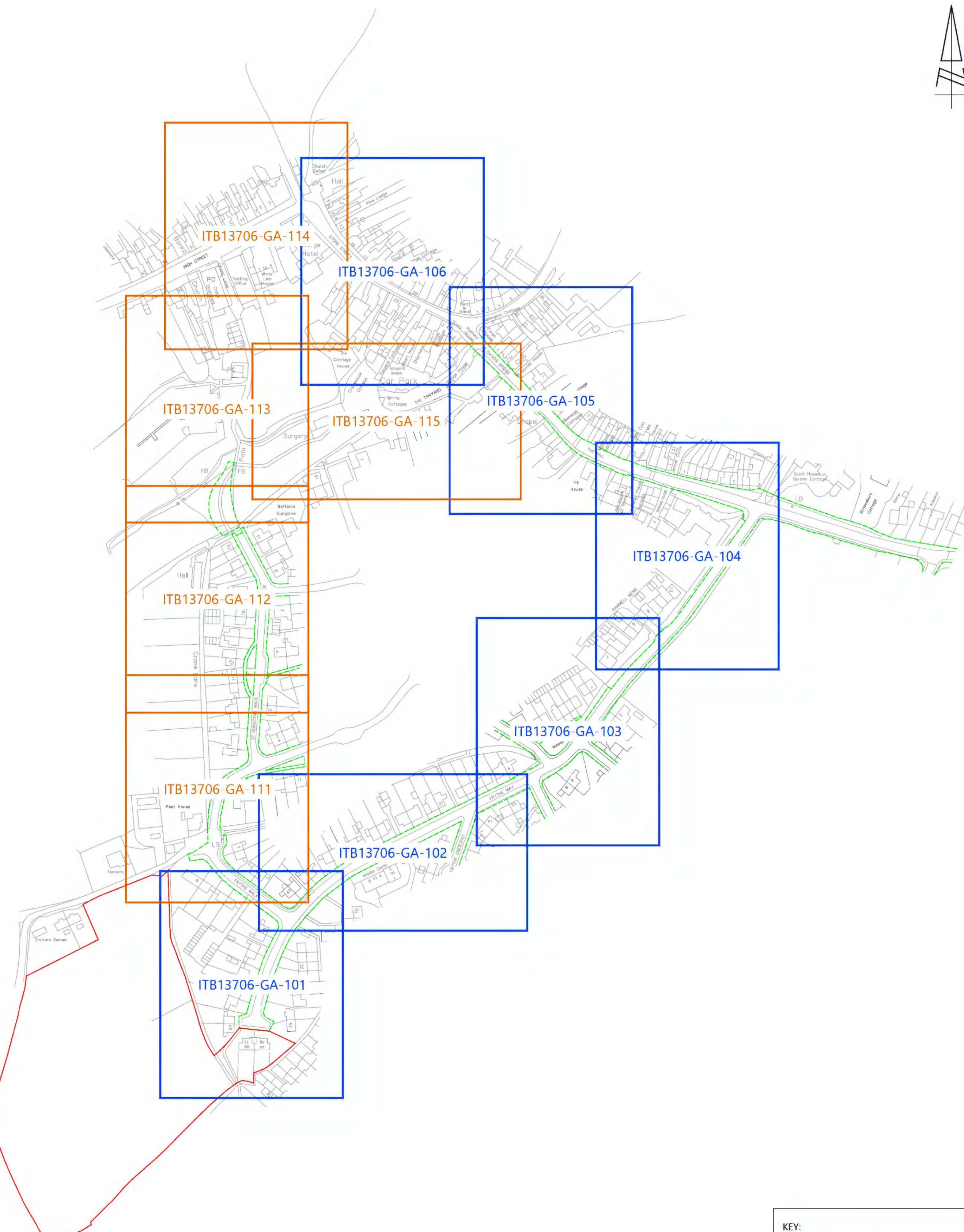
Appendix A3

Drawings associated with the Design Organisation Response

| <u>Audit Stage</u> | <u>Drawing No.</u> | <u>Rev</u> | <u>Title</u> |
|--------------------|--------------------|------------|---|
| Stage 1 | ITB13706-GA-001 | E | Proposed Site Access Arrangement |
| | ITB13706-GA-008 | -- | Swept Path Analysis – Large Refuse Passing Estate Car |

fenley

APPENDIX E. POTENTIAL PEDESTRIAN IMPROVEMENTS



SCALE BAR @ 1:2000

A horizontal scale bar with a black and white alternating pattern. It is marked with the numbers 0, 50, 100, and 200 at regular intervals.

DRAWING ISSUED FOR FEASIBILITY CONSIDERATION AND PLANNING PURPOSES ONLY. DRAWING NOT TO BE USED FOR CONSTRUCTION. I-TRANSPORT LLP ACCEPT NO RESPONSIBILITY FOR ERRORS MADE BY OTHERS IN SCALING FROM THIS DRAWING. MEASUREMENTS SHOULD BE TAKEN FROM FIGURED DIMENSIONS ONLY. CDM REQUIREMENTS CONSIDERED AT FEASIBILITY STAGE ONLY. FURTHER CONSIDERATION REQUIRED BY DETAILED DESIGN TEAM.



PROJECT:

LAND AT FRYTHE WAY, CRANBROOK

[illegible]