Tunbridge Wells Borough

Issues and Options
Consultation Statement
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Part 1: Summary of Consultation

Introduction

1.1 The Issues and Options consultation was the first borough-wide public consultation undertaken by the Borough Council in regard to the preparation of a new Local Plan. The public consultation took place over a period of six weeks between Tuesday 2 May and Monday 12 June 2017. The consultation was carried out in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2 This part 1 of the Consultation Statement provides an overview of the Issues and Options consultation, informing who and how the Council consulted, what consultation material was used, how comments received have been considered and an evaluation of the consultation.

1.3 Part 2 of the Consultation Statement provides a summary of the comments received and the Council’s initial response to those comments.

Background

1.4 The Issues and Options consultation document, the first stage in the Local Plan preparation process, sets out the Council’s initial thoughts about what the scope of the new Local Plan should be and the planning issues it should address.

1.5 The main purposes of the consultation were; to publicise the preparation of a new Local Plan, seek early views from a wide cross section of the community and stakeholders on what the Local Plan should seek to achieve over the period to 2033, and to invite comments on potential strategy options for delivering new homes, employment space, retail and leisure facilities in Tunbridge Wells borough.

1.6 The Issues and Options consultation document includes the following:

1. A set of draft objectives for the new Local Plan that give an indication of the expected scope of the Plan’s Strategy.
2. Identification of the main issues and challenges relevant to future development in the borough that will be addressed in the new Local Plan.
3. Five potential strategy options for the distribution of new development within the borough, together with commentary on the implications of each.

1.7 The consultation also provided opportunity for respondents to identify any additional issues that were considered relevant to preparing a new Local Plan and any alternative development scenarios that it was thought appropriate for the Council to consider.

Who was consulted?

1.8 Consultation material was made available for comment to a wide range of organisations and individuals in accordance with the Council’s Statement of Community Involvement April 2016, including the following:

- Statutory consultees
- Internal Council stakeholders, including Councillors
- Parish and Town Councils
- Royal Tunbridge Wells Town Forum
Developers and agents
Infrastructure providers
Local organisations, amenity, community and Neighbourhood Planning groups
General public
Contacts on the Council’s planning consultation database
Adjoining local authorities and Duty to Cooperate partners

Consultation Material and Methods

1.9 The Issues and Options consultation material included the following documents:
- Tunbridge Wells Borough Local Plan: Issues and Options
- Response form for Issues and Options document
- Interim Sustainability Appraisal
- Response form for Interim Sustainability Appraisal

1.10 Information comprising the evidence base to support preparation of the new Local Plan was referenced in the Issues and Options consultation documents and published on the Council’s website.

1.11 The following methods of consultation were used:

Letters

1.12 In accordance with Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012, letters were sent out prior to the start of the consultation period, by post or by email to all the above consultees informing them of the Issues and Options consultation and inviting them to comment.

Posters

1.13 Posters were displayed at various locations around the borough including the Council’s RTW Gateway office in the town centre, in the roundel outside of the Weald Information Centre in Cranbrook, all public libraries and Council car parks. Information posters and leaflets were sent to all Parish and Town Councils asking that these be displayed where they thought most appropriate e.g. village hall, local shop, notice boards. A4 sized posters were sent to local shops on the Council’s database requesting they be displayed in shop windows. Parish and Town Councils were also encouraged to publicise the Issues and Options consultation on their individual websites, newsletters and in any local magazines.

Summary Leaflets

1.14 Summary leaflets were produced that summarised the main issues and presented a summary of the five Strategic Options for development. These were distributed at exhibition events and made available in local libraries.

Consultation Exhibition Events

1.15 Four consultation exhibition events were held at three venues across the borough to allow the general public and other interested parties to view material and information on the Issues and Options document. These were held at various times including evenings and the weekend and were attended by Council officers including Planning Policy officers, members of the Economic Development Team and also KCC Highways officers, to answer questions and give advice.
1.16 A series of exhibition boards were used at the events to display the Vision, Objectives and all the Issues and five Strategic Options, including maps. The summary leaflets referred to were also distributed at these events.

List of exhibition events:

Wednesday 10 May 2017 4pm to 7pm
Venue: Matfield Pavilion, The Green, Matfield
Number of people in attendance: 104

Visitors included: residents from Matfield, Pembury, Goudhurst, Horsmonden, Paddock Wood, Colts Hill, Lamberhurst and Five Oak Green, a local architect, a Pembury Parish Councillor, Neighbourhood Plan Groups, a Borough Councillor and a member of the Campaign to Protect Rural England.

Thursday 11 May 2017 4pm to 7pm
Venue: Royal Victoria Place Shopping Centre, Tunbridge Wells (Unit 9 in Ely Court)
Number of people in attendance: 65

Visitors included: RTW Town Forum members, legal solicitors, business representatives, residents from Showfields/Ramslye and Bidborough, a tenant farmer and planning professionals.

Friday 12 May 2017 4pm to 7pm
Venue: Vestry Hall, The Old Fire Station, Stone Street, Cranbrook
Number of people in attendance: 107

Visitors included: Hawkhurst parish councillor, several neighbourhood plan representatives and residents from Cranbrook, Hawkhurst, Goudhurst, Lamberhurst and Benenden.

Saturday 13 May 2017 10am-2pm
Royal Victoria Place Shopping Centre, Tunbridge Wells (Unit 9 in Ely Court)
Number of people in attendance: 75

Visitors included: Residents from Tunbridge Wells, Southborough and Langton Green.

The exhibition boards were left on display in the windows of the shop unit in the Royal Victoria Place Shopping Centre when closed between the events held on 11 and 13 May.

Other Briefing Sessions

1.17 A number of briefing sessions were held prior to the start of the formal consultation to inform Borough Councillors, Parish/Town Councils, Neighbourhood Planning groups and the Royal Tunbridge Wells Town Forum of the intended consultation and to provide a briefing and explanation of the Local Plan Issues and Options document.

Local News Media

1.18 Public notices were placed in two local newspapers:
Kent and Sussex Courier - A Public Notice advertising the consultation on the Issues and Options was placed in the edition for the week ending Friday 28 April 2017

Wealden Advertiser - The same Public Notice was placed in the edition for the week ending Friday 28 April 2017

1.19 Two individual briefings were provided to local newspapers; the Kent and Sussex Courier and the Tunbridge Wells Times, prior to the formal public consultation commencing.

1.20 The Issues and Options consultation was also advertised in ‘Local’, the Tunbridge Wells Borough Council’s magazine (spring edition 2017), which is delivered to all households in the borough.

Electronic Consultation

1.21 The Issues and Options consultation was advertised through a web page on the Borough Council’s website (www.tunbridgewells.gov.uk) and comments were invited. This page provided a link to a separate Planning Consultation web page where the consultation document could be viewed.

1.22 The Council’s consultation portal was also used to enable people to view and comment online during the consultation period.

1.23 In addition, the Council’s Facebook, Twitter and LinkedIn accounts were used to advertise the consultation and invite comments.

1.24 The opportunity was also taken to publicise the Issues and Options consultation by including information in emails sent by the Borough Council in regard to Annual Council Tax Statements.

1.25 Further details in relation to the submission of comments are given below.

Council Staff Briefings

1.26 Staff representatives of a cross service officer working group were briefed on the Issues and Options document in the period leading up to the production of a formal consultation document and were provided with a copy of the final document.

Councillor information

1.27 As well as the Borough Councillor briefing sessions referred to above, the consultation was advertised in Borough Councillors’ newsletters on the weeks commencing 8 March and 24 April 2017.

1.28 Members of the Council’s Planning Policy Working Group were also briefed and involved in the preparation of the consultation document early in the year.

Submission of Comments

1.29 Comments could be made in the following ways:

Via the consultation portal

1.30 The consultation document and supporting studies/information could be viewed, and comments made directly online, using the Council’s consultation portal at http://consult.tunbridgewells.gov.uk.
Using a response form

1.31 Alternatively, a response form (for filling in electronically or printing out) could be downloaded from the Council’s website at www.tunbridgewells.gov.uk/localplan or a paper copy requested by phoning the Planning Policy Team; and returned by email or by post.

1.32 For those without access to a computer, the consultation documents could be viewed at the following locations:

- Tunbridge Wells Gateway, Grosvenor Road, Royal Tunbridge Wells;
- Weald Information Centre, The Old Fire Station, Cranbrook; and
- All libraries in the Tunbridge Wells Borough area.

1.33 All forms of consultation not only made clear how comments could be made but also provided links to further information relating to documents supporting the Issues and Options consultation document and links to evidence studies for the new Local Plan, where relevant.

Consideration of Comments Received

1.34 In total there were 551 respondents to the consultation, making a total of 6,686 comments in answering the set questions.

1.35 Pie chart 1 below shows 4,335 comments/answers were received by email, 1,713 via the consultation portal through the Council’s website, 573 via a written response form and 65 by written letter.
1.36 Pie chart 2 below shows the number of responses received for each of the response groups. 465 responses were received from residents and individuals, 39 responses from other organisations and companies (e.g. developers and agents), 15 responses from Parish and Town Councils, 14 responses from statutory bodies and utilities, 11 responses from resident, amenity and other groups and 7 responses from adjoining and other local authorities.

![Pie Chart 2](image)

1.37 Part 2 of this Statement of Consultation provides an overview of the comments received along with the Council's initial response to the comments.

1.38 All respondents provided details of their name and address, so no anonymous responses were therefore received. Respondents’ contact details were also used to deal with any queries relating to submission of comments where needed.

1.39 A separate response report was compiled for the Interim Sustainability Appraisal consultation, which ran in tandem with the Issues and Options consultation.

**Consultation Evaluation**

1.40 The Issues and Options consultation document was formatted in a way that would make it user friendly, i.e. concise, sectioned text with use of colour and graphics and links provided to further information and evidence studies; and appendices attached with a further document list and glossary of terms used. The document did require an element of reading to inform a response. Therefore, the question response form was designed to make use of simple tick boxes for a significant number of questions with a subsequent comment box for further responses where applicable.

1.41 It is noted that some respondents commented on the fact that the consultation period should have been longer with more events across the borough; and that when read in conjunction with related evidence studies and other related documents the document itself was complex and
technical. Some respondents mentioned that a shorter summary consultation document should also have been produced and made available for comments. These comments will be taken into account for future consultations later in the Local Plan process.

1.42 Overall, the consultation received a good response and the comments made were informative in determining the view of the general public, statutory consultees, other groups and stakeholders in relation to key issues and what strategic Options are preferred at this early stage in the Local Plan process. The comments also highlight other important considerations that will be taken into account in developing the next stages of the new Local Plan.

Next steps

1.43 The Issues and Options consultation is only the first stage in the Local Plan review process. The Council’s documenting and analysis of the responses received to the Issues and Options consultation are set out in Part 2 of this Consultation Statement. All the comments will be taken into consideration as part of the preparation of a new Local Plan and there will be opportunity for further public involvement and consultation when the next key stage is reached; the anticipated publication of a Local Plan pre-submission consultation document in early summer 2018.
Part 2: Summary of Comments Received and Council's Response

Introduction

2.1 This part 2 of the Consultation Statement summarises the responses received to the Tunbridge Wells Borough Local Plan Issues and Options consultation and is structured on the sections and questions set out in The Issues and Options document.

2.2 For the purposes of analysis the responses received to the consultation were divided into the following different respondent groups:

- Adjoining Local Authorities and Other Local Authorities
- Other organisations and companies (e.g. agents and developers)
- Parish and Town Councils
- Residents associations, Neighbourhood Development groups, amenity and various community and other organisations
- Statutory Bodies, Utility Companies, NHS, Emergency Services
- Residents and other individuals

2.3 This part of the Consultation Statement summarises the responses received for all of these groups. Whilst the responses received are formatted as a list, they draw together key issues across all the groups in answering a particular question. A separate and more detailed response report has also been compiled for each of the groups and these reports are attached as Appendix A.

2.4 It is important to note that not all respondents answered every question. Therefore the total number of responses for each question may vary.

Section 3 – Vision and Objectives

Vision

Introduction

This section relates to the draft Vision for the borough up to 2033. The draft Vision states that new development will be delivered in a sustainable way and will seek to protect and enhance the exceptional quality of the built, natural and historic environment while promoting economic prosperity to ensure the borough remains a special place. Three questions were asked in relation to the draft Vision:

Question 1: Do you agree with the new draft Vision for the borough?

Summary of Responses

244 responses were received to this question. 154 respondents (about 63%) disagreed with the draft Vision, 75 respondents (about 31%) agreed; while a further 15 respondents (about 6%) did not indicate a view. Overall, of those who expressed an opinion, the majority of 67% disagreed with the Vision, while 33% agreed.

Question 2: What suggestions do you have for improving or updating the draft Vision and relating it to 2033?

Summary of responses
205 responses were received to this question.

Key issues referred to across the response groups were:

- Vision is too long, over ambitious and prescriptive and should concentrate on a small number of clear priorities.
- Too much focus on Tunbridge Wells (TW) and Paddock Wood (PW). Vision needs to ensure it illustrates how development will take place across the borough and address the needs of rural villages.
- Vision should include adequate protection of Metropolitan Green Belt as well as the Kent High Weald AONB.
- Should include recognition of need to review current Green Belt boundaries.
- Vision is unsustainable due to constraints of the borough, in particular AONB designation. Should make clear that AONB designation covering 69% of the borough is likely to constrain TWBC meeting its objectively assessed need.
- Vision should reflect responsibility placed on the Borough Council from the duty to cooperate to understand how these plans impact with/on other adjoining boroughs.
- Vision should look how the borough will develop over a much longer period beyond the proposed Local Plan. Numbers should be based on long term sustainable growth not short term theoretical needs.
- Do not expect to set policy so far into the future. 2033 is too far off to be relevant. Choose goals which are achievable.
- Should include Neighbourhood Plans in the Vision to engage communities in wider borough initiatives, providing social cohesion and housing mix in the villages.
- Vision should include reference to development and provision of additional infrastructure; roads, public transport, water, electricity, broadband, mobile reception.
- Vision should include reference to agriculture.
- Include sustainability in terms of energy production, conservation and consumption.
- Reference to local needs is contrary to the NPPF and is therefore wrong starting point for the Plan; should be to meet all of the borough’s development needs.
- Vision is not “inclusive”, nor is it compliant with UK Disability Strategy 2012 and the legal compliance post 2025.
- Vision puts development ahead of environmental protection and suggests only environment/heritage of “exceptional quality” will be protected.
- Place greater emphasis on role of TW as a strategic location within wider context of Kent and East Sussex - seek the growth of TW as a sub-regional settlement.
- Vision does not explicitly include commitment to providing sufficient numbers of new homes to meet full housing need arising in the borough.
- Vision should make specific reference to tackling unaffordability of housing as a key need.
- Vision puts an artificial ‘cap’ or limit on opportunities for sustainable development.
- Vision should generally restrict development in most categories as local roads and infrastructure cannot cope with a 16% population increase.
- Vision is derived from a flawed national plan (central government) requiring further housing in the South East without any regard as to how this can be meaningfully achieved. Many of ‘local needs’ being ‘identified’ in the new Plan are dictated by central government not local people.
- Vision should be based on reformulating and strengthening focus on quality environment, not housebuilding.
- Should include focus on brownfield sites to meet the housing demands; and integration of industrial estates with housing to provide jobs locally.
- Vision should mention preservation of historic buildings and historic setting of villages.
Should include a specific commitment to lower pollution, and ease traffic congestion.

Vision talks about housing and economic development, but nothing specific about transport infrastructure - availability and suitability of this is a prime requirement.

Vision seems to be a continuation of yesterday’s trends – no mention of new technology and other global influences. Work and transportation will be vastly different in 2033.

People choose to live in towns or rural villages for different reasons – the two are not interchangeable. Invalid to assume if towns are full people will choose to live in rural communities. Separate housing numbers are required for urban and rural locations.

Entire Vision is based on cramming housing into already overcrowded villages and towns, instead of focusing on providing a sustainable quality of life.

Vision should be balanced to both developing existing built town areas and preservation of surrounding countryside and unique historic villages. Rural businesses rely on local communities and visitors to the countryside environment, but this seems to be ignored in the Vision.

Question 3: What should we be aiming and aspiring to achieve and why?

Summary of Responses

190 responses were received to this question.

Key issues referred to across the response groups were:

- Aspire to have better local facilities for local communities, economic growth, local education and local jobs.
- Encourage cottage industries and agricultural business.
- Encourage retention of active villages rather than dormitory villages.
- Improve access to the countryside.
- Better protection and preservation of AONB and Green Belt.
- Aim to enhance AONB for future generations and as a tourist asset.
- Green Belt boundaries need to be reviewed, and strategically relaxed to accommodate sustainable development required to meet future housing needs, offering social benefits.
- Green Belt buffer zones between TW borough and adjoining boroughs need to be created to prevent other boroughs from building on our borders and making use of our infrastructure without contributing to its upkeep/ further expansion.
- Concentrate on promoting existing commuting links and the benefit to industry the borough has - such as good access to channel ports, London; High Speed Rail Links and M25.
- Should be aiming to build right type of housing to meet needs of individual areas/settlements, including affordable housing and housing for first time buyers and the elderly and aspiring to achieve an overall spread of housing throughout the borough.
- Aim for development proposals that are well located, deliverable and affordable to meet local needs.
- Aim to encourage effective use of land by re-using land that has been previously developed.
- Recognise town centres as the heart of communities and pursue policies to support their viability and vitality.
- Aim should be to elevate TW borough to a sub-regional status in terms of quality of its retail and employment offer and as a location for people to live.
- Important mistakes of the past – failing to provide properly for economic growth – are not repeated. Good quality economic development that properly meets the needs of businesses is essential both nationally and at local level.
- Should be aiming to devise and agree joined up policies (public and private sector providers) to improve the mental and physical health and wellbeing of all sections of the population.
Urgently tackle existing atmospheric and noise pollution.

Overcome present problem of road congestion by enabling shift away from private motor cars – cycle network, pedestrian friendly environment, better public transport.

Aim to maintain historic fabric and setting of town which contributes to general wellbeing of its residents and considerable future tourism potential.

Focus on improving local infrastructure first and pushing back on national government.

Aim to build a limited number of houses that will be for local needs only - the number of proposed houses is massively too high and an unrealistic target. Reduce housing numbers.

Sustainability is not a vision when combined with the SHMA housing numbers and call for sites.

Should be measured, realistic and carefully-planned growth, bearing in mind the value of countryside, agriculture and limits of economic/employment potential in the area.

A more robust, flexible future strategy is needed given lack of housing supply and past failure to achieve the Core Strategy housing requirements, resulting in release of several greenfield sites.

New development should be designed around major, Council led transport upgrades. Significant investment required in local transport networks, in particular public transport for both urban and rural areas.

Update and extend existing leisure facilities within surrounding available land.

Consider changes in technology and impact on lifestyles — e.g. home working / flexible working days based around improved IT connectivity.

Social, cultural and economic activities too focused on RTW, denying other settlements of such attractions and investment.

Encourage economic growth in villages to provide job opportunities.

Overall, should aim to ensure the quality of life for all residents whether in the home, at school, at work, or at leisure in 2033 is better than today.

**Council’s Response**

The Council welcomes the comments received on the draft Vision Statement, which are noted and will be considered and addressed in preparing a final Vision for inclusion in the draft Local Plan.

The Council’s preference remains to include a short, concise Vision Statement in the draft Local Plan rather than a long statement that attempts to reference all relevant matters in some detail. The draft Vision should be read in tandem with the draft Strategic Objectives which seek to set out by themed headings the outcomes required to deliver the Vision. The issues raised in responses will be given due consideration in the development strategy incorporated into the draft Local Plan and the detailed allocations and development management policies of the Local Plan. A revised Vision Statement will be considered, revised if concluded appropriate and included in the draft Local Plan to be the subject of further consultation.

**Objectives**

**Introduction**

This section relates to the eight draft Strategic Objectives needed to realise the Vision, which are (i) Meeting development needs, (ii) Protecting and enhancing the borough’s distinctive environment, (iii) Delivering sufficient infrastructure, (iv) Providing high quality housing, (v) Making provision for economic growth, (vi) Ensuring adequate leisure and recreational facilities, (vii) Delivering sustainable development and (viii) Delivering adequate transport and parking capacity. The following three questions were asked in relation to these draft Objectives:
Question 4: Do you think these are the right Objectives?

Summary of Responses

206 responses were received to this question. 88 respondents (about 43%) agreed with the Objectives, 109 respondents (about 53%) disagreed; while 9 respondents (about 4%) did not indicate a view. Overall, of those who expressed an opinion, the slight majority of 55% disagreed with the Objectives, while 45% agreed.

Question 4a: If you answered No, please explain why you don't think these are the right Objectives.

Summary of Responses

138 responses were received to this question.

Key issues referred to across the response groups were:

- Strategic objectives are very vague - talk in generalities without an overriding vision of how they will be achieved.
- Cannot plan for building without first looking at infrastructure of the borough, particularly in the more built up areas. This should be first in the Objectives list.
- The Objectives are not SMART - specific, measurable, achievable, realistic and time-bound.
- Sustainability features a lot in overall document and NPPF but not discussed as a long-term objective.
- Nothing in Objectives about creating social cohesion or balanced communities.
- Objective 1 should include AONB and Green Belt.
- Objective 1 is unrealistic without proper assessments of constraints, limiting ability of TWBC to meet its objectively assessed housing need.
- Modify Objective 1 to provide more certainty that full 'objectively assessed' housing need will be met with sufficient flexibility.
- Objective 1 needs to reflect 'Duty to Cooperate' - TWBC may need to accommodate unmet development needs of neighbouring authorities.
- Objective 1: Should refer to meeting realistic development needs and make reference to maximising use of appropriate brownfield opportunities.
- Objectives 1 and 2 are contradictory - can’t do both. New development is never going to protect/enhance the natural, built and historic environment.
- Objective 2 does not reflect need to protect and enhance distinctive character of individual settlements - particularly important given five Options for Growth.
- Objective 2 should include specific mention of AONB.
- Objective 2 too general to be meaningful - natural and built environment should not be conflated and separate.
- Objective 2 fails to consider role of appropriate mitigation in protecting and enhancing the environment whilst the Council makes "every effort" to meet its housing needs (NPPF sustainable objectives).
- Objective 3 should mention water and sewage infrastructure, energy position, health, social care, education and provision of superfast broadband to rural areas.
- Objective 4 should refer to mix of sizes, types and tenures to meet housing need and refer to 'sustainable locations'.
- Objective 4 should include a clear commitment to affordable housing.
- Objective 7 is unnecessary and repetitive; could be replaced with objective on sustainable living and energy use.
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Objective 8 should be for 'good' transport and parking facilities as opposed to 'adequate', and should refer to congestion and related air pollution and technological change.

- Objectives 3, 7 and 8 should be included in Vision.
- No mention of needs/aspirations of existing residents. Should not disrupt/deteriorate people’s lives and livelihoods.
- Objectives not particularly specific to TW and could apply to almost anywhere.
- Objectives attempt to cover matters in para.7 of NPPF - economic, social and environmental roles. However, insufficient focus placed on need to support a community's health, social and cultural well-being.
- Objectives do not take account of effect of erosion of historical landscapes or long term effect on AONB.
- Objectives should be more explicit about need to release Green Belt land and exceptional circumstances that exist.
- Objectives do not clearly identifying significant shortage of market and affordable housing within the borough.
- Objectives are poorly drafted - really only 3 objectives (Protecting Borough’s environment, Meeting development needs, Delivering sufficient infrastructure), with other 5 Objectives merely being aspects of these three.
- Objectives on climate change and preservation of quantity and quality of natural resources are essential.
- An additional Objective should relate to reduction in impact of traffic on residents of rural areas – speed and frequency of cars and lorries.
- Objectives assume certain levels of employment and retail growth - whilst employment growth is to be encouraged, employment sectors in TW are those most likely to be hit by Brexit.
- Must include needs and space requirements for agriculture and farming and growing own food.
- Wording in Objectives very open to interpretation - “seek, sufficient and adequate” are not good enough. The language needs to be specific and clear.

Question 5: Are there any amendments required or other Objectives that you think should be included?

Summary of Responses

168 responses were received to this question.

Key issues referred to across the response groups were:

- Little mention of how TWBC is going to "ensure" or deliver" most of Objectives - needs to be demonstrated they can be achieved within a reasonable level of cost and supplied in areas where additional housing is actually located.
- Need to be clear about hierarchy of Objectives. Proposed plan is driven by housing numbers which may be flawed and make no distinction between urban and rural need. Everything else appears to be secondary – and sustainability related issues including transport and parking are bottom of the list. These are absolutely key to achieving best outcome for all residents so should be the starting point for building a plan.
- Objectives should include aim to improve present inadequate infrastructure for existing population and detailed requirements for new growth. Should be listed first in the Objectives.
- Need to look at provision of education and social facilities, not just leisure requirement, a lot of people are attracted to the area because of these and need to retain this.
• Should be more direct reference to providing different types and size of housing - entry level housing, housing for the elderly and downsizers, to ensure that the right homes are being built to meet the need.

• Should be an objective to encourage cross boundary partnership working towards economic growth, transport connectivity and infrastructure development.

• Constraints in Objective 1 should take into account AONB and Green Belt.

• Should clearly differentiate between purpose of Objective 1 (housing delivery) and 4 (housing choice) consistent with NPPF 50.

• Objective 2 - include reference to no net loss of biodiversity.

• Concerns Objectives 2 and 3 will not be carefully considered whilst trying to meet main development targets of Objective 1.

• Objective 4 - Para. 50 of NPPF does not support limiting provision to local needs, instead directing that a mix of housing should reflect demographic and market trends (including migration) and needs of specific groups. Therefore, reference to local needs should be omitted.

• Objective 7 does not accurately reflect NPPF paras 6 to 16 (presumption in favour of sustainable development).

• Objective 8 could be revised to specifically include enhancements to provision of walking and cycling facilities and to generally think beyond the needs of the borough.

• Objective 5 should acknowledge wider role of TW in the sub-region.

• Could include Objective to support Neighbourhood Plans and community involvement in planning.

• An additional objective should be added for “ensuring health and wellbeing”.

• Objectives need to consider the immediate requirement of reduction and calming of traffic.

• Another objective should relate to balance of growth and development across the borough, including, looking at how the many rural communities in the borough will be sustained economically over next 15 years.

• Protection of the environment should be a stand alone Objective without reference to development.

• Give greater prominence to agriculture in the Objectives.

• Start point should focus on sustainability and quality of life and full assessment of risks of development to overall carbon footprint is essential.

Council’s Response

The Council welcomes the comments received on the Strategic Objectives, which are noted and will be considered and addressed in preparing a final set of Objectives for inclusion in the draft Local Plan.

As commented above the draft Strategic Objectives should be read in tandem with the draft Vision and considered together. The responses commenting on the Objectives are similar to or reflect those made to the draft Vision. It follows that many of the issues commented upon in the responses will be given due consideration in the development strategy incorporated into the draft Local Plan and the detailed allocations and development management policies of the Local Plan.

A revised set of Strategic Objectives will be considered, revised if concluded appropriate and included in the draft Local Plan to be the subject of further consultation.
Section 4 – Key Issues and Challenges

Introduction

This section identifies the key issues that the Local Plan will need to consider and address when putting forward a strategy and policies for delivery of growth. These key issues are:- (i) Natural and Built Environment, (ii) Infrastructure, (iii) Housing, (iv) Economy, (v) Transport and Parking, (vi) Leisure and Recreation and (vii) Sustainability. Two questions were asked relating to each issue, as follows:

i. **Natural and Built Environment**

**Question 6a: Have we identified the main environmental issues facing the borough?**

**Summary of Responses**

198 responses were received to this question. 75 respondents (about 38%) agreed that all environmental issues had been identified, 107 respondents (54%) disagreed; while a further 16 respondents (8%) did not indicate a view. Overall, of those who expressed an opinion, the slight majority of 59% were in disagreement, while 41% agreed.

**Question 6b: If No, what environmental issues do you think are missing?**

138 responses were received to this question.

Key issues referred to across the response groups were:

- Generally thought that housing targets could not be met without serious harm to the environment.
- Give high priority to protection of the Green Belt and AONB. (Others did mention however, that the Green Belt should be reviewed to allow limited sustainable development on the edge of settlements to meet housing needs.)
- Make reference to the importance of both natural and built heritage assets. There was a suggestion that these be dealt with separately as Issues, possibly as 2 sub sections.
- Focus development on brownfield sites.
- Protect ancient woodland and farmland.
- Habitat protection important and should be seeking “net gain” on biodiversity, making space for nature and habitat connectivity in new developments.
- Green Infrastructure - green spaces, links and protection of gardens should be encouraged.
- Ensure good, environmentally friendly design for new development.
- Address light pollution - reference made to CPRE tranquillity and dark skies in rural areas.
- Air and noise pollution need to be addressed.

**Council’s Response**

The responses highlight a range of detailed environmental issues and these will be considered further in preparing a draft development strategy for the borough, to be set out in the draft Local Plan, and a suite of relevant strategic and more detailed development management policies.

The Council continues to complete a proportionate evidence base to support and inform the Local Plan preparation process. This includes built and natural environment evidence work and also a Green Belt Study which has been published on the Council’s website.
In combination it is considered that the evidence base information together with the responses to the Issues and Options consultation will enable the Council to identify all key environmental issues that the Local Plan should seek to address.

ii. **Infrastructure**

**Question 6c:** Have we identified the main infrastructure issues facing the borough?

**Summary of Response**

179 responses were received to this question. 61 respondents (34%) agreed that all infrastructure issues had been identified, 107 respondents (about 60%) disagreed; while a further 11 respondents (about 6%) did not indicate a view. Overall, of those who expressed an opinion, the majority of 64% disagreed, while 36% agreed.

**Question 6d:** If No, what infrastructure issues do you think are missing?

129 responses were received to this question.

Key issues referred to across the response groups were:

- Already a strain on existing infrastructure. Therefore, there should be a robust infrastructure plan in place before any new development commences. This should include issues of deliverability and funding of new infrastructure and a review of funding provided through Section 106 agreements.
- Suggested that phasing of development may be necessary to coordinate capacity in tandem with new development.
- More development will result in an increased demand for school places – therefore assessment needed of existing and new schools to meet this.
- Health care provision will need to be reviewed – existing GP surgeries are already over subscribed and particular focus needed for the elderly.
- Water and sewage issues need to be considered – wastewater, flood defence and water supply (already droughts). More development will put additional pressure on already overloaded sewage and drainage systems.
- Need to address all future energy requirements e.g. already a lack of gas services in rural areas.
- Should safeguard existing mineral and waste management facilities.
- Need to include broadband provision as an issue.
- Should be sustainable infrastructure e.g. electric charging points for cars.

**Council’s Response**

The Council recognises that infrastructure provision and need is a critical issue highlighted across responses to the consultation. The responses identify issues and concerns regarding various forms of infrastructure including social/community, physical and green infrastructure.

The Council will continue to positively engage with all relevant infrastructure authorities and agencies, having an ongoing relationship, in order to prepare a comprehensive infrastructure delivery plan which will sit alongside the new Local Plan as part of its delivery. Where sites are allocated for development the relevant policies will identify the necessary infrastructure that needs to be secured and put in place.
The Council continues to complete a proportionate evidence base to support and inform the Local Plan preparation process. This work includes a strategic flood risk assessment study, revised Infrastructure Development Plan (IDP) and revised Transport Strategy (as referred to in the response to Question 6j below). Upon completion, these studies will be published on the Council’s website.

In combination it is considered that the evidence base information together with the responses to the Issues and Options consultation and ongoing engagement with stakeholders will enable the Council to identify all key infrastructure requirements and to produce a robust Infrastructure Delivery Plan.

### iii. Housing

**Question 6e: Have we identified the main housing issues facing the borough?**

**Summary of Responses**

204 responses were received to this question. 57 respondents (about 28%) agreed that the main housing issues had been identified, 138 respondents (about 68%) disagreed, while 9 respondents (about 4%) did not indicate a view. Overall, of those who expressed an opinion, the majority of 71% disagreed, while 29% agreed.

**Question 6f: If No, what housing issues do you think are missing?**

156 responses were received to this question.

Key issues referred to across the response groups were:

- Unrealistic housing target/OAN- should be locally led not target driven. No explanation why there is such a significant increase since the Site Allocations Plan 2016. Recognised that OAN may change again when new central government methodology introduced.
- The SMHA is based on migration (especially from London). Brexit may affect this.
- The Local Plan should be supported by a Housing Needs Study.
- Should significantly increase number of affordable homes (to buy or rent) and the price of affordable homes reviewed as still too expensive, forcing local people out.
- Encourage higher densities to reduce pressure in rural areas and to meet overall housing target.
- More housing needed for specialist groups – elderly, disabled, special needs, key workers.
- Smaller sites and self build should be encouraged (to create local employment opportunities).
- Borough is made up of 2 distinctive groups – urban and rural. Methodology used for assessing growth/need does not account for 2 different environments, infrastructure and economic development.
- Concern more development in rural areas will result in dormitory settlements with residents commuting to work in larger urban areas.
- Use of existing empty properties in borough e.g. conversions should be encouraged.
- A better range of housing is needed overall, especially smaller properties for downsizing.
- Duty to cooperate important in terms of addressing cross boundary housing needs.
- New homes should be ecologically friendly and sustainable.
- No mention of gypsy/traveller needs in the borough.
- May need to release land on edge of settlements in sustainable locations, to address need.

**Council’s Response**
The responses highlight a range of detailed housing issues and these will be considered further in preparing a suite of relevant strategic and more detailed development management policies. Such policies will include those relating to affordable housing and specialist needs housing.

The Council continues to complete a proportionate evidence base to support and inform the Local Plan preparation process. This includes housing related evidence work such as a borough-wide local housing needs study and a Gypsy and Traveller Accommodation Assessment. Both will be published when completed in early 2018.

As part of the preparation and to gather evidence and information to inform the new Local Plan, the Council invited individuals and organisations to identify sites and broad locations for housing and economic development uses within the borough, known as the ‘Call for Sites’. The first Call for Sites took place in 2016, and a second Call for Sites was conducted in 2017 at the same time as the Local Plan Issues and Options consultation.

All sites submitted under both Call for Sites will be assessed for their suitability for development under a process known as a Strategic Housing and Economic Land Availability Assessment (SHELAA). An Interim SHELAA that includes sites submitted in 2016 only has been produced and is available to view on the Council's website. A SHELAA that includes sites submitted in both 2016 and 2017 will be published on the Council's website in late spring/early summer 2018.

The Council also has a published Strategic Housing Market Assessment (SHMA) 2015 combined with Sevenoaks District, which can be viewed on the Council's website. The SMHA considers overall housing need; need for different sizes of homes and need for different types of homes, particularly from a growing older population. The Council does not intend to update the current SMHA but will instead use the approach proposed by Central Government in applying a standard methodology for calculating housing need and numbers for the borough. Once prepared, these details will be published on the Council's website.

In combination it is considered that the evidence base information together with the responses to the Issues and Options consultation and ongoing engagement with stakeholders will enable the Council to identify all key housing issues that the Local Plan should seek to address.

iv.  **Economy**

**Question 6g:** Have we identified the main economic issues facing the borough?

**Summary of Responses**

174 responses were received to this question. 65 respondents (about 37%) agreed that the main economic issues facing the borough had been identified, 96 respondents (about 55%) disagreed, while 13 respondents (about 8%) did not express an opinion. Overall, of those who expressed an opinion, the majority of 60% disagreed, while 40% agreed.

**Question 6h:** If No, what economic issues do you think are missing?

121 responses were received to this question.

Key issues referred to across the response groups were:

- Council's Economic Needs Study acknowledged. However 11-15 hectares of economic floorspace is considered to be insufficient for current and future population.
- Need to incorporate opportunities for smaller businesses to reduce commuting e.g. better broadband provision.
• Should focus on Key Employment Areas and improving employment outside of RTW to ease pressure on the central area.
• New employment land and leisure facilities should be located close to future housing to reduce commuting and pollution.
• The quality (not just quantity) of employment floorspace is important.
• Need for independently accessible work places and long term employment for people with disabilities.
• Concern employment/commercial uses being lost to residential conversions.
• Rural and farming economy important - should be encouraging farming and cottage industries in rural areas.
• Value of sport to the economy should be referred to in Local Plan.
• Less out of town development and encourage regeneration of existing towns and villages – less commuting.
• Need to consider wider economic drivers e.g. migration and Brexit will have an impact on employment.
• No recognition of technological changes and how these will impact employment.
• Significant shift in retail trends from high street to online which will impact any retail expansion.
• Encourage small, independent shops.
• Tourist industry important – promote TW more as a tourist destination for both rural and urban areas (will need to address congestion issues first).
• Review hotel accommodation in the borough.
• No mention of business rates in Local Plan.

Council’s Response

The new Local Plan will seek to provide appropriate provision of employment sites, including within both the urban and rural areas, to meet identified needs and deliver a range of employment types and opportunities based on the outcomes of the Tunbridge Wells Economic Needs Study, published on the Council’s website.

The objective is to ensure the borough is a key destination for businesses. It is considered likely that in addition to new sites, existing, well located employment sites and premises will need to be retained and protected from change of use/redevelopment to alternative uses, maintaining the existing policy approach.

To supplement the Economic Needs Study a separate Tunbridge Wells Town Centre Office Study has been commissioned, the results of which will be published in early 2018.

As part of the proportionate evidence base to support and inform the Local Plan preparation process, a Leisure and Retail Study April 2017 and Hotel Capacity Study April 2017 have also been undertaken. These Studies deliver an appraisal of the retail, leisure and hotel needs of the borough and capacity in the period to 2033, and review the current performance of Royal Tunbridge Wells, Southborough, Paddock Wood, Cranbrook and Hawkhurst centres across the borough. They are published on the Council’s website.

In combination it is considered that the evidence base information together with the responses to the Issues and Options consultation and ongoing engagement with stakeholders will enable the Council to identify all key economic requirements that the Local Plan should seek to address.

v. Transport and Parking

Question 6i: Have we identified the main transport and parking issues facing the borough?
Summary of Responses

188 responses were received to this question. 52 respondents (about 28%) agreed that the main transport and parking issues had been identified, 119 respondents (about 63%) disagreed, while 17 respondents (9%) did not express an opinion. Overall, of those who expressed an opinion, the majority of 70% disagreed, while 30% agreed.

Question 6j: If No, what transport and parking issues do you think are missing?

156 responses were received to this question.

Key issues referred to across the response groups were:

- Better bus, train and cycling coordination needed across the County- important to work with other statutory authorities to ensure funding and delivery.
- Rail services important for the borough. Concern that services are to be reduced, putting more pressure on already over stretched services and station car parking; this includes settlements outside of/adjoining the borough e.g. Marden.
- Better and more affordable bus services needed, especially for rural areas, school children and the elderly.
- Main routes through the borough and into RTW are already heavily congested and there are existing car parking problems. These need to be tackled before any new development.
- Review of overall highway capacity and assessment of key journey patterns for all growth Options needed.
- Include provision of access for people with disabilities to public transport e.g. access ramps, surfacing, assistance at train stations.
- Safer cycle routes needed. Council’s Cycling Strategy acknowledged, but difficulty is cycle routes are not joined up. Also should encourage better cycle storage/parking on public transport and car parks.
- Parking strategy needed for both urban and rural areas.
- Better parking for tourist attractions e.g. free parking days.
- Other parking strategies to consider- one hour on street parking in towns, peak/non-peak charges, better car parking needed at train stations and Pembury Hospital.
- Consider Park and Ride for the town.
- Improve PROW network, including provision of higher status PROWs e.g. bridleways.
- Consider progressive technologies e.g. need for electric car charging points.
- Need to tackle HGV routing, especially in rural areas.
- Many rural roads need repairing and cannot sustain any increase in traffic.
- Shortage of car parking leading to on street parking in residential areas is a problem generally.
- Overall, there should be a policy intention to reduce car use, increase public transport use and reduce transport caused pollution (noise and air).

Council’s Response

The responses highlight a range of detailed transport and parking issues and these will be considered further in preparing a suite of relevant strategic and more detailed development management policies.

The Council will continue to engage positively with Kent County Council as highway authority, with Highways England and with relevant bus and train operators in preparing a draft development strategy for the borough, to be set out in the draft Local Plan; as well as a suite of relevant strategic and more detailed development management policies.
The current Transport, Cycling and Parking Strategies will all be reviewed alongside the work to prepare the new Local Plan. Transport infrastructure in its various forms will be a key element of the Infrastructure Delivery Plan prepared and published alongside the new Local Plan.

In combination it is considered that the evidence base information together with the responses to the Issues and Options consultation and ongoing engagement with stakeholders will enable the Council to identify all key transport and parking issues that the Local Plan should seek to address.

vi. **Leisure and Recreation**

**Question 6k:** Have we identified the main leisure and recreation issues facing the borough?

**Summary of Responses**

174 responses were received to this question. 79 respondents (about 45%) agreed that the main leisure and recreation issues had been identified, 86 respondents (about 49%) disagreed, while 9 respondents (about 6%) did not indicate a view. Overall, of those who expressed an opinion, there was a slight majority of 52% in disagreement and 48% in agreement.

**Question 6l:** If No, what leisure and recreation issues do you think are missing?

104 responses were received to this question.

Key issues referred to across the response groups were:

- Reference should be made to relationship between location of leisure/recreation facilities and house prices – higher house prices if closer.
- Encouragement and improvement of existing pitches/sporting facilities for dual use to meet local needs e.g. schools.
- Open space important in new development – health and well being.
- More all weather facilities needed. Though concern was also raised about not having too many all weather pictures with floodlights.
- More emphasis needed on cultural facilities, including the arts in rural areas.
- Countryside important as a leisure and tourist attraction – protect AONB and Green Belt.
- The enjoyment of the existing countryside recognised as important but more innovative recreational facilities such as outdoor gyms should be encouraged.
- Retain woodland, common land and green spaces.
- Over use of PROWs could put pressures on enjoyment of countryside.
- More bed and breakfast accommodation needed.
- Stated that leisure and recreation facilities s facilities in RTW far outweigh rural areas and should be distributed fairly across the borough. However, also mentioned that this could be unrealistic for travel and economic reasons.
- Include provision of network of green spaces.
- Lack of cycle paths in borough.
- Should be a policy to protect playing fields from development.

**Council’s Response**

The new Local Plan will seek to provide appropriate provision of leisure and recreation facilities across the borough, including within both the urban and rural areas.
Having regard to this, the Council continues to complete a proportionate evidence base to support and inform the Local Plan preparation process, such as the Open Space, Sport and Recreation Study, which includes the provision of formal and informal open spaces and sports pitches, to identify any existing deficiencies and set standards for new open space and recreation provision.

In combination it is considered that the evidence base information together with the responses to the Issues and Options consultation will enable the Council to identify all key leisure and recreation issues that the Local Plan should seek to address.

vii. **Sustainability**

**Question 6m:** Having regard to the prepared Sustainability Appraisal Scoping Report (link given here in I/O document), have we identified the main sustainability issues facing the borough?

**Summary of Responses**

171 responses were received to this question. 95 respondents (about 56%) disagreed that the main sustainability issues had been identified, 61 respondents (about 36%) agreed, while 15 respondents (about 8%) did not indicate a view. Overall, of those who expressed an opinion, the majority of 61% were in disagreement and 39% in agreement.

**Question 6n:** If No, what sustainability issues do you think are missing?

121 responses were received to this question.

Key issues referred to across the response groups were:

- Sustainability mitigating factors should be included in planning policy for developers.
- Better recycling facilities needed across the borough.
- Water resources, drainage and flooding not discussed in enough detail.
- Should be greater emphasis on monitoring of air and noise pollution.
- Water should be seen as a constraint and also a possible leisure use e.g. reservoirs.
- Parking should be included in SA choices.
- Concern about additional pressures on existing infrastructure - congested roads, school, health etc.
- Sustainability should be judged in a flexible way - factors which contribute to sustainability vary between urban and rural areas e.g. urban areas use cleaner fuels and have sewage disposal; rural areas rely on high sulphur fossil fuels and have no sewage disposal.
- The SA issues conflict: development needs/housing/transport v climate change/energy strategy.
- SA fails to meet special needs of people with disabilities and health needs of ageing population.
- Fails to mention importance of designing development to reduce carbon emissions. All new buildings should be Zero Carbon – use of solar panels, rainwater collection.
- Not enough emphasis on transport as a sustainable issue.
- Encourage electric cars and charging points.
- Relative scoring of each growth Option is too high level and may eliminate sites with strong credentials.
- Assessing development against a set of sustainability criteria will not prevent unsustainable piecemeal development of 13 000 houses. Approach should be based on sustainability criteria and sites identified afterwards.
- Important indicators for wellbeing should be listed – e.g. air quality, road noise, landscape loss in AONB/Green Belt.
- Reduce light pollution.
Council’s Response

The responses highlighted a range of sustainability issues and these will be considered further in preparing a suite of relevant strategic and more detailed development management policies.

An Interim Sustainability Appraisal (SA) was also prepared to accompany the Issues and Options document and was published for consultation at the same time. The responses to the SA consultation have been reviewed under a separate report but considered in conjunction with the Issues and Options consultation responses in preparing strategic and development management policies in the new Local Plan. An updated Interim Sustainability Appraisal has been prepared and published on the Council’s New Local Plan web page at www.tunbridgewells.gov.uk/localplan.

Section 5 – Strategy Considerations

Introduction

Under this section, there are a number of strategic considerations which include:-(i) Cross-boundary Strategic Planning and Duty to Cooperate, (ii) Settlements in the Borough, (iii) Development Boundaries and (iv) Strategic Options (Five possible options – 1. Focused growth, 2. Semi-dispersed growth, 3. Dispersed growth, 4. Growth Corridor-led Approach and 5. New Settlement growth). At least two questions were asked relating to each of the strategic considerations as follows:

i. Cross-boundary Strategic Planning

Question 7: Are there any specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?

Summary of Responses

177 responses were received to this question. 134 respondents (about 76%) agreed there were specific cross boundary issues that should be considered, 30 respondents (about 17%) disagreed, while 13 respondents (about 7%) did not express an opinion. Overall, of those who expressed an opinion, the vast majority of 81% agreed that there were specific cross-boundary issues that need to be considered.

Question 7a: If Yes, what are the specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?

Summary of Responses

152 responses were received to this question.

Key issues referred to across the response groups were:

- A combined approach with all Kent and East Sussex authorities on the provision of essential services, utilities and infrastructure is imperative – schools, healthcare, water supply, waste management, flood management, energy and roads.
- There is unmet housing need in all neighbouring boroughs and districts - TWBC should assess the capacity of the borough more comprehensively, including considering suitable sites in the Green Belt.
- Development in the borough will create demands on road, rail and other infrastructure but similar development in other boroughs will amplify the issues. The development of 13,000 houses in the borough coupled with similar growth in other boroughs will create new bottlenecks.
• Major improvement to public transport network, location of railway stations and rail links, surrounding road infrastructure and car parking are required.
• As high percentage of borough is AONB - should consider cross boundary discussion with others to take some of TWBC's housing numbers.
• Wealden District Council is planning for levels of housing growth below their OAHN due to concerns about protecting the health of the Ashdown Forest SPA/SAC. The Issues and Options paper does not indicate whether any discussion has taken place or how this matter will be addressed.
• Cross boundary discussion with Tonbridge and Malling, Maidstone and Ashford Borough Councils over the opportunities for development along the Ashford to Charing Cross railway line.
• Cross border discussion with neighbouring authorities along the Uckfield to London railway line, especially in view of the opportunities potentially offered by the BML2 rail project if it materialises.
• DoT has recently published a consultation that contemplates reducing current train services to smaller stations between London and Hastings/Ashford, heavily relied on by TWBC residents who commute to London. Council should seek to cooperate with neighbouring LPAs to resist such reduction and mitigate any impact if it does take place.
• Opportunities to improve smaller railway stations e.g. West Malling, to improve links to London and beyond.
• SHMA advises that in event of an unmet need it would be appropriate to approach authorities which share the HMA namely Sevenoaks, Tonbridge & Malling, Wealden and Rother. Therefore, in the event of a proven unmet need, Maidstone BC (MBC) would expect opportunities to be fully explored in these authority areas as priority.
• TW Economic Study (2016) concludes TW borough shares a functional economic market area with Sevenoaks District and Tonbridge & Malling borough. Again, MBC considers TW should be directed to these authorities for unmet needs.
• Proposals which could upgrade transport connections, and specifically public transport services, between TW and MBC would be welcome. MBC request further clarification and discussion on this as part of Duty to Co-operate.
• Integral that consideration given to potential impacts of London's anticipated growth on borough's existing/future infrastructure requirements. KCC would welcome further engagement to assess implications of such growth on infrastructure and services.
• Appropriate coordination of new secondary school provision across the West Kent area and East Sussex will be required.
• PROW networks and high ecological connectivity cross boundaries and should be taken into consideration in new Local Plan.
• Should be discussion between TW, Tonbridge and Maidstone for possible joint development along boundaries with a new station between Tonbridge and Paddock Wood with parking facilities and access to the now duelled A21 and M25 beyond.
• Council needs to do much more than have an exchange of correspondence with neighbouring authorities, as suggested at Para 5.5.- need joint plans and policies or formal planning agreements for cross boundary developments.
• Long-distance visual impact of developments is important.
• Green Belt important - protect or review?
• HGV routing problem especially in rural areas - need to address HGV access (or lack of it) at M25/M26 junction – creates cross country traffic that could otherwise use motorways and trunk roads.
• Consider provision of sites for Gypsy and Traveller communities.
● "Garden village" concept as this may not fall within one specific borough.
● Engage in consultation on noise and air pollution as a result of airport expansion, especially Gatwick.

Council’s Response

The Council recognises and accepts that, under the Duty to Cooperate, neighbouring authorities, the County Council and other relevant agencies should be positively engaged and involved in discussions on identified strategic cross boundary issues such as meeting housing targets, infrastructure and a coordinated approach to transport provision, as the Plan moves forward. Following best practice and emerging national requirements it would be the intention to complete Memoranda of Understanding/Statements of Common Ground as necessary with all the relevant parties as the Plan progresses and before Examination. Once the review of responses to the Issues and Options is complete and work on preparing a draft Local Plan document is underway it is the intention to schedule a series of meetings with adjacent local authorities and key infrastructure providers to update them on how the new Local Plan is to proceed.

ii. Settlement Groupings

Question 8: – Do you agree with the suggested groupings of settlements?

Summary of Responses

202 responses were received to this question. 56 respondents (about 28%) agreed with the suggested settlement groupings, 130 respondents (about 64%) disagreed, while 16 respondents (about 8%) did not express an opinion. Overall, of those who expressed an opinion, the majority of 70% disagreed with the suggested groupings, while 30% agreed.

Question 8a: If No, what changes do you suggest to the groupings of settlements and why?

Summary of Responses

158 responses were received to this question.

Comments made in relation to specific settlements are included in the detailed reports attached at Appendix A.

General issues referred to across the response groups were:

● Extremely flawed methodology - status of range of services and facilities available is highly unstable and therefore an illogical means of providing an indication of the level of sustainability and appropriateness of any settlement to accommodate further growth.
● Some small settlements could take proportionally more housing and probably be re-vitalised as a result.
● Groupings should be weighted in view of transport links (to train stations and main roads), availability of public transport (trains and bus services) and flooding issues.
● Retail sector has changed to Supermarket deliveries, online buying etc.
● Accessibility to good quality educational facilities important.
● Groupings also need to reflect levels of deliverable development, ease of growth and access to areas of employment.
● Hierarchy is based on numbers of shops, pubs and facilities, ignoring location, transport links, and other constraints.
- Weighting of some criteria inappropriate. e.g. a Primary school scores 3 and Secondary school scores 5 - fails to reflect there are only 9 state secondary schools within whole borough and it would be more sustainable for development to be located closer to secondary schools. More sense for primary schools to be attributed 1 point rather than 3.
- Purpose of groupings and what the categorisation means is inadequately described - stronger justification of the groupings could be presented within the Issues and Options document to support the evidence base.
- Questioned whether each nursery/pre-school should be given an equal score - as with shops, the existence of a service is surely more important than additional ones which merely provide further choice.
- Value of a train station has been significantly underestimated. Train travel is a highly sustainable mode of transport, allowing access to high-quality employment without use of a car. Suggested that scoring given to train line is reconsidered.
- Scoring must be amended to reflect an accurate representation of the value of a facility/service e.g. a mobile service (available only for a few hours on one day a week) is 1 point, the same as other convenience/comparison shops/health services, open 5 - 7 days each week.
- Suggested that group B and C villages are combined as ‘sustainable villages’, containing core day-to-day services that support an element of future growth, whilst group D and E villages combined as ‘other villages’ where services are more limited and therefore development may need to be more controlled to ensure a sustainable approach to growth.
- Questioned whether points should be given for Sustrans Cycle Route 18 – as generally an on-road route, with no dedicated cycle lanes, on winding, highly hazardous roads.
- Topography of villages in relation to development sites and access to services facilities should be taken into account e.g. some on steep slopes while others are flat.
- Number of services and amenities in a village can depend on proximity to larger settlements e.g. where more isolated may have more self supporting facilities.
- Hierarchy should also include a Group F for hamlets of Colliers Green, Hartley, Cranbrook Common, Wilsley Green, Wilsley Pound and Golford.

**Council's Response**

In the commentary of the suggested settlement grouping on page 32 of the Issue and Options consultation document the Council makes clear that this is an initial grouping based on evidence gathered to date; and confirms that further work and consideration of all evidence would allow a final suggested hierarchy of settlements to be set out in the Local Plan.

It is considered that the level of provision of services and facilities at any settlement is a relevant and significant factor in considering the sustainability of a settlement and in influencing decisions on the status of a settlement and where it might sit in the settlement hierarchy.

It is made clear in the Issues and Options consultation document that the results of the Role and Function Study is only one of a number of factors that will influence the selection of appropriate locations for new development.

Consideration of the responses to the Issues and Options consultation, including those relating to changing service and facility provision and the methodology used, along with the evidence studies, sustainability assessment and assessment of sites, will lead to the Borough Council agreeing a preferred development strategy and settlement hierarchy which will be set out in the draft Local Plan and subject to further public consultation.

**iii. Development Boundaries**
Question 9: – Should the policy approach of defining settlement “Limits to Built Development” continue in principle?

Summary of Responses

223 responses were received to this question. 190 respondents (about 85%) agreed that the policy approach of defining Limits to Built Development should continue, 6 respondents (about 3%) disagreed, while 27 respondents (about 12%) did not express an opinion. Overall, of those who expressed an opinion, the vast majority of 97% agreed that the policy approach of Limits to Built Development should continue.

Question 9a: Should the defined Limits to Built Development as currently drawn be retained in their current form or in order to maintain settlement patterns, or be removed to enable the delivery of suitable sites?

Summary of Responses

218 responses were received to this question. 162 respondents (about 74%) agreed that Limits to Built Development should be retained in their current form, 28 respondents (about 13%) thought that they should be removed, while 28 respondents (about 13%) did not express an opinion. Overall, of those who expressed an opinion, a significant majority of 85% felt that the Limits to Built Development should be retained in their current form.

Question 9b: If the currently defined limits are to be reviewed/redrawn, what criteria do you think should be applied in redrawing the boundaries?

Summary of Responses

169 responses were received to this question.

Key issues referred to across the response groups were:

- Any proposed changes to existing LBDs should allow a small % of flexibility, considered on a case by case basis, in consultation with local communities and Parish Councils.
- Should be reviewed in some of smaller settlements where development might make the settlement more sustainable (whilst ensuring that character/setting not destroyed).
- Review to allow flexibility and organic growth, to meet longer term needs for both housing and employment.
- Re-draw but exclude Green Belt and AONB land.
- Re-draw to reflect existing built development and planned allocations.
- Review taking into account natural constraints: - flood plains, sensitive areas of landscape characteristics, conservation areas and common land, of Green Belt or AONB.
- Should encompass all of recognised village (built area) and be drawn with care.
- Review to include garden areas where current LBD cuts through it.
- Consider relationship to existing settlement boundary, built development within the settlement and character of area.
- Likely some defined LBDs will be out of date and therefore need to be reviewed. For larger settlements, may be redrawn to include land where development can be supported and sustainable.
- Criteria for defining LBD boundaries should be based on a robust up to date evidence base, assessing and meeting the housing needs of the borough and specific communities; making use of appropriate assessments on landscape, highway and sustainability and considering...
role of mitigation where appropriate to balance sustainable needs of the Local Plan as set out in the NPPF.

- Need to assess sustainability of any extended limits, and whether justifiable based on relevant criteria such as (a) current/future availability of additional local infrastructure (healthcare, schools and roads) to adequately support such development and (b) harm to the environment (habitats and noise and air pollution).
- Should only be redrawn where potential developments would allow - walking distance to schools, shops and local facilities; and existing infrastructure is strong enough to allow extra capacity on roads with infrastructure to allow/encourage walking and cycling.
- The proposition assumes that infrastructure exists and services are provided in a uniform way across the borough. In towns extension of services is a practical proposition but in the villages the same levels of infrastructure are not in place and are not easily extensible.
- Request that some hamlets have own LBDs.

**Council’s Response**

The responses received indicate there is general support for retaining some form of development boundary designation and this will be considered in deciding upon an appropriate approach in reviewing and preparing strategic and more detailed development management policies.

As the Council continues to complete a proportionate evidence base to support and inform the Local Plan preparation process, this will include a topic paper in respect of development boundaries to support the final decisions made.

**iv. Strategic Options (Five possible options as above)**

**Question 10:** Please let us know your preferred option or combination of options in order of preference.

**Summary of Responses**

289 responses were received to this question in terms of ranking Strategic Options in order of preference. However, a significant number of these respondents stated they preferred a combination of Options as set out in Question 10a below. One respondent stated they did not agree with any of the Options.

Of those who ranked the Strategic Options:

- 116 respondents (about 60%) ranked Option 4 (Growth Corridor-led Approach) as their most preferred Option;
- 34 respondents (about 18%) ranked Option 5 (New freestanding settlement) as their most preferred Option;
- 26 respondents (about 13%) ranked Option 1 (Focused Growth) as their most preferred Option;
- 16 respondents (about 8%) ranked Option 3 (Dispersed Growth) as their most preferred Option;
- 2 respondents (about 1%) ranked Option 2 (Semi-dispersed Growth) as their most preferred Option.

However, some of these Options were ranked in combination with other Options (as below).
From these responses, it can be concluded that of those who ranked the Strategic Options, the majority of 60% of respondents chose Option 4 (Growth Corridor-led Approach) as their preferred Option.

**Question 10a: If you prefer a combination of options, please state which ones.**

**Summary of Responses**

149 responses were received to this question, stating their preferred combinations. However, some respondents made a comment rather than state a preference.

Of those who stated their combination preference:

- 66 respondents (46.8%) chose a combination of Option 4 (Growth Corridor-led Approach) and Option 5 (New Settlement Growth) as their preference.
- 29 respondents (20%) chose a combination of Option 4 (Growth Corridor-led Approach), Option 3 (Dispersed Growth) and Option 1 (Focused Growth) as their preference.
- 10 respondents (7%) chose a combination of Option 1 (Focused Growth) and Option 4 (Growth Corridor-led Approach) as their preference.
- 6 respondents (4.3%) chose a combination of Option 3 (Dispersed Growth) and Option 5 (New Settlement Growth) as their preference.
- 6 respondents (4.3%) chose a combination of Option 4 (Growth Corridor-led Approach) and Option 5 (New Settlement Growth) as their preference.
- 6 respondents (4.3%) chose a combination of Option 1 (Focused Growth) and Option 2 (Semi-dispersed Growth) as their preference.
- 6 respondents (4.3%) chose a combination of Option 1 (Focused Growth) and Option 5 (New Settlement Growth) as their preference.
- 3 respondents (2%) chose a combination of Option 4 (Growth Corridor-led Approach), Option 3 (Dispersed Growth) and Option 5 (New Settlement Growth) as their preference.
- 2 respondents (1.4%) chose a combination of Option 4 (Growth Corridor-led Approach), Option 1 (Focused Growth) and Option 2 (Semi-dispersed Growth) as their preference.
- 2 respondents (1.4%) chose a combination of Option 4 (Growth Corridor-led Approach) and Option 5 (New Settlement Growth) as their preference.
- 2 respondents (1.4%) chose a combination of Option 3 (Dispersed Growth) and Option 2 (Semi-dispersed Growth) as their preference.
- 1 respondent (0.7%) chose a combination of Option 1 (Focused Growth), Option 3 (Dispersed Growth) and Option 4 (Growth Corridor-led Approach) as their preference.
- 1 respondent (0.7%) chose a combination of Option 2 (Semi-dispersed Growth), Option 3 (Dispersed Growth) and Option 4 (Growth Corridor-led Approach) as their preference.
- 1 respondent (0.7%) chose a combination of Option 1 (Focused Growth) and Option 3 (Dispersed Growth) as their preference.
- 1 respondent (0.7%) chose a combination of Option 3 (Dispersed Growth) and Option 4 (Growth Corridor-led Approach) as their preference.

Overall, although there was a range of preferred combinations of strategic Options among respondents, of those who expressed an opinion, the majority of 46.8% chose a combination of Option 4 (Growth Corridor-led Approach) and Option 5 (New freestanding settlement) as their preference.

**Council’s Response**
The progression of work to prepare a draft Local Plan, including a relevant development strategy for the borough, will take account of the responses to the Issues and Options consultation, current and emerging national policy, new national and local evidence and the findings of the Sustainability Appraisal work.

Work to date, and having due regard to responses received to the Issues and Options consultation, is such that the Preferred Option presented in the draft Local Plan is likely to be an amalgamation of three of the presented suggested options.

Question 11: What views do you have about the possibility of a new settlement somewhere in the borough providing for future development needs?

Summary of Responses

199 responses were received to this question.

Key issues referred to across the response groups were:

- Would need excellent transport links- i.e. on a main train line and possibly its own train station with good parking facilities
- Advantage – Implementation and higher level funding for a master infrastructure plan (should be implemented before built).
- Would result in additional large volumes of traffic and would therefore need higher level funding and government cooperation to improve A road networks.
- It could take up a large area of greenfield land.
- Should be located outside the AONB and Green Belt.
- Must be a sustainable mixed development with option to expand in future plan periods and compatible with its surroundings.
- Employment opportunities.
- Must be standalone, self-sufficient, sustainable and have no impact on existing already heavily developed and populated areas.
- Due to Green Belt, AONB and other landscape designations and known physical constraints such as flood risk, there is no suitable location for a new settlement in the borough.
- Until the Council has properly assessed maximum levels of growth that could be accommodated within/adjacent to existing settlements, should not be considering new settlement option.
- Need to assess how it would relate to and respect the character of historic heritage of settlements within the borough.
- Would not provide a balanced growth strategy and would not serve housing needs within rural areas, underprovided by the previous Core strategy.
- New settlement should be planned as a whole rather than piecemeal.
- Placing such an enormous number of houses in the rural borough would destroy rural TW wherever it is located.
- Description of ‘Garden Village’ is misleading. 5000 - 7000 homes is a town - difficult, if not impossible, to find a suitable location for a new settlement of that size.
- Would take a very long time to come about and may not meet houses needs in Plan period.
- Due to high level of AONB landscape (70%) such a large scale development will not be possible.
- Any new settlement would need to have all necessary schools, doctors, leisure facilities and transport links in place before any people move in.
- Detrimental to farmland and agriculture.
• Without a shared vision from all landowners then a new settlement will not materialise into a successful conclusion.
• Any new 'garden village' should be outside the borough altogether.

**Question 11a: Where do you think a possible new settlement could be located?**

**Summary of Responses**

165 responses were received to this question.

Locations identified across the response groups were:

• North of the borough, adjacent to a main railway line.
• Outside of the AONB and Green Belt.
• Eastern part of the Borough because transport links afforded by Ashford are far superior to those to the west of the borough.
• Somewhere with potential for local employment.
• Create a new settlement between TW, Pembury and Tonbridge - By the A21 and good access to M25 with access to TW, Tonbridge and PW train stations (or build another station between Tonbridge and PW) - access to hospital, schools, Industrial estates, shops; access to all Tonbridge and TW facilities and jobs.
• Locate the new settlement in the A21 growth corridor - sustainable location.
• Staplehurst Parish Council - new settlement should not be situated in areas adjoining Staplehurst or in Cranbrook and Hawkhurst areas to the south of Staplehurst, as the impact would be unsustainable.
• Locate to the south of Kippings Cross roundabout.
• To the South East around Cranbrook and Hawkhurst area.
• Between Pembury and Paddock Wood (PW).
• South East of PW – not too far from the train line.
• West or east of PW in Maidstone Borough.
• Area of flat land between Tudeley and Five Oak Green.
• On government owned land adjoining Blantyre House.
• New Settlement to the north of borough near Marden or Staplehurst on the Ashford to Tonbridge Railway line.
• Create a new settlement between TW/Pembury/Tonbridge.
• Capel/Five Oak Green area.
• As close to the existing railway stations at Staplehurst and Headcorn as possible - north of Frittenden.
• Lower-lying area to minimise visual impacts - either NW or SW of Goudhurst.
• In between Lamberhurst and Pembury or PW and Southborough.
• Use land at Bewl Country Park.
• North of North Farm Industrial Estate between the railway line and A21.
• East of Ashdown Forest, south of TW and the Weald -minimum impact on environment and AONB.
• One option would be a sensitive development of a number of hamlets and farmsteads around a core settlement with new transport and infrastructure. A rail link is essential.
• Consideration should be given under duty to co-operate to a new settlement outside the borough boundary close to an existing train station.

**Council’s Response**
The above questions relating to a Strategic Growth Option for a new settlement in the borough are location neutral.

In response to Questions 10 and 10a above there was a level of support indicated for a new settlement under the preferred combination of Options 4 and 5, with a wide range of views on possible locations.

Having regard to this, the Council continues to complete a proportionate evidence base to support and inform the Local Plan preparation process which includes the commissioning of a New Settlement Feasibility Study to identify potential locations and support any final decisions made in respect of a new settlement in the borough. The Feasibility Study is expected to be completed and published early in 2018. The outcomes of the study will be carefully considered, alongside other evidence work and findings, in order to decide upon a preferred development strategy for the borough and to be articulated in the new Local Plan.

**Question 12: Do you think we have considered and identified all reasonable options for accommodating future development growth within the borough?**

**Summary of Responses**

176 responses were received to this question. 84 respondents (about 48%) agreed that all reasonable options for accommodating future growth have been identified and considered, 91 respondents (about 52%) disagreed, while one respondent (about 0.6%) did not express an opinion. Overall, of those who expressed an opinion, the slight majority of 52% were in disagreement, with 48% in agreement.

**Question 12a: If No, please set out what other options for accommodating future development growth within the borough you think should be considered.**

**Summary of Responses**

119 responses were received to this question.

Other options/comments made across the response groups were:

- Not convinced that such substantial growth is in fact required within the borough - 13,000 housing target is based on SMHA survey. However, the projection is largely based on the past; not based on local need; and does not split the growth forecasts between TW towns and TW rural areas which are not the same; the projection takes no account of AONB, landscape character, trains, jobs, services, traffic, etc. as constraints have not yet been applied.
- Challenge the Objectively Assessed Need.
- Needs to be a firm policy of brownfield first.
- Rational policy would be: a main focus for development in main urban area; subsidiary focus on development in small towns/larger villages; small scale development in smaller villages; and an overall focus on locating development where it is sustainable, with good transport links and environmental constraints are not breached.
- Options for increasing housing density in existing settlements should be explored.
- Role of farmsteads and hamlets, including modern farm buildings should be addressed.
- One aspect not explored is wider scale compulsory purchase, to allow development in run-down areas, rather than green field areas.
- There are areas just outside the borough where development would make more sense - e.g. Marden and Staplehurst.
Need to start building upwards. Current developments use far too much land.
Should be more focus along the A21 corridor.

Council’s Response

It is noted that no other strategy options for growth were put forward in the responses received. Due consideration will be given to the more detailed comments made regarding density, building heights and the role of farmsteads and hamlets in bringing forward site allocations and development management policies in the draft Local Plan.

Section 6 – Development Management Policies

Introduction

This section considers the policies that are currently in place in the Tunbridge Wells Borough Local Plan 2006 and identifies the key topics that may merit and necessitate new development management policies, especially in the light of government guidance in the NPPF (2012) and any updated local evidence. Three questions were asked relating to (i) existing policies, two questions relating to (ii) new policies and one question relating to (iii) detailed policies, as follows:

i. Existing Policies

Question 13: Which policies do you consider are suitable for continued use?

Summary of Responses

67 responses were received to this question, but not all respondents specifically identified policies considered suitable for continued use.

Summary of policies identified to be suitable for continued use across the response groups were:

Tunbridge Wells Borough Local Plan 2006:

Chapter 3 – Green Belt, Rural Fringe and Limits to Built Development
Policy LBD1 (also already replaced (in part) by Policy AL/STR 1 in Site Allocations Local Plan 2016)
Policies MGB1 and MGB2
Policies RF1 and RF2

Chapter 4 – Environment
Policies EN1, EN2, EN4, EN5, EN6, EN8, EN10, EN11, EN12, EN13, EN15, EN16, EN17, EN19, EN20, EN21, EN22, EN23, EN25, EN26, EN27 and EN28

Chapter 5 – Town, Neighbourhood and Village Centres
Policies CR1, CR2, CR3, CR9 and CR12

Chapter 6 – Housing
Policies H1 to H13 (Policies H6 and H7 already replaced by other housing allocation policies in Site Allocations Local Plan 2016)
Chapter 7 – Economic Development

Policies ED1, ED2, ED3 and ED5

Chapter 8 – Tourism

Policies T1, T2 and T3

Chapter 9 – Recreation

Policies R1, R2 and R6

Chapter 10 – Community Services

Policy CS3, CS4, CS5 and CS6

Chapter 11 – Transport and Parking

Policies TP1, TP2, TP3, TP4, TP5, TP6, TP7, TP8, TP9, TP17, TP18 and TP27 (specific reference made to additional provision of public car park in Rusthall)

One respondent considered all policies in Chapters 3 to 10 of the 2006 Local Plan, including those that were not saved, with the exception of site-specific policies where the sites have been developed since the 2006 Plan, should be reinstated in the new Local Plan.

Another respondent indicated that no policies are suitable for continued use.

Core Strategy 2010:

CP2: Green Belt; CP3: Transport Infrastructure; CP4: Environment; CP5: Sustainable Design and Construction; CP6: Housing Provision; CP7: Employment Provision and CP8: Retail, Leisure and Community Facilities Provision could all be usefully reproduced in new Local Plan.

Most of the policies should be carried through to new document and updated as necessary in consultation with community and statutory consultees.

Tunbridge Wells Site Allocations Local Plan 2016:

Recommended existing principles and designations set out for RTW Primary Shopping Area are continued, mainly drawing on adopted policies of Local Plan Allocations Document.

Other comments:

- High Weald AONB Management Plan (not a policy but should be given due regard and not mentioned in the plan).
- Retain all policies that protect environment.
- One respondent - Not been given information needed to answer.
- New strategy must review all old policies and decide on validity.
- One respondent - too many policies to consider - surely for the officers/members to decide.
- One respondent - Not identified any policies unsuitable for continued use.
- Very important to take forward relevant saved policies and DPD policy/ allocations into new Local Plan in coherent and comprehensive manner to avoid wording anomalies in 2010 Core Policy.
- If Community Infrastructure Levy is to be introduced - may also require revision of some policies.
Question 14: Which policies do you think may be out of date or no longer necessary?

Summary of Responses

46 responses were received to this question, but not all respondents specifically identified policies which were considered to be out of date.

Summary of Policies considered to be out of date across the response groups were:

Tunbridge Wells Borough Local Plan 2006:

Chapter 3 – Green Belt, Rural Fringe and Limits to Built Development

Policy LBD1 (also already replaced (in part) by Policy AL/STR 1 in Site Allocations Local Plan 2016)- does not relate to Local Plan period to 2033.

Chapter 6 – Housing

Policy H7 (already replaced by other housing allocation policies in Site Allocations Local Plan 2016)

Chapter 7 – Economic Development

Policies ED1 and ED3

Chapter 9 – Recreation

Policy R6 criterion 3

Chapter 10 – Community Services

Policies CS4 and CS6

Chapter 11 – Transport and Parking

Policies TP10 (A21 bypass nearly complete)
Policy TP11
Policy TP26

Other comments:

- New strategy must review all policies and decide on validity.
- One respondent - too many policies to consider - surely for the officers/members to decide.
- Policy CS6 for Community Buildings does not fully reflect the NPPF and requires updating.
- The Theatres Trust recommend policy wording - support arts and culture at all levels to support local economy and ensure all residents, visitors and future generations have access to cultural opportunities. Policies should protect, support and enhance cultural facilities and activities and promote cultural led development as a catalyst for regeneration in town centres.

Question 15: Which policies do you think could be updated or amended, and how?

Summary of Responses

55 responses were received to this question, but not all respondents specifically identified policies to be updated / amended.
Summary of policies suggested for updating/amendment across the response groups were:

**Tunbridge Wells Borough Local Plan 2006:**

**Chapter 3 – Green Belt, Rural Fringe and Limits to Built Development**

Policy LBD1 – amend to reflect NPPF and more positive approach in rural areas to ensure robust housing supply.

MGB1 – amend to allow for larger settlement expansion to meet housing needs.

**Chapter 4 – Environment**

Policy EN1 - Add reference to air quality in paragraph 1.

Policy EN2 – review and replace.

Policy EN4 - review and replace.

Policy EN5 - review and replace.

Policy EN6 - add Hawkhurst Colonnade

EN8 - update to refer to need to maintain and improve intrinsically Dark Night Skies in High Weald and add new policy for street lighting to reflect modern preference for ‘dark skies’.

Policy EN10 - Needs to be updated and strengthened as too heavily in favour of development and does not fully reflect significance of heritage assets awarded by NPPF (paras. 132 and 135).

Recommended Policy EN 10 amended to state the following:

- “that permission or consent will only be granted for proposals that are based on a thorough understanding of the heritage significance of the asset and its setting;
- that the impact of the proposal on the heritage significance must be fully explained in the application;
- that proposals will only be accepted where they conserve or enhance that significance;
- that the only exceptions to the above principles will be where limited and fully justifiable enabling development is required or where there are very significant economic, social or environmental benefits that would accrue to the wider community from the proposal; that these cannot be delivered by an alternative proposal and that the benefits of the proposal significantly outweigh the impact on the heritage asset; and
- where proposals impact on the significance of heritage assets there will be a requirement for proper archaeological recording and publication”.

Policy EN11 - In 2009-10 TWBC worked with KCC and the Kent Gardens Trust to identify and survey a number of historic gardens, including Statements of Significance useful for development control purposes. KCC advises that a revised Gardens policy should make reference to both the Kent Gardens Compendium and revised garden surveys.

Policy EN13 - removed trees should be replaced by another and cut down only if an ALTERNATIVE SITE is not available and add the word “significantly” in front of “outweighs” in paragraph 2.

Policy EN14 – review and replace.

Policy EN15 - Add the word “significantly” in front of “outweigh” in paragraph 1.

Policy EN16 - review and replace.

Policy EN 18 - second paragraph may require updating taking account of latest technological possibilities for avoiding incidence/consequences of flooding and exceptional need to provide housing to meet central government imposed targets for the borough.

Policy EN20 - review and replace.

Policy EN21- review and replace. Council should incorporate Local Green Space proposals as appropriate.

Policy EN22 - review and replace. Council should retain areas of local landscape importance to reflect value of locally important landscapes.
Policy EN23 - Add Hawkhurst to para 4.156 - as it’s green bordered approaches, particularly along the ridge, are part of its character.
Policy EN24 - review and replace.
Policy EN25 - review and replace.
Policy EN26 - review and replace.
Policy EN27 - review and replace.
Policy EN28 - review and replace.

Chapter 5 – Town, Neighbourhood and Village Centres

Recommended updating to general text as follows:

2.5  5.26 - there is no Royal Victoria Hall (RVH) and Council offices.

2.6  5.90 - incorrect as there are numerous convenience provisions including Tesco, Premier Southborough Stores and Osbornes.

- 5.91 - incorrect as no plans for a supermarket in proposed Hub development.
- 5.93 - references to RVH refurbishment should now be deleted.
- 5.96 - now incorrect as the plans for the area are specific in terms of parking.
- 5.97 - 'high quality' and 'high standard' are subjective and cannot be measured.
- 5.98 - incorrect reference to RVH again.
- 5.100 – 5.103 - redraft post Southborough Hub development.

- 5.149 - refers to recycling. Should have more significance and a commitment for better provision.

Policy CR1 - review and update.
Policy CR2 - review and update.
Policy CR3 - review and update.
Policy CR5 – update in light of subsequent executed or proposed development in town centre of RTW.
Policy CR7 – review and update.
Policy CR13 - not clear why all defined neighbourhood centres in RTW were deleted from this policy. This effectively negates Policy CS6 for RTW.

Chapter 6 – Housing

Recommended updating to general text as follows:

6.56 - revise as number of piecemeal developments granted since the original plan.

Policy H1 – review and update.
Policy H2 – needs to be updated to accord with NPPF and National Space Standards
Policy H4 - needs to be reviewed / updated with proper traveller site allocations made.

Policies relating to ‘housing development outside the limits to built development’ should be reviewed and replaced, including Policies H8, H9, H10, H11 and 13.

Chapter 7 – Economic Development

Policies ED1, ED2, ED3 and ED5 – review and update.

Chapter 9 – Recreation
Policy R1 - Sport England recommends this policy is amended to better reflect NPPF in relation to assessment of open space and buildings, any losses replaced by equivalent or better provision in terms of quantity and quality in a suitable location or if the development is for alternative sports and recreational provision, the needs of which clearly outweigh the loss.

Policy R2 - review and update.

Policy R6 criterion 3- No current allotment site should be used for development on pretext that there is no better alternative.

Chapter 10 – Community Services

Policy CS4 - In relation to developer contributions, reference to 2 mile radius threshold applicable to primary provision should be amended to 1 mile to reflect reasonable accessibility for children on foot.

Policy CS6 - does not fully reflect NPPF Para 70 “in promoting healthy communities planning decisions should plan positively for cultural buildings and guard against the loss of cultural facilities and services”. This should be reflected in a new policy with recommended wording suggested by the Theatres Trust.

Chapter 11 – Transport and Parking

Recommended updating to general text as follows:

- 11.128 and TP121 - still stand but with amendment.
- 11.130 - will be out of date following Southborough Hub development as there are parking provisions re provided throughout the area.

Policy TP1 - Delete words “non-residential” from paragraph 1.

Policy TP3 - Add words “and travel plan” after words “transport assessment” in paragraph 2.

Policy TP4 - Add a new 6th criterion: “The traffic generated by the proposal will not materially increase atmospheric pollution within an Air Quality Management Area or noise in an Important Area for Road Noise”.

Policies TP5, TP6, TP7, TP8 and TP9 - may need updating once an agreed strategy for parking has been formulated under updated Transport Strategy. To promote active travel, may be appropriate to increase required cycle parking from 1 to 2 spaces per dwelling unit.

Policy TP11 - review and update.

Policy TP18 - update in light of recently agreed Cycling Strategy.

Policy TP19 - update as some of policy objectives were delivered during previous plan period.

Policy TP26 - car parks in Hawkhurst now limited (few public spaces in North Grove, some parking at primary school and short stay convenience store car parks).

Core Strategy 2010:

Core Policy 1 (delivery of development): Replace with an updated policy. Should incorporate eventual spatial / development strategy and exception sites policy.

Core Policy 7 – review and update.
Site Allocations Plan 2016:

Policy AL / STR2: Environmental and Recreation Designations - designations should be reviewed and replaced.

Policy AL / STR3: Safeguarding Former Railway Lines - review and replace.

Other comments:

- Policies relating to infrastructure and services should be reviewed.
- New Local Plan should review and update all existing policies contained in extant Local Plan, adopted Core Strategy and Site Allocations Local Plan to ensure they meet any new government policy changes.
- All policies, such as space standards and those relating to sustainable and renewable energy should be reviewed against changes in national policy.
- Policies relating to the limits to built development need updating to reflect a more positive approach to planning in rural areas and to ensure a robust supply of housing.
- Green Belt policies should be updated to reflect provisions of NPPF and provide localised definitions of how key terms are defined.
- Travel sustainability policy should be updated to account for proposed reduction in rail services at PW, Marden and Staplehurst.
- Existing policies for public transport and cycling have not resulted in adequate improvements. Therefore should be emphasised much more strongly within policy documents.

ii. New Policies and Topic Areas

Question: Considering the topic areas above, are there any other topics that you think the new Tunbridge Wells Borough Local Plan should include?

Summary of Responses

66 responses were received to this question. One respondent answered “No”.

Summary of suggested New Policies/ Topic Areas across the response groups:

New Policies:

- Street lighting (EN policy) – to align with modern thinking on “dark skies”. Replace street lighting with sustainable path lighting (for people). Outside urban areas (not including village centres or LBDs) no lighting should be required.
- A21/M26 junction (TP policy) – joint strategy needed with adjoining boroughs to re-route HGVs at reduced diesel consumption (due to steady optimum speed) and less damage to settlements on cross country routes.
- Technology (ED policy) – to facilitate local IT and communications based industries.
- Policies should be included to protect distinctive character of existing settlements.
- Policy supporting renewable energy.
- Policy to ensure best practice approaches to remediating land contamination on brownfield sites.
- Policy to tackle diffuse pollution from current foul drainage infrastructure, with infrastructure for new development allowing capacity for existing rural areas to link to mains sewer extensions where feasible.

New Topic Areas:
• Natural Resources.
• Provision of water supply (distinct from flooding).
• Suitable housing for older people (allowing downsizing and to free up larger family homes).
• Plans to enable young people to afford to stay in the area – buying options, not just rental.
• New strategy must review all old policies and decide on validity.
• Master planning for all settlement growth to be achieved through NDPs.
• Co-housing schemes and Community Land Trusts should be included in policy.
• Protection of ancient woodland, farmland and fieldscapes.
• Green infrastructure (GI)- should be fundamental part of Local Plan. If well planned, GI can be embedded into development early in planning process and enable Local Plan to deliver sustainable growth to benefit the borough’s communities, environment and local economy.
• Impact of climate change.
• Infrastructure - waste disposal, care of elderly, roadway repairs, noise pollution.
• Air pollution.
• Ecology and protected species.
• Brownfield sites under natural, built and historic environment.
• Add infrastructure improvements to roads, paving and lighting.
• Providing public conveniences to the smaller towns and villages.
• Traffic problems and how to alleviate them.
• Careful use of natural resources.
• Maintaining biodiversity and green spaces.
• Clear statement on carbon emissions and energy consumption targets is needed projected to at least 2050, and a view on how this is aligned with the Paris climate change agreement.
• More detail of “cumulative impact” referenced in section 4.8 needed in next consultation draft.
• Further topic be addressed – “The Presumption in Favour of Sustainable Development” which underpins NPPF.

Other comments:

• Kent Police - consider Section 106 contributions be made to the police service, including infrastructure and policing infrastructure.
• Consultation document fails to take in to account wider definition of “Healthy Communities” as defined under the NPPF, namely “safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion”.

Question 17: Are there any topics that you consider do not require any further detailed development management policies because there is sufficient coverage already in place, i.e. in national guidance (the NPPF)?

Summary of Responses

34 responses were received to this question, of which 24 respondents answered “No” and 5 had no comment.

General comments across the response groups were:

• It should be a self-contained document capable of being stand alone and read as such to avoid multiplicity of documents on different websites.
• New strategy must review all old policies and decide on validity, tailored to specific circumstances of the borough.
No mention of AONB Management Plan.
Brexit - local policies could be particularly useful in fields currently covered by European environmental legislation.

iii. Detailed Policies

Question 18: Are there any specific planning issues affecting the borough of Tunbridge Wells that you consider are not adequately covered by the NPPF or already referenced in this chapter and which you would like to see addressed in a policy?

Summary of Responses

59 responses were received to this question, of which 2 respondents answered “No”.

Summary of Specific Issues which should be included/considered across the response groups:

- Can housing numbers be met as 70% of borough is in AONB?
- Should be specific, prominent and robust policy addressing development within High Weald AONB (original EN26 was deleted, presumably it repeated national policy). However, a locally distinctive policy for the High Weald AONB, referencing the Management Plan, would reinforce national policy and explain how it should be applied locally.
- High Weald AONB Unit should be an automatic planning consultee.
- High percentage of AONB land in the Borough – key tourism attraction – at odds with NPPF.
- Have labour costs in terms of new housing development and incoming labour to the area been taken into account?
- Should be a policy that states the context of a site and its surroundings should be considered first and the detail within it second.
- KCC - there are existing policies relating to KCC’s PROWs and Access Service. However, provision of a new specific policy that clarifies TWBC’s aspirations for PROWs, Village Greens and Common Land is recommended.
- Consider compensation and offsetting for land where mitigation does not sufficiently cover biodiversity loss.
- Compliance with all articles of the UNCRDP & UKDS 2012 by 2025 to provide independent access for all.
- Process of assignment of Section 106 funds should be addressed.
- New and updated policy to enable construction of rural workers dwellings in the countryside.
- An opportunity to apply a flexible approach to barn conversions.
- Policies ED1/ED5 - concerned scope of these is extremely limiting and does not provide sufficient scope for farm businesses to consolidate and grow.
- Shape future rather than leave to market forces, retaining key assets for the future and generating income to support community health and welfare.
- Identify robust constraints on development and focus on affordable housing.
- Create at least one sustainable Garden Village in the borough as a new community with schools, health services, employment and transport infrastructure, including new or existing railway stations.
- Develop network of high quality, integrated sustainable transport solutions and infrastructure focusing on walking, cycling and public transport for short journeys.
- Within RTW, increase quantity and quality of local employment, building on existing core sectors while developing new sectors such as media, health, tourism, arts and culture, and designate new zones dedicated to employment use.
- Maintain high visual amenity and cultural value of landscapes within and on perimeter of town that contribute to its economic health.
- Move developments away from main urban area to ease traffic congestion.
- Air quality caused by traffic congestion.
- Borough policy to conserve Green Belt and AONB areas.
- Separate policy to indicate clear activities scheduled to be undertaken to reduce traffic congestion to A26 area.
- Add infrastructure improvements to roads, paving and lighting.
- Need for a good supply of local needs housing.
- Concentrate on TW town centre to ensure all buildings are used and it provides a good shopping environment.
- Need to take crime prevention into account as in planning/design of new development.
- Where will the water supply come from – given the South East is a water shortage area?

**Council’s Response**

In the next key stage of the Local Plan review process, the Local Plan pre-submission consultation document will include draft development management policies. The Council will take account of the comments put forward in the consultation responses and other comments while exploring draft policies. The Council’s Development Management Officers and other stakeholders such as KCC and the Environment Agency will be actively involved in policy formation and testing. This will ensure the policies are workable and address development and land use issues in the borough.

The Council agrees that the development management policies should be simple and user friendly.

As part of this process, officers will explore the need for a policy to cover the Community Infrastructure Levy for new development.

**Conclusion**

**Introduction**

This final section allowed the opportunity to comment on any other planning and development related matters that should be considered or have not been mentioned in the Issues and Options document; and also for any general comments to be made, under the following question:

**Question 19:** Are there any other planning and development matters that you think the new Local Plan should consider or cover that have not been mentioned in this Issues and Options document? You can also make any general comments here.

**Summary of Responses**

462 responses were received to this question.

More than 60% of these comments were objections made in relation to specific sites from the Call for Sites process, which ran at the same time as the Issues and Options consultation. The responses received in relation to these specific sites will be considered separately alongside work to produce a final Strategic Housing and Economic Land Availability Assessment (SHELAA) and decide upon allocations to be included in the draft Local Plan.

In addition, many of the other comments received in response to this question, such as housing numbers and need, transport and congestion, infrastructure needs, AONB, Green Belt, historic and environmental protection, air and noise pollution and cross boundary issues have already been referred to in responses to the previous questions above.
In some cases, adjoining and other local authorities and statutory bodies felt they were unable to provide a detailed response to some of the questions given the high level detail of the Issues and Options consultation document at this early stage in the Local Plan Process; and would welcome further engagement on matters such as infrastructure provision, education, medical facilities as the Plan preparation progresses. Specific comments received from these consultees can be found in the detailed reports attached at Appendix A.

Also, some of the comments received relate to issues regarding specific settlements and again these can be referred to in the detailed reports attached at Appendix A.

Planning and development matters not mentioned in the Issues and Options Document and other general comments across the response groups were:

- Objectively Assessed Need (OAN) of 648 dwellings per annum or 12,950 dwellings from 2013-2033 is noted. However, the Issues and Options document does not indicate the overall level of growth being considered and whether this is above or below the OAN.
- At a time of considerable economic and political uncertainty (Brexit, possible change in government) together with rapid technological change, it seems rash to inflict such major changes in terms of housing development on the borough.
- The proposed business development will not create number of jobs required to support 13,000 households and the proposed mix of jobs is merely an extension of historic development activities.
- Specific reference should be made to the Ashdown Forest Special Area of Conservation with regards to atmospheric pollution and nitrogen deposition.
- It is not clear the degree to which any of the Options will meet housing need given the potential constraints on development that are still to be considered.
- Have not developed a concrete infrastructure plan for each Option. Therefore impossible to choose an Option without knowing what exact infrastructure will be behind that Option.
- Any new Local Plan will need to provide a range of different sites to ensure a robust supply of developable land to meet needs across the plan period - therefore do not think it appropriate to indicate whether one approach would be preferable to others.
- Important that the Council and surrounding authorities acknowledge and adequately address migratory patterns in their evidence base and emerging housing targets to ensure appropriate level of planned growth is achieved across the area.
- In accordance with the tests of soundness, affordable housing requirements need to be consistent with national planning policy, to ensure delivery over the plan period and flexible enough to deal with changing circumstances.
- It is vital to continue to direct development in line with the settlement groupings, which will ensure that sustainable locations are developed and gives the borough the best opportunity to meet its required needs.
- The Borough Transport Strategy needs refreshing and updating to cover the proposed Plan period.
- The Council should not lose sight of the wishes of the local communities, where greater than envisaged growth might be desired to help maintain the viability of settlements.
- The Council is advised to consider a focused consultation with local people and parish councils to begin identifying potential Local Green Space designations.
- The Council should give special consideration to the emerging draft policies in Neighbourhood Development Plans (NDPs) and consult closely with parish councils responsible for NDPs in drawing up the Local Plan, to maximize co-ordination and avoid discrediting the neighbourhood planning process.
- Older people should not be isolated in special build, out-of-the-way places but integrated into lively, mixed-age areas.
• New homes should be built with all ages in mind, accessible for wheelchairs and fit for later adaptations.
• Absolute need to match the scale of new proposed development with master planning and urban design of highest quality procured through design teams working to national and international standards.
• Any associated proposals maps for the Local Plan should show the boundaries of the Parishes and Town Councils, highlight major road and rail links, along with secondary school concentrations and their catchment areas.
• Seems to be a significant and viable option missing from proposals - The Rail Corridor.
• Another way of opening up the borough is resurrecting the PW branch line that went from PW via Horsmonden and Goudhurst to Hawkhurst.
• Should include developing conservation areas of the future.
• The publicity for this consultation was very limited and the time for consultation far too short.
• Four days for public consultation exhibitions were not properly promoted and were hardly adequate to do justice to the importance of the subject in hand.

**Council's Response**

The Council will take account of all the comments put forward in the consultation responses in the next stages of preparation of the new Local Plan.

In respect of some of the issues highlighted in response to the above question, the Council will also continue to work with parish and town councils and communities in the development and adoption of Neighbourhood Development Plans and Local Green Space designations; will seek to provide social and cohesive communities in terms of housing need and design through appropriate masterplans; and will seek to address comments made in respect of consultation procedures, such as the possibility of a longer consultation period with more events, in future consultations later in the Local Plan process.
Appendix A: Detailed Response Reports
## Contents

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**Representation Grouping: Parish and Town Councils**

Overall, responses were received from 13 Parish/Town Councils in the borough:

- Brenchley Parish Council
- Cranbrook & Sissinghurst Parish Council
- Capel Parish Council
- Frittenden Parish Council
- Goudhurst Parish Council
- Hawkhurst Parish Council
- Horsmonden Parish Council
- Lamberhurst Parish Council
- Speldhurst Parish Council
- Pembury Parish Council
- Paddock Wood Town Council
- Rusthall Parish Council
- Southborough Town Council

Responses were also received from the adjoining Parish of Staplehurst and the Kent Association of Local Councils (KALC). However, it is important to note that not all Parish/Town Councils or KALC answered every question. Therefore the total number of responses received for each question may vary.

**Section 3 – Vision and Objectives**

**Vision**

**Introduction**

This section relates to the draft Vision for the borough up to 2033. This includes the development of housing, economic, leisure and recreation uses identified within the new Local Plan to meet local needs. The Vision states that new development will be delivered in a sustainable way and will seek to protect and enhance the exceptional quality of the built, natural and historic environment while promoting economic prosperity to ensure the borough remains a special place. Three questions were asked in relation to the Vision as follows:

**Question 1: Do you agree with the new draft Vision for the borough?**

**Summary of Responses**

13 responses were received to this question. 6 respondents (about 46%) disagreed with the draft Vision, 3 respondents (23%) agreed; while a further 4 respondents (about 31%) did not indicate a view. Overall, of those who expressed an opinion, the majority of about 67% disagreed with the Vision, while about 33% agreed.
Question 2: What suggestions do you have for improving or updating the draft Vision and relating it to 2033?

Summary of responses

13 responses were received to this question.

Summary of Specific Issues/Concerns:

- Vision is too long, over ambitious and over prescriptive and should concentrate on a small number of clear priorities.
- Too much focus on Tunbridge Wells urban area and Paddock Wood. The Vision needs to ensure that the under pinning information illustrates how development will take place across the borough and address the needs of rural villages.
- No mention or consideration of Metropolitan Green Belt that exists to protect villages. Vision should ensure adequate protection of Metropolitan Green Belt as well as the Kent High Weald AONB.
- No mention of not being able to make housing targets.
- Does not take into account the wider benefits of the Borough.
- Tunbridge Wells is a major settlement in Kent and as such the plan doesn’t reflect this.
- Lack of detail regarding infrastructure.
- No overview perspective to understand how these plans impact with/on other adjoining boroughs.
- Need to review the impact of technology on the work environment; i.e. working from home, online banking etc. for both urban and rural areas.
- Total disconnect between the objectives and the borough limitations of geography, AONB & Green Belt in so far as the SHMA housing assessment and its build projections are concerned.
- If the view is taken that the town is FULL (on which the SHMA numbers projection are largely derived) it is neither valid nor sustainable to place those houses on rural Tunbridge Wells.
- Although there is a strong consensus for protecting the AONB from development, there is, nevertheless, a concern that this should not mean parishes that lie outside the AONB (or those that are not fully within it) become automatically targeted for development.
- The vision should also look to how the borough will develop over a much longer period beyond the proposed local plan. The numbers should be based on long term sustainable growth not short term theoretical needs.
- The villages do not have sustainable communities with increases in demands for infrastructure (schools, doctors surgeries etc.) that cannot be supported. The vision only enforces the notion they are dormitories for the larger urban areas.
- Larger developments (in village terms) are damaging to local communities as they place strain on local services and where alternative services require even more commuting.
- The borough should encourage Neighbourhood Plans in their vision to engage communities in broader borough initiatives providing an appropriate social cohesion and housing mix in the villages.
- The draft Vision should also include reference to development and provision of additional community infrastructure and general infrastructure (e.g. roads, public transport, water, electricity, broadband, mobile reception);
- The draft Vision should also include reference to agriculture. There should be a Vision for agriculture which would ensure sustainable and diverse agriculture, supporting small family
enterprises as well as larger operations, and which takes account of the possible and as yet unquantifiable impacts of Brexit.

- Our roads are congested and cannot cope now with the volume of traffic.
- Concerns that if more commuters move to the borough - car parks are already full, will there be adequate public transport to the stations? and trains are already at full capacity.
- The new Local Plan needs to consider additional community infrastructure, including how to finance it, to both support existing and new housing which should include schools and healthcare facilities and also general infrastructure supporting public transport looking at rail, bus and road transport and capacity of utilities, broadband and mobile reception.
- Major concerns with the existing road network in terms of the quality, capacity and congestion.
- Include sustainability in terms of energy production, conservation and consumption.
- This policy will need to address social, economic & environmental sustainability.

**Suggested amendments to wording:**

- One Parish Council answered Yes subject to replacing wording from “new development” to “special place” with the following “steps will be taken to protect and enhance the exceptional quality of the built natural and historic environment ensuring that such development as is permitted will comply with that ideal”.

**Others:**

- Delete ‘seek to’ and ‘on a day to day basis’
- Add after “…in a sustainable way” – “and having regard to the constraints presented by the AONB and the Metropolitan Green Belt.”

**Question 3: What should we be aiming and aspiring to achieve and why?**

**Summary of Responses**

10 responses were received to this question.

**Summary of Specific Issues/Concerns:**

- Aspire to have better local facilities for local communities, economic growth, local education and local jobs.
- Encourage cottage industries and agricultural business.
- Provide/retain community lead facilities including shops and businesses to feed the local population.
- Encourage the retention of active villages rather than dormitory villages.
- Infrastructure is a fundamental requirement for sustainable development and meeting the target for 13 000 new homes, both for communities and in general terms. Concerns about how it will be funded. Requires a coordinated investment plan from multiple agencies.
- Improve access to the countryside.
- Better protection and preservation of AONB and Green Belt.
- Widen vision to include growing Tunbridge Well’s status as a settlement area.
- Aim to enhance the AONB for future generations and as a tourist asset.
• Concentrate on promoting existing commuting links and the benefit to industry the borough has - such as good access to channel ports, London; High Speed Rail Links and M25.
• Historical education benefits in the borough.
• Sustainability is not a vision when combined with the SHMA housing numbers and call for sites.
• The presumption in favour of sustainability in the context of TW is flawed when looking at the proposed options. The answer is therefore half the number of houses.
• Sustainability features a lot in the overall document and in the NPPF but is not discussed as a long-term objective. The local plan defines goals until 2033. However, 2033 is simply a milestone and growth will then continue. If the current target is barely achievable then any further growth beyond 2033 can only be achieved by removing all limits to built development and dismantling the AONB and Green belt protections. Therefore suggested that the target figure needs adjusting to reflect a number that can be assimilated into the borough without wholesale removal of constraints.
• The strategic Objectives should include an objective to build homes and create employment where people want to live and work.
• What is meant by “high quality” housing?
• There is not simply a requirement for affordable housing in the context of planning requirements but also for open market housing which is ‘affordable’ to first time buyers and the elderly.
• Should be aiming to build the right type of housing to meet the needs of individual areas/settlements and aspiring to achieve an overall spread of housing throughout the borough.
• New buildings/dwellings should be energy efficient with a minimum borough wide specific target for all aspects of any development, critically addressing energy consumption and embodied energy.

Objectives

Introduction

This section relates to the eight draft Strategic Objectives needed to realise the Vision, which are (i) Meeting development needs, (ii) Protecting and enhancing the borough’s distinctive environment, (iii) Delivering sufficient infrastructure, (iv) Providing high quality housing, (v) Making provision for economic growth, (vi) Ensuring adequate leisure and recreational facilities, (vii) Delivering sustainable development and (viii) Delivering adequate transport and parking capacity. The following three questions were asked in relation to these draft Objectives:

Question 4: Do you think these are the right Objectives?

Summary of Responses

11 responses were received to this question. 6 respondents (about 55%) agreed with the Objectives, 4 respondents (about 36%) disagreed; while one respondent (about 9%) did not indicate a view. Overall, of those who expressed an opinion, the majority of 60% agreed with the Objectives, while 40% disagreed.
Question 4a: If you answered No, please explain why you don’t think these are the right Objectives.

Summary of Responses

9 responses were received to this question.

Summary of Specific Issues/Concerns:

- Strategic objectives are very vague – One Parish Council unable to comment because the information provided is not quantifiable.
- ‘Adequate’ is not good enough - transport strategy needs to include elderly and less able.
- Would like constraints in Objective 1 to take into account AONB and Green Belt.
- The Objectives are not SMART - specific, measurable, achievable, realistic and time-bound.
- The objectives talk in generalities without an overriding vision of how such a number might be achieved. Need to think about investment in community facilities as this can be more constrained in rural communities e.g. school catchment areas, medical facilities roads etc.
- It is irrational to simply extend the urban growth figure to the rest of the borough which has not benefited from past investment and, other than as a place to put new houses and will not benefit from future investment.
- The long-term vision is defined but there is nothing in the vision about managing the impact of future growth on differing communities. Accommodating growth based simply on numbers could easily create dormitory towns.
- Imperative that sufficient infrastructure is delivered, especially the A26 from the A21 to Eridge Road (just past the Sainsbury’s roundabout).
- Adequate leisure and recreational facilities needed with growth.
- Another important infrastructure problem is the lack of water if development was to be substantially increased.
- Sustainability features a lot in the overall document and in the NPPF but is not discussed as a long-term objective. The local plan defines goals until 2033. However, 2033 is simply a milestone and growth will then continue. If the current target is barely achievable then any further growth beyond 2033 can only be achieved by removing all limits to built development and dismantling the AONB and Green belt protections. Therefore suggested that the target figure needs adjusting to reflect a number that can be assimilated into the borough without wholesale removal of constraints.
- There is nothing in the objectives about creating social cohesion or balanced communities. The objectives discuss a housing mix but this is again from the perspective of the existing major urban settlements. Delivering a mix of housing to promote social cohesion is a different problem in the villages. Too many large properties and gated communities already built. Need to support cohesive and lasting communities.

Question 5: Are there any amendments required or other Objectives that you think should be included?

Summary of Responses

9 responses were received to this question.
Summary of Specific Issues:

- There is no mention of economic growth as appropriate to a rural community.
- Needs to be demonstrated that these objectives can be achieved within a reasonable level of cost and return value for money and that they are supplied in areas where the additional housing is actually located.
- Constraints in Objective 1 should take into account AONB and Green Belt.
- Need to look at the provision of education and social facilities, not just leisure requirement, a lot of people are attracted to the area because of these and need to retain this.
- “Ensure” with regard to infrastructure - inadequate infrastructure at present, how will this be funded and will this be tackled before development commences?
- Need to include requirements/impact of adjacent Districts.
- Should mention the wider role of Tunbridge Wells within Kent.
- Continued increasing growth is not possible without removing a significant number of the policy based constraints and broader environmental constraints.
- Does not take into account the town and country divisions in the borough.
- Should be more direct reference to providing different types of housing including entry level housing, housing for the elderly who are looking to downsize, a suitable mix of sizes of housing and a full and substantive review of the relevant demographic to ensure that the right homes are being built to meet the need.
- Any new development of housing needs to be matched by the creation of jobs in the borough.
- The proposed business development will not create the number of jobs required to support 13,000 households and the proposed mix of jobs is merely an extension of historic development activities. The Plan talks about 10,000 new jobs, noting our history in insurance & finance just as the latter is in danger of migrating out of UK as a result of Brexit.
- The assumption that retail will continue to grow seems unduly optimistic - High streets are in crisis with shops closing and retail is damaged by high business rates and on-line shopping.
- The demand for business premises needs to be monitored and managed to ensure that firstly new sites meet the need of a changing business community and secondly new development is not at the expense of existing centres.
- Tunbridge Wells is a special place and the centre needs to be carefully managed to ensure that it remains relevant to the broader community and that is continues to provide a cultural and retail heart of the borough.
- The housing options flowing from the flawed SHMA proposal are largely build ourselves out of a recession so let’s build driven (anywhere), rather than either housing or business need generated - The whole Plan is therefore not “joined up” or based on what is needed or sustainable.
- There should be an objective to encourage cross boundary partnership working towards economic growth, transport connectivity and infrastructure development.

Section 4 – Key Issues and Challenges

Introduction

This section identifies the key issues that the Local Plan will need to consider and address when putting forward a strategy and policies for delivery of growth. These key issues are: (i) Natural and Built Environment, (ii) Infrastructure, (iii) Housing, (iv) Economy, (v) Transport and Parking, (vi) Leisure and Recreation and (vii) Sustainability. Two questions were asked relating to each issue, as follows:
(i) **Natural and Built Environment**

**Question 6a: Have we identified the main environmental issues facing the borough?**

**Summary of Responses**

12 responses were received to this question. 5 respondents (about 42%) agreed that all environmental issues had been identified, 4 respondents (about 33%) disagreed; while a further 3 respondents (about 25%) did not indicate a view. Overall, of those who expressed an opinion, this question attracted a slight majority of those agreeing at 55%, while 45% disagreed.

**Question 6b: If No, what environmental issues do you think are missing?**

**Summary of Responses**

8 responses were received to this question.

**Summary of Specific/ Missing Issues:**

- No mention made of light pollution, an important issue for dark skies in rural areas, despite it being highlighted in the Landscape Character Assessment 2017.
- Protecting the Green Belt.
- Invasive species management.
- Not just protection of a view we should also protect the special habitats that we value such as ancient woodlands, gills, meadows and rough grassland verges.
- The Borough is further eroding the areas of AONB.
- Issues are broadly correct. However they are flawed as disconnected from the reality of housing build numbers, selected location options and the constraints of Tunbridge Well’s geography, AONB etc.
- No mention of increased noise, air pollution or congestion. Concentrating jobs and investment in the urban areas has already caused increases in traffic from the villages and beyond and any significant increase in the dispersal of housing will only increase these volumes, car dependency and need for parking.
- Coordinated approach to transport not discussed - needed to remove/reduce the dependency on motor vehicles or prevent unplanned random development of another North Farm estate which sees journeys from shop-to-shop by car because the pedestrian or other mechanisms were never considered. No Park and Ride schemes and the bus services from outlying areas are not real alternatives to the car.
- Not just about achieving correct number of residential units but ensuring that units constructed are fit for purpose in terms of the needs of those looking for housing.
- The impact on the Natural and Built environment is not just about housing development but the requirement for additional community infrastructure and other key infrastructure such as road and rail links.
- Current green belt designation should not rule out sustainable development. There should be a green belt review as in some areas land designated as AONB is more 'special' than
certain areas of green belt such as the area to the north of Paddock Wood (an area with excellent existing transport and community infrastructure). It appears that green belt designation does not necessarily mean the land is 'special' in landscape terms.

- Many rural lanes are not capable of handling additional capacity so it is vital to bear in mind that the construction of additional community and general infrastructure will impact on the natural environment. The concept of infrastructure concerns should include capacities of utilities, schools, the mobile network and broadband. These are all fundamental to creating sustainable developments.
- Complete change in the application of planning law in TWBC is required - in order to deliver proper places for people to live and work in. The stated aim is to avoid piecemeal development and yet the allocations of sites policy encourages piecemeal development.

Suggested amendments to wording:

- Suggested amendment to wording - Instead of “there should no net loss of biodiversity” (end of para 4.6) should read ‘should enhance and improve biodiversity’
- Suggested additional wording at para 4.11 ‘when making and improving linkages between different parts of an urban area, cycling and walking routes should be included. Areas should be allocated on the cycling routes for the secure lockable storage of cycles to encourage utility cycling to places of work, such lockable storage should be supplied as a priority’

(ii) Infrastructure

Question 6c: Have we identified the main infrastructure issues facing the borough?

Summary of Response

13 responses were received to this question. 2 respondents (about 15%) agreed that all infrastructure issues had been identified, 9 respondents (about 70%) disagreed; while a further 2 respondents (about 15%) did not indicate a view. Overall, of those who expressed an opinion, the vast majority of 82% disagreed, while 18% agreed.

Question 6d: If No, what infrastructure issues do you think are missing?

Summary of Responses

12 responses were received to this question.

Summary of Specific/Missing Issues:

- Upgrades and improvements do not address the issue where there is a lack of services such as gas. Would like this included as it affects fuel poverty.
• Should be clear statement that as technologies develop planning conditions to ensure the provision of sustainable infrastructure such as electric charging points for cars and fibre optic broadband/cable should be placed on permissions.
• There is a primary need to provide new systems for utility services such as water and sewage from scratch and not just to tack on to already overloaded systems. Coordinated strategy from multiple agencies which would include road and rail services and all utilities needed, including working with need of adjoining districts.
• Planning and design needs to plan ahead for a safer environment in terms of personal safety and crime in the absence of a visible police force.
• Improvements to fibre optic broadband and mobile coverage should be central to any development planning.
• Rail connections to London have not been addressed, particularly given the substantial increase in development along the London to Ashford and south east coastline.
• How is the additional investment going to be funded – developers or government?
• How will so many additional ‘essential staff’ be accommodated in an area of sky-high housing prices?
• Concern that existing road system is currently not coping with speeds and volumes of traffic and that current and future infrastructure requirements need to be address before considering any large residential development.
• Power cuts which impacts on economic businesses – reliability of utility supplies
• Supply of water due to drought conditions in winter as well as summer – infrastructure needed on new development to address these requirements.
• Water treatment/management and storage on current and future infrastructure.
• More weight needs to be given to considerations regarding transport including: (i) frequency and number of rail services at rural stations; (ii) bus routes; (iii) investment in existing road network; (iv) new roads; (v) integrated transport links between rail, bus and road including potential park and ride; and (vi) access to A roads and motorways from settlements.
• Primary school education capacity should be included.
• Future energy requirements

(iii) Housing

Question 6e: Have we identified the main housing issues facing the borough?

Summary of Responses

12 responses were received to this question. 3 respondents (about 25%) agreed that the main housing issues had been identified, while 9 respondents (about 75%) disagreed. Overall, the vast majority of respondents disagreed that we had identified the main housing issues facing the borough.

Question 6f: If No, what housing issues do you think are missing?

Summary of Responses

11 responses were received to this question.
Summary of Specific/Missing Issues:

- One respondent stated that all issues had been adequately covered.
- No mention of assisted housing for those with learning difficulties and disabilities.
- Issue of housing for older people is not addressed - should be provision for developers to build attractive low rise developments for people wishing to downsize that are designed/equipped for elderly residents and built in accessible areas.
- The aspiration to provide self build plots will not be met unless a policy is included to allocate 5% of sites for this purpose that can then be offered to individuals for self build projects.
- Small sites should be made primarily available to local builders to increase local employment and opportunities for apprenticeships and youth training.
- Location of future development not sufficiently addressed in terms of where needed. Nor housing density been addressed to make best use of land in the urban areas where development is most needed.
- Plan does not specify what the main housing issues/requirements are.
- ‘Affordable’ housing is still too expensive and local people will be forced out, while people from outside the area move in. What does the Borough Council intend to do to counter this issue?
- Overall the plan tries to address issues of costs and affordability. Presently demands are met by large private developers working on major projects - this approach doesn’t always satisfy social issues and integration and therefore engagement needed with other experts on this, such as Social Housing and Welfare Officers.
- Schools, Hospitals and Health Centres.
- The objectively assessed need should be based at parish level and should be community led and not target driven.
- In addition to affordable housing (often imposed on developers as a planning requirement to a certain percentage), consideration also needs to be given as to the affordability of market housing, especially in terms of first time buyers and the elderly looking to downsize.
- The assessed need in the SHMA of 13,000 new dwellings is flawed because it reflects a need based on an urban projection of growth and not on the need of the borough as a whole. If the town is considered to be full then the answer is not to simply equate town and country and share the burden with the rest of the borough. The key missing issue is that the borough is made up of two distinct groups. The methodology for assessing the growth need does not account for the two differing environments, their level of infrastructure and economic development.
- Building houses across the borough in pursuit of a target number will only end with the majority of households commuting to the major urban areas for work.
- One PC believed that there are 5,000 empty houses in the borough and asked if this figure is correct and, if not, how many are there?
- Infrastructure investment takes many years of planning and delivery and cannot simply be created without detailed planning.
- Expanding the numbers of houses built in the villages will make the process of assimilation of families into rural communities impossible and will stretch local services beyond capacity with no plan or possibility of resolution.
(iv) **Economy**

**Question 6g: Have we identified the main economic issues facing the borough?**

**Summary of Responses**

12 responses were received to this question. 4 respondents (about 33%) agreed that the main economic issues facing the borough had been identified, 7 respondents (about 59%) disagreed, while one respondent (8%) did not express an opinion. Overall, of those who expressed an opinion, the majority of 64% disagreed, while 36% agreed.

**Question 6h: If No, what economic issues do you think are missing?**

**Summary of Responses**

9 responses were received to this question.

**Summary of Specific/Missing Issues:**

- Ensure viability and vitality within the rural economy by encouraging farming and cottage industries.
- No mention of the impact of immigration to the borough where limited knowledge of English language and skills may limit employment opportunities in the local economy.
- The suggestion that there should 11-15 hectares for employment land is nowhere near sufficient for the current or future population of the borough. Such employment land should also be located close to future housing development to reduce travel time, carbon emissions and pressure on commuter services.
- The provision of better tourist facilities and encouraging tourism to take advantage of the AONB and historic villages as well as the historic centre of Tunbridge Wells has not been explored.
- What kind of employment and sectors does the Borough want to attract to Tunbridge Wells?
- In the first instance, should there be a strategy to fill all the high number of retail and office premises that are currently empty (many for sometime)?
- Less out of town retail development – preferable regeneration of towns and villages to enable people to commute less by car.
- Tourism/hotels/hospitality opportunities for sustainability and growth.
- Lack of adult education – post 16 tertiary education.
- No recognition of technological changes over next 15 years and what impact they will have on future employment potential.
- Without a valid business plan the extra houses and 30,000 people are going to be either retired, children or become commuters which calls for the location to be in the proximity of Tunbridge Wells and Tonbridge where the schools and train links are located.
- No discussion on level of business rates and the impact this has on small as well as large businesses.
- The economic issues of post-Brexit impact on agriculture should be added.
- Needs to be investigation regarding the retail and leisure facilities available, to be provided alongside new housing developments to ensure appropriate services are available.
- Poor availability and quality of broadband connectivity - should be seen as a vital service in any new development in addition to investment required for existing housing and settlements.
- The level of empty retail space has grown over the last 3 years with even Victoria Place no longer immune to large empty retail spaces. Society have shifted purchasing to online services and investment in additional retail space is out-of-step with current trends.
- The build plan and the business plan are not joined up.

(v) **Transport and Parking**

**Question 6i: Have we identified the main transport and parking issues facing the borough?**

**Summary of Responses**

12 responses were received to this question. 4 respondents (about 33%) agreed that the main transport and parking issues had been identified, 7 respondents (about 59%) disagreed, while one respondent (8%) did not express an opinion. Overall, of those who expressed an opinion, the majority of 64% disagreed, while 36% agreed.

**Question 6j: If No, what transport and parking issues do you think are missing?**

**Summary of Responses**

11 responses were received to this question.

**Summary of Specific/Missing Issues:**

- Cycling strategies will not be effective as networks are not joined up and need to address commuter and utility cycling as a method of transport rather than a leisure activity.
- More lockable secure storage for cycles should be provided/ located in car parks and at stations.
- Car parks should be provided with electric charging points, should be on a pay on exit basis and have some method of indicating where spare spaces are located. These measures are needed to future proof the system.
- Should be a parking strategy for rural areas as well as central RTW.
- Focus on parking provision for new developments as well as existing parking.
- Public car parking for attractions and tourism.
- Consideration should be given to policing to address parking on pavements.
- One hour on street parking should be encouraged wherever practical.
- Substantial concerns about parking at the local railway stations and consideration should be given to decking.
- Pressure needed on the County to co ordinate buses, trains and cycling to reduce pollution and congestion and produce an integrated transport strategy.
- RTW should have at least 2 park and ride car parks. Possible locations on the A21 near North Farm, near Sainsbury’s on the A26 or, outside Southborough towards the A21 junction. This would reduce congestion in the urban area and lower air pollution levels.
- Park and ride would completely destroy the character of TW where the ability to pop in to TW and drive round is essential to the maintenance of a thriving in-town retail opportunity, this is especially important because of the spread-out nature of the high streets.
- The rural problem of HGV routing is not addressed as a strategy for the next 20 years.
- Particulate reduction from diesels is not addressed.
- Railway issues have been insufficiently dealt with (reference and link made to Kent County Council Response to the South Eastern Rail Franchise Public Consultation).
- Perhaps consideration could be given to a tram service or similar as a solution to capacity.
- Tunbridge Well’s main routes in and out of the town are almost permanently choked. Will the existing problems be tackled before housing and commercial developments attract even more people and traffic comes into the town?
- Our roads are currently congested. In addition to improved public transport (frequent and affordable), we need safer cycle routes and more affordable bus services. Improve school bus services by reducing costs and increasing frequency.
- Look at ways to ease congestion on the A26 - Too many sets of traffic lights/pedestrian crossings influence slow flow of traffic along the St. Johns area to Southborough - will discourage people from visiting the town.
- Also, road systems have major bottlenecks that at times create serious congestion. Additional development outside of the urban areas will only exacerbate the situation.
- Dealing with the block spots in a car friendly way would ease the frustrations of TW – the Longfield Road estate solutions show how creative thinking and co-operation can achieve real results.
- TW and surrounding villages need better public transport links that are suitable to serve an ageing population.
- Review issues surrounding Tunbridge Wells being central to the road networks and consider trunk routes away from major towns and sub distributing into it.
- Options 3 & 5 are likely to produce a huge increase in traffic in the search for jobs, schools and “the Town”. Only option 4 or a variant will not do this.
- For transport to be improved there needs to be more investment into public transport both in terms of rail services and bus routes, especially in rural areas.
- Overall realistic review of highway capacity needs to be undertaken.

Suggested amendments to wording:

- At the end of para 4.35, after Colt's Hill, please add 'and the intersection of the A268 and A229’

(vi) Leisure and Recreation

Question 6k: Have we identified the main leisure and recreation issues facing the borough?

Summary of Responses

12 responses were received to this question. 5 respondents (about 42%) agreed that the main leisure and recreation issues had been identified, while 7 respondents (about 58%) disagreed. Overall, there was a majority of those in disagreement.
Question 6l: If No, what leisure and recreation issues do you think are missing?

**Summary of Responses**

9 responses were received to this question.

**Summary of Specific/Missing Issues:**

- Improved sports pitches needed, not necessarily more pitches.
- RTW needs more hotel and B and B accommodation to meet visitor demand. Some of this should be affordable.
- There is a need to ensure that recreation and leisure facilities are distributed fairly across the borough.
- There is a lack of mention of provision for the arts in rural areas.
- There is insufficient mention of cultural leisure pursuits.
- Where will the land.space be allocated for additional leisure facilities?
- What kind of leisure facilities are planned? They should suit all ages – especially teenagers, who are being underserved in this respect at the moment.
- Issue of the reduction in outdoor sports facilities due to field sports such as football becoming less popular (lack of volunteers to manage clubs and training). Encourage these to be used for other sports such as hockey, rounders, quick cricket.
- Lack of safe cycle paths within the Borough.
- Designated leisure areas in and around villages which are free and have a variety of natural resources for locals to explore the rural area.
- Retention of PROWs if they go through a development zone so that locals can access the rural areas easily which is vital for health and well-being.
- The idea of locating speciality leisure facilities throughout the borough are unrealistic. If they are economically valid, which is improbable, they will result in a trans- borough “rat-run”.
- Tunbridge Wells is a great town and should be encouraged to thrive not divested of services.
- Countryside as a leisure recreational and tourist resource.
- A network of greenspaces which need to be connected by bridleways etc.
- Encouragement of undirected leisure facilities as opposed to volunteer/leader led.
- Specific mention was made by Rusthall PC about needing a larger community/sports/youth centre i.e. redevelopment of the pavilion in Southwood Road to provide better facilities – would be grateful if the Borough Council could move this forward.

**(vii) Sustainability**

**Question 6m: Having regard to the prepared Sustainability Appraisal Scoping Report (link given here in I/O document), have we identified the main sustainability issues facing the borough?**

**Summary of Responses**

11 responses were received to this question. 8 respondents (about 73%) disagreed that the main sustainability issues had been identified, while 3 respondents (about 27%) agreed. Overall, there was a vast majority of those in disagreement.
**Question 6n: If No, what sustainability issues do you think are missing?**

**Summary of Responses**

10 responses were received to this question.

**Summary of Specific/Missing Issues:**

- Sustainability mitigating factors should be included in planning policy for developers to adhere to.
- Provision for recycling facilities not covered. No mention of a recycling centre to serve the eastern part of the borough. Borough should investigate the use of single stream technology for recycling rather than the piecemeal approach that currently exists.
- Issue of water resources and drainage/flooding and how these might be addressed is not discussed in any detail. There is recognition that the borough operates in an area of water stress but no mention of, for example, ensuring that developers install brown water systems in new houses or solar panels on roofs and wind farms on suitable high sites.
- No mention of catering for health needs of an expanding and ageing population and addressing the broader public health agenda.
- Should be a policy for greater and more effective monitoring of air pollution, particularly in areas of traffic congestion, even in rural settlements.
- In the same way that the AONB is a significant constraint to development, resources like water are similarly constraining.
- Once again, the Green Belt is not mentioned and must be maintained to serve the purpose for which it was originally intended.
- The Sustainability Appraisal Scoping report was very difficult to assess as there was no guidance on how to come to conclusions.
- Parking does not seem to have been included as an issue with the choices for the SAR which may have an impact on choices shown.
- Lack of detail of how the aims will be achieved.
- Include improvements to utility supplies, waste disposal and recycling across the borough.
- Whilst many of the listed issues may be correct they are contra-indicated to the borough build plan (13,000 housing target).
- The borough is divided into two distinct groups: Urban areas where there are cleaner fuels (gas), sewage disposal to every household; and the countryside where there is a reliance on high-sulphur fossil fuels to provide heating of water and buildings and where public sewage systems are not available.
- Main issues are highlighted Sustainability Appraisal p17 table 4 which identifies key policy targets in terms of development needs, housing and transport standing in conflict with climate change and energy strategy targets. The key to reversing this conflict would be to set the highest sustainability standard for delivering on development, housing and transport.
- As a significant number of 13,000 houses reflects inward migration then the pressure on rail services, where parking is inadequate, will also be much greater.
- Energy conservation must be recognised as being equally important to renewable energy generation.
- Should be phased building of new homes and businesses to enable assimilation.
- Encourage development of local/home employment.
- Felt more information required on some issues before being able to comment.
Section 5 – Strategy Considerations

Introduction

Under this section, there are a number of strategic considerations which include:- (i) Cross-boundary Strategic Planning and Duty to Cooperate, (ii) Settlements in the Borough, (iii) Development Boundaries and (iv) Strategic Options (Five possible options – 1. Focused growth, 2. Semi-dispersed growth, 3. Dispersed growth, 4. Growth Corridor-led Approach and 5. New Settlement growth). At least two questions were asked relating to each of the strategic considerations as follows:

(i) Cross-boundary Strategic Planning

Question 7: Are there any specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?

Summary of Responses

12 responses were received to this question. 10 respondents (about 84%) agreed there were specific cross boundary issues that should be considered, one respondent (about 8%) disagreed, while one other respondent (about 8%) did not express an opinion. Overall, of those who expressed an opinion, the vast majority of 91% agreed that there were specific cross-boundary issues that need to be considered.

Question 7a: If Yes, what are the specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?

Summary of Responses

12 responses were received to this question. Cross-boundary discussions needed for:

- "Garden village" concept as this does not necessarily need to fall within one specific borough.
- Wider sustainable transport solutions and other infrastructure.
- As high percentage of borough covered by AONB should consider cross boundary discussion with others as to whether they could take some of the TW numbers, to deliver housing supply.
- Major development may have considerable impact on the residents of neighbouring authorities.
- Increased population of settlements to the south of Maidstone will necessitate increased investment in and significant improvement of the local bus service.
- Addressing concerns raised about unlawful development and lack of enforcement in a number of areas along the boundary with Maidstone Borough.
• Discussion between TWBC, Tonbridge and Maidstone for possible joint development along the boundaries plus a new station between Tonbridge & Paddock Wood with huge parking facilities and with access to the now duelled A21 & thus the M25.
• Staplehurst PC request that the Local Plan recognises that development, particularly in Hawkhurst, Cranbrook and Frittenden areas, would have an impact on Staplehurst due to increased traffic travelling to and from the railway station as well as to and from Maidstone and beyond. Therefore a share of developer contributions should be allocated to Staplehurst highways and station infrastructure improvements.

Other Issues raised:

• Water/flood management/resources as well as management and supply of other utilities and energy.
• Consideration of acute and secondary healthcare provision.
• Engagement in consultations on the impact of noise and air pollution as a result of airport expansion, especially Gatwick.
• Mabledon House and Estate should be considered.
• HGV routing and weight limit enforcement - need to be directed away from minor roads. Also access (or lack of it) for HGVs at the M25/M26 junction needs to be addressed. This creates cross country traffic that otherwise could use motorways and trunk roads.
• That the Paddock Wood area is prone to flooding is not a sensible argument if one considers that 1/3rd of the Netherlands is below sea-level. (The lower Weald floods largely because the communities have not kept the ditches clear since the 1950’s).
• The pressure for development will increase the demands on major road and rail infrastructure and similar development in other boroughs will amplify the issues. Although improvements made to the A21 in TW will ease some pressure, the additional development in other boroughs will mean increased volumes. The development of 13000 houses in the borough coupled with similar growth in other boroughs will simply create new bottlenecks.
• Therefore, major improvement to public transport network, location of railway stations and rail links, surrounding road infrastructure and car parking are required.

Suggested amendments to wording:

At para 5.1, after 'transport connections with Maidstone' please add 'and Rother'.

(ii) Settlement Groupings

Question 8: – Do you agree with the suggested groupings of settlements?

Summary of Responses

13 responses were received to this question. 5 respondents (about 38%) agreed with the suggested settlement groupings, 7 respondents (about 54%) disagreed, while one other respondent (about 8%) did not express an opinion. Overall, of those who expressed an opinion, there was a majority of 58% that disagreed with the suggested groupings.
**Question 8a: If No, what changes do you suggest to the groupings of settlements and why?**

**Summary of Responses**

10 responses were received to this question.

**Summary of Specific Issues:**

- Extremely flawed methodology - an illogical means of providing an indication (even a theoretical indication) of the level of sustainability and appropriateness of any settlement to accommodate further growth (13,000 houses across the Borough).
- Some small settlements could take proportionally more housing and probably be re-vitalised as a result.
- Questioned why Pembury in Group A when the village was previously in Group C.
- Questioned whether Paddock Wood and settlements with no train station should fall within the same group.
- Questioned why Lamberhurst has been put in Group B which does not take into account constraints which would be a barrier to building within the Parish. - 100% AONB, flood plains, conservation and commonland and reference made to Landscape Character Assessment states under Landscape strategy p152 - that “it is important that the Teise Valley does not become significantly further developed.” Therefore considered that Lamberhurst should be placed in Group C.
- Five Oak Green considered to be in the wrong group – it is a standalone village that does not have as many facilities as neighbouring parishes. Should be in group D with small rural settlements with equivalent limited facilities. Also, if the neighbouring settlement of Paddock Wood is allowed to continue to enlarge westwards, then danger of urbanisation.
- The groupings should be weighted in view of transport links (to train stations and main roads), availability of public transport (trains and bus services) and flooding issues.
- Retail sector has changed to Supermarket deliveries, online buying etc.
- Accessibility to good quality educational facilities important.
- In creating a settlement hierarchy, the groupings also need to reflect the levels of deliverable development, ease of growth and access to areas of employment.
- The hierarchy is based on numbers of shops, pubs and facilities, ignoring location, transport links, and other constraints.
- Topography of villages in relation to development sites and access to services facilities should be taken into account e.g. some on steep slopes while others are flat.
- Number of services and amenities in a village can depend on proximity to larger settlements e.g. where more isolated with less transport links, such as Goudhurst, may have more self supporting facilities but where a village has better access to nearby larger settlements it may need less of own facilities. This could flaw the hierarchy methodology.
- Building large numbers of houses away from economic and rail services increases the volume of traffic and long term dependency on the car.
- Hierarchy should also include a Group F for hamlets of Colliers Green, Hartley, Cranbrook Common, Wilsley Green, Wilsley Pound and Golford.
(iii) **Development Boundaries**

**Question 9: Should the policy approach of defining settlement “Limits to Built Development” continue in principle?**

**Summary of Responses**

14 responses were received to this question. 12 respondents (about 86%) agreed that the policy approach of defining Limits to Built Development should continue, while 2 respondents (about 14%) did not express an opinion. Overall, of those who expressed an opinion, there was a unanimous agreement (100%) that the policy approach of Limits to Built Development should continue.

**Question 9a: Should the defined Limits to Built Development as currently drawn be retained in their current form or in order to maintain settlement patterns, or be removed to enable the delivery of suitable sites?**

**Summary of Responses**

14 responses were received to this question. 11 respondents (about 79%) agreed that Limits to Built Development should be retained in their current form, one respondent (about 7%) thought that they should be removed, while 2 respondents (about 14%) did not express an opinion. Overall, of those who expressed an opinion, a significant majority (about 92%) felt that the Limits to Built Development should be retained in their current form.

**Question 9b: If the currently defined limits are to be reviewed/redrawn, what criteria do you think should be applied in redrawing the boundaries?**

**Summary of Responses**

12 responses were received to this question.

**Summary of Specific Issues:**

- The 2006 Local Plan uses LBDs to control growth around all urban areas and villages aiming to prevent the unrestricted sprawl into the surrounding countryside and to maintain the separate identity and character of settlements, prevent their coalescence and the erosion of largely undeveloped gaps. These aims still stand and this control mechanism which has been very effective is needed now more than ever. To quote section 3.39 “Once taken for built development, the countryside cannot be easily replaced or restored”. LBDs should remain.
- The Sustainability Assessment of Local Plan (2006) Policies H5, H8-11, H13 and T3 demonstrate the policies’ stature and effectiveness and they should be retained.
- Any proposed changes to existing LBDs should be consulted with local communities.
- The LBD provides a clear constraint for development and removing the LBD would result in un-controlled development.
- They should be reviewed in some of the smaller settlements where development might make the settlement more sustainable (whilst ensuring that character/ setting is not destroyed).
Retain but local needs housing should be considered in villages with no LBD.
LBD could be reviewed taking into account natural constraints: - flood plains, sensitive areas of landscape characteristics, conservation areas and common land, of Green Belt or AONB.
Transport links should be considered.
Should encompass all of the recognised village (built area) and be drawn with care.
In some settlements, part of the curtilage of some properties falls outside of the LBD (and may also be in the Green Belt) making it difficult for individuals to obtain planning permission for outbuildings etc. whereas an immediate neighbour inside the LBD can build.
If they were to be redrawn then 5-8% flexibility for increase should be allowed with local community consent that would enable agreement for local need development and the concept of walkability to community centres retained.
If considering the LBD for the major urban areas then a broad remove/retain strategy might be appropriate. When this is extended to the villages then the impact is much more significant and removing boundaries could have a catastrophic effect on small communities. The proposition assumes that infrastructure exists and services are provided in a uniform way across the borough. In towns extension of services is a practical proposition but in the villages the same levels of infrastructure are not in place and are not easily extensible.
The idea of a blanket removal seems reckless although relaxing boundaries against defined criteria may be a benefit.
Policy approach of defining "Limits to Build Developments" supported subject to a review of current LBDs and should be looked at alongside Neighbourhood Planning proposals.
Likely in some cases that the defined LBDs will be out of date and therefore need to be reviewed. For settlements higher up the hierarchy, they may be redrawn to include land where development can be supported and sustainable.
Request that some hamlets have own LBDs.
Will result in increased density.
Create proper urban centres with mixed use, not dormitory settlements.

(iv) Strategic Options (Five possible options as above)

Question 10: Please let us know your preferred option or combination of options in order of preference.

Summary of Responses

Only 6 responses were received to this question in terms of ranking strategic options in order of preference. 5 of these respondents preferred a combination of options as set out in Question 10a below.

Of those who ranked the strategic options, 3 respondents (50%) ranked Option 4 (Growth Corridor-led Approach) as their most preferred option, one respondent (about 16%) ranked Option 1 (Focused Growth) as their most preferred option, one respondent (about 16%) ranked Option 3 (Dispersed Growth) as their most preferred option; while one respondent (about 16%) ranked Option 5 (New freestanding settlement) as their most preferred option. However, some of these options were ranked in combination with other options (as below).
**Question 10a: If you prefer a combination of options, please state which ones.**

**Summary of Responses**

12 responses were received to this question, with 11 stating their preferred combinations. The responses are summarised as follows:

- 6 respondents (55%) selected a combination of Option 4 (Growth Corridor-led Approach) and Option 5 (New freestanding settlement) as their preference. Although one of these respondents specified that their preference was for both of these options in one location i.e. a new freestanding settlement along the A21 corridor and another respondent stated that there were some concerns about the visual impact of Option 4.
- 2 respondents (about 18%) selected a combination of Option 1 (Focused Growth), Option 4 (Growth Corridor-led Approach) and Option 5 (New freestanding settlement) as their preference, with Option 1 meeting development needs for the short term, Option 4 for the medium term and Option 5 as a longer term strategy.
- One respondent (about 9%) selected a combination of Option 2 (Semi-dispersed Growth) and Option 4 (Growth Corridor-led Approach) as their preference.
- One respondent (about 9%) chose a combination of Option 1 (Focused Growth) and 2 (Semi-dispersed growth) as their preference.
- One respondent (about 9%) chose a combination of Option 4 (Growth Corridor-led Approach), Option 1 (Focused Growth) and Option 3 (Dispersed Growth) as their preference. These were broken down into housing development percentages: Option 4 - 30%, Option 1 - 20% and Option 3 - 15%, and stated that the remaining 35% should be an option not to build at all. This respondent considered that a no build option should also have been included as a strategic option in the Local Plan Issues and Options consultation.
- One respondent did not state a preferred combination of options but expressed particular concern about and opposition to Option 4 because it would change the entire dynamic of Pembury Village, in that it would become a suburb of Tunbridge Wells with its identity at risk of being obliterated.
- Another respondent did not support Option 5, as housing development in rural locations will generally not be appropriate or sustainable due to lack of adequate road infrastructure, lack of public transport, the increase in car journeys to employment locations, lack of community infrastructure and the detrimental impact on the natural environment.

Overall, although there was a range of preferred combinations of strategic options among respondents, of those who expressed an opinion, a majority of 55% chose a combination of Option 4 (Growth Corridor-led Approach) and Option 5 (New freestanding settlement) as their preference.

**Question 11: What views do you have about the possibility of a new settlement somewhere in the borough providing for future development needs?**

**Summary of Responses**

12 responses were received to this question.
Summary of Specific Issues:

- It would need excellent transport links - i.e. on a main train line and possibly its own train station with good parking facilities
- Advantage – Implementation and higher level funding for a master infrastructure plan (should be implemented before built)
- Would result in additional large volumes of traffic and would therefore need higher level funding and government cooperation to improve A road networks.
- Disadvantage - it could take up a large area of greenfield land.
- Should preferably be located outside the AONB and green belt.
- Must be a sustainable mixed development with option to expand and compatible with its surroundings.
- Employment opportunities.
- Must be standalone and not overshadow another community and be as self-sufficient as possible with own allowance for buildings that could be used for commerce etc.
- The new settlement should be near the A21 with access to the M25, access to a choice of railway stations, access to hospital, schools, industrial estate and shops, access to all of Tunbridge Wells and Tonbridge facilities and access to transport links to jobs. Elsewhere in the Borough there would be huge implications on the natural environment, lack of community infrastructure and lack of supporting infrastructure.
- Could possibly be a sensitive development of a number of hamlets and farmsteads around a core settlement with new transport and infrastructure.
- The housing target is 13 000 – if this cannot be accommodated in the urban area then don’t build so many houses if it means having to build in the rural areas where there are more landscape constraints and fewer services.

Question 11a: Where do you think a possible new settlement could be located?

Summary of Responses

12 responses were received to this question.

Summary of Specific Issues/possible locations:

- North of the borough, adjacent to a main railway line, i.e. Paddock Wood or Five Oak Green
- Outside of the AONB.
- Eastern part of the Borough would be a far more suitable place to build a new settlement – because the transport links afforded by Ashford are far superior to those to the West of the Borough. (International hub, with access to London via the M20 (just 9 miles away) and trains every few minutes to several London mainline stations).
- Paddock Wood and Five Oak Green are already settlements so should not even be considered as appropriate for a new town/village. Current plans are for Paddock Wood to have 1000 new homes.
- Consider a location with good transport/rail links.
- Somewhere with potential for local employment.
• Create a new settlement between Tunbridge Wells, Pembury and Tonbridge - By the A21 and good access to M25; access to three railways stations (Tunbridge Wells, Tonbridge, Paddock Wood) or build another station between Tonbridge and Paddock Wood; access to hospital, schools, Industrial estates, shops; access to all Tonbridge and Tunbridge Wells facilities (theatre, cinema, restaurants, shops, supermarkets etc.; access to transport links and jobs (local, regional or London); could link to a possible new Business Park near A21.

• Locate the new settlement in the A21 growth corridor.

• Staplehurst Parish Council submit that a new settlement should not be situated in areas adjoining Staplehurst nor in the Cranbrook and Hawkhurst areas to the south of Staplehurst, as the impact of the settlement numbers on Staplehurst would be unsustainable.

• One respondent commented that as no survey had been conducted, they were unable to answer this question and added that Lamberhurst Parish is 100% in AONB and has several constraints which would not make it a suitable area to site a new development of this scale.

• One respondent claimed they could not fairly comment.

**Question 12: Do you think we have considered and identified all reasonable options for accommodating future development growth within the borough?**

**Summary of Responses**

14 responses were received to this question. 6 respondents (about 43%) agreed that all reasonable options for accommodating future growth have been identified and considered, 7 respondents (about 50%) disagreed, while one respondent (about 7%) did not express an opinion. Overall, of those who expressed an opinion, there was a slight majority (54%) of respondents in disagreement.

**Question 12a: If No, please set out what other options for accommodating future development growth within the borough you think should be considered.**

**Summary of Responses**

9 responses were received to this question.

**Summary of Specific Issues/other options:**

• Not convinced that such substantial growth is in fact required within the Borough - too much traffic and pollution already, no infrastructure to support such growth is identified, serious lack of water availability with low aquifers and 20 years to plan and build reservoirs. In rural areas there is inadequate road infrastructure, a lack of bus services, lack of train stations and parking and landscape constraints.

• The 13,000 housing target is based on the Strategic Housing Market Assessment (SMHA) survey. However, the projection is largely based on the past; it is not based on local need; the projections do not split the growth forecasts between TW towns and TW rural areas and assumes they are the same, when they are not; the projection takes no account of the
AONB, the landscape character, trains, jobs, services, traffic, etc. as constraints have not yet been applied.

- Challenging the Objectively Assessed Need has not yet been addressed.
- The Borough Council should consider whether by seeking to fulfil the 13,000 quota, it would endanger the quality of our environment and therefore whether it should pursue a lower housing target.
- Concern about the loss of designated countryside and the historical character of our towns and villages, the pressure on infrastructure; particularly education and health and overcrowded roads.
- Would have been useful to have explored further the idea of a brand new settlement, rather than just asking for views in principle – highly likely residents will only view the settlement favourably if away from where they live.
- As for Q11a – garden village settlement constructed within the A21 growth corridor would be the best option (proximity to A21 and good access to M25; access to three railway stations at Tunbridge Wells, Tunbridge and Paddock Wood; possible new train station; good access to hospitals, schools, industrial estates and leisure and retail facilities; access to all of Tunbridge Wells and Tonbridge facilities (theatre, cinema, restaurants, shops and supermarkets); good access to transport links to employment both local, regional and London; additional development of employment use, such as a business park near the A21).
- As for Q11a – an option would be a sensitive development of a number of hamlets and farmsteads around a core settlement with new transport and infrastructure. A rail link is essential.

Section 6 – Development Management Policies

Introduction

This section considers the policies that are currently in place in the Tunbridge Wells Borough Local Plan 2006 and identifies the key topics that may merit and necessitate new development management policies, especially in the light of government guidance in the NPPF (2012) and any updated local evidence. Three questions were asked relating to (i) existing policies, two questions relating to (ii) new policies and one question relating to (iii) detailed policies, as follows:

(i) **Existing Policies**

**Question 13: Which policies do you consider are suitable for continued use?**

**Summary of Responses**

8 responses were received to this question. Only 4 respondents specifically identified policies considered suitable for continued use.
Summary of policies identified to be suitable for continued use:

Tunbridge Wells Borough Local Plan 2006:

Chapter 3 – Green Belt, Rural Fringe and Limits to Built Development

Policy LBD1 (also already replaced (in part) by Policy AL/STR 1 in Site Allocations Local Plan 2016)

Chapter 4 – Environment

Policies EN1, EN4, EN5, EN6, EN8, EN10, EN11, EN13, EN15, EN16, EN20, EN21, EN22, EN23 and EN25

Chapter 5 – Town, Neighbourhood and Village Centres

Policies CR3, CR9 and CR12

Chapter 6 – Housing

Policies H1 to H13 (Policies H6 and H7 already replaced by other housing allocation policies in Site Allocations Local Plan 2016)

Chapter 7 – Economic Development

Policies ED1, ED2, ED3 and ED5

Chapter 8 – Tourism

Policies T1, T2 and T3

Chapter 9 – Recreation

Policies R1, R2 and R6

Chapter 10 – Community Services

Policy CS6

Chapter 11 – Transport and Parking

Policies TP1, TP2, TP3, TP4, TP5, TP8 and TP27 (specific reference made to additional provision of public car park in Rusthall)

Other comments:

- High Weald AONB Management Plan (not a policy but should be given due regard and not mentioned in the plan).
- Retain all policies that protect the environment.
- One respondent - Not been given the information needed to be able to answer.
- New strategy must review all old policies and decide on validity.
• One respondent - Too many policies to consider - surely this question is for the officers and members to decide.
• One respondent - Not identified any policies which are not suitable for continued use.

**Question 14: Which policies do you think may be out of date or no longer necessary?**

**Summary of Responses**

Only 5 responses were received to this question and only one respondent specifically identified policies which were considered to be out of date.

**Summary of Policies considered to be out of date:**

**Tunbridge Wells Borough Local Plan 2006:**

**Chapter 6 – Housing**

Policy H7 (already replaced by other housing allocation policies in Site Allocations Local Plan 2016)

**Chapter 11 – Transport and Parking**

Policies TP10, TP11 and TP26

**Other comments:**

• New strategy must review all old policies and decide on validity.
• One respondent - None identified.
• One respondent - Not been given the information needed to be able to answer.
• One respondent - Too many policies to consider - surely this question is for the officers and members to decide.

**Question 15: Which policies do you think could be updated or amended, and how?**

**Summary of Responses**

6 responses were received to this question. Only one respondent specifically identified policies to be updated/amended.

**Summary of policies suggested for updating/amendment:**

**Tunbridge Wells Borough Local Plan 2006:**

**Chapter 4 – Environment**

Policy EN6 - add Hawkhurst Colonnade

Policy EN13 - removed trees should be replaced by another and cut down only if an ALTERNATIVE SITE is not available
Policy EN23 - Add Hawkhurst to para 4.156 - as it’s green bordered approaches, particularly along the ridge, are part of its character

Replace EN2, EN14, EN26, EN27 and EN28 with updated policies.

Other comments:

- One respondent - None identified.
- All of the policies should be continually reviewed to ensure they meet any new government policy changes.
- Policies relating to infrastructure and services should be reviewed.
- One respondent - Not been given the information needed to be able to answer.
- One respondent - Too many policies to consider - surely this question is for the officers and members to decide.

(ii) New Policies and Topic Areas

Question 16: Considering the topic areas above, are there any other topics that you think the new Tunbridge Wells Borough Local Plan should include?

Summary of Responses

7 responses were received to this question. One respondent answered “No”.

Summary of suggested New Topic Areas/Policies:

New Policies:

1. Street lighting (EN policy) – to align with modern thinking on “dark skies”. Replace street lighting with sustainable path lighting (for people, not vehicles). Outside urban areas (not including village centres or LBDs) no lighting should be required and instead it should be discouraged.
2. A21/M26 junction (TP policy) – joint strategy needed with adjoining boroughs to re-route HGVs at reduced diesel consumption (due to steady optimum speed) and less damage to settlements on cross country routes.
3. Technology (ED policy) – to facilitate local IT and communications based industries.

New Topic Areas:

- Natural Resources.
- Provision of water supply (distinct from flooding).
- Suitable housing for older people (allowing to downsize and free up larger family homes).
- Plans to enable our young people to afford to stay in the area – buying options, not just rental.
- New strategy must review all old policies and decide on validity.
- Master planning for all settlement growth to be achieved through NDPs.
- Co-housing schemes and Community Land Trusts should be included in policy.
- Protection of ancient woodland and fieldscapes.

**Question 17:** Are there any topics that you consider do not require any further detailed development management policies because there is sufficient coverage already in place, i.e. in national guidance (the NPPF)?

**Summary of Responses**

6 responses were received to this question, of which 4 respondents answered “No”.

**Other comments:**
- It should be a self-contained document capable of being stand alone and read as such.
- New strategy must review all old policies and decide on validity.
- No mention of AONB Management Plan.

(iii) **Detailed Policies**

**Question 18:** Are there any specific planning issues affecting the borough of Tunbridge Wells that you consider are not adequately covered by the NPPF or already referenced in this chapter and which you would like to see addressed in a policy?

**Summary of Responses**

10 responses were received to this question, of which 2 respondents answered “No”.

**Summary of Specific Issues which should be included/considered:**

- No mention of Green Belt.
- As an area of AONB, within easy reach of London, it should be protected as an accessible area.
- Can housing numbers be met as 70% of borough is in AONB?
- High Weald AONB Unit should be an automatic planning consultee.
- High percentage of AONB land in the Borough – key tourism attraction – at odds with NPPF.
- Have labour costs in terms of new housing development and incoming labour to the area been taken into account?
- There should be a policy that states that the context of a site and its surroundings should be considered first and the detail within it second.
Conclusion

Introduction

This final section allowed the opportunity to comment on any other planning and development related matters that should be considered or have not been mentioned in the Issues and Options document; and also for any general comments to be made, under the following question:

**Question 19: Are there any other planning and development matters that you think the new Local Plan should consider or cover that have not been mentioned in this Issues and Options document? You can also make any general comments here.**

Summary of Responses

9 responses were received to this question.

Summary of Specific Issues/ General comments:

- No mention of protecting the Green Belt.
- Concern that the local plan does not reflect the constraints within the Borough - 70% AONB and may not actually meet the housing requirement needs. Great danger that additional targets will be given from other adjoining local authorities as has happened in Mid-Sussex.
- Concern that there is no detail of the methodology used to calculate the enormous increase in housing required for the borough. Lack of transparency as to whether the demand is truly driven by a proven borough/local need or that it has been imposed centrally without meaningful objective.
- The 13,000 housing target is based on the Strategic Housing Market Assessment (SMHA) survey. However, the projection is largely based on the past; it is not based on local need; the projections do not split the growth forecasts between TW towns and TW rural areas and assumes they are the same, when they are not; the projection takes no account of the AONB, the landscape character, trains, jobs, services, traffic, etc. as constraints have not yet been applied.
- Not convinced that such substantial growth is in fact required within the Borough - too much traffic and pollution already, no infrastructure to support such growth is identified, serious lack of water availability with low aquifers and 20 years to plan and build reservoirs. In rural areas there is inadequate road infrastructure, a lack of bus services, lack of train stations & parking and landscape constraints.
- Absolute need to match the scale of new proposed development with master planning and urban design of highest quality procured through design teams working to national/international standards.
- Any associated proposals maps for the Local Plan should show the boundaries of the Parishes and Town Councils, highlight major road and rail links, along with secondary school concentrations and their catchment areas.
- Should include developing conservation areas of the future.
- The 2016 Parking Study does not adequately express the intensity of the parking problems in Hawkhurst. Only a token number of spaces are publicly available at Northgrove Road, the supermarket car parks are private and restricted stay, Fowlers car park is used by school parents and is often full and there is no long-stay parking for people in local employment, all
causing overspill into narrow residential roads. This needs to be included in policy for the coming 20 years.

- Concern from one parish about the Settlement and Function Study – this part of the evidence base is flawed by mathematical error. Hawkhurst PC was asked to complete two forms: one for Highgate and one for The Moor. Following submission, after scoring, and without any further contact with the Parish Council, the two scores were added together. This is invalid and negates the facts. Concern therefore, that Hawkhurst scores very highly and incorrectly.
- Concern from another parish that the methodology for assessing the capabilities in each village to develop a village hierarchy is consistent but it does not reflect any real-world constraints around the viability of these settlements.
- In creating a settlement hierarchy, the groupings also need to reflect the levels of deliverable development, ease of growth and access to areas of employment and/or access to train services.
- The hierarchy is based on numbers of shops, pubs and facilities, ignoring location, transport links, and other constraints.
- Topography of villages in relation to development sites and access to services facilities should be taken into account e.g. some on steep slopes while others are flat.
- Number of services and amenities in a village can depend on proximity to larger settlements e.g. where more isolated with less transport links, such as Goudhurst, may have more self-supporting facilities but where a village has better access to nearby larger settlements it may need less of own facilities. This could flaw the hierarchy methodology.
- Building large numbers of houses away from economic and rail services increases the volume of traffic and long term dependency on the car.
- Strategic Option 3 places huge increases on the villages, a 20-50% increase.
- The basis of the Option 2 and 3 settlement allocation hierarchy has been a facilities cascade. The basis of that cascade seems a flawed basis for allocation of development to the parishes.
- The areas of Colliers Green, Hartley, Cranbrook Common, Wilsley Pound, Wilsley Green and Golford should be specified hamlets in the Settlement Role and Function Study, as they were listed in the original Local Plan.

**Specific Issues for Sites within Call for Sites:**

- One respondent raised objection to any sites being allocated for development in the Green Belt and AONB (this includes site 4S and all others within the stated areas). Purpose of the Green Belt is to stop separate settlements merging.
**Representation Grouping: Adjoining Local Authorities and Other Local Authorities**

Overall, responses were received from the following seven Local Authorities:

- Kent County Council (Planning and Environment)
- Kent County Council (Flood and Water Management)
- Maidstone Borough Council
- Sevenoaks District Council
- Tandridge District Council
- Tonbridge & Malling Borough Council
- Wealden District Council

It is important to note that not all organisations answered every question. Therefore, the total number of responses for each question may vary.

**Section 3 – Vision and Objectives**

**Vision**

**Introduction**

This section relates to the draft Vision for the borough up to 2033. This includes the development of housing, economic, leisure and recreation uses identified within the new Local Plan to meet local needs. The Vision states that new development will be delivered in a sustainable way and will seek to protect and enhance the exceptional quality of the built, natural and historic environment while promoting economic prosperity to ensure the borough remains a special place. Three questions were asked in relation to the Vision as follows:

**Question 1: Do you agree with the new draft Vision for the borough?**

**Summary of Responses**

One response was received to this question from KCC (Planning) and they agreed with the new draft Vision.

**Question 2: What suggestions do you have for improving or updating the draft Vision and relating it to 2033?**

**Summary of Responses**

Two responses were received to this question from KCC (Planning) and Maidstone BC.
Summary of Specific Issues/Concerns:

- Proposed Vision states that ‘in 2033 Tunbridge Wells Borough Council will have delivered
development to meet its local needs in a sustainable way’. The reference to local needs is
contrary to the NPPF/G and is therefore the wrong starting point for the Plan - should be to
meet all of the borough’s development needs (where this is consistent with national policy)
and not be limited to ‘local’ needs. Also, para.157 of NPPF explicitly requires local planning
authorities to take account of migration when identifying housing need, not limit
requirements to natural growth only. Also required to plan for anticipated economic inward
investment and new and emerging business sectors which may locate in an area. Therefore,
reference to local needs should be omitted from the draft Vision.

- KCC welcomes proposed Vision. Whilst reference made to development of housing,
economic, leisure and recreational uses, important that provision of infrastructure required
to support such growth and delivery of sustainable development is recognised.

- Integral that TWBC aspires to create well connected places - effective transport links and
digital communications (e.g. superfast broadband).

- KCC advises new Vision to say “protect and enhance the exceptional quality of the built,
natural and historic environment”.

- Essential TWBC works to ensure there will be no net loss of biodiversity throughout the
borough - can be achieved by awarding highest level of protection to statutory designated
sites.

- Ecological connectivity across the borough needs to be maintained and enhanced.

- TWBC should aspire to increase number of Local Wildlife Sites throughout the borough and
secure delivery of ecological enhancements within them.

- Should be aspiring to develop sustainable transport opportunities within the borough -
integrated network of high quality walking and cycling routes, to encourage active travel and
provide low carbon transport alternatives to short distance car journeys. Would help
improve health and well-being of residents, reduce traffic congestion and address air quality
issues.

Question 3: What should we be aiming and aspiring to achieve and why?

Summary of Responses

No responses were received to this question.

Objectives

Introduction

This section relates to the eight draft Strategic Objectives needed to realise the Vision, which are (i)
Meeting development needs, (ii) Protecting and enhancing the borough’s distinctive environment,
(iii) Delivering sufficient infrastructure, (iv) Providing high quality housing, (v) Making provision for
economic growth, (vi) Ensuring adequate leisure and recreational facilities, (vi) Delivering sustainable
development and (viii) Delivering adequate transport and parking capacity. The following three
questions were asked in relation to these draft Objectives:
**Question 4: Do you think these are the right Objectives?**

**Summary of Responses**

One response was received to this question from KCC (Planning) and they agreed with the Objectives.

**Question 4a: If you answered No, please explain why you don’t think these are the right Objectives.**

**Summary of Responses**

No responses were received to this question.

**Question 5: Are there any amendments required or other Objectives that you think should be included?**

**Summary of Responses**

Two responses were received to this question from KCC (Planning) and Maidstone BC.

**Summary of Specific Issues/Concerns:**

- Draft Objective 4- ‘To provide high quality housing: to deliver the Local Plan’s housing requirements, to include a range of housing types to meet local needs.’ - Para. 50 of NPPF does not support limiting provision to local needs, instead directing that a mix of housing should reflect demographic and market trends (including migration) and needs of specific groups. Therefore, reference to local needs should be omitted from draft Strategic Objectives.
- KCC supports TWBC’s positive approach towards delivering planned and sustainable economic and housing growth across TW through the proposed Objectives and would welcome further engagement to ensure provision of necessary infrastructure responsive to local needs.
- With regard to Objective 2, KCC recommends following wording is added: “all new development will seek to protect and enhance both the natural, built and historic environment to ensure that its special character is maintained and that there will be no net loss of biodiversity”.
- Objective 8 refers to delivery of adequate transport and parking capacity. This Objective could be revised to specifically include enhancements to the provision of walking and cycling facilities.

**Section 4 – Key Issues and Challenges**

**Introduction**

This section identifies the key issues that the Local Plan will need to consider and address when putting forward a strategy and policies for delivery of growth. These key issues are:- (i) Natural and Built Environment, (ii) Infrastructure, (iii) Housing, (iv) Economy, (v) Transport
and Parking, (vi) Leisure and Recreation and (vii) Sustainability. Two questions were asked relating to each issue, as follows:

(i) **Natural and Built Environment**

**Question 6a: Have we identified the main environmental issues facing the borough?**

**Summary of Responses**

Two responses were received to this question from KCC (Planning) and KCC (Water). KCC (Water) agreed that the main environmental issues have been identified, while KCC (Planning) disagreed.

**Question 6b: If No, what environmental issues do you think are missing?**

**Summary of Responses**

One response was received to this question from KCC (Planning).

**Summary of Specific Issues/Concerns:**

- KCC recognises TWBC’s intention to undertake a Green Belt review and requests full engagement, should review recommend changes.
- To ensure new Local Plan has no impacts on statutory designated sites (e.g. SSSIs, SPAs, SACs and Ramsar Sites) KCC recommends consideration given to indirect impacts from increased recreational pressures.
- Reference should be made to ensuring no impacts on Local Wildlife Sites, unless appropriate mitigation and compensation measures can be secured.
- Reference should be made to ensure no impacts on Ancient Woodlands, widely regarded as irreplaceable, have significant value due to long history of woodland cover, with many undisturbed features. National policy to discourage development that will result in loss of Ancient Woodland.
- Any impact on ‘Habitats and Species of Principal Importance’ published under Section 41 of the National Environment and Rural Communities (NERC) Act 2006 must be included.
- Consideration must be given to species identified in the Kent Biodiversity Action Plan, as well as those identified as ‘red list’ species. (Section 40 of the NERC Act 2006 places duty on all public authorities to conserve and enhance biodiversity)
- Inappropriate to join Natural and Built Environment into one single issue as they have very different needs, potential, legislative and policy contexts and implementation mechanisms. Therefore, KCC recommends dividing Natural Environment section into two subsections:- Landscape and Biodiversity. A separate landscape section would enable new Local Plan to bring together relevant historic environment, ecological, land-form and land-use issues; and would allow policies to be developed concerning development in countryside, re-use/development of agricultural buildings and new development in farmsteads that could be proactive in helping to protect and enhance landscape.
• KCC welcomes the identification of surviving medieval landscape of the borough as an outstanding asset (para 4.3).
• Para 4.4 - advised ‘archaeological sites’ added to list of heritage asset types.
• Recommend TWBC adopt Kent Farmsteads Guidance as an SPD.
• KCC welcomes TWBC’s recognition of importance of Historic Landscape Characterisation. An improved HLC is currently in preparation- KCC this document should be adopted as a SPD and would welcome further engagement with TWBC as the document advances.
• Recommended the term ‘Historic Environment’ is used in new Local Plan, as well as policies for the different components of the Historic Environment such as historic buildings and conservation areas, archaeological sites and the historic landscape (Para 126 of NPPF).
• KCC recommends (and would welcome further engagement on) preparation of a Heritage Strategy for TW setting out the following aims: i. to identify and describe key themes of relevance of heritage of borough and assets that represent them; ii. to assess role these can play in regeneration and tourism; iii. to identify both vulnerabilities and opportunities they provide; iv. to inform site allocations; and v.to support policy development.

(ii) Infrastructure

Question 6c: Have we identified the main infrastructure issues facing the borough?

Summary of Responses

One response was received from KCC (Planning) to this question and they disagreed that the main infrastructure issues have been identified.

Question 6d: If No, what infrastructure issues do you think are missing?

Summary of Responses

One response was received to this question from KCC (Planning).

Summary of Specific Issues/Concerns:

• KCC keen to work closely with TWBC to develop an enhanced understanding of the infrastructure required to support growth in TW, mechanisms for delivery, where gaps in funding exist and how these might be addressed.
• KCC currently updating the Kent and Medway Growth and Infrastructure Framework (September 2015) and recognises potential synergy between this Framework and TWBC’s emerging Local Plan.
• Further engagement regarding role development contributions will play in delivering essential infrastructure and enabling development, particularly in relation to the pooling of s106 contributions, would be welcomed.
• Anticipated that development within the Local Plan will necessitate a significant increase in demand for both Primary and Secondary school places. Complexity of provision planning combined with lead-in time and significant capital costs of educational projects such as expansions and new schools requires close working between all parties involved. KCC welcomes opportunity to work with TWBC to ensure appropriate education provision is
incorporated within the emerging Local Plan, including a sustainable funding strategy for new infrastructure.

- KCC notes consultation document does not make reference to their adopted Kent Minerals and Waste Local Plan 2013-2030 (July 2016) which sets out overarching strategy and planning policies for minerals and waste operations, specifically mineral safeguarding. The supporting Minerals Safeguarding Areas (MSA) maps identify potential presence of important economic mineral types (e.g. superficial and crustal geology) in TW borough. Therefore recommended consideration given to need to identify and safeguard mineral reserves and the infrastructure required to facilitate mineral movements (Policy DM7 specifically refers). KCC would welcome further engagement with TWBC on this matter, to ensure sustainability of mineral safeguarding and supply are maintained in Kent.


- KCC’s waste management facilities available to TW borough are close to their operating capacity. To accommodate increased demand from growth, additional capacity will be required. KCC is currently undertaking forecasting to identify quantum of additional demand generated by housing growth and appropriate mitigation projects. Details will be submitted to TWBC as they emerge.

- Copy of KCC’s Kent Minerals and Waste Local Plan – Safeguarding Supplementary Planning Document (adopted April 2017) is appended to response form.

- KCC notes emerging Local Plan does not make reference to provision of broadband and recommends working closely with TWBC to include a specific policy to ensure provision of high speed broadband services across new development.

(iii) Housing

**Question 6e: Have we identified the main housing issues facing the borough?**

**Summary of Responses**

One response was received to this question from KCC (Planning) and they agreed that the main housing issues have been identified.

**Question 6f: If No, what housing issues do you think are missing?**

**Summary of Responses**

Two responses were received to this question from KCC (Planning) and Maidstone BC.

**Summary of Specific Issues/Concerns:**

- No mention of requirement to provide for specific accommodation needs of Gypsies and Travellers in TW borough. Whilst TW borough understood to have relatively small established population of Gypsies and Travellers, planned provision for this community is an
issue that must be addressed through the Local Plan, drawing on an up to date assessment of needs. May also need to make specific site allocations as a result.

- KCC acknowledges SHMA requirements and wishes to engage with TWBC when DCLG’s new housing standard methodology is released to establish the implications of revised growth on existing/future infrastructure and service requirements in Kent.
- With regard to design, KCC recommend consideration is given to provision of a policy requirement to meet criteria set out in the Lifetime Homes Standards (2010), ensuring homes are inclusive, accessible, adaptable, sustainable and of good value.

**(iv) Economy**

**Question 6g: Have we identified the main economic issues facing the borough?**

**Summary of Responses**

One response was received to this question from KCC (Planning) and they agreed that the main economic issues have been identified.

**Question 6h: If No, what economic issues do you think are missing?**

**Summary of Responses**

One response was received to this question from KCC (Planning).

**Summary of Specific Issues/Concerns:**

- KCC recognises TWBC’s Economic Needs Study (2016) identifies 11-15 hectares of employment floor space to deliver the anticipated growth of approximately 10,000 jobs over the Plan period. However, growth within some existing employment areas is constrained due to physical and transportation constraints and there is loss of employment floor space due to application of permitted development rights. Therefore, KCC will actively work with TWBC to identify how these areas can be unlocked through Local Plan process.
- TW has high level of residents with advanced qualifications and expertise; however, many of these commute to London. Therefore need to incorporate opportunities for smaller businesses within new development, especially start-up units, to more skilled workers in the borough.
- KCC considers new Plan should protect and support current creative/cultural venues and enable delivery of new facilities so every resident has access to creative and cultural venues within a reasonable distance of their home.
(v) Transport and Parking

**Question 6i: Have we identified the main transport and parking issues facing the borough?**

**Summary of Responses**

One response was received to this question from KCC (Planning) and they disagreed that the main transport and parking issues have been identified.

**Question 6j: If No, what transport and parking issues do you think are missing?**

**Summary of Responses**

One response was received to this question from KCC (Planning).

**Summary of Specific Issues/Concerns:**

- KCC has worked collaboratively with TWBC in developing its Transport Strategy and Cycling Strategy that will be used to support the new Local Plan and will continue to work closely with TWBC in reviewing these documents, alongside preparation of new Plan.
- Recommended reference is made to KCC Active Travel Strategy - KCC would welcome further engagement with TWBC to identify and prioritise new active travel routes and any maintenance issues on existing active travel network throughout TW borough, as well as associated funding requirements in support of new Local Plan.
- TW Cycling Strategy recognises ‘existing cycle routes are incomplete’ and ‘that there is no integrated and continuous route network’. Lack of good quality off-road facilities is regularly mentioned as main barrier to increased public cycling activity, so should be effort to enhance provision of this.
- PROW - Good quality off-road routes are very popular, but compared to other boroughs/districts in Kent, provision of higher status PROWs (e.g. Bridleways, Restricted Byways and Byways open to all traffic) is relatively sparse in TW borough.

(vi) Leisure and Recreation

**Question 6k: Have we identified the main leisure and recreation issues facing the borough?**

**Summary of Responses**

One response was received to this question from KCC (Planning) and they agreed that the main leisure and recreation issues have been identified.

**Question 6l: If No, what leisure and recreation issues do you think are missing?**

**Summary of Responses**

One response was received to this question from KCC (Planning).
Summary of Specific Issues/Concerns:

- No reference to relationship between location of leisure and recreation facilities and house prices. Evidence suggests that house prices are higher when located closer to such facilities. Also, good leisure and recreation facilities have a positive impact on working environment as companies likely to locate near such facilities.
- Recent KCC report on Green Infrastructure in relation to Kent and Medway Growth and Infrastructure Framework appended to response form.

(vii) Sustainability

Question 6m: Having regard to the prepared Sustainability Appraisal Scoping Report (link given here in I/O document), have we identified the main sustainability issues facing the borough?

Summary of Responses

One response was received to this question from KCC (Planning) and they agreed that the main sustainability issues facing the borough have been identified.

Question 6n: If No, what sustainability issues do you think are missing?

Summary of Responses

One response was received to this question from KCC (Planning).

Summary of Specific Issues/Concerns:

- In SA Scoping Report (October 2016) Table 6 refers to Sustainable Objective 19 as being “Manage flood risk and conserve, protect and enhance water resources”; however, latest SA Issues and Options Report refers to Sustainable Objective 19 as “Reduce flood risk and conserve, protect and enhance water resources”. KCC reiterates its advice set out in its response to consultation on SA Scoping Report (July 2016) which identified the first objective as most appropriate.
- With regard to table 4 concerning SA compatibility testing of Local Plan objectives and SA objectives, KCC – as Lead Local Flood Authority – considers there is a clear relationship between leisure activities and water management. e.g. Eastern Quarry development in Ebbsfleet has central large lake essential to managing flood risk, also used for recreational and leisure activities.

Section 5 – Strategy Considerations

Introduction

Under this section, there are a number of strategic considerations which include:- (i) Cross-boundary Strategic Planning and Duty to Cooperate, (ii) Settlements in the Borough, (iii) Development Boundaries and (iv) Strategic Options (Five possible options – 1. Focused
growth, 2. Semi-dispersed growth, 3. Dispersed growth, 4. Growth Corridor-led Approach and 5. New Settlement growth). At least two questions were asked relating to each of the strategic considerations as follows:

(i) **Cross-boundary Strategic Planning**

**Question 7:** Are there any specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?

**Summary of Responses**

One respondent, KCC (Planning) answered “yes” to this question.

**Question 7a:** If Yes, what are the specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?

**Summary of Responses**

Two responses were received to this question from KCC (Planning) and Maidstone BC.

**Summary of Specific Issues:**

- Maidstone Borough Council (MBC) - only if it is adequately demonstrated, through evidence and positive planning, that needs cannot be met in full should the scope for provision in other authority areas be explored. With respect to housing, the SHMA (2015) identifies a single housing market area covering Sevenoaks, TW, Tonbridge and Crowborough. SHMA advises that in event of an unmet need it would be appropriate to approach these authorities which share the HMA (in whole or in part) namely Sevenoaks, Tonbridge & Malling, Wealden and Rother. Therefore, in the event of a proven unmet need, MBC would expect opportunities to be fully explored in these authority areas as the priority.
- Also, the TW Economic Study (2016) concludes TW borough shares a functional economic market area with Sevenoaks District and Tonbridge & Malling borough, reflecting, in particular, the pattern of strongest commuting flows. These are the authorities with which TW should most appropriately be directed for unmet needs.
- Commuting patterns for TW are strongest with Tonbridge & Malling, Sevenoaks and London whereas for Maidstone borough, commuting flows are greatest with Tonbridge & Malling, London and Medway. The scale of commuting between Maidstone and TW borough is, relative to other areas, less significant. Proposals which could upgrade transport connections, and specifically public transport services, between TW and MBC would be welcome in principle. MBC would therefore request further clarification and discussion on this subject area as part of the Duty to Co-operate.
- KCC welcomes TWBC’s intention to assess potential impact of migration from London to the borough. Integral that consideration given to potential impacts of London’s anticipated growth on borough’s existing/future infrastructure requirements. Therefore, KCC would welcome further engagement to assess potential implications of such growth on infrastructure and services.
- KCC - Appropriate coordination of new secondary school provision across the West Kent area and East Sussex will be required.
• KCC - PROW network crosses boundaries and should be taken into consideration in new Local Plan. New developments will have an impact on character and use of PROW network in TW and neighbouring localities. This access network is a valuable and should not be adversely impacted by development, but protected and enhanced where possible.
• As in KCC’s response to question 3, consideration should be given to maintaining high ecological connectivity across surrounding LPAs and across Kent.

(ii) Settlement Groupings

Question 8: – Do you agree with the suggested groupings of settlements?

Summary of Responses

No responses were received to this question.

Question 8a: If No, what changes do you suggest to the groupings of settlements and why?

Summary of Responses

No responses were received to this question.

(iii) Development Boundaries

Question 9: – Should the policy approach of defining settlement “Limits to Built Development” continue in principle?

Summary of Responses

No responses were received to this question.

Question 9a: Should the defined Limits to Built Development as currently drawn be retained in their current form or in order to maintain settlement patterns, or be removed to enable the delivery of suitable sites?

Summary of Responses

No responses were received to this question.

Question 9b: If the currently defined limits are to be reviewed/redrawn, what criteria do you think should be applied in redrawing the boundaries?

Summary of Responses

No responses were received to this question.
(iv) Strategic Options (Five possible options as above)

Question 10: Please let us know your preferred option or combination of options in order of preference.

Summary of Responses

No responses were received to this question.

Question 10a: If you prefer a combination of options, please state which ones.

Summary of Responses

One response was received to this question from KCC (Planning).

Summary of Specific Issues/Concerns:

KCC (Planning) commented on all five Strategic Options in relation to Highways and Transportation, Education and Heritage Conservation.

The two most favoured Options were 4 and 5 as follows:-

KCC would welcome opportunity to further explore both Options to identify associated infrastructure requirements.

OPTION 4 – Growth Corridor-led Approach

KCC welcomes TWBC’s proposal to stimulate a new ‘growth corridor’ around the A21, close to RTW and Pembury, to meet the economic, housing and wider development needs of the borough.

Highways and Transportation

- Option 4 suggests large scale growth with excellent links to strategic road network. To make this development sustainable, is essential to create a development large enough to encourage internalised trips including retail, education and health care related trips.
- Recommended consideration is given to integration of key destinations in RTW into the proposed expansion from the outset to reduce the risk of exacerbating existing high levels of congestion along A21 corridor. Also, innovative transport solutions to link A21 corridor and RTW could alter number of generated trips.
- PW presents similar opportunities along A228, and has advantage of railway station. Consideration should be given to maximising potential of location of railway station in achieving a reduction in private car trips. Also, further exploration of capacity issues on SE Main Line and Medway Valley Line are necessary.
Education

- Significant development in one geographic area - would be appropriately met through provision of new schools within the development. This provides opportunity to be ‘self-supporting’ for primary education provision; subject to size and location of new settlement, may also be appropriate to include a new secondary school. Careful consideration of quantum and location of new provision would be required.

Heritage Conservation

- Growth corridor contains large number of heritage assets (including Somerhill, more than 80 Listed Buildings, 33 historic farmsteads, wealth of historic landscape features and at least two Second World War pillboxes). Difficult to see how extensive development could fail to impact on setting of Somerhill or the hillfort although acknowledged this Option would reduce pressure on other potential development areas.

OPTION 5 – New Settlement

- KCC welcomes principle of proposal to create a new freestanding ‘Garden Village’ settlement to accommodate anticipated development needs of the borough.

Highways and Transportation

- Location of separate settlement has yet to be determined. However, development to east/northeast of borough has been suggested. Whilst this would encourage development away from TW town centre, KCC (Highways) will be required to determine implications of the proposed scale of growth to NE of TW on A229 corridor.
- Recommended consideration also given to alternative locations for large settlement, with access to employment and education opportunities.

Education

- As for Option 4 above.

Heritage Conservation

- This option simply suggests a settlement of between 5,000 and 7,000 houses. Likely that single large settlement would have very significant impact on historic environment generally, perhaps more so than incremental settlement as for Option 1. If Option 5 is pursued, consult KCC Heritage Conservation early in the process.

Question 11: What views do you have about the possibility of a new settlement somewhere in the borough providing for future development needs?

Summary of Responses

No responses were received to this question.
**Question 11a:** Where do you think a possible new settlement could be located?

**Summary of Responses**

No responses were received to this question.

**Question 12:** Do you think we have considered and identified all reasonable options for accommodating future development growth within the borough?

**Summary of Responses**

No responses were received to this question.

**Question 12a:** If No, please set out what other options for accommodating future development growth within the borough you think should be considered.

**Summary of Responses**

No responses were received to this question.

**Section 6 – Development Management Policies**

**Introduction**

This section considers the policies that are currently in place in the Tunbridge Wells Borough Local Plan 2006 and identifies the key topics that may merit and necessitate new development management policies, especially in the light of government guidance in the NPPF (2012) and any updated local evidence. Three questions were asked relating to (i) existing policies, two questions relating to (ii) new policies and one question relating to (iii) detailed policies, as follows:

(i) **Existing Policies**

**Question 13:** Which policies do you consider are suitable for continued use?

**Summary of Responses**

One response was received from KCC (Planning) to this question.
Summary of policies identified to be suitable for continued use:

Tunbridge Wells Borough Local Plan 2006:

Chapter 4 – Environment

Policies EN1, EN21, EN22 and EN23

Chapter 5 – Town, Neighbourhood and Village Centres

Policy CR2

Chapter 9 – Recreation

Policies R1 and R2

Chapter 11 – Transport and Parking

Policies TP1, TP2, TP3, TP4, TP9 and TP18

Question 14: Which policies do you think may be out of date or no longer necessary?

Summary of Responses

No responses were received to this question.

Question 15: Which policies do you think could be updated or amended, and how?

Summary of Responses

One response was received from KCC (Planning) to this question.

Summary of policies suggested for updating/amendment:

Tunbridge Wells Borough Local Plan 2006:

Chapter 4 – Environment

Policy EN10

Needs to be updated and strengthened. The text is weighted too heavily in favour of development and does not fully reflect the significance awarded to heritage assets by the NPPF (paras. 132 and 135). Therefore recommended that Policy EN 10 is amended to state the following:

- “that permission or consent will only be granted for proposals that are based on a thorough understanding of the heritage significance of the asset and its setting;
- that the impact of the proposal on the heritage significance must be fully explained in the application;
- that proposals will only be accepted where they conserve or enhance that significance;
that the only exceptions to the above principles will be where limited and fully justifiable enabling development is required or where there are very significant economic, social or environmental benefits that would accrue to the wider community from the proposal; that these cannot be delivered by an alternative proposal and that the benefits of the proposal significantly outweigh the impact on the heritage asset; and

that where proposals impact on the significance of heritage assets there will be a requirement for proper archaeological recording and publication”.

Policy EN11

In 2009-10 TWBC worked with KCC and the Kent Gardens Trust to identify and survey a number of historic gardens, including Statements of Significance useful for development control purposes. KCC advises that a revised Gardens policy should make reference to both the Kent Gardens Compendium and revised garden surveys.

(ii) New Policies

Question 16: Considering the topic areas above, are there any other topics that you think the new Tunbridge Wells Borough Local Plan should include?

Summary of Responses

No responses were received to this question.

Question 17: Are there any topics that you consider do not require any further detailed development management policies because there is sufficient coverage already in place, i.e. in national guidance (the NPPF)?

Summary of Responses

No responses were received to this question.

(iii) Detailed Policies

Question 18: Are there any specific planning issues affecting the borough of Tunbridge Wells that you consider are not adequately covered by the NPPF or already referenced in this chapter and which you would like to see addressed in a policy?

Summary of Responses

One response was received to this question from KCC (Planning).
Summary of Specific Issues which should be included/considered:

There are existing policies relating to KCC’s PROWs and Access Service. However, the provision of a new/specific policy that clarifies TWBC’s aspirations for PROWs, Village Greens and Common Land is recommended, providing clarity for developers and planners when preparing and reviewing development proposals.

Conclusion

Introduction

This final section allowed the opportunity to comment on any other planning and development related matters that should be considered or have not been mentioned in the Issues and Options document; and also for any general comments to be made, under the following question:

Question 19: Are there any other planning and development matters that you think the new Local Plan should consider or cover that have not been mentioned in this Issues and Options document? You can also make any general comments here.

Summary of Responses

Seven responses were received to this question from all respondents:- KCC (Planning), KCC (Water), Maidstone BC, Sevenoaks DC, , Tandridge DC, Tonbridge & Malling BC and Wealden DC.

Summary of Specific Issues:

KCC (Planning and Environment)

KCC will continue to work closely with TWBC to ensure delivery of new housing, employment and required infrastructure in response to local needs over new Local Plan period (2013 – 2033).

KCC comments under relevant questions set out above.

KCC (Flood and Water Management)

There is nothing that stands out as requiring comment from Flood and Water Management, only Q.6a answer - yes.

Maidstone BC

Comments (officer level) set out under relevant questions above. Look forward to continuing, constructive dialogue on strategic, cross boundary issues as part of the Duty to Co-operate as Local Plan progresses.

MBC comments under relevant questions set out above.
Sevenoaks DC

SDC and TWBC share a number of key constraints including AONBs and SSSIs. Also, share similar issues in terms of providing for employment, housing market areas and issues surrounding housing affordability.

SDC believes TWBC’s approach to Issues and Options for new Local Plan is positive and proactive in light of current national planning policy.

**Duty to Co-operate**

SDC welcomes ongoing, useful Duty to Co-operate discussions with TWBC to address key cross boundary issues, specific to the local level. Will also continue to work together in other forums, outside of formal Duty to Co-operate –, to identify additional cross boundary issues such as health, infrastructure and transport with key delivery partners.

**Objectively Assessed Need**

The joint SMHA for TWBC and Sevenoaks DC states OAN of 648 units/year over the plan period 2013-2033 (equates to total of 12,960 units being built over 20 years).

National guidance sets out parameters for assessing ability to meet OANs, as well as identifying appropriate sites to meet requirements. Noted TWBC has taken a “settlement hierarchy” approach focusing development in sustainable locations, and broad principles on how this could be achieved through strategic options and distribution of development.

Emerging Sevenoaks District Local Plan public consultation during - likely to be late 2017/early 2018 when SDC will be clearer about its ability, or not, to progress sustainable development that meets identified needs in either its own area or housing market area, due to high level of Green Belt (93%) and AONB (60%) within District. As it may not be possible to meet own OAN in full, SDC will continue to engage with neighbouring authorities, including TWBC, under Duty to Co-operate for further discussions on how this issue can be resolved.

**Distribution of Development**

Should significant development be brought forward using a Growth Corridor-led Approach, considerations should be given to impact on highways, especially along A21 and at Morelys Roundabout (at the bottom of Riverhill in Sevenoaks).

Descriptions and justifications for each Option, including brief descriptions of transport links, services and facilities that are available should be detailed against each proposed Option.

Would be helpful if TWBC published its Settlement Hierarchy in future consultations, to illustrate clearly what services/facilities are available for sustainable development - would give greater justification for more detailed site allocations for new Local plan.

**Other Strategic Issues**

Strategic considerations must be looked at in wider context of West Kent. Issues of health, infrastructure and transport will be have to be considered as part of new Local Plan and will involve a number of delivery partners (e.g. KCC, Highways England and the West Kent Clinic Commissioning
Group). Important both SDC and TWBC engage with the appropriate delivery partners both under direct Duty to Co-operate and additional forums that both authorities attend (i.e. West Kent CCG’s Local Care Forum, the West Kent Infrastructure & Transport Group).

SDC recognises impact of Ashdown Forest southern areas of Sevenoaks District. Following commissioning of evidence with 6 neighbouring authorities to assess the impact of future development in the area, SDC will continue to work proactively with Natural England, neighbouring authorities and other bodies to understand impact of Local Plan on such sites.

**Tandridge DC**

At present, no comments to make but withhold right to make further comments as Plan progresses.

TDC would like to continue to work together on mitigation measures required as part of Ashdown Forest and support for High Weald AONB.

**Tonbridge & Malling BC**

As no potential yields for each of proposed development strategies, difficult to provide a view on a preferred Option/combination of Options. Document is heavily caveated in respect of challenges of fully meeting OAN over the Plan period, suggesting none of the Options will be sufficient. Consultee has no indication whether one or combination of Options will meet more/less of the need than others.

Second Call for Sites running parallel to current consultation and therefore may be premature to include sites at this stage - questioned whether further consultation will be necessary when the sites are known and current timetable may need to be extended.

Clearly as a neighbouring LPA, located within the same housing market area, the options that could deliver more of identified need would be preferable to those that deliver less. Risk in carrying out consultation without benefit of potential yields and could result in most productive Options being rejected before they have been fully considered.

Also matter of maintaining a five year housing land supply. As no assessment of phasing of each Option, again preferences expressed at this stage could undermine the ability of a future strategy to deliver sufficient housing numbers across the Plan period. e.g. new settlement may provide a significant proportion of the total need but will inevitably take some years before such a site could deliver housing (may only provide 1-200 units a year). A more successful approach may be to have a mixed portfolio of small to large sites (as supported in the Housing White Paper).

Options promoting a northern extension to LBD north of TW and the Option 4 A21corridor approach would clearly have cross boundary impacts on local highway network, community infrastructure and air quality. Should these Options be taken forward, TMBC would welcome opportunity to work with TWBC as TMBC also brings forward future development proposals in vicinity of south Tonbridge.

Duty to Co-operate - TMBC welcomes recognition of positive cross-boundary liaison on strategic planning matters and opportunity to continue. TMBC in preparing its own Local Plan is striving to meet locally identified needs, particularly for the West Kent Housing Market Area shared with TWBC, addressing similar constraints and challenges.
**Wealden DC**

**Housing**

OAN of 648 dwellings per annum or 12,950 dwellings from 2013 -2033 is noted. Document does not indicate overall level of growth being considered and whether this is above/below the OAN. TWBC has indicated WDC (with others) is included within its housing market area. WDC concurs with this. Therefore, will need to consider whether development within TW will be able to meet shortfall within other areas. The emerging Wealden Local Plan has identified that Wealden unable to meet its OAN and will ask other LPAs within housing market area, including TW, to consider meeting the shortfall. As a strategic cross boundary matter, WDC would welcome further discussions on this.

**Economy**

WDC has identified that TW is within its Functional Economic Market Area. The emerging Wealden Local Plan has identified it can meet its own need in terms of employment floor space and does not rely on TW borough to meet any shortfall. However, the Wealden Local Plan is an emerging document and the economy is a strategic cross boundary matter – WDC welcome further discussions on this.

**Natural Environment**

WDC share a number of common natural environment issues including protected landscape in AONB and the need to protect the Ashdown Forest Special Protection Area (SPA) and Special Area of Conversation (SAC).

**High Weald AONB**

Will continue to work with TWBC as part of High Weald AONB Officer Steering Group which assists in providing a common approach and support to the High Weald and work undertaken by High Weald AONB Unit.

**Ashdown Forest SPA**

Recent visitor survey to Ashdown Forest undertaken on behalf of WDC, TWBC and other LPAs - relates to policies concerning recreational impact on SPA. Survey has resulted in a new policy in the emerging Wealden Local Plan.

However, noted that this particular issue has not been specifically identified within TWBC’s consultation document (though has been identified in the ‘Analysis of the Implications of TWB Local Plan: Issues and Options for European Sites’).

This is a strategic cross boundary matter requiring further discussion with the relevant LPAs.

**Ashdown Forest SAC**

Noted consultation document does not mention any assessment of impacts on Ashdown Forest SAC with regards to atmospheric pollution and nitrogen deposition. However atmospheric pollution in relation to Ashdown Forest SAC has been identified in the ‘Analysis of the Implications of TWB Local Plan: Issues and Options for European Sites’.
WDC consider an assessment under the Habitat Regulations must be undertaken in combination with other plans and projects. WDC will be publishing its Habitat Regulations Assessment shortly and welcomes the cross boundary working group recently formed, including TWBC, to consider this strategic cross boundary matter.

**Specific Issues for Sites within Call for Sites**

No responses were received in relation to the Call for Sites.
**Representation Grouping: Statutory Bodies, Utility Companies, NHS, Emergency Services**

Overall, responses were received from 14 groups/bodies covering a range of issues including environment, health, education, transport, water and culture and leisure, as follows:

- Education and Skills Funding Agency (ESFA)
- Environment Agency
- Forestry Commission
- Highways England
- High Weald AONB Unit
- Historic England
- Kent Police
- Kent Wildlife Trust
- Natural England
- Network Rail
- Southern Water Services
- Sport England
- Theatres Trust
- West Kent Clinical Commissioning Group (CCG)

However, it is important to note that not all organisations answered every question. Therefore the total number of responses for each question may vary.

**Section 3 – Vision and Objectives**

**Vision**

**Introduction**

This section relates to the draft Vision for the borough up to 2033. This includes the development of housing, economic, leisure and recreation uses identified within the new Local Plan to meet local needs. The Vision states that new development will be delivered in a sustainable way and will seek to protect and enhance the exceptional quality of the built, natural and historic environment while promoting economic prosperity to ensure the borough remains a special place. Three questions were asked in relation to the Vision as follows:

**Question 1: Do you agree with the new draft Vision for the borough?**

**Summary of Responses**

3 responses were received to this question with one (33%) supporting the draft Vision, one (33%) having no particular comment on the Vision and one (33%) requesting a particular amendment to the Vision.
Question 2: What suggestions do you have for improving or updating the draft Vision and relating it to 2033?

Summary of Responses

1 response was received to this question recommending an amendment to the Vision.

Summary of Specific Issues:

- Draft Vision is unsustainable due to constraints of the borough, in particular the AONB designation. The Vision should make clear that the AONB designation covering 69% of the borough is likely to constrain the ability of TWBC to meet its objectively assessed need.

Question 3: What should we be aiming and aspiring to achieve and why?

Summary of Responses

3 responses were received to this question with a range of comments.

Summary of Specific Issues:

- Welcome the draft Vision including the need to protect and enhance the natural environment.
- Should be referring to improved delivery of well-designed, energy efficient affordable homes, including those for land-based workers.
- Should be referring to master planning and community consultation for developments of all sizes.

Objectives

Introduction

This section relates to the eight draft Strategic Objectives needed to realise the Vision, which are (i) Meeting development needs, (ii) Protecting and enhancing the borough’s distinctive environment, (iii) Delivering sufficient infrastructure, (iv) Providing high quality housing, (v) Making provision for economic growth, (vi) Ensuring adequate leisure and recreational facilities, (vi) Delivering sustainable development and (vii) Delivering adequate transport and parking capacity. The following three questions were asked in relation to these draft Objectives:

Question 4: Do you think these are the right Objectives?

Summary of Responses

2 responses were received to this question with 1 response of no and 1 response of yes.
Question 4a: If you answered No, please explain why you don’t think these are the right Objectives.

Summary of Responses

1 response was received to this question.

Summary of Specific Issues:

- Considered Objective 1 is unrealistic without proper assessments of constraints, that the Constraints Study is not adequate in this regard and does not address such constraints as the AONB limiting ability of TWBC to meet its objectively assessed housing need.
- Objective 2 should include specific mention of the AONB.
- Objective 4 should include a clear commitment to affordable housing

Question 5: Are there any amendments required or other Objectives that you think should be included?

Summary of Responses

3 comments were received on this question.

Summary of Specific Issues:

- The Plan could include an Objective to support Neighbourhood Plans and community involvement in planning.
- Welcome the draft Vision and Objectives including the need to protect and enhance the natural environment.
- Support for Objective including enhancement of the natural environment which needs to be retained in line with the NPPF “net gain” principle.

Section 4 – Key Issues and Challenges

Introduction

This section identifies the key issues that the Local Plan will need to consider and address when putting forward a strategy and policies for delivery of growth. These key issues are:- (i) Natural and Built Environment, (ii) Infrastructure, (iii) Housing, (iv) Economy, (v) Transport and Parking, (vi) Leisure and Recreation and (vii) Sustainability. Two questions were asked relating to each issue, as follows:

(i) Natural and Built Environment

Question 6a: Have we identified the main environmental issues facing the borough?

Summary of Responses

2 responses were received to this question. 1 respondent agreed that all environmental issues had been identified and 1 respondent disagreed.
Question 6b: If No, what environmental issues do you think are missing?

Summary of Responses

3 responses were received to this question.

Summary of Specific Issues:

- The statutory AONB Management Plan contains more detail on TWBC policies in relation to conserving the High Weald AONB.
- The importance of good design and the use of local materials to mitigate impact on landscape character.
- The high concentration of ancient woodland and medieval field systems in the borough which provide an interlinked habitat network for many common and rare species.
- The density of historic landscape assets across the borough (identified by Historic Landscape Characterisation included in the evidence base).
- The significance of fields surrounding individual farms as a key characteristic of the borough creating separation between small settlements
- Pleased to note inclusion of the High Weald AONB, valuable agricultural land and scarce habitats and species.
- Should also make reference to Ancient Woodland and protected sites (statutory and non-statutory) including SSSI’s for both biological and ecological interest.
- Rather than seeking “no net loss of biodiversity” should seek a “net gain of biodiversity” to be achieved through a well planned green infrastructure strategy.

(ii) Infrastructure

Question 6c: Have we identified the main infrastructure issues facing the borough?

Summary of Responses

1 response was received to this question which agreed that all the infrastructure issues have been identified.

Question 6d: If No, what infrastructure issues do you think are missing?

Summary of Responses

2 responses were received to this question.

Summary of specific Issues:

- Southern Water supports emphasis in Para. 4.14 of importance of addressing infrastructure requirements generated by new development and that over the lifespan of the Local Plan it may be that Southern Water needs to provide new or improved wastewater infrastructure to support new development.
- Southern Water also supports the requirement for relevant local authorities to work with landowners, developers and infrastructure providers to deliver infrastructure efficiently
through the use of developer contributions. This is appropriate for the timely provision of the necessary local (i.e. site specific) sewerage infrastructure.

- Over the life time of the Local Plan, investment at Wastewater Treatment Works may be required in order to increase capacity or to meet stricter environmental standards in the treatment of wastewater. Such investment is planned and funded through the water industry's five yearly price review process. In cases where investment may have long lead times, will be important to ensure policies are in place, for phasing of developments, in order to effectively coordinate the delivery of additional capacity in tandem with development.
- Sport England note a new IDP will need to identify all infrastructure requirements as a result of the new development proposed, as well as any current deficiencies. Document attached on meeting need for sporting provision generated by new development, that may be used to inform any new IDP.
- Sport England understand, that a Playing Pitch Strategy is currently in process, however it is not yet finalised and some way from being adopted. SE strongly encourages the LA to work towards finalising this process to avoid an objection from Sport England.

(iii) Housing

**Question 6e: Have we identified the main housing issues facing the borough?**

**Summary of Responses**

2 responses were received to this question, one stating that all the housing issues have been identified and one stating they have not.

**Question 6f: If No, what housing issues do you think are missing?**

**Summary of Responses**

2 responses were received to this question.

**Summary of Specific Issues:**

- Southern Water supports requirement in para 4.24 to consider demands from other land uses as well as housing and take account of any constraints to development. Should any housing development be proposed within close proximity to an existing wastewater treatment land use, they would seek to secure site specific policy provisions (where relevant) to ensure adequate separation between the Works and any sensitive receptors, such as housing.
- AONB designation extending across 69% of borough, and its character as landscape relatively unchanged since the medieval period, places clear constraints on TWBC meeting its full objectively assessed housing need.
- For development in AONB need to pay particular attention to AONB character as set out in TWBC’s adopted AONB Management Plan.
- Particular needs of land-based workers for appropriately designed affordable housing and yard space.
• Dark skies and need for appropriate lighting schemes to minimise impact.
• Predominantly historic character of roads in the borough and need for development to pay particular attention to conserving the character and archaeology of historic routes.

(iv) Economy

Question 6g: Have we identified the main economic issues facing the borough?

Summary of Responses

2 responses were received to this question stating that not all of the economic issues have been identified.

Question 6h: If No, what economic issues do you think are missing?

Summary of Responses

2 responses were received to this question.

Summary of Specific Issues:

• The loss of capacity for farming and forestry in farmsteads and the need to secure this capacity within existing small settlements.
• Sport England wishes to highlight fact that sport makes a very substantial contribution to the economy and to the welfare of individuals and society. It is an important part of the national economy, contributing significantly in terms of spending, economic activity (measured using Gross Value Added) and employment. Also health and well-being (or happiness) impacts. Its economic impact places it within top 15 sectors in England and its wider economic benefits mean it is a key part of society, which results in huge benefits to individuals and communities. Sport England would therefore request the value of sport to the economy is reflected within the Local Plan.

(v) Transport and Parking

Question 6i: Have we identified the main transport and parking issues facing the borough?

Summary of Responses

No responses were received to this question.

Question 6j: If No, what transport and parking issues do you think are missing?

Summary of Responses

No responses were received to this question.
(vi) **Leisure and Recreation**

**Question 6k:** Have we identified the main leisure and recreation issues facing the borough?

**Summary of Responses**

2 responses were received to this question stating that not all of the leisure and recreation issues have been identified.

**Question 6l:** If No, what leisure and recreation issues do you think are missing?

**Summary of Responses**

2 responses were received to this question.

**Summary of Specific Issues:**

- Understood that a Playing Pitch Strategy is currently in process. However it is not yet finalised and some way from being adopted. Therefore, not yet in a position to form robust part of TWBC evidence base as required by the NPPF. Would strongly encourage working towards finalising this process in order to avoid an objection from Sport England.
- Opportunities to improve health and well-being, get close to nature, and appreciate the historic and cultural associations of our routeways provided by an extensive public rights of way system, and the need to maintain this system.

(vii) **Sustainability**

**Question 6m:** Having regard to the prepared Sustainability Appraisal Scoping Report (link given here in I/O document), have we identified the main sustainability issues facing the borough?

**Summary of Responses**

1 response was received to this question stating that all of the Sustainability issues have been identified.

**Question 6n:** If No, what sustainability issues do you think are missing?

**Summary of Responses**

1 response was received to this question.

**Summary of Specific Issues:**

- When the Issues are developed into sustainability criteria and these criteria then applied to options in the draft Sustainability Appraisal, they are interpreted in a way that only gives a very partial picture of sustainability.
Section 5 – Strategy Considerations

Introduction

Under this section, there are a number of strategic considerations which include:- (i) Cross-boundary Strategic Planning and Duty to Cooperate, (ii) Settlements in the Borough, (iii) Development Boundaries and (iv) Strategic Options (Five possible options – 1. Focused growth, 2. Semi-dispersed growth, 3. Dispersed growth, 4. Growth Corridor-led Approach and 5. New Settlement growth). At least two questions were asked relating to each of the strategic considerations as follows:

(i) Cross-boundary Strategic Planning

Question 7: Are there any specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?

Summary of Responses

1 response was received to this question stating yes.

Question 7a: If Yes, what are the specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?

Summary of Responses

2 responses were received to this question.

Summary of Specific Issues:

- The High Weald AONB: a Joint Advisory Committee and joint officer working group already exists.
- The key cross-boundary issue for Natural England is air quality on Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC). The Council is aware of the recent Wealden Judicial Review, so any proposed options for development will need to consider this impact on Ashdown Forest from increased growth, in combination with other plans and projects.

(ii) Settlement Groupings

Question 8: Do you agree with the suggested groupings of settlements?

Summary of Responses

1 response was received to this question stating no.
Question 8a: If No, what changes do you suggest to the groupings of settlements and why?

Summary of Responses

1 response was received to this question.

Summary of Specific Issues:

- Settlement groupings should be based on the character of settlements and not just their size.
- Farmsteads and hamlets as a key component of settlement in the borough should be included in the groupings even if they are then dismissed as locations for significant development.

(iii) Development Boundaries

Question 9: – Should the policy approach of defining settlement “Limits to Built Development” (LBD) continue in principle?

Summary of Responses

1 response was received to this question stating yes.

Question 9a: Should the defined Limits to Built Development as currently drawn be retained in their current form or in order to maintain settlement patterns, or be removed to enable the delivery of suitable sites?

Summary of Responses

No responses were received to this question.

Question 9b: If the currently defined limits are to be reviewed/redrawn, what criteria do you think should be applied in redrawing the boundaries?

Summary of Responses

1 response was received to this question.

Summary of Specific Issues:

- Neither option in Question 9a is supported because, if the limits remain unchanged then the additional development cannot be accommodated and the removal of limits altogether is not supported because would leave the LPA with no control over how settlements expand.
- The defined LBDs should be amended to enable the delivery of suitable sites.
- The criteria should reflect the results of a detailed character study carried out for each settlement.
(iv) **Strategic Options (Five possible options as above)**

**Question 10:** Please let us know your preferred option or combination of options in order of preference.

**Summary of Responses**

1 response was received to this question stating a combination of options was preferred.

**Question 10a:** If you prefer a combination of options, please state which ones.

**Summary of Responses**

5 responses were received to this question.

**Summary of Specific Issues:**

- Southern Water has no preference between Options, having a statutory duty to serve new development within its operational area. Once Options have been refined and included in the draft Local Plan, SW will undertake an infrastructure capacity assessment and its ability to meet the forecast demand for proposed development. Site specific planning policies and allocations could then be worded to incorporate infrastructure requirements, and provide early warning to facilitate the delivery of any requisite infrastructure.

- Options 2 and 3 (Semi-dispersed & Dispersed Growth) – with regard to development at Five Oak Green and/or Lamberhurst, this may be significantly constrained by flood risk and surface water management. Allocation of future development should follow the sequential process and should include measures to actively reduce flood risk to existing settlements. If major development is proposed at Five Oak Green, contributions from potential developers should be sought to help fund flood risk management infrastructure for the existing village.

- A combination of Options 3 and 5 and other approaches including investigating the potential for small scale development of farmsteads and hamlets reflecting the dispersed settlement pattern of the area.

- Option 4 (corridor-led approach) - likely to have significant, adverse impacts on AONB, and be at odds with aim of preventing coalescence of existing settlements as included with other Options by merging TW with Pembury. Similarly Option (new garden village), given much of the borough is designated as AONB, could significantly impact on this designation unless it can be located outside the AONB boundary. In these cases, the Council will need to robustly demonstrate it cannot achieve its required housing in any other way which avoids such significant harm to the AONB, as in line with para.116 of the NPPF. Options 1-3 may be simpler to manage in terms of landscape impacts if planned well but again will need close consideration of the special qualities of the AONB.

- Kent Wildlife Trust would prefer Option with least negative impact on biodiversity and protected sites and habitats. At present, not possible to make that judgement because of "broad" nature of initial consultation. With more detailed work-up of proposals at a later stage this may be clearer.
Question 11: What views do you have about the possibility of a new settlement somewhere in the borough providing for future development needs?

Summary of Responses

3 responses were received to this question.

Summary of Specific Issues:

- Southern Water does not object to creation of a new settlement - this would be likely to generate a need for wastewater treatment options to be investigated further. These would be assessed once a final location is determined.
- Not appropriate in the AONB.
- Please note that any development that would either involve the loss of playing field or prejudice the use of the playing field would be strongly resisted by Sport England.

Question 11a: Where do you think a possible new settlement could be located?

Summary of Responses

1 response was received to this question.

Summary of Specific Issues:

Outside of the AONB.

Question 12: Do you think we have considered and identified all reasonable options for accommodating future development growth within the borough?

Summary of Responses

2 responses were received – 1 stating yes and 1 stating no.

Question 12a: If No, please set out what other options for accommodating future development growth within the borough you think should be considered.

Summary of Responses

1 response was received to this question.

Summary of Specific Issues:

- Housing numbers should be challenged.
- Options for increasing housing density in existing settlements and for new development should be explored.
- The role of farmsteads and hamlets, including modern farm buildings should be addressed.
Section 6 – Development Management Policies

Introduction

This section considers the policies that are currently in place in the Tunbridge Wells Borough Local Plan 2006 and identifies the key topics that may merit and necessitate new development management policies, especially in the light of government guidance in the NPPF (2012) and any updated local evidence. Three questions were asked relating to (i) existing policies, two questions relating to (ii) new policies and one question relating to (iii) detailed policies, as follows:

(i) Existing Policies

Question 13: Which policies do you consider are suitable for continued use?

Summary of Responses

1 response was received to this question (although included in comments under question 16).

Summary of policies identified to be suitable for continued use:

Tunbridge Wells Borough Local Plan 2006:

Chapter 4 – Environment

Policy EN16

Question 14: Which policies do you think may be out of date or no longer necessary?

Summary of Responses

1 response was received to this question.

Summary of Policies considered to be out of date:

Tunbridge Wells Borough Local 2006:

Chapter 10 – Community Services

Policy CS6

Other comments:

- Policy CS6 for Community Buildings does not fully reflect the NPPF and requires updating.
- Local plans should support arts and culture at all levels to support the local economy and ensure that all residents and visitors, and future generations, have access to cultural opportunities. Policies should protect, support and enhance cultural facilities and activities, particularly those which might otherwise be traded in for more commercially lucrative developments, and promote cultural led development as a catalyst for regeneration in town centres.
• The Theatres Trust recommend policy wording to support the above ambitions.

**Question 15: Which policies do you think could be updated or amended, and how?**

**Summary of Responses**

4 responses were received to this question.

**Summary of policies suggested for updating/amendment:**

**Tunbridge Wells Borough Local Plan 2006:**

**Chapter 4 – Environment**

Policy EN8 – update to refer to need to maintain and improve intrinsically Dark Night Skies in the High Weald.

**Chapter 10 – Community Services**

Policy CS6 - does not fully reflect NPPF and requires updating. Para 70 of NPPF states “in promoting healthy communities planning decisions should plan positively for cultural buildings and guard against the loss of cultural facilities and services”. This should be reflected in a new policy with recommended wording suggested by the Theatres Trust.

**Chapter 9 – Recreation**

Policy R1 - currently protects recreational open space. Sport England recommends this policy is amended to better reflect the NPPF in relation to an assessment of open space and buildings, any losses replaced by equivalent or better provision in terms of quantity and quality in a suitable location or if the development is for alternative sports and recreational provision, the needs of which clearly outweigh the loss.

**Question 16: Considering the topic areas above, are there any other topics that you think the new Tunbridge Wells Borough Local Plan should include?**

**Summary of Responses**

4 responses were received to this question.

**Summary of suggested New Topic Areas/Policies:**

**New Policies:**

- Additional policy to ensure best practice approaches to remediating land contamination on brownfield sites.
- Additional policy to tackle diffuse pollution from current foul drainage infrastructure, with any improved infrastructure for new developments allowing capacity for existing rural areas to link to mains sewer extensions where feasible.
New Topic Areas:

- Green infrastructure should form fundamental part of Local Plan. If well planned, GI can be embedded into development early in planning process and enable Local Plan to deliver sustainable growth to benefit the borough’s communities, environment and local economy. Green and blue infrastructure encompass green roofs, parks and gardens, playing fields and allotments, beaches, watercourses and wetlands, river corridors, woodlands, grasslands, trees and hedgerows etc. The multifunctional services and benefits of GI are wide-ranging, supporting and safeguarding communities and the environment.
- GI strategy should be embedded in the Local Plan rather than a subsidiary of the wider infrastructure theme.

Other comments:

- Kent Police generally content with policies in the Plan but consider Section 106 contributions can be made to the police service, including infrastructure and policing infrastructure.
- Consultation document fails to take in to account the wider definition of “Healthy Communities” as defined under the NPPF, namely “safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion”.
- Welcome reference to “cumulative impact” in section 4.8. Would appreciate more detail of this in next consultation draft. Similarly, issue of loss of farmland and its impact upon locally significant species and habitats, protection of locally-significant sites and the importance of green infrastructure all needs to be referred to in detailed consultation to follow.

Question 17: Are there any topics that you consider do not require any further detailed development management policies because there is sufficient coverage already in place, i.e. in national guidance (the NPPF)?

Summary of Responses

No responses were received to this question.

Question 18: Are there any specific planning issues affecting the borough of Tunbridge Wells that you consider are not adequately covered by the NPPF or already referenced in this chapter and which you would like to see addressed in a policy?

Summary of Responses

2 responses were received to this question.
Summary of Specific Issues:

- Should be a specific policy addressing development within the High Weald AONB. The original EN26 was deleted, presumably because it just repeated national policy. However, a locally distinctive policy for the High Weald AONB, referencing the Management Plan, would add to national policy and explain how it should be applied in the High Weald.
- Consideration of compensation and offsetting for land where mitigation does not sufficiently cover biodiversity loss.

Conclusion

Introduction

This final section allowed the opportunity to comment on any other planning and development related matters that should be considered or have not been mentioned in the Issues and Options document; and also for any general comments to be made, under the following question:

**Question 19: Are there any other planning and development matters that you think the new Local Plan should consider or cover that have not been mentioned in this Issues and Options document? You can also make any general comments here.**

Summary of Responses

9 responses were received to this question from 9 different organisations.

Summary of Specific Issues:

**Education and Skills Funding Agency (ESFA)**

ESFA notes significant growth in housing stock expected in the borough (population growth of 16.6% to 2033 and 12,960 new homes over Plan period). This will place additional pressure on social infrastructure such as education facilities (as at Para 1.43 of consultation document), which also refers to early engagement with service providers. Therefore, the ESFA should be involved as the Local Plan is prepared.

Noted TWBC intends to roll forward allocations in the SALP 2016. Nevertheless, education provision must be based on most up-to-date evidence of need and demand. ESFA welcomes reference in Para 4.16 of current consultation of need for an updated Infrastructure Delivery Plan (IDP) to identify need arising from new development and allow infrastructure providers to target provision appropriately. Please consult ESFA on any revisions to the IDP and intended mechanisms for securing developer funding.

ESFA would like to be included as early as possible in discussions on potential site allocations, as there may be school projects emerging in the borough, appropriate for specific site designation.

Refer to residential scheme at Mascalls Court Farm, including a site for a 2FE Free School primary school - to meet need for school places arising from new development in PW. In light of adopted
Policies AL/PW3A, PW3B and PW4 (to be carried forward in the next plan), emerging ESFA proposals for a Forward Loan Fund to support delivery of schools at an early stage as part of large residential and mixed use developments may be of interest to the Council and would be happy to meet to discuss this.

National Policy - would be helpful if explicitly referenced within the document:

- NPPF advises that LPAs should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72).
- ESFA supports principle of TWBC’s safeguarding land for provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. LPAs should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary.
- Local Plan should also have regard to Joint Policy Statement from Secretary of State for Communities and Local Government and the Secretary of State for Education on ‘Planning for Schools Development’ (2011) which sets out the Government’s commitment to support the development of state-funded schools and their delivery through the planning system.
- ESFA encourages close working with LPAs during all stages of planning policy development to help guide development of new school infrastructure and meet predicted demands for primary/secondary school places.
- As basic need for school places is high across Kent and capacity issues clearly affect more than one local authority area, this is a community infrastructure issue of cross-boundary significance. In line with the Duty to Cooperate, please therefore engage fully with ESFA during Plan preparation. Example and link given of approach taken by London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD).
- Ensuring an adequate supply of sites for schools is essential to ensure TW can swiftly and flexibly respond to existing and future need for school places across borough over plan period.
- Plan should be deliverable over its period - need to ensure education contributions made by developers are sufficient to deliver additional school places required to meet increase in demand generated by new developments. TW does not currently have a Community Infrastructure Levy (CIL) in place but does have a clear approach to Section 106 planning obligations. ESFA supports Council’s intention to review the IDP, with opportunity to consider approach to seeking developer contributions and potential for implementing CIL charging in the future. ESFA would be interested in responding to this.

**Environment Agency**

Options 2 and 3 (Semi-dispersed & Dispersed Growth) -with regard to development at Five Oak Green and/or Lamberhurst, this may be significantly constrained by flood risk and surface water management. Allocation of future development should follow the sequential process and should include measures to actively reduce flood risk to the existing settlements. If major development is proposed at Five Oak Green, should seek contributions from potential developers to help fund flood risk management infrastructure for the existing village.

Section 2.21-26 - recommend the environment section refers to the water environment. Might be addressed by referring to some of many rivers and other waterbodies in the borough and services they provide. e.g. providing water resources, supporting wildlife in rivers and amenity value of
waterways. Also recommend this section emphasises importance of remediating sites affected by historic contamination.

Pleased section 4.54 states "the new Local Plan will need to recognise that the borough is within an area of serious water stress. Ways of reducing water consumption need to be implemented as well as opportunities for improving groundwater quality." Hope to see this reflected in adoption of optional and more stringent target for household water use available in The Building Regulations &c. (Amendment) Regulations 2015 (now that the Code for Sustainable Homes is no longer supported). Note this forms part of mitigation suggested in section 5.2.4 of Interim Sustainability Appraisal.

Hope to see larger commercial developments achieve BREEAM standards of Very Good or Excellent.

Section 4.7 refers to "intensive water management to prevent flooding and some farm practices can both lead to a loss of ecological value". Promotion of Natural Flood Management would be an appropriate addition here at it aims to help reduce flood risk while improving "ecological value" of land.

Recommend section 4.10 (infrastructure) is expanded to consider foul drainage infrastructure - a challenging topic, particularly for development in rural areas.

In Leisure and Recreation section, benefits of waterbodies as places where people can relax, exercise and gain other cultural ecosystem services (UK National Ecosystem Assessment) not considered. Should be, as proper use of natural systems has wide benefits to residents of borough in terms of health and social care costs.

Also recommend greater engagement with Kent Nature Partnership - county-led body that drives environmental improvement and limits environmental degradation. Aligning objectives with KNP through Local Plan may be an effective way to deliver positive environmental outcomes in the borough.

Forestry Commission

Not in a position to input to consultation process on Local Plans but have provided standard advice in relation to the protection of Ancient Woodland and Veteran Trees, Biodiversity and flood risk.

In wider planning context, Forestry Commission encourages local authorities to consider role of trees in delivering planning objectives as part of a wider integrated landscape approach, through the inclusion of green infrastructure (including trees and woodland) in and around new development; and use of locally sourced wood in construction and as a sustainable carbon lean fuel.

Highways England

Consider that as Plan is in its earliest stages where the level of detail is naturally insufficient to assess and mitigate the transport impacts, they are not in a position to offer any detailed comments at this point in time. As the Council progresses with the new Local Plan, would be particularly interested in the “updated transport modelling work” referenced within the document.
High Weald AONB Unit

Noted 69% of TW borough is covered by AONB designation but role of High Weald AONB as a national designation constraining development is downplayed.

No mention made of statutory High Weald AONB Management Plan, adopted by TWBC and by law formulates their policy for management of the area and carrying out their functions.

Significance of AONB designation in delivering a high quality environment to support businesses and tourism should be stated.

Section 2: Settlements (p. 9 -10) does not mention dominant settlement characteristics of TW borough i.e. dispersed historic settlements of farmsteads and hamlets. None of Options appear to consider growth in any of these small settlements and it would be helpful to clarify if this were the case.

Disappointed no small settlement character studies have been prepared, particularly given emphasis on semi-/dispersed growth in the Options, likely to have significant impact on character of settlements such as Cranbrook and Hawkhurst.

Section 2: Economy (p. 11 – 12). Agriculture, forestry and other land based industries are important components of TW’s economy. Although employing only a small number of people these industries are critical to maintaining high quality environment which attracts a ‘significant amount of investment in the form of tourism’ (para. 2.20). The needs of these industries should be acknowledged and addressed in the Plan.

Section 4: Natural and built environments of the borough are significant topics in their own right and should merit individual sections.

Inclusion of a Landscape Character Assessment and Historic Landscape Characterisation (HLC) welcomed.

Development Constraints Study underplays significance of AONB. Key characteristics of AONB character, mapped by the AONB partnership and readily available to TWBC as a partnership member are not mentioned nor shown on constraints map.

Para 2.25 does not reflect full meaning of NPPF para 116, giving impression that certain forms of edge of settlement are specifically considered. Whereas, NPPF makes it clear that every proposal for major development in an AONB should be considered on its individual merits against 3 tests set out in para 116.

Historic England

Many issues/matters in consultation document beyond remit and concern of Historic England and their comments are limited to matters relating to the historic environment and heritage assets. Also note that as in early stage of local plan formulation, the current document may be subject to significant change and therefore comments limited to more general matters. Therefore wish to be re-consulted as Plan progresses.
Particular focus in Plan should be on NPPF which sets out a positive, clear strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraphs 126 and 157); and contain strategic policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 156).

NPPF paras 9 and 126 - not a passive exercise but requires a plan for maintenance and use of heritage assets and for delivery of development including within their setting that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.

HE have set out a general list of issues which should be taken in to account in relation to the historic environment and the development of Local Plans and Planning policy. In summary all policies and proposals throughout all sections of the Plan should be tested against the potential effects they will have on the historic environment and the significance of heritage assets.

**Natural England**

No particular comments to make on growth Options paper. Written on basis of not knowing specifics about locations etc. but provides a very useful and interesting perspective on possible growth options.

**Network Rail**

Number of sites are situated adjacent to operational railway land and infrastructure. TWBC and potential developers should be aware of, and consider, Network Rail’s standard guidelines/requirements when developing sites located adjacent to/close to Network Rail’s land, assets and operational railway infrastructure. Would like to continue to be included in the planning policy consultations.

**West Kent Clinical Commissioning Group (CCG)**

CCG will continue to engage with TWBC as the Local Plan is developed, to fully understand the impact of growth on existing services and infrastructure.

Health infrastructure requirements (as a result of new developments) should be identified and inform the TWBC Infrastructure Delivery Plan (IDP). This work will form part of the CCG wide infrastructure plans being developed under the CCG Local Care Plan (as part of the Kent & Medway Sustainability and Transformation Plan).

**Specific Issues for Sites within Call for Sites**

No responses were received in relation to the Call for Sites.
**Representation Grouping: Residents associations, amenity and various community and other organisations**

Overall, responses were received from 11 resident/community/amenity organisations within the borough, The Access Group, the Weald of Kent Protection Society, the National Farmers Union and the National Trust. However, it is important to note that not all organisations answered every question. Therefore the total number of responses received for each question may vary.

**Section 3 – Vision and Objectives**

**Vision**

**Introduction**

This section relates to the draft Vision for the borough up to 2033. This includes the development of housing, economic, leisure and recreation uses identified within the new Local Plan to meet local needs. The Vision states that new development will be delivered in a sustainable way and will seek to protect and enhance the exceptional quality of the built, natural and historic environment while promoting economic prosperity to ensure the borough remains a special place. Three questions were asked in relation to the Vision as follows:

**Question 1: Do you agree with the new draft Vision for the borough?**

**Summary of Responses**

8 responses were received to this question. 2 respondents (25%) disagreed with the draft Vision, while 6 respondents (75%) agreed. Overall, there was a vast majority of those in agreement.

**Question 2: What suggestions do you have for improving or updating the draft Vision and relating it to 2033?**

**Summary of Responses**

8 responses were received to this question.

**Summary of Specific Issues/Concerns:**

- Vision is not "inclusive", nor is it compliant with UK Disability Strategy 2012 and the legal compliance post 2025.
- Local Plan should attempt to institute long term policies flexible enough to adapt to foreseeable trends in lifestyle choices in relation to housing type and location, transport mode, schools location, parking and retail provision.
- Vision as presently drafted appears to put development ahead of environmental protection and to suggest that only environment/heritage of "exceptional quality" will be protected.
- Vision could perhaps be reworked to make it more locally relevant.
- Vision should consider the issues with traffic in the town within the next couple of years.
Don’t want to lose green spaces and countryside and lose the slogan ‘Kent - The Garden of England’.
The plan has to include infrastructure planning as part of its aims. At least 4 new 2-form primary schools, 2 secondary schools and 2 new GP surgeries should be planned for within the borough.
Not good enough to state that x number of houses are needed, but make no plans as how the residents of these properties are going to be supported or what the impact of these new homes will have on existing residents and their use of existing facilities.

**Question 3: What should we be aiming and aspiring to achieve and why?**

**Summary of Responses**

9 responses were received to this question.

**Summary of Specific Issues/Concerns:**

- The vision must reflect that all businesses and workplaces, as well as townscapes must be independently accessible, irrespective of the initial cost, in order to enable people with disabilities to enter the workplace.
- Should be aiming to devise and agree joined up policies to be delivered by all relevant public sector providers and the private sector to improve the mental and physical health and wellbeing of all sections of the population across all demographic profiles.
- Should retain clear, sustainable boundaries to the town so that suburban sprawl does not arise and all residents have safe walking or cycling access both to the town centre and to the open countryside.
- Urgently tackle the present atmospheric pollution and noise pollution.
- Overcome the present problem of road congestion by enabling modal shift away from private motor cars.
- Maintaining the historic fabric and setting of the town which contributes to the general wellbeing of its residents and offers considerable future tourism potential.
- Maintaining sufficient local employment sites for all sectors of the population of RTW to reduce the risk of RTW becoming a dormitory town.
- Ensuring that any new housing development meets proven housing need, including the 50% element for affordable housing and is not primarily market-driven.
- Should do more to protect the greenbelt and the urban fringe around Tunbridge Wells.
- TWBC must always be mindful of a growing aging population and the challenges it will present. Many older people would leave their larger homes if suitable homes were available to them. New homes should be built fit for later adaptions of an aging population.

**Objectives**

**Introduction**

This section relates to the eight draft Strategic Objectives needed to realise the Vision, which are (i) Meeting development needs, (ii) Protecting and enhancing the borough’s distinctive environment, (iii) Delivering sufficient infrastructure, (iv) Providing high quality...
housing, (v) Making provision for economic growth, (vi) Ensuring adequate leisure and recreational facilities, (vi) Delivering sustainable development and (viii) Delivering adequate transport and parking capacity. The following three questions were asked in relation to these draft Objectives:

**Question 4: Do you think these are the right Objectives?**

**Summary of Responses**

8 responses were received to this question. 4 respondents (50%) agreed with the Objectives, 1 respondent (12.5%) disagreed; while 3 respondents (37.5%) agreed to some extent following amendments. Overall, there was a vast majority of those in disagreement to at least some extent.

**Question 4a: If you answered No, please explain why you don’t think these are the right Objectives.**

**Summary of Responses**

5 responses were received to this question.

**Summary of Specific Issues/Concerns:**

- It should not be assumed that parking capacity and adequate transport capacity are mutually reinforcing. The opposite may be the case and a full strategic study should be made of the issue of parking provision across all parts of the town.
- Objectives are poorly drafted; there are really only three objectives (Protecting Borough’s environment, Meeting development needs, Delivering sufficient infrastructure), with the other five objectives all merely being aspects of these three.
- Objective 1 should refer to meeting realistic development needs and make reference to maximising appropriate brownfield opportunities
- Objective 2 is too general to be meaningful; natural and built environment should not be conflated and separate objectives on climate change and preservation of quantity and quality of natural resources is essential
- Objective 3 should mention water and sewage infrastructure, energy position, health, social care, education and provision of superfast broadband to rural areas.
- Objective 4 should refer to an appropriate mix of sizes, types and tenures to meet housing need. It should refer to ‘sustainable locations’.
- Objective 7 is unnecessary and repetitive; could be replaced with objective on sustainable living and energy use.
- Objective 8 should be for ‘good’ transport and parking facilities as opposed to ‘adequate’, and refer to congestion and related air pollution including the resolution of these issues.
- More emphasis needs to be given to the immediate requirement of reduction and calming of traffic in town.
**Question 5:** Are there any amendments required or other Objectives that you think should be included?

**Summary of Responses**

10 responses were received to this question.

**Summary of Specific Issues/Concerns:**

- No facility must for any reason exclude a disabled person, they must irrespective of cost, make their facilities inclusive to all. A failure in the plan to make this clear amounts to discrimination.
- Important objective should be “to support a well borough”; this should be a focus in the town of Royal Tunbridge Wells and the wider borough by linking the traditional objectives of planning policy with these wider objectives.
- An additional objective should be added for “ensuring health and wellbeing”.
- Objectives need to consider the immediate requirement of reduction and calming of traffic in town.
- Housing needs to include predominantly 2/3 bedroom houses that are affordable to people to get a mortgage that earn the national average salary and in particular first time buyers.
- More emphasis needs to be placed on sustainable and shared means of transport rather than cars. Better infrastructure needs to be put in place for pedestrians and cyclists, and bus routes need to be considered.
- A ‘Park and Ride’ scheme for Tunbridge Wells could well be a very good strategic objective for the Borough.
- Serious consideration is needed for infrastructural constraints — schools, roads, health facilities.

**Section 4 – Key Issues and Challenges**

**Introduction**

This section identifies the key issues that the Local Plan will need to consider and address when putting forward a strategy and policies for delivery of growth. These key issues are:- (i) Natural and Built Environment, (ii) Infrastructure, (iii) Housing, (iv) Economy, (v) Transport and Parking, (vi) Leisure and Recreation and (vii) Sustainability. Two questions were asked relating to each issue, as follows:
(i) *Natural and Built Environment*

**Question 6a: Have we identified the main environmental issues facing the borough?**

**Summary of Responses**

7 responses were received to this question. 1 respondent (14.2%) agreed that all the main environmental issues have been identified; 3 respondents (42.9%) disagreed, while 3 respondents (42.9%) agreed to some extent with concerns raised. Overall, there was a slight majority of those in agreement to at least some extent.

**Question 6b: If No, what environmental issues do you think are missing?**

**Summary of Responses**

6 responses were received to this question.

**Summary of Specific Issues/Concerns:**

- Oversized cars should be discouraged by imposing additional premiums in car parks.
- New roads should be designed to avoid congestion.
- Adequate amounts of schools must be provided to enable the children of a family to attend the same school, avoiding parents needing to drive from one school to another at peak times.
- Light pollution is an important issue for rural areas with dark skies; this should be addressed in the Plan.
- Climate change considerations.
- Paragraph 4.7; the statements made have no basis in evidence and are meaningless without clear explanation.
- More care is required as to how the linkage between farming, planning and biodiversity is made; particularly given that a great many farming practices significantly enhance biodiversity.
- Water security is a key risk for agriculture and horticulture. In this context the Plan should give positive support to any water resource adaptations that farming businesses may require.
- There is no discussion on the carbon load from the proposed massive increase in housebuilding, the required infrastructure and the loss of countryside. This should be calculated.
- All development sites should make space for nature and habitat connectivity as an important theme.
- It is disingenuous to say that pressure for new built development “could” have direct impacts on landscape and environmental assets and their settings. It is abundantly clear that the housing numbers proposed under the SHMA cannot be accommodated without serious environmental damage.
- The plan should refer to the AONB Management Plan to demonstrate decision making has met the statutory duty to have regard to ‘the purpose of conserving and enhancing the natural beauty’ of the AONB.
The plan should consider the success of the landscape character approach, and evaluate if restoration of local landscape designations would assist to protect the setting of the AONB.

Tranquillity can be an important and valued feature of landscapes, and should be considered in the local plan.

The value of agricultural land should be a key theme of the natural environment or economy themes.

No mention is made of the vital need to reduce significantly the severe air pollution and also noise pollution.

In paragraph 4.4, reference should be made to the extensive local list of heritage assets not yet statutorily defined as such.

In 4.8, it should be emphasised that some development proposals will not be capable of respecting the local environment let alone enhancing it. There should be a presumption against granting planning permission in such cases.

In 4.11, there should be more guidance on what constitutes the specific identity of a place and its surrounding urban realm. Reference also might be made to improving linkages by development of green networks favouring safe pedestrian and cycle access.

(ii) Infrastructure

Question 6c: Have we identified the main infrastructure issues facing the borough?

Summary of Response

10 responses were received to this question. 1 respondent (10%) agreed that all the main infrastructure issues have been identified; 6 respondents (60%) disagreed, while 3 respondents (30%) agreed to some extent with concerns raised. Overall, there was a majority of those in disagreement.

Question 6d: If No, what infrastructure issues do you think are missing?

Summary of Responses

9 responses were received to this question.

Summary of Specific Issues/Concerns:

- Communal areas such as allotments, community gardens and public areas with seating and lavatories should be built to install a feeling of peace and calm, and to enable all age groups to appreciate each other.
- A sense of wellbeing in a community is overlooked nowadays but it is crucial to good health.
- All townscapes, all information modes, including all street signs; buildings; dwelling and workplaces; must be independently accessible to all.
- Serious and growing problems of water and sewerage provision need to be tackled before considering further housing development.
- Serious problems of location, accessibility and adequacy of both primary and secondary school sites are also a present problem.
The current process for Section 106 funds from new developments needs review. It should follow a process which ensures that these funds are assigned to prioritized infrastructure improvements in the town; this is not currently the case.

A calculation needs to be made of the amount of land required for work places, schools, shops, community and health facilities, green spaces, roads, cycle lanes etc. to fit the forecast population growth.

There is insufficient recognition of the importance of transport infrastructure and the extent to which it can be put under strain.

Building at much greater density than previously achieved in the Borough would help to reduce the environmental impact of the infrastructure required.

Social care, care homes and supported housing for the ageing population needs to be considered. This will involve increased provision for health centres/GP’s, dentists, and hospitals.

More supermarkets and shopping facilities need to be considered.

Infrastructure developers should be reminded at an early stage that there are a number of considerations that should be incorporated to prevent unnecessary disruption of farms and farm businesses.

(iii) Housing

Question 6e: Have we identified the main housing issues facing the borough?

Summary of Responses

7 responses were received to this question. 4 respondents (57.1%) disagreed that all the main housing issues have been identified, while 3 respondents (42.9%) agreed to some extent with concerns raised. Overall, there was a slight majority of those in agreement.

Question 6f: If No, what housing issues do you think are missing?

Summary of Responses

7 responses were received to this question.

Summary of Specific Issues/Concerns:

- The key issue is "inclusive, independently accessible housing for all". In practical terms it will result in a major redesign of all types of housing to accommodate these changes and the needs of elderly and disabled people.
- Market housing fails to deliver even the TWBC stipulated 35% affordable housing element.
- More affordable housing for rent is urgently needed and failure to provide it is substantially contributing to the area’s traffic and congestion problems as lower paid employees are forced to commute into the town.
- Low density development of market housing, such as on the Hawkenbury Farm site, should be avoided elsewhere in future.
- No reference has been made to the opportunities for bringing the majority of the over 1000 properties empty at any one time in the Borough quickly back into occupation by a mixture of incentives and penalties.
• No mention has been made of the opportunities to offer incentives in RTW town centre for small scale conversion of space over traditional shop premises to residential use.
• The 2015 SHMA needs to be reviewed given that significantly fewer households are projected at 2033 in the 2014-based household projections.
• Lack of employment growth and realism on jobs must cast doubt on the economic feasibility of the population and housing growth that is being planned for.
• There should be a proactive strategy to ensure suitable brownfield urban sites are identified and delivered.
• With strong attention paid to density the amount of beautiful countryside spoiled by housing can be reduced by at least half.
• The emphasis for housing issues needs to focus on younger households and affordable 2 and 3 bedroom homes for younger families. In the current developments there is an over-emphasis on larger 4 / 5 bedroom properties.
• The borough needs to attract a younger generation to the area to maintain its vitality, job creation and financial health.
• Need to support an ageing population, who may want to downsize.
• Houses should be ecologically friendly and sustainable.

(iv) Economy

Question 6g: Have we identified the main economic issues facing the borough?

Summary of Responses

7 responses were received to this question. 1 respondent (14.3%) agreed that all the main economic issues have been identified; 2 respondents (28.6%) disagreed, while 4 respondents (57.1%) agreed to some extent with concerns raised. Overall, there was a majority of those in agreement to at least some extent.

Question 6h: If No, what economic issues do you think are missing?

Summary of Responses

6 responses were received to this question.

Summary of Specific Issues/Concerns:

• The policy team has failed to appreciate the implications of the DWP's Welfare to Work Policy, as it affects the provision of employment for disabled people aged 16 to 64.
• There needs to be a clear acceptance of the need for inclusive independently accessible workplaces and the need to provide long term employment for all groups of disabled people.
• It will not be sufficient merely to “monitor” the deleterious effects of national policy on employment stock in RTW town centre as mentioned in paragraph 4.30.
• A more active involvement and investment by TWBC will be required to realise the real promise of tourist potential in RTW and the borough as a whole.
• What is missing is the link between the economic prosperity of the Borough and the protection of its natural, built and historic environment.
• In paragraph 4.29 mobile telephone coverage needs to be mentioned as well as broadband.
• Concerned about the way employment uses, particularly offices, are being forced out of the towns and villages in favour of conversion to residential under the new permitted development rules.
• Question whether so much of the “industrial estates” at North Farm and High Brooms (now largely converted to retail outlets) will continue to be needed for that purpose as shopping shifts increasingly online.
• Not convinced that the future needs of local food production have been given sufficient weight in the economic study.
• Development should not constrain existing facilities e.g. high street retailers.
• There is an urgent need for a factory of sufficient size to give employment to many skills and provide apprenticeships.

(v) Transport and Parking

Question 6i: Have we identified the main transport and parking issues facing the borough?

Summary of Responses

9 responses were received to this question. 1 respondent (11.1%) agreed that all the main transport and parking issues have been identified; 5 respondents (55.6%) disagreed, while 3 respondents (33.3%) agreed to some extent with concerns raised. Overall, there was a slight majority of those in disagreement.

Question 6j: If No, what transport and parking issues do you think are missing?

Summary of Responses

8 responses were received to this question.

Summary of Specific Issues/Concerns:

• All cycle tracks and routes must be totally segregated in order to comply with inclusive access.
• Future driverless pods should be restricted to designated safe routes or tracks.
• Issues surrounding assistance, priority seating, and car parking spaces for disabled people will need to be factored into the Plan.
• Failure to provide blue badge permit holders with free off street parking close to shopping areas will lead to on street congestion.
• The policy of cutting bus services must be reversed.
• Bus services must be available at weekends and public holidays irrespective of the additional costs. With changing work practices, there is a need to have late running bus services.
• All information at bus stops must be in large print, tactile or audible formats for the visually impaired. Also all footways at bus stops must be raised to meet with the kneeler/ramp systems.
• At all rail stations, station staff must be available at all times to facilitate the use of portable ramps for wheelchairs or pushchairs, to provide assistance to disabled or elderly people.
All street signage will have to become accessible and will have to include pictograms for the learning and mental health impaired, as well as audio/tactile signage for the visually impaired.

Strongly support tackling congestion through non motorised forms of travel notably by the improvement and additional provision of safe and attractive pedestrian and cycle routes.

There is a need to involve local employers in developing active travel plans.

“Parking solutions” are not only relevant to new development as mentioned in paragraph 4.40.

There is a need for a comprehensive strategic review of the purpose of and provision of both on and off street parking in the whole of the town.

Tunbridge Wells is an extremely unsafe environment for pedestrians and cyclists, and prioritises vehicles and traffic flow over pedestrians and cyclist safety.

The reduction and calming of traffic in town, with specific attention to the promotion of Active Travel and Modal Shift is missing from the Plan.

Key transport issue which is not mentioned is the importance of rail services and connections to the life and economy of the Borough.

It is essential to test whether any further development around and in RTW and Southborough can be accommodated without increasing already unacceptable levels of rat running and pollution.

Car parks should make financial allowances for those coming into areas to work for the whole day.

Oversized cars fill up the road and the pavement.

No new housing should be built without parking spaces.

Strategy is required for transport which should include:
  o Re-routing cut through HGVs away from the town
  o A ban on HGVs cutting through residential roads and the town centre
  o Implementation of 20mph zones
  o Improvement in cyclist and pedestrian safety
  o Removal of free on road car parking and implementation of an out of town Park and Ride/Walk

(vi) Leisure and Recreation

Question 6k: Have we identified the main leisure and recreation issues facing the borough?

Summary of Responses

8 responses were received to this question. 1 respondent (12.5%) agreed that all the main leisure and recreation issues have been identified, while 7 respondents (87.5%) disagreed. Overall, there was a vast majority of those in disagreement.
Question 6l: If No, what leisure and recreation issues do you think are missing?

Summary of Responses

7 responses were received to this question.

Summary of Specific Issues/Concerns:

- There is a need for more all-weather facilities.
- Notably missing is a reference to culture provision in RTW.
- A glaring omission is the enjoyment of the countryside, by using public rights of way and visiting the AONB, nature reserves and other protected areas.
- More public bridleways are needed, to provide more joined up access to the countryside by cycle and on horseback without the use of increasingly hazardous rural roads.
- Very reluctant to see many more open grassy playing pitches converted to all-weather surfaces in the villages and rural areas, especially with the floodlighting that normally accompanies all-weather surfaces.
- Need to retain countryside for the high number of walkers and ramblers that frequent the area.
- Would like increased provision of innovative recreational facilities such as a Pump track or outdoor gym equipment.
- Important to reflect upon the pressure that leisure and recreation can have on wider rural economic activity through maintenance pressure on public rights of way networks etc.
- Policy should be included in the new local plan to address pressures in urban fringe locations.

(vii) Sustainability

Question 6m: Having regard to the prepared Sustainability Appraisal Scoping Report, have we identified the main sustainability issues facing the borough?

Summary of Responses

7 responses were received to this question. 1 respondent (14.2%) agreed that all the sustainability issues have been identified; 3 respondents (42.9%) disagreed, while 3 respondents (42.9%) agreed to some extent with concerns raised. Overall, a slight majority agreed at least to some extent that all the sustainability issues have been identified.

Question 6n: If No, what sustainability issues do you think are missing?

Summary of Responses

6 responses were received to this question.

Summary of Specific Issues/Concerns:

- The failure to meet the very specialist needs and support of disabled people within this document is a serious error and could result in prosecution for exclusion and discrimination.
• It is regrettable that in spite of evident constraints, TWBC is being effectively coerced by central government policy to place housing need above many of the other factors that contribute to wellbeing in the local population.
• Sustainability policies should robustly tackle existing air and noise pollution problems in RTW.
• There could be greater discussion of the transport implications of growth scenarios anywhere in the borough.
• The document fails to recognise broadly accepted sustainability themes, such as the importance of location, access to services and accessibility of public transport.
• An iterative approach to plan development informed by the SA should improve the plan contribution to delivering sustainable development, rather than simply relying on mitigation.
• Fails to mention the importance of proactively designing site layout to reduce carbon emissions.
• Should recognise the importance of SuDS.
• Adequate recycling facilities should be available to all parts of the borough.

Section 5 – Strategy Considerations

Introduction

Under this section, there are a number of strategic considerations which include:-(i) Cross-boundary Strategic Planning and Duty to Cooperate, (ii) Settlements in the Borough, (iii) Development Boundaries and (iv) Strategic Options (Five possible options – 1. Focused growth, 2. Semi-dispersed growth, 3. Dispersed growth, 4. Growth Corridor-led Approach and 5. New Settlement growth). At least two questions were asked relating to each of the strategic considerations as follows:

(i) Cross-boundary Strategic Planning

Question 7: Are there any specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?

Summary of Responses

8 responses were received to this question. 7 respondents (87.5%) agreed that there were specific cross-boundary planning issues that should be considered, while 1 respondent (12.5%) disagreed. Overall, the vast majority agreed that there were specific cross-boundary issues that need to be considered.

Question 7a: If Yes, what are the specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?

Summary of Responses

7 responses were received to this question.
Summary of Specific Issues/Concerns:

- Green belt should be placed on the periphery of Tunbridge Wells.
- The strain that will be put on infrastructure, and in particular competition for school places in Kent, from housing developments on the boundary with East Sussex.
- The routing of passing through traffic, away from the town centre, specifically HGVs.
- If a large amount of new housing is provided in the east of the borough, it will not actually meet the housing growth needs of the residents of Royal Tunbridge Wells, who will be more likely to look for housing in Tonbridge if they cannot find it in Tunbridge Wells or Southborough.
- The green belt dividing Southborough from Tonbridge is under constant threat and needs to be protected.
- The plan must demonstrate that development will not have an adverse impact on the integrity of the Ashdown Forest SAC.
- Issues arising from the structure of the rail network, which provides little transport connectivity between settlements within the Borough.
- The proximity of the boundary with Wealden District Council and the impact Wealden’s own housing development plans could have on RTW, its infrastructure and environment.
- Cross boundary issues with Tonbridge and Malling, Maidstone and Ashford Borough Councils over the opportunities for development along the Ashford to Charing Cross railway line.
- Cross border discussion with neighbouring authorities along the Uckfield to London railway line, especially in view of the opportunities potentially offered by the BML2 rail project if it materialises.

(ii) Settlement Groupings

Question 8: Do you agree with the suggested groupings of settlements?

Summary of Responses

7 responses were received to this question. 2 respondents (28.6%) agreed with the suggested groupings of settlements, while 5 respondents (71.4%) disagreed. Overall, there was a vast majority of those in disagreement.

Question 8a: If No, what changes do you suggest to the groupings of settlements and why?

Summary of Responses

6 responses were received to this question.

Summary of Specific Issues/Concerns:

- Both Rusthall and Pembury are directly affected by the Urban Creep from Tunbridge Wells which has connected both areas with Tunbridge Wells and the affects of the Urban Area.
- No basis for assessing the relative facilities or overall score of Royal Tunbridge Wells in comparison with other settlements because the Settlement Study provides no data about RTW.
- While Cranbrook and Paddock Wood may be comparable in terms of existing services and facilities, the scope for sustainable development in Paddock Wood is greater.
- Found it odd that Horsmonden, Benenden and Matfield are not thought to be broadly comparable in terms of sustainability with Brenchley, Goudhurst and Lamberhurst.
- Too much emphasis seems to be placed on the availability of shops, post offices, pubs, nurseries/pre-schools and surgeries, any of which, being private businesses, can swiftly disappear and be converted to residential use when the owners retire.
- Not enough emphasis is placed on the speed and frequency with which public transport enables residents to reach the nearest town and railway station.
- Ludicrous for the study to give sustainability points for Sustrans Cycle Route 18. Except where it passes through Bedgebury Forest, this is an on-road route, with no dedicated cycle lanes, on winding, highly hazardous roads.
- Brenchley and Matfield school is situated on the outskirts of Brenchley, between the two villages, and its governing document makes clear that it is for the children of Brenchley and Matfield parish. It is therefore not entirely correct to say that Brenchley has a school and Matfield does not.
- Question whether each nursery or pre-school within a village should be given an equal score: as with shops, the existence of a service at all is surely more important than additional ones which merely provide further choice.
- Consider this method to be unsuitable for allocating 13,000 houses across the borough.

(iii) Development Boundaries

Question 9: – Should the policy approach of defining settlement “Limits to Built Development” continue in principle?

Summary of Responses

8 responses were received to this question. All 8 respondents (100%) were in agreement that the policy approach of defining settlement “Limits to Built Development” should continue in principle.

Question 9a: Should the defined Limits to Built Development as currently drawn be retained in their current form or in order to maintain settlement patterns, or be removed to enable the delivery of suitable sites?

Summary of Responses

7 responses were received to this question. All 7 respondents (100%) agreed that the Limits to Built Development should be retained in broadly their current form as opposed to being removed.
**Question 9b:** If the currently defined limits are to be reviewed/redrawn, what criteria do you think should be applied in redrawing the boundaries?

**Summary of Responses**

6 responses were received to this question.

**Summary of Specific Issues/Concerns:**

- Existing boundaries of settlements should be retained; to redraw them would destroy existing communities and undermine the broad thrust of the Vision as set out in this document.
- Sustainability of any potential built development should be a principal criterion. In RTW this should notably avoid development which might worsen the situation in the present AQMA or have adverse effects on high quality landscapes and biodiversity.
- There should be a strong presumption in favour of redrawing limits only to include Greenfield and existing Rural Fringe land and not land currently classified as Green Belt or AONB.
- Limits should be redrawn to reflect existing built development and planned allocations.
- Only minor modifications to the LDB should be permitted, i.e. for small developments up to 10 dwellings.

**(iv) Strategic Options (Five possible options as above)**

**Question 10:** Please let us know your preferred option or combination of options in order of preference.

**Summary of Responses**

9 responses were received to this question in terms of ranking strategic options in order of preference. 5 of these respondents preferred a combination of options as set out in Question 10a below. 1 respondent indicated they did not agree with any of the strategic options.

Of those who ranked the strategic options, 1 respondent (12.5%) ranked Option 4 (Growth Corridor-led Approach) as their most preferred option, 5 respondents (62.5%) ranked Option 5 (New Settlement Growth) as their most preferred option, while 2 respondents (25%) ranked Option 1 (Focused Growth) as their most preferred option. However, some of these options were ranked in combination with other options (as below). Overall, a majority of respondents selected Option 5 as their most preferred option.

**Question 10a:** If you prefer a combination of options, please state which ones.

**Summary of Response**

7 responses were received to this question, summarised as follows:

- 3 respondents (60 %) selected a combination of Option 5 (New Settlement Growth) and Option 1 (Focused Growth) as their preference.
• 2 respondents (40%) selected a combination of Option 5 (New Settlement Growth) with elements of Option 4 (Growth Corridor-led Approach) as their preference.
• One respondent indicated they did not agree with any of the strategic options.
• One respondent did not state a preferred combination of options but expressed particular concern about and opposition to Option 4 because of issues with road access/capacity surrounding Pembury.
• Concerns were raised that Option 4 carries serious dangers of ribbon development and eventual coalescence with Tonbridge, and that Options 1, 2 and 3 are wholly incompatible with the vision objectives.

Overall, the majority (60%) chose a combination of Option 5 (New Settlement Growth) and Option 1 (Focused Growth) as their preference.

**Question 11: What views do you have about the possibility of a new settlement somewhere in the borough providing for future development needs?**

**Summary of Responses**

8 responses were received to this question.

**Summary of Specific Issues/Concerns:**

• Any new settlement must be properly planned and the appropriate infrastructure must be planned from the start.
• It must be located near a railway line and have excellent transport links.
• The planning of a new settlement should be planned as a whole rather than piecemeal.
• A transport strategy is required to address the needs of the new settlement and to ensure there is no negative impact on Tunbridge Wells.
• The new settlement would be twice the size of the existing town of Paddock Wood. It is not feasible within the Borough, given environmental constraints.
• It should be planned in such a way that it might accommodate some further expansion in future Plan periods should this be required to help meet the borough’s development needs at that time.

**Question 11a: Where do you think a possible new settlement could be located?**

**Summary of Responses**

8 responses were received to this question.

**Summary of Specific Issues/possible locations:**

• It could be located in the east of the borough so as to spread the traffic and employment provision away from the already terribly congested Tunbridge Wells area.
• Close to good transport links and to possibly include a new railway station.
• The constraints of the AONB must be considered and ideally any development should be outside the AONB.
• To the South East, towards Cranbrook and Hawkhurst. Or between Pembury and Paddock Wood.
• Preferred option is area of flat land between Tudeley and Five Oak Green.
• Near to Frittenden to make use of the existing station at Staplehurst. The station has limited parking and in cooperation with the other local authorities land would need to be acquired.
• Cannot see a suitable location within the Borough for such a huge greenfield development.
• The area of search might run broadly in a line in the north of the borough from the Five Oak Green area as far as the Frittenden area with rail connection through Staplehurst, Headcorn, Paddock Wood or possibly a new station between Paddock Wood and Tonbridge.
• A much less likely area of search would be along the Uckfield to London railway, but little of this lies in the borough, the road network is particularly poor and it is close enough to RTW to be likely to add to congestion and other problems in the town.
• A site where an additional more limited new small village might arise would be on the government owned land at and adjoining Blantyre House.

Question 12: Do you think we have considered and identified all reasonable options for accommodating future development growth within the borough?

Summary of Responses

7 responses were received to this question. 6 respondents (85.7%) agreed that all reasonable options for accommodating future development growth have been considered, while 1 respondent (14.3%) disagreed. Overall, there was a vast majority of those in agreement.

Question 12a: If No, please set out what other options for accommodating future development growth within the borough you think should be considered.

Summary of Responses

1 response was received to this question.

Summary of Specific Issues/Concerns:

• A much greater emphasis on density is required.
• There needs to be a firm policy of brownfield first, rather than allocating proportions of development to particular settlements which will then be required to be fulfilled irrespective of how brownfield or windfall sites happen to arise elsewhere.
• A rational policy would have: a main focus for development on the main urban area; a subsidiary focus on development in the small towns and larger villages; encouragement of small scale development in the smaller villages; and an overall focus on locating development where it is sustainable, there are good transport links and the environmental constraints are not breached.
Section 6 – Development Management Policies

Introduction

This section considers the policies that are currently in place in the Tunbridge Wells Borough Local Plan 2006 and identifies the key topics that may merit and necessitate new development management policies, especially in the light of government guidance in the NPPF (2012) and any updated local evidence. Three questions were asked relating to (i) existing policies, two questions relating to (ii) new policies and one question relating to (iii) detailed policies, as follows:

(i) Existing Policies

Question 13: Which policies do you consider are suitable for continued use?

Summary of Responses

6 responses were received to this question.

Summary of policies identified to be suitable for continued use:

Tunbridge Wells Borough Local Plan 2006:

- EN2/3/12
- EN17
- EN19
- EN26/7
- EN28
- TP1 to 9
- TP13
- TP17
- TP27
- RF1/2
- CS3/5
- H3
- H5
- MGB2
- LBD1, EN4, EN5, EN8, EN10, EN11, EN15, EN20, EN21, EN22, CR3, CR12, H1, H5, H8, H9, H10, H11, H13, ED5, T3, R6, CS6, TP4, TP8.
- All policies in Chapters 3, to 10 of the 2006 Local Plan, including those that were not saved, but with the exception of those site-specific policies where the sites have been developed since the 2006 Plan, should be reinstated in the new Local Plan.
- All saved policies affecting RTW seem suitable for continued use except for TP10 (Question 14). Some may benefit from amendment or updating (Question 15).
- No policies are suitable for continued use.
Core Strategy 2010:

- Most of the policies should ideally be carried through to the new document, updated as necessary, in consultation with the community and statutory consultees.
- Core Policy 2: Green Belt; Core Policy 3: Transport Infrastructure; Core Policy 4: Environment; Core Policy 5: Sustainable Design and Construction; Core Policy 6: Housing Provision; Core Policy 7: Employment Provision; and Core Policy 8: Retail, Leisure and Community Facilities Provision could all usefully be reproduced in the new Local Plan.

Other comments:

- It will be very important to take forward the relevant saved policies and the relevant DPD policy/allocations into the new Local Plan in a coherent and comprehensive manner to avoid some of the wording anomalies which showed up in the 2010 Core Policy.
- If the Community Infrastructure Levy is to be introduced, this may also require the revision of some of the policies.

Question 14: Which policies do you think may be out of date or no longer necessary?

Summary of Responses

6 responses were received to this question. Only 4 respondents specifically identified policies considered out of date or no longer necessary.

Summary of Policies considered to be out of date:

Tunbridge Wells Borough Local 2006:

- H7, TP10, TP11, TP26 — these are all very out of date.
- TP10 on the A21 dualling is now redundant.

Question 15: Which policies do you think could be updated or amended, and how?

Summary of Responses

5 responses were received to this question.

Summary of policies suggested for updating/amendment:

Tunbridge Wells Borough Local 2006:

- EN1: Add a reference to air quality in paragraph 1.
- EN4: Review and replace.
- EN5: Review and replace.
- EN8: Review and replace. The Council should consider designation of a dark skies protection zone, in those locations where dark skies are an important character.
- Add new policy for street lighting to reflect modern preference for ‘dark skies’.
- EN10: Review and replace.
EN11: Review and replace.
EN13: Add the word “significantly” in front of “outweighs” in paragraph 2.
EN15: Add the word “significantly” in front of “outweigh” in paragraph 1.
EN16: Review and replace.
EN 18: The second paragraph may require updating taking account of the latest technological possibilities for avoiding the incidence/consequences of flooding and the exceptional need to provide housing to meet central government imposed targets for the borough.
EN20: Review and replace.
EN21: Review and replace. The Council should incorporate Local Green Space proposals as appropriate.
EN22: Review and replace. The Council should retain areas of local landscape importance to reflect the value of locally importance landscapes.
EN23: Review and replace.
EN24: Review and replace.
Policy H4 clearly also needs to be reviewed and updated, with proper traveller site allocations made.
Policies relating to ‘housing development outside the limits to built development’ should be reviewed and replaced, including Policy H8, 9, 10, 11, 13.
CR5 requires updating in the light of subsequent executed or proposed development in the town centre of RTW.
CR13: It is not clear to us why all the defined neighbourhood centres in RTW were deleted from this policy. This effectively negates CS6 so far as RTW is concerned.
CS4: In relation to developer contributions, the reference to a 2 mile radius threshold applicable to primary provision should be amended to 1 mile as this would reflect reasonable accessibility for children on foot.
TP1: Delete the words “non-residential” from paragraph 1
TP3: Add the words “and travel plan” after the words “transport assessment” in paragraph 2.
TP4: Add a new 6th criterion: “The traffic generated by the proposal will not materially increase atmospheric pollution within an Air Quality Management Area or noise in an Important Area for Road Noise”.
TP5/6/7/8/9: These may be in need of updating once an agreed strategy for parking has been formulated as part of an updated Transport Strategy. In order to promote active travel, it may be appropriate to increase required cycle parking from 1 to 2 spaces per dwelling unit.
TP18: This will require updating in the light of the recently agreed Cycling Strategy.
TP19: This requires updating as some of the policy objectives were delivered during the previous plan period.
MGB1 Review and replace.
Core Strategy 2010:

- Core Policy 1 (delivery of development): Replace, with an updated policy. It should incorporate the eventual spatial/development strategy, and exception sites policy.

Site Allocations Plan 2016:

- Policy AL / STR2: Environmental and Recreation Designations: Designations should be reviewed and replaced.
- Policy AL/ STR3: Safeguarding Former Railway Lines: Review and Replace.

(ii) New Policies

Question 16: Considering the topic areas above, are there any other topics that you think the new Tunbridge Wells Borough Local Plan should include?

Summary of Responses

7 responses were received to this question.

Summary of suggested New Topic Areas/Policies:

- Ensuring that all buildings, dwellings, workplaces and townscapes are independently accessible to all.
- Active Travel and Modal Shift should be included as a specific topic.
- Under Development principles, perhaps road layout. Under historic environment perhaps ancient monuments, local heritage assets and historic routeways as well as listed buildings.
- There needs to be a new policy covering ‘Landscape scale’ habitat conservation, referring to Biodiversity Opportunity Areas, habitat connectivity, and the contribution this must make to climate change adaptation.
- There needs to be a new policy concerning local greenspaces.
- There should be a policy in the Local Plan prohibiting the demolition or alteration of a building while an application for listed building status is under consideration by Historic England.

Question 17: Are there any topics that you consider do not require any further detailed development management policies because there is sufficient coverage already in place, i.e. in national guidance (the NPPF)?

Summary of Responses

5 responses were received to this question, all of which (100%) answered “No”.

Other comments:

- Prudent and useful to maintain a range of detailed development principles tailored to the specific circumstances of the borough.
• With Brexit approaching, local policies could be particularly useful in the fields currently covered by European environmental legislation.
• Useful for residents and local voluntary bodies to have a comprehensive suite of policies to refer to in the Local Plan, so that they do not have to find their way around a multiplicity of documents on different websites.

(iii) Detailed Policies

Question 18: Are there any specific planning issues affecting the borough of Tunbridge Wells that you consider are not adequately covered by the NPPF or already referenced in this chapter and which you would like to see addressed in a policy?

Summary of Responses

9 responses were received to this question.

Summary of Specific Issues/Concerns:

• Compliance with all the articles of the UNCRDP & UKDS 2012 by 2025 to provide independent access for all.
• Difficult to answer this question without extensive research but think there may be some issues.
• The process of assignment of Section 106 funds should be addressed.
• New and updated policy to enable the construction of rural workers dwellings in the countryside.
• An opportunity to apply a flexible approach to barn conversions.
• Policy ED1/ED5 - concerned that the scope of these two policies is extremely limiting and does not provide sufficient scope for farm businesses to consolidate and grow.
• Planning permission should be refused in AONB except in exceptional circumstances. Would like to see a prominent and robust policy by TWBC to reinforce and uphold the NPPF protections for the AONB.

Conclusion

Introduction

This final section allowed the opportunity to comment on any other planning and development related matters that should be considered or have not been mentioned in the Issues and Options document; and also for any general comments to be made, under the following question:
Question 19: Are there any other planning and development matters that you think the new Local Plan should consider or cover that have not been mentioned in this Issues and Options document? You can also make any general comments here.

Summary of Responses

12 responses were received to this question.

Summary of Specific Issues/ General comments:

- Remind TWBC about the Legal requirements imposed on the UK by the Disability Strategy and Action Plan to meet total compliance with all the articles of the UN Convention on the Rights of Disabled People by 2025.
- Regarding access to AONB, so far the council and KCC have failed disabled peoples rights to independent access in accordance with The Countryside & Rights of Way Act.
- Near total failure by both the Borough and KCC to make sure historic sites and all rights of way are made independently accessible to disabled people in according with The Countryside & Rights of Way Act and Historic England's Disability Policy.
- In the villages and other conservation areas, the heights of new buildings, dwellings or workplaces, should not exceed the height of surrounding buildings to ensure total privacy for local residents and to retain the existing architectural look of the area.
- 15 of the sites submitted in Royal Tunbridge Wells are situated in Green Belt/AONB. They should only be considered further as a very last resort after all other possibilities for sustainable development in the Borough have been considered and after a final review of existing Green Belt land has been agreed in Full Council. This is not made clear in the interim SHELAA but should be stated once the results of the second Call for Sites are known.
- In relation to existing Rural Fringe sites, it will be necessary to achieve effective mitigation measures, for example on traffic and air quality, should any further development be contemplated.
- Low housing densities on a number of recent market housing developments in the borough have been wasteful of a very precious land resource. We would hope to see TWBC insist on more appropriate densities under the new Local Plan.
- No popular ambition to enlarge the town to a small city or to embrace a different or suburban character.
- The erosion of RTW’s unique assets from earlier expansion has made the town a less attractive place to live and work.
- It is now clear that any further significant development in Culverden or St John’s Wards would have intolerable consequences both for older established residents and also residents of the many existing new developments, and there should therefore be no further increases in population in these areas.
- Would not wish to see the development of suburban estates on the remaining farmland separating Tunbridge Wells from the western part of Southborough.
- Culverden/St John’s has a large and increasing number of dwellings either lacking a garden altogether or with very small gardens. The existence of large undeveloped open spaces and woodland adjoining Culverden, readily accessible for leisure and recreation via a network consisting of a rural lane and historic routeway (Reynolds Lane), Smockham Lane and other footpaths and bridleways is thus particularly important in maintaining the amenity of this area for large numbers of residents.
• Commuter rat-running, compounded by the presence of so many schools in the Culverden area, has now reached unacceptable proportions. One way in which the present situation might be ameliorated would be through the introduction of a 20mph zone.
• Like to see a feasibility study carried out into the possibility of selective junction closures within zone boundaries in Culverden.
• Need to see coherent policies adopted by KCC on school entry procedures and location.
• The creation of Safe Routes to Schools in the town; have been advocating for some time one such route which would run from Rusthall, via Woodside Road Rusthall to Culverden Down, thence via the playing fields at TWGGS to the TWBGS and St Gregory’s.
• Advocate the restoration of a greater number of smaller primary schools across the town to minimise the necessity for so many parents to drive children to distant parts of the town or even to outlying settlements.
• Concerned that the format you require for receipt of responses i.e. this on-line system, is too off-putting.
• Para 2.10 introduces a SHMA without giving a brief indication of what it is and who produced it.
• The average UK household size is 2.3 persons. Hence 12,960 homes in 20 years mean housing an extra 29,808 people. The 2011 population of Tonbridge was 38,357. So our borough has to build close to the equivalent of Tonbridge.
• Regarding option 1, the figure of 648 housing units p/a for 20 years is simply unachievable without causing irreparable harm to the town and wider environment; Tunbridge Wells would no longer exist in recognisable form.
• With regard to allocating a site for housing, strongly of the opinion that you should make a clear statement of the number of dwellings you will expect to see on it.
• Mindful that the housing density of the proposed Union House is too great whilst that of Hawkenbury farm could have been significantly greater.
• Mindful of and wish to reaffirm commitment to seeing the retention of the AONB, the Tunbridge Wells and Rusthall commons, various green spaces in the towns e.g. the Grove, Dunorlan Park, Calverley Grounds, the Nevill ground, sports grounds and the concept of the Green Belt.
• Increasing the population density will inevitably contribute to the worsening of traffic on the A26 and air quality would suffer. Pressure on already stretched medical services and schools would also increase.
• Would not want any development at Mabledon if it was to impact on the setting of the building which is grade II listed.
• Dispute the need to provide 650 to 700 houses per year. Given that employment growth in the borough in the 21 years from 1991 to 2013 was zero, the jobs forecasts which project an ever-rising volume of employment seem unduly optimistic and if the increase in jobs is not forthcoming.
• The Council is advised to consider a focused consultation with local people and parish councils to begin identifying potential Local Green Space designations.
• The Council should give special consideration to the emerging draft policies in NDPs and consult especially closely with the PCs responsible for these NDPs in drawing up the Local Plan, to maximize co-ordination and avoid discrediting the neighbourhood planning process.
• Real difficulty in responding to so many large and important documents all at once.
• The consultation document goes to some length describing leisure & recreation activities, and the Council may benefit from an understanding of the visitor numbers at National Trust properties.
• Within the supporting studies it was disappointing to see no reference to National Trust properties. As major visitor attractions within the plan area some additional reference to these sites would enhance the plans coverage.
• The proposed level of growth will inevitably increase the number of visitors to National Trust properties and their access routes. This level of growth may impact on the conservation of these historic sites and place additional burdens on visitor infrastructure.
• New builds should be in keeping with historic buildings, not a hodgepodge of cheaper options. Parks and gardens shouldn’t be encroached upon and green verges should be appreciated for the unseen benefits they bring.
• Schools transport must be reviewed as school buses cause congestion and notable pollution.
• The Borough should carry out regular inspections on care homes and the staff.
• Older people should not be isolated in special build, out-of-the-way places but integrated into lively, mixed-age areas. Even if retirement villages are built, they should not be isolated away from main communities.
• New homes should be built with all ages in mind, accessible for wheelchairs and fit for later adaptions.
• Public lavatories and benches are essential for an aging population.
• Doctors’ surgeries should be factored into new estates. Police offices, however small, should be accommodated into all communities.
• Special parking areas should be built into roads for increasing numbers of Care Nurses calling on the elderly at home.
• Pavements should be wide to accommodate mobility scooters and slower walkers, and all high streets should be accessible and free of obstacles.
• Sufficient sunlight should reach all buildings and all people should have the possibility to view the sky; this helps avoid depression.
• Community spaces for all ages are essential, as is the ability to grow vegetables and flowers.
• All flats should have balconies and all houses should have gardens, however small.

Speciﬁc Issues for Sites within Call for Sites:

• Site 39 “Land adjoining Dunorlan Park” - Strongly object to building taking place on this land as it is an area of Green Belt directly adjoining the boundary of Dunorlan Park. Views from the Park would be adversely affected by any properties developed here, while the land is a wildlife haven. Access to and from Pembury Road is already difﬁcult and would become very dangerous if many more vehicles were making use of it.
• Site 45 “Land adjoining Birchwood Avenue / Dower House Crescent Southborough” - A change of use to Commercial or Residential would result in signiﬁcant loss of amenity and the many footpath walkers and users of the Wood. Recently commissioned a wildlife survey and this showed that land is likely to provide a habitat to many species, some rare, including dormice and bats.
• Site 53 “Land adjoining Hawkenbury Allotments and Recreation Ground” - Object to building taking place on these two plots partly because of the effect on views from Dunorlan Park. Also, any building would represent a spread of housing away from the current building boundary of Tunbridge Wells into an area of existing woodlands. Vehicle access would be through existing minor roads on the edge of Hawkenbury and/or directly onto Halls Hole Road which is already an over-used ‘rat run’ road.
• Site 119 may be within ancient woodland, not adjacent to it. The site was coppiced last autumn/winter, in common with several other parts of Angley Wood.
• Site 144 “Land adjacent to Yew Tree Green Road and Furnace Lane” - The western part of this land adjacent to Furnace Lane is opposite Furnace Pond and forms part of the setting of the historic ironworks and mill race there; the historic remains from the ironworks may even extend onto site 144. There is also a scenically interesting viaduct on the eastern part of the site, carrying the now disused hop-pickers line.
• **Site 169 “Land adjacent to Yew Tree Green Road and Maidstone Road, Horsmonden”** - This land is crossed by the route of the disused Hop-pickers railway line.

• **Site 242 “Cinderhill Playing Field, Brenchley”** - This site forms part of Cinderhill Centenary Woodland which has been rented to Brenchley Parish Council for many years and is much valued for public access, including on horseback.
Representation Grouping: Other organisations and companies

Overall, responses were received from 39 organisations and companies, the majority of which consisted of planning agents and developers. However, it is important to note that not all organisations answered every question. Therefore the total number of responses received for each question may vary.

Section 3 – Vision and Objectives

Vision

Introduction

This section relates to the draft Vision for the borough up to 2033. This includes the development of housing, economic, leisure and recreation uses identified within the new Local Plan to meet local needs. The Vision states that new development will be delivered in a sustainable way and will seek to protect and enhance the exceptional quality of the built, natural and historic environment while promoting economic prosperity to ensure the borough remains a special place. Three questions were asked in relation to the Vision as follows:

Question 1: Do you agree with the new draft Vision for the borough?

Summary of Responses

24 responses were received to this question. 16 respondents (66.7%) agreed with the draft Vision, while 7 respondents (29.2%) disagreed. 1 respondent stated that they both agreed and disagreed with parts of the draft vision (4.1%). Overall, there was a majority of those in agreement.

Question 2: What suggestions do you have for improving or updating the draft Vision and relating it to 2033?

Summary of Responses

24 responses were received to this question.

Summary of Specific Issues/Concerns:

- Should include the recognition of the need to review the current Green Belt boundaries.
- Vision places a strong emphasise on the protection of “the exceptional” quality of built, natural and historic environment by new development. The current wording and particular reference to “protection” limits the development of sites that has the potential to deliver environmental sustainability.
- The development needs of the borough are more than just ‘local’ and this should be reflected in the Vision.
- The plan should place greater emphasis on the role of TW as a strategic location within the wider context of Kent and East Sussex.
- Vision should seek the growth of the town of TW as a sub-regional settlement.
Vision should reflect the additional responsibility placed on the borough from the duty to cooperate, and whether it would be possible to accommodate the unmet need of more constrained neighbour boroughs such as Wealden District.

Vision must move away from providing for ‘daily’ needs only and look to delivering the needs on a more strategic level.

Vision does not explicitly include commitment to providing sufficient numbers of new homes to meet full housing need arising in the borough.

No mention of good health or transport links within the overarching ‘Draft Vision’.

Vital that all development takes into consideration full infrastructure.

Suggest a specific note in the Vision which considers tackling the unaffordability of housing as a key need for the borough.

There is a need to provide more housing choice for future residents and therefore housing supply must be increased.

There is commitment to protect the landscape and quality of the natural and built environment and to increasing economic prosperity, but commitment to increasing housing supply is missing.

Should perhaps have some reference to the development of transport as this will be essential for growth forecasts to be met.

Vision doesn’t match the ambition of Issues and Options Consultation Document (IO) paragraph 1.25. This paragraph refers to the NPPF requirement to meet development needs “in full”; the word “full” is omitted from the Vision.

Vision prejudges the outcome of stages of the plan-making process still to come.

Vision puts an artificial ‘cap’ or limit on opportunities for sustainable development.

Should recognise need to review current settlement boundaries and consider the controlled release of sustainably located land within the AONB.

Question 3: What should we be aiming and aspiring to achieve and why?

Summary of Responses

22 responses were received to this question.

Summary of Specific Issues/Concerns:

- Paragraph 3.9 of the Issues and Options Consultation states that “In preparing a new Local Plan for the borough, the Council is required to positively seek opportunities to meet the identified development needs of the area”, and this needs to be reflected in the Plan’s Vision Statement.
- Aim for development proposals that are well located, deliverable and affordable to meet local needs.
- Aim to encourage effective use of land by re-using land that has been previously developed.
- Recognise town centres as the heart of communities and pursue policies to support their viability and vitality.
- Define extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations.
- Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres.
- There is clear need to develop some Green Belt land to assist in meeting the housing need.
- Aim should be to elevate TW borough to a sub-regional status in terms of the quality of its retail and employment offer and as a location for people to live.
- Local Plan should aspire to meet development needs in full in accordance with the NPPF.
- Vision through the Draft Strategic Objectives needs to specify in broad terms where new development will be focused once the Council is clearer about its preferred Option and the spatial distribution to be pursued.
- Villages should be allowed greater flexibility to expand, otherwise they will stagnate.
- There is merit in removing sites from the Green Belt where the built up nature of the site means that the land no longer fulfils the core objectives of the Green Belt.
- Strategic Green Belt review around Pembury given this is a logical location for growth now that the A21 improvements are approaching completion.
- Council should be aiming to meet its obligations and, as a minimum, deliver the objectively assessed need for 648 homes per year in full.
- Important that mistakes of the past – failing to provide properly for economic growth – are not repeated. Good quality economic development that properly meets the needs of businesses is essential both nationally and at local level.
- Delivery of increased market housing is crucial to provide new affordable homes across the borough.

Objectives

Introduction

This section relates to the eight draft Strategic Objectives needed to realise the Vision, which are (i) Meeting development needs, (ii) Protecting and enhancing the borough’s distinctive environment, (iii) Delivering sufficient infrastructure, (iv) Providing high quality housing, (v) Making provision for economic growth, (vi) Ensuring adequate leisure and recreational facilities, (vii) Delivering sustainable development and (viii) Delivering adequate transport and parking capacity. The following three questions were asked in relation to these draft Objectives:

Question 4: Do you think these are the right Objectives?

Summary of Responses

22 responses were received to this question. 14 respondents (63.6%) agreed with the Objectives, while 8 respondents (36.4%) disagreed. Overall, there was a majority of those in agreement.
Question 4a: If you answered No, please explain why you don’t think these are the right Objectives.

Summary of Responses

17 responses were received to this question.

Summary of Specific Issues/Concerns:

- Draft Strategic Objective 1 needs to reflect the ‘Duty to Cooperate’ and the fact that the Borough may need to seek to meet development requirements where these cannot be met by neighbouring authorities.
- Too many schemes, especially small housing sites, are becoming excessively burdened by contribution requirements that prejudice viability and therefore delivery.
- Encourage the Council to consider the Vale Road area (including the Torrington car park site) as a particularly sustainable opportunity to contribute towards meeting the Borough’s future development requirements.
- A more flexible approach for development in the countryside should be adopted.
- Enhancements to the A21, the high level of housing delivery required and the lack of consideration of unmet need from an adjoining District indicates that the objectives need to be amended.
- The draft strategic objectives should be more explicit about the need to release Green Belt land and the exceptional circumstances that exist.
- Objective one should be modified to provide more certainty that the full ‘objectively assessed’ housing need will be met with sufficient flexibility.
- The proposed Draft Strategic Objectives do not go far enough in terms of clearly identifying the significant shortage of market and affordable housing within the District.

Question 5: Are there any amendments required or other Objectives that you think should be included?

Summary of Responses

17 responses were received to this question.

Summary of Specific Issues/Concerns:

- Consideration should be given to release of Green Belt land for the development of suitable sites that offer opportunities to accommodate development without significantly compromising the purposes of the Green Belt.
- Objective 5 should acknowledge the wider role of Tunbridge Wells in the sub-region.
- Objective 8 ought to think beyond the needs of the Borough.
- Expand on where development needs will be focused especially within the proposed settlement hierarchy, and the changing needs of the Borough’s population.
- Delivering sufficient infrastructure to include service improvements and ensuring infrastructure is delivered in a coordinated and timely manner.
• The need for regular review of the plan should be more explicit.
• Clearly differentiate the purpose of Draft Strategic Objective 1 (housing delivery) and 4 (housing choice) consistent with NPPF 50.
• Draft Strategic Objective 7 does not accurately reflect NPPF 6 to 16 (presumption in favour of sustainable development).
• Should not preclude all development from the AONB but should instead consider where development needs can be met without causing unnecessary harm to the wider AONB.
• Essential to good planning that the new Local Plan provides a more robust and flexible future strategy to ensure that the required housing growth is properly delivered.
• Actively engage with neighbouring authorities to identify the very best solutions for growth that are not artificially restricted by administrative boundaries.

Section 4 – Key Issues and Challenges

Introduction

This section identifies the key issues that the Local Plan will need to consider and address when putting forward a strategy and policies for delivery of growth. These key issues are:- (i) Natural and Built Environment, (ii) Infrastructure, (iii) Housing, (iv) Economy, (v) Transport and Parking, (vi) Leisure and Recreation and (vii) Sustainability. Two questions were asked relating to each issue, as follows:

(i) Natural and Built Environment

Question 6a: Have we identified the main environmental issues facing the borough?

Summary of Responses

18 responses were received to this question. 15 respondents (83.3%) agreed that all the main environmental issues have been identified; 2 respondents (11.1%) disagreed, while 1 respondent (5.6%) stated that some but not all of the main issues had been identified. Overall, there was a vast majority of those in agreement.

Question 6b: If No, what environmental issues do you think are missing?

Summary of Responses

13 responses were received to this question.

Summary of Specific Issues/Concerns:

• Core Strategy stated a commitment to review the Green Belt boundary around Tunbridge Wells and Southborough, but this did not occur at the time the Site Allocations Local Plan was produced.
• Would be more up to date if it stated "net gain" rather than "no net loss" of biodiversity.
• Should commission a Green Belt Review to consider whether exceptional circumstances exist to alter Green Belt boundaries.
• Imperative that no individual sites are discounted simply because they fall within a wider strategic parcel which may contribute to one or more Green Belt purposes.
• Hawkhurst is considered suitable in landscape terms for accommodating development with limited sensitivity upon the wider AONB.
• The current adopted development plan (CS and SALP) is already out-of-date and materially inconsistent with the NPPF.
• The Council should “reassess the availability and suitability” of the three remaining existing Rural Fringe sites at Grange Road Allotments, North Farm Tip and Culverden Down. Each of these sites are not suitable, available and deliverable for housing.
• For nearly 35 years the current Green Belt boundary has endured and essentially remained static – all the while extracting the development capacity of land within the LBD of Royal Tunbridge Wells.
• The IO Consultation Document should adopt a ‘neutral’ position and avoid pre-determination of issues.
• Given the geographical coverage of the AONB it is inevitable that allocations will need to be made within this designation.
• The Borough need to fully explore how development located on settlement edges within the AONB can be accommodated in a sustainable positive and sensitive way that can actually enhance the AONB designation
• The need for enabling development to ensure the continued protection and enhancement of historic assets and community facilities also needs to be taken into account.

(ii) Infrastructure

Question 6c: Have we identified the main infrastructure issues facing the borough?

Summary of Response

16 responses were received to this question. All 16 respondents (100%) agreed that all the main infrastructure issues have been identified.

Question 6d: If No, what infrastructure issues do you think are missing?

Summary of Responses

6 responses were received to this question.

Summary of Specific Issues/Concerns:

• An important element will be that when reviewing key facilities and overall health needs within the Borough, new housing will need to be located so that it is easily accessible, and provides for the needs of key workers.
• Important that where there are opportunities for improvements to local infrastructure, the Local Plan should be visionary and help to facilitate these.
• Support for Schools in the Borough, including Cranbrook School, needs to be considered as part of the emerging Local Plan. Schools must be able to diversify and enhance their facilities and look to alternative funding models through disposal of peripheral or underused assets.

(iii) Housing

Question 6e: Have we identified the main housing issues facing the borough?

Summary of Responses

19 responses were received to this question. 6 respondents (31.6%) agreed that all the main housing issues have been identified, while 13 respondents (68.4%) disagreed. Overall, there was a majority of those in disagreement.

Question 6f: If No, what housing issues do you think are missing?

Summary of Responses

7 responses were received to this question.

Summary of Specific Issues/Concerns:

• There is currently only between 2.5 and 3.57 years supply of housing land available. In order to meet the OAN, there will be a need to review the Green Belt boundary.
• There is a need to review the suitability and availability of safeguarded rural fringe sites with a view to allocating alternative sites if they remain undeliverable.
• The duty to cooperate would indicate that some of Wealden District Council’s unmet housing need ought to be provided within adjoining Districts. Tunbridge Wells with its improved A21 links would be an appropriate location.
• Due to the early stage of Plan preparation, it is important that the SHMA is kept up-to-date including any changes brought about by the 2017 White Paper to ensure that any final housing target accords with the NPPF.
• The Duty to Cooperate now forms part of the legislative requirements for the Plan-led system and must thus be fully engaged with by the Borough Council.
• The Borough has not yet effectively demonstrated the duty to cooperate with the wider Housing Market Area and neighbouring authorities in the delivery of the full objectively assessed housing needs for housing within the area.
• Align the work on the emerging Local Plan with other Local Planning Authorities to enable cross-boundary strategic planning.
• Given the projected population growth and close proximity to London, it is important that the Council and surrounding authorities acknowledge and adequately address migratory patterns in their evidence base and emerging housing targets.
• The emerging Local Plan should acknowledge the Government’s ambitions and seek to deliver the necessary level and type of housing required for the Borough’s communities.
• The Plan needs to demonstrate how any shortfall in housing delivery from the Core Strategy period to date is to be addressed, and explain how it intends to deal with the issue of affordability.
• Concern with regard to the robustness of the SHMA, in particular with regard to how it responds to market signals.
• The plan should provide for as wide a range of types of sites, in as wider a range of locations as possible. This would include small, medium and large sites as well as potential new settlements and/or strategic urban extensions.
• A greater range of housing is required in rural areas that meet the needs and aspirations of a wide range of households, not just those on low incomes or that are local to a specific area.
• The Council has on a number of occasions had to release Greenfield land to supplement housing supply against the Core Strategy housing target. This form of release could have been avoided had a more flexible approach been taken to delivery of sustainable sites adjacent to, and outside of, settlement boundaries.
• A greater number of sites need to be identified for release in order to ensure that the strategy is sufficiently flexible and has the ability to respond to rapid change.
• 48% of the claimed supply is made up of sites without planning permission and it is therefore questionable whether all of these sites will come forward in the next five years, which raises serious doubts over whether they can legitimately be included.
• Housing policies should be supported by the most up-to-date evidence which will require frequent monitoring and updating.
• A blanket approach to space standards should be avoided to ensure a suitable range of houses are available.
• Scheme viability needs to be considered, ensuring onerous requirements are not imposed hindering the deliverability of schemes.
• The consultation makes little reference of the failures of previous housing policies based on the restrictions on development outside the limits to built development.
• The Document does not recognise as a ‘Key Issue and Challenge’ that meeting the housing needs of older persons is more than just about delivery of ‘housing’. It is also about the intrinsically linked provision of ‘care’.
• An assurance was given at the Site Allocations DPD hearing that sufficient land would be made available in the Local Plan Review so as to avoid the need for a “planning by appeal” approach, and it is important that the Local Plan achieves this.
• The 0 figure for economic growth and the lack of allowance for job provision in the OAHN is not compliant with National Planning Guidance.
• The local authority will need to ensure that policies are in place to allow for affordable housing to be brought forward as an exception to normal policy.
• There is presently no clear timetable in place for when the standardised methodology on the calculation of housing need will be adopted and therefore it is critical that progress on the Local Plan is not delayed whilst the outcome of this guidance is awaited.

(iv) Economy

Question 6g: Have we identified the main economic issues facing the borough?

Summary of Responses

16 responses were received to this question. 11 respondents (68.8%) agreed that all the main economic issues have been identified, while 5 respondents (31.2%) disagreed. Overall, there was a majority of those in agreement.
**Question 6h: If No, what economic issues do you think are missing?**

**Summary of Responses**

9 responses were received to this question.

**Summary of Specific Issues/Concerns:**

- Key opportunity within the emerging Local Plan to increase the overall quantum of development through intensifying existing uses and increasing development densities.
- The Spa Industrial Estate, being located within an established employment area, is the most suitable location to deliver economic growth in the longer term based on long term needs.
- Greater flexibility should be promoted in the Key Employment Areas, such as Spa Industrial Estate, to allow the Council to effectively plan for future employment growth within the borough.
- The Local Plan should promote ancillary uses where appropriate within Use Classes B1/B2 and B8 to facilitate retail floor space, including trade counters and offices.
- Plan is based upon the focus of drawing retail and employment into Tunbridge Wells. This is an unsound plan as TW is already highly congested and to increase this would be a mistake. Should look to help improve satellite towns and villages to provide a variety of retail and employment opportunities and so ease the pressure on one central area.
- More emphasis should be placed on providing small business accommodation, particularly within the rural areas.
- The plan must recognise the benefits that existing rural commercial operators bring to the borough’s economy and put in places the policies to ensure these benefits are not lost due to over stringent policies.
- Significant weight should be placed on the need to support economic growth through the planning system.
- The District is not providing the homes to support the enhancement, expansion and future additional employment land that it seeks to achieve and this needs to be reviewed.
- 20ha employment land would be a more ambitious and appropriate target which provides the flexibility required by the NPPF and provides a greater prospect of delivery of the number of jobs sought to be created through the Local Plan.
- It is important that the OAN identified in the Economic Needs Study is interrogated further and translated into an appropriate employment land ‘requirement’, which is then planned for.
- Document does not sufficiently emphasise that the quality of floor space is also in decline; there is no ‘Grade A’ space.
- Real opportunity for the Council to revitalise the economic growth within Tunbridge Wells and re-establish the town’s position within the south east region as an employment location; the Local Plan must take advantage of this opportunity.
(v) **Transport and Parking**

**Question 6i: Have we identified the main transport and parking issues facing the borough?**

**Summary of Responses**

16 responses were received to this question. 15 respondents (93.8%) agreed that all the main transport and parking issues have been identified, while 1 respondent (6.2%) disagreed. Overall, there was a vast majority of those in agreement.

**Question 6j: If No, what transport and parking issues do you think are missing?**

**Summary of Responses**

4 responses were received to this question.

**Summary of Specific Issues/Concerns:**

- The Local Plan should carefully consider the practicalities associated with future residents accessing core day-to-day services and facilities and whether this would necessitate use of the private car.
- Assessing key journey patterns associated with all growth options should be a core part of the transport evidence base.
- Fails to recognise that any deficiencies in highway infrastructure or capacity can be addressed through the Infrastructure Delivery Plan.
- Important to work closely with other strategic authorities to agree mechanisms for delivery including access to the few remaining public funding streams to ensure a coordinated and timely approach that does not entirely depend on private funding for critical off-site transport infrastructure.
- Parking needs to be comparable with out of town options and other costs also levelled.

(vi) **Leisure and Recreation**

**Question 6k: Have we identified the main leisure and recreation issues facing the borough?**

**Summary of Responses**

16 responses were received to this question. 15 respondents (93.8%) agreed that all the main leisure and recreation issues have been identified, while 1 respondent (6.2%) disagreed. Overall, there was a vast majority of those in agreement.
Question 6l: If No, what leisure and recreation issues do you think are missing?

Summary of Responses

4 responses were received to this question.

Summary of Specific Issues/Concerns:

- It should be a policy emphasis that new housing development sites that can help meet open space needs will be prioritised, and that this could include suitable informal open space and recreation use within the Green Belt.
- Notcutts Pembury represents a leisure and recreational facility insofar as it provides far more than just a retail experience. We would reiterate the need for a policy framework that allows a suitable level of regeneration and expansion to ensure the long term viability of the business.
- The need to provide sporting facilities and pitches which meet the needs of the local community and other groups can be accommodated through the dual use of facilities, for example at Schools.

(vii) Sustainability

Question 6m: Having regard to the prepared Sustainability Appraisal Scoping Report, have we identified the main sustainability issues facing the borough?

Summary of Responses

15 responses were received to this question. 14 respondents (93.3%) agreed that all the sustainability issues have been identified, while 1 respondent (6.7%) disagreed. Overall, there was a vast majority of those in agreement.

Question 6n: If No, what sustainability issues do you think are missing?

Summary of Responses

2 responses were received to this question.

Summary of Specific Issues/Concerns:

- In seeking to deliver sustainable development, a more pragmatic view needs to be adopted, particularly when assessing new development in rural areas.
- Sustainability must be judged and applied in a more flexible manner, recognising that the factors which contribute to sustainability will vary between rural and urban areas. It should not simply be used as a ridged tool to justifying unwanted development.
Section 5 – Strategy Considerations

Introduction

Under this section, there are a number of strategic considerations which include: (i) Cross-boundary Strategic Planning and Duty to Cooperate, (ii) Settlements in the Borough, (iii) Development Boundaries and (iv) Strategic Options (Five possible options – 1. Focused growth, 2. Semi-dispersed growth, 3. Dispersed growth, 4. Growth Corridor-led Approach and 5. New Settlement growth). At least two questions were asked relating to each of the strategic considerations as follows:

(i) Cross-boundary Strategic Planning

Question 7: Are there any specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?

Summary of Responses

19 responses were received to this question. 17 respondents (89.5%) agreed that there were specific cross-boundary planning issues that should be considered, while 2 respondents (10.5%) disagreed. Overall, the vast majority agreed that there were specific cross-boundary issues that need to be considered.

Question 7a: If Yes, what are the specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?

Summary of Responses

21 responses were received to this question.

Summary of Specific Issues/Concerns:

- Wealden Council is planning for zero housing growth in Crowborough. This is within the same housing market area as Tunbridge Wells. Housing provision in Tunbridge Wells may therefore need to be increased in the emerging Plan to meet this expected shortfall.
- There is unmet housing need in all neighbouring boroughs and districts. In light of this, the Local Authority should assess the capacity of the Borough more comprehensively, including considering suitable sites in the greenbelt.
- Wealden District Council is planning for levels of housing growth below their OAHN due to concerns about protecting the health of the Ashdown Forest SPA/SAC. The issues and options paper does not indicate whether any discussion has taken place or how this matter will be addressed.
- The Council should positively and proactively engage with neighbouring Authorities under the Duty to Cooperate to ensure that opportunities to deliver sustainable development immediately adjacent to the most sustainable town in the Borough are not missed.
• The Council should work alongside Wealden District under the Duty to Cooperate to consider how air quality impacts associated with new development could be mitigated via cross-boundary working.
• Align the work on the emerging Local Plan with other Local Planning Authorities (LPA) to enable cross-boundary strategic planning.
• Continued information sharing is required in relation to the Duty to Cooperate Statement to ensure that the duty has been legally discharged and positively pursed in planning terms.
• Should the Council choose not to meet its housing needs in full there will need to be significant evidence produced to justify this position and meaningful discussion will need to take place with surrounding authorities on accommodating the need.
• There is some ambiguity over the extent of the Housing Market Area here, and we would ask that the Council provides clarity on this matter.
• It is accepted that London lacks the capacity to meet its own OAN, and Tunbridge Wells will need to factor this into their duty to cooperate discussions.
• The Council should be making the most of the opportunities presented by the A21 dualling improvements in terms of making Tunbridge Wells a more attractive business location and attracting businesses currently based outside the Borough.
• In order to meet its needs for housing growth in the period up to 2033, the Council should consider the release of land to the south of Tunbridge Wells within the administrative district of Wealden through the duty to co-operate.

(ii) Settlement Groupings

Question 8: – Do you agree with the suggested groupings of settlements?

Summary of Responses

19 responses were received to this question. 15 respondents (78.9%) agreed with the suggested groupings of settlements, while 3 respondents (15.8%) disagreed. 1 respondent (5.3%) stated that they did not understand the settlement groupings. Overall, there was a vast majority of those in agreement with the suggested groupings of settlements.

Question 8a: If No, what changes do you suggest to the groupings of settlements and why?

Summary of Responses

17 responses were received to this question.

Summary of Specific Issues/Concerns:

• This is an overly prescriptive approach which attempts to differentiate villages which contain many of the same core services and facilities.
• Would suggest that group B and C villages are combined as ‘sustainable villages’ which contain those core day-to-day services that support an element of future growth, whilst group D and E villages combined as ‘other villages’ where services are more limited and
therefore development may need to be more controlled to ensure a sustainable approach to growth.

- Would suggest that the basic assessment of sustainability should include those core services which future residents would require for day-to-day living without recourse to the use of the private car. Such an assessment should also consider accessibility to public transport modes and the role housing growth will play in supporting and enhancing such facilities.
- The difference between a group B and C village can be seen to be very limited and does not materially affect the core suitability of a settlement to accommodate future growth.
- Blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.
- There is no definition of what is different between each group.
- Paddock Wood should be included within the same group as the main urban areas of Royal Tunbridge Wells and Southborough.
- Greater regard should be had to proximity of villages to other larger settlements.
- Wider benefits and sustainability credentials of certain settlements that are within the lower groups should be recognised.
- Suggested settlement groupings are not a measure of their ability to accommodate new development, as no consideration has been given to wider constraints such as Green Belt and AONB.
- The ‘Regional Hub’ status of Royal Tunbridge Wells remains intact unless or until the new Local Plan provides an evidence base to substantiate any change. However, nowhere in the IO Consultation Document is the term ‘Regional Hub’ referred to.
- There appears to be no logical reason or explanation to why each of the ‘scoring settlements’ have been further subdivided into groups A-E.
- Advocate that a simpler hierarchy is formed consisting of Urban settlements, containing Tunbridge Wells and Southborough, Semi Rural Service Settlements containing all of the higher scoring settlements, Rural Settlements containing the medium scoring settlements and limited and Unserviced Settlements containing all of the lower scoring settlement.
- Para. 4.27 of the Settlement Role and Functions Study indicates that the Study considers the geographical relationship that exists between different places by reason of proximity and geography; this appears to play no role in the classification of the settlements.
- What is not clear is how the groupings of settlements will relate to the amount of development which will be permitted.
- The groupings should not be a means to restrict development upon the basis that there might not be a sufficient level of services or infrastructure. Instead, these should identify that there is capacity for supporting infrastructure to be brought forward in line with housing development.
(iii) Development Boundaries

Question 9: Should the policy approach of defining settlement “Limits to Built Development” continue in principle?

Summary of Responses

17 responses were received to this question. All 17 respondents (100%) were in agreement that the policy approach of defining settlement “Limits to Built Development” should continue in principle.

Summary of Specific Issues/Concerns:

- Should be some flexibility as to the potential development of suitable sites that are well related to the Limits to Built Development.
- It is important to define boundaries, but a more flexible policy approach is needed.
- Limits to Built Development should not be artificially restricted by Local Authority administrative boundaries, but be based correctly on land-use and spatial planning criteria.

Question 9a: Should the defined Limits to Built Development as currently drawn be retained in their current form or in order to maintain settlement patterns, or be removed to enable the delivery of suitable sites?

Summary of Responses

15 responses were received to this question. All 15 respondents (100%) thought that the defined Limits to Built Development should be removed.

Summary of Specific Issues/Concerns:

- Should be removed to include suitable sites with capacity for development.
- It is considered that development proposals at the edges of settlements can be positively considered without the need for development boundaries.
- The wording of Question 9a (and the available response) is ambiguous and capable of misleading some respondents.
- This is an out-dated approach, given that these boundaries were defined in 1990 and the context for development has significantly changed since.
- The existing LBD should not be used as an ‘in principle’ barrier or reason itself not to meet the full OAN for development.
- It is clear that additional land outside existing settlement boundaries will be required in order for the Local Plan to meet identified development needs.
- LBDs should be abolished and formal site allocations should be employed to identify sustainable locations for development.
Question 9b: If the currently defined limits are to be reviewed/redrawn, what criteria do you think should be applied in redrawing the boundaries?

Summary of Responses

28 responses were received to this question.

Summary of Specific Suggestions/Concerns:

- Should be reviewed and extended to include suitable and available urban fringe sites particularly around Tunbridge Wells.
- In reviewing/redrawing the currently defined limits, sites with good access to existing services and facilities or sites with potential to create sustainable links with the core of the settlements should be taken into account.
- Windfall sites are an important component of housing land supply and tightly drawn limits to built development should be avoided otherwise smaller settlements cannot grow organically to meet longer term local needs.
- Consideration should be given to wider limits to built development which includes garden land.
- Consider whether there is merit in identifying land which, whilst lying outside any redrawn settlement boundary, represents ‘reserved’ land should the Council fail to maintain a five year housing land supply.
- Have a clear and strongly defined defensible outer boundary to control the extent of development.
- Should consider the relationship to existing settlement boundary, the relationship to existing built development within settlement, and the nature and character of existing adjoining built development.
- An extension of the defined LBD is required to allocate further housing sites, including much needed affordable housing for residents to meet a defined need.
- The boundary for Pembury should be reviewed given its ability to accommodate growth and to make best provision of the upgrading of the A21.
- Continue to focus changes to the LBD on those greenfield sites which have been promoted to the Council through the SHLAA/SHELAA subject to less environmental constraints as opposed to no constraints.
- Greatest weight should be given to locations and sites which already adjoin the existing LBD and form ‘pockets’ of currently undeveloped land which is well contained by established and enduring natural features and/or physical man-made infrastructure already in the landscape.
- Rather than to apply strict criteria (which might arbitrarily exclude otherwise suitable land), sites should be considered on their merits.
- Factors for consideration will include access to services, the ability of a site to deliver wider community benefits, as well as any adverse impacts resulting from development and the extent to which these can be mitigated.
- From an economic development perspective, consideration should be given to redrawing settlement boundaries in order to include land which would be suitable for sustainable employment development.
• Settlement boundaries can only be considered appropriate if they reflect the current character of an area and do not limit essential development to meet the needs of the community.
• It is considered that the wider campus of Cranbrook School to the north of The Hill and Big Side and Jaegers Field should be included within the settlement boundary of Cranbrook.

(iv) Strategic Options (Five possible options as above)

Question 10: Please let us know your preferred option or combination of options in order of preference.

Summary of Responses

31 responses were received to this question in terms of ranking strategic options in order of preference. 19 of these respondents preferred a combination of options as set out in Question 10a below.

Of those who ranked the strategic options, 4 respondents (33.3%) ranked Option 3 (Dispersed Growth) as their most preferred option, 1 respondent (8.3%) ranked Option 5 (New Settlement Growth) as their most preferred option, 2 respondents (16.7%) ranked Option 4 (Growth Corridor-led Approach) as their most preferred option, while 5 respondents (41.7%) ranked Option 1 (Focused Growth) as their most preferred option. Overall, a slight majority of respondents selected Option 1 as their most preferred option.

Question 10a: If you prefer a combination of options, please state which ones.

Summary of Response

13 responses were received to this question in terms of stating which specific combination of options was preferred, summarised as follows:

• 2 respondents (15.4%) chose a combination of Option 1 (Focused Growth) and Option 4 (Growth Corridor-led Approach) as their preference.
• 1 respondent (7.7%) chose a combination of Option 1 (Focused Growth), Option 2 (Semi-dispersed Growth) and Option 4 (Growth Corridor-led Approach) as their preference.
• 1 respondent (7.7%) chose a combination of Option 2 (Semi-dispersed Growth), Option 3 (Dispersed Growth) and possibly Option 4 (Growth Corridor-led Approach) as their preference.
• 2 respondents (15.4%) chose a combination of Option 4 (Growth Corridor-led Approach) and Option 5 (New Settlement Growth) as their preference.
• 1 respondent (7.7%) chose a combination of Option 1 (Focused Growth) and Option 3 (Dispersed Growth) as their preference.
• 2 respondents (15.4%) chose a combination of Option 2 (Semi-dispersed Growth) and Option 4 (Growth Corridor-led Approach) as their preference.
• 1 respondent (7.7%) chose a combination of Option 3 (Dispersed Growth) and Option 5 (New Settlement Growth) as their preference.
• 1 respondent (7.7%) chose a combination of Option 3 (Dispersed Growth) and Option 2 (Semi-dispersed Growth) as their preference.
• 2 respondents (15.4%) chose a combination of Option 1 (Focused Growth) and Option 2 (Semi-dispersed Growth) as their preference.

Overall, there was a very mixed response of combinations with no clear majority preference. There was a slight preference for the combinations of Options 1 and 2, Options 4 and 5, Options 2 and 4, and Options 1 and 4, with two respondents each stating one of these combinations as their preference.

**Question 11: What views do you have about the possibility of a new settlement somewhere in the borough providing for future development needs?**

**Summary of Responses**

20 responses were received to this question.

**Summary of Specific Issues/Concerns:**

• Typically, it takes many years to plan for and assemble the land for a development of this scale.
• Infrastructure provision, particular drainage, can be extremely complex and prohibitively expensive.
• Due to Green Belt, AONB and other landscape designations together with known physical constraints including access and flood risk, there is no suitable location for the establishment of a new settlement in the Borough.
• Until the Council has properly and robustly assessed the maximum levels of growth that could be accommodated within or adjacent to existing settlements, the Council should not be considering new settlement options.
• There are a variety of challenges associated with establishing a new settlement, not least how it would relate and respect the character of historic settlement development within the Borough which has focused on the growth of towns and villages outward from a historic, heritage rich core.
• Considering lead-in times associated with new settlements, much of the housing may be delivered much later in the Plan period. Due to the complexities of delivering development on such a scale, a range of additional site allocations, including strategic site allocations, will be required during the early to middle part of the Plan period.
• Will receive excessive opposition and challenge, thereby halting development coming forward in a timely manner throughout the plan period.
• A settlement of 5,000 -7,000 units would take significant time to come forward due to infrastructure provision, land assembly etc. This is likely to mean that the delivery of units within the plan period would be limited. A smaller garden village type settlement of 1,000-2,000 units might be deliverable in a shorter time frame.
• It would not provide a balanced growth strategy and would not serve the interests of housing within the rural area and development within the villages, which was underprovided by the previous Core strategy.
• Caution is needed to ensure that the preferred strategy allows sufficient time for a garden village to be properly planned and before a reliance is placed on its delivery.
• Important that the Council first consider the eligibility criteria specified in the latest DCLG guidance ‘Locally-Led Garden Villages, Towns and Cities (March 2016) before deciding on a location.
• Any strategic development must be supplemented by suitable land releases throughout the settlement hierarchy so that families, young people and aging populations have a choice of housing options.
• This option would not deliver housing within the plan period and would do nothing to address the Council’s existing recognised shortfall.
• It is not clear if the Council intends a new settlement as an option to meeting either all the full OAN for development or even all of any Local Plan ‘local need’ or ‘requirement’.
• There is no apparent basis for the suggestion for the figure of “between 5,000 and 7,000 homes”, nor is “larger scale housing and other growth” explained.
• This option would plainly disrupt and de-stabilise the borough-wide Regional Hub role and function of Royal Tunbridge Wells as intended by the current (and previous) development plans.
• If a garden village is to be pursued it must only be as a small part of the overall housing strategy for the Borough.
• A new garden village would likely require significant investment in road and other infrastructure. That money would be better spent on infrastructure schemes which would help to address existing problems.

**Question 11a: Where do you think a possible new settlement could be located?**

**Summary of Responses**

6 responses were received to this question.

**Summary of Specific Issues/possible locations:**

- Suggest the A21 corridor/sites in proximity to the A21 as being a suitable and sustainable location for a strategic intervention including a new Garden Village settlement.
- Non-AONB parts of the Borough lack proximity to the Borough’s main settlements. It is therefore questionable whether a new settlement located within the non-AONB land (particularly at Frittenden), would contribute towards addressing the Borough’s housing needs.
- A new settlement could be located to the south of the Kippings Cross roundabout.
Question 12: Do you think we have considered and identified all reasonable options for accommodating future development growth within the borough?

Summary of Responses

19 responses were received to this question. 18 respondents (94.7%) agreed that all reasonable options for accommodating future development growth have been considered, while 1 respondent (5.3%) disagreed. Overall, there was a vast majority of those in agreement.

Question 12a: If No, please set out what other options for accommodating future development growth within the borough you think should be considered.

Summary of Responses

10 responses were received to this question.

Summary of Specific Issues/Concerns:

- A full Regulation 18 consultation would be needed on individual sites before it is possible to properly comment on the options available.
- Support prudent and intensified re-use of existing sites prior to the need to release Greenfield land.
- None of the IO Options 1 to 5 specifically refer to or recognise the potential for extension of Royal Tunbridge wells at a particular location, such as the CESL sites which are in the Green Belt but less constrained than locations elsewhere in the AONB.
- Could refer to adopting the principles of garden cities to create a sustainable urban extension or suburb.

Section 6 – Development Management Policies

Introduction

This section considers the policies that are currently in place in the Tunbridge Wells Borough Local Plan 2006 and identifies the key topics that may merit and necessitate new development management policies, especially in the light of government guidance in the NPPF (2012) and any updated local evidence. Three questions were asked relating to (i) existing policies, two questions relating to (ii) new policies and one question relating to (iii) detailed policies, as follows:

(i) Existing Policies

Question 13: Which policies do you consider are suitable for continued use?

Summary of Responses

14 responses were received to this question. Only 1 respondent specifically identified policies for continued use.
Summary of policies identified to be suitable for continued use:

- The majority of policy themes remain relevant, but most areas require updates to bring the policies in line with the NPPF.
- Most except H2: Small and intermediate sized dwellings.
- Recommended that the existing principles and designations set out for the Royal Tunbridge Wells Primary Shopping Area are continued in the main, mainly drawing on the adopted policies of the Local Plan Allocations Document.

**Question 14: Which policies do you think may be out of date or no longer necessary?**

**Summary of Responses**

12 responses were received to this question. Only 1 respondent specifically identified policies considered out of date or no longer necessary.

**Summary of Policies considered to be out of date:**

- Policy LBD1 does not relate to the Local Plan period (2013 – 2033) and is therefore out-of-date.

**Question 15: Which policies do you think could be updated or amended, and how?**

**Summary of Responses**

14 responses were received to this question.

**Summary of policies suggested for updating/amendment:**

- Core Strategy Core Policy 7 and Policies ED1 and ED3 of the Local Plan.
- The new Local Plan should review and update all existing policies contained within the extant Local Plan, adopted Core Strategy and Site Allocations Local Plan.
- All policies, such as space standards and those relating to sustainable and renewable energy should be reviewed against changes in national policy.
- It is considered that the Council should undertake an entire review of existing DM policies given their adoption date (2006), i.e. eleven years previous and six prior to the NPPF.
- H2: Small and intermediate sized dwellings needs to be updated to accord with the NPPF and National Space Standards.
- Policies relating to the limits to built development need updating to reflect a more positive approach to planning in rural areas and to ensure a robust supply of housing.
- Green Belt policies should be updated to reflect the provisions of the NPPF and to provide localised definitions of how key terms are defined locally.
- MGB1 – amended to refer to suitably redrawn boundary to allow for larger settlement expansion to meet housing needs.
LBD1 – should be amended to reflect NPPF and to acknowledge some development within may be acceptable to meet housing and development needs.

(ii) New Policies

**Question 16: Considering the topic areas above, are there any other topics that you think the new Tunbridge Wells Borough Local Plan should include?**

**Summary of Responses**

5 responses were received to this question. Only 2 respondents specifically identified suggestions for other topics that the new Local Plan should include.

**Summary of suggested New Topic Areas/Policies:**

- More detail of the “cumulative impact” referenced in section 4.8 needed in the next consultation draft.
- The issue of loss of farmland and its impact upon locally significant species and habitats, protection of locally-significant sites and the importance of green infrastructure all need to be referred to in the more detailed consultation to follow.
- It is considered that a further topic be addressed – “The Presumption in Favour of Sustainable Development” which underpins the NPPF.

**Question 17: Are there any topics that you consider do not require any further detailed development management policies because there is sufficient coverage already in place, i.e. in national guidance (the NPPF)?**

**Summary of Responses**

4 responses were received to this question, all of which stated that there no topics which do not require any further detailed DM policies.

(iii) Detailed Policies

**Question 18: Are there any specific planning issues affecting the borough of Tunbridge Wells that you consider are not adequately covered by the NPPF or already referenced in this chapter and which you would like to see addressed in a policy?**

**Summary of Responses**

5 responses were received to this question. Only 1 respondent specifically identified planning issues that are not adequately covered by the NPFF.

**Summary of Specific Issues/Concerns:**

- Consideration of compensation and offsetting for land where mitigation does not sufficiently cover biodiversity loss.
Conclusion

Introduction

This final section allowed the opportunity to comment on any other planning and development related matters that should be considered or have not been mentioned in the Issues and Options document; and also for any general comments to be made, under the following question:

**Question 19:** Are there any other planning and development matters that you think the new Local Plan should consider or cover that have not been mentioned in this Issues and Options document? You can also make any general comments here.

Summary of Responses

30 responses were received to this question. The vast majority of these responses were representations from agents/developers in regards to the merits of specific sites they were promoting.

Summary of Specific Issues/ General comments:

- There is no identification in the consultation document, or in the supporting evidence base, as to what the key cross border or strategic issues are for Tunbridge Wells.
- Concerned that the Council has not identified within the consultation document the Housing Market Area within which Tunbridge Wells is located. If the Council considers itself to be self-contained then it should make this clear.
- Would recommend taking a much broader approach to the Housing Market Area including not only Sevenoaks but Tonbridge and Malling and Rother as a minimum. Suggest that further work be undertaken to understand the housing needs across these Boroughs and Districts.
- Concerned as to the limited nature of uplift in housing numbers. Consider it extremely important that TWBC considers a substantial uplift in housing figures in order that the affordability of new housing is enhanced for potential purchases.
- It is not clear the degree to which any of the options will meet housing need given the potential constraints on development that are still to be considered.
- Any new Local Plan will need to provide a range of different sites to ensure a robust supply of developable land to meet needs across the plan period. Therefore do not think it is appropriate to indicate whether one approach would be preferable to the others.
- It is important that the Council and surrounding authorities acknowledge and adequately address migratory patterns in their evidence base and emerging housing targets to ensure the appropriate level of planned growth is achieved across the area.
- The emerging Local Plan should acknowledge the Government’s ambitions and seek to deliver the necessary level and type of housing required for the Borough’s communities.
- In accordance with the tests of soundness, affordable housing requirements need to be consistent with national planning policy, to ensure delivery over the plan period and flexible enough to deal with changing circumstances.
• The OAN should be increased from 648 dpa to at least 727 dpa in order to take account of affordability and net migration uplifts.
• There is a housing supply shortfall emerging within the borough when assessed against the OAN.
• There is a need for more sustainable urban extensions to be allocated in this plan review to meet the OAN and maintain the rolling five year land supply.
• In order to deliver sustainable growth, land will need to be released from the Green Belt. Growth at the edge of Tunbridge Wells will need to feature in whichever growth option is taken forward.
• An uplift of just 17 dpa has been allowed for Tunbridge Wells. An affordability uplift of 57 dpa is more appropriate.
• If the council do not allocate a sufficient amount of deliverable land the Local Plan will become exposed and found unsound by the inspector at the Examination in Public. This will result in a knock-on delay in the adoption of the Local Plan and critically the delivery of housing, infrastructure and key services that the borough so badly needs.
• Although the A21 improvements do make this corridor a more logical growth point in years to come, this approach is premature on the basis that there are more logical sustainable and deliverable sites within and around the most sustainable settlements within the borough.
• It is vital to continue to direct development in line with the settlement groupings, which will ensure that sustainable locations are developed and gives the borough the best opportunity to meet its required needs.
• The council must recognise the importance of the existing housing allocations that have been identified in the adopted Site Allocations DPD. The council should prioritise these sites and welcome them to come forward as soon as possible so they can begin to contribute to the housing needs of the borough.
• Ensure an even development across the borough and facilities with sufficient infrastructure.
• The Council should ensure that the future results of the SA clearly justify its policy choices.
• The Borough Transport Strategy needs refreshing and updating to cover the proposed Plan period.
• The published vision is written in a manner to suggest that the ‘local needs’ are fully known at point of adoption. It is suggested that flexibility to adapt to changes is built into the vision, and that appropriate review timeframes are built in to the Plan as a matter of course and in line with Government policy/guidance.
• The Council should not lose sight of the wishes of the local communities, where greater than envisaged growth might be desired to help maintain the viability of settlements.
• A major policy shift to release more land in the Borough is required.
• It is important that dispersion of growth is the accepted strategy, as the benefits and impacts are then widespread over the whole community rather than concentrated in one area.
• The LPA references a ‘loss of office floor space in recent years’ – what is the explanation of this statement? More clarity is needed.
• The LPA has to try to make provision to ‘consume its own smoke’ as a policy on housing and not to divert housing to neighbouring authorities.
• The Local Plan needs to provide a range of attractive new locations so that office-based businesses can be retained in and indeed attracted to the Borough.

**Specific Issues for Sites within Call for Sites:**

• Spa Industrial Park site - greater flexibility is needed to promote a wider range of employment generating uses to better reflect the findings of the Economic Needs Study and to ensure the site is capable of meeting occupier requirements into the future.

• It is considered that the topography of site 189 in particular is far better suited to housing than an alternative use such as employment.

• The site at Longfield Road is not included within the SHELAA, which is considered to be a clear oversight, particularly given recent discussions.

• Cranbrook School requires sufficiently flexible planning policies to enable them to adapt over time to the changing needs of their students and to be able to utilise opportunities for enabling development.
Representation Grouping: Residents and other Individual responses

Overall, responses were received from 465 residents and individuals. However, it is important to note that not all respondents answered every question. Therefore the total number of responses received for each question may vary.

Section 3 – Vision and Objectives

Vision

Introduction

This section relates to the draft Vision for the borough up to 2033. This includes the development of housing, economic, leisure and recreation uses identified within the new Local Plan to meet local needs. The Vision states that new development will be delivered in a sustainable way and will seek to protect and enhance the exceptional quality of the built, natural and historic environment while promoting economic prosperity to ensure the borough remains a special place. Three questions were asked in relation to the Vision as follows:

Question 1: Do you agree with the new draft Vision for the borough?

Summary of Responses

195 individual responses were received to this question. 138 respondents (about 70%) disagreed with the draft Vision, 48 respondents (about 25%) agreed; while a further 9 respondents (about 5%) did not indicate a view. Overall, of those who expressed an opinion, the vast majority of about 75% disagreed with the Vision, while about 25% agreed.

Question 2: What suggestions do you have for improving or updating the draft Vision and relating it to 2033?

Summary of Responses

157 responses were received to this question.

Summary of Specific Issues/Concerns:

Infrastructure/Utilities:

- Infrastructure in borough already too stretched in both urban and rural areas. Needs to be addressed - schooling, roads, public transport, medical services, flooding.
- Need infrastructure first, then new development.
- Water shortage a real problem and needs addressing first – Bewl Reservoir under stress.
- Better broadband connection/speed needed, especially in rural areas.
- The vision should generally restrict development in most categories as it is clear that local roads and infrastructure cannot cope with a 16% population increase that is assumed.
- The local schools are full and there are insufficient places for 2018 let alone 2033. Therefore need to review education/schooling needs.
• Greater emphasis required for provision of increased medical facilities - possible further hospital, additional doctors/medical centres.

• No vision shown for essential provision of further care home development to serve increasing older population.

• Electricity supply service outdated and overloaded.

Housing numbers/need:

• The Plan is not due to be approved until 2019 and will already be 6 years into the plan cycle. On the basis that the current plan to build 300 houses per year is on track, it will already be some 2000 houses behind the new Local Plan of 650 houses per year - how is this going to be rectified?

• The Vision is derived from a flawed national plan (central government) requiring further housing in the South East without any regard as to how this can be meaningfully achieved. Many of the supposedly ‘local needs’ being ‘identified’ in the New Local Plan are being dictated by central government not by local people. Number of houses to accommodate proposed immigration of people to the area is a prime example.

• Increasing residential development in countryside because town areas are already saturated begs the question as to why new quotas have been agreed which are double the numbers of the current plan.

• Should be better consideration of what housing is actually needed in a given area and how this impacts on local services. Also, consider improving infrastructure and highway/traffic needs to better accommodate existing/ prospective residents, before agreeing to additional development.

• There would seem to be a total disconnect between the objectives and the borough limitations of geography, AONB & Green Belt in so far as the SHMA housing assessment and its build projections are concerned. If the view is taken that the town is full (on which the SHMA numbers projection are largely derived) it is neither valid nor sustainable to place those houses on rural Tunbridge Wells.

• Although a strong consensus for protecting the ANOB from development, this should not mean parishes that lie outside the AONB (or those that are not fully within it) become automatically targeted for development.

• Vision should be based on reformulating and strengthening the focus on quality environment and not on housebuilding. The assessment of housing need and population growth is likely inappropriate and inaccurate for the next 20 years and needs to be redone.

• Maintain the Vision to urban zone expansion to utilise and improve existing infrastructure but reduce the quota to a scale of what can be accommodated to deliver positive results. Reject any overflow of quotas that would require drastic change to rural communities and be detrimental to those local businesses and countryside.

• Revisit statistics, querying projected growth for TW Borough, taking into account possible effects of Brexit on growth (population & economic) and consider possibility that greater growth could be envisaged elsewhere in the country and less in the crowded South-East.

• Intelligent projections for the future may indicate aspects which need to be recognised, covering period from 2017-2022 and beyond. Likely changes to lifestyle developments and adaptations for the future by 2033 will probably demand more flexible projections.

• Concern that housing associations face an estimated 14% cut in resources as a result of reduced future rents whilst there is a shift to fixed-term tenancies for all social housing tenants. Councils should not be forced to sell off their expensive housing stock to finance the Government’s housing reforms and social welfare policy which will be to encourage home ownership rather than affordable rented housing.
• Should be new legislation abolishing national minimum space standards for new homes and allowing councils to build micro-units (“pocket homes”) as a way of meeting housing needs. Also zero carbon standards for new homes and the green homes scheme should be reinstated (to cut UK carbon emissions by one third).
• Should focus on brownfield sites much more effectively to meet the housing demands. Integrate the industrial estate areas with housing as these provide jobs locally too.
• Really explore methods to provide housing opportunities for younger people without increasing significantly increasing total housing stock.
• Suggested that housing numbers be revised, and look at development closer to main town and Pembury perhaps in the area of North Farm, near the A21 corridor.
• Concern that case for building number of houses listed is more related to successive government failures to build sufficient housing in London/ suburbs than any real need to expand the local housing stock to satisfy the needs of existing residents. Pricing out of London workers from London housing market is bad for all parties with a terrible detrimental effect on the countryside (e.g. more commuting, building on rural land which is then gone forever).
• The focus needs to be away from TW which is already struggling to cope with its current population.
• If building continues at the current rate all the surrounding boroughs will simply become an amalgam of TW, with no green areas left, gridlocked roads and already over stretched schools and buses will not have capacity to keep up. Air and noise pollution already heavily affected by flight paths to Gatwick and the congested A26 will be massively increased and detrimental to residents and environment.
• SHMA study says ‘The population projections are based on trends between 2006/7 and 2012, a period which included an economic recession. The SHMA analysis suggests that housing market circumstances during this period may have influenced net migration from London, and that a moderate increase in migration from London might be expected moving forwards’ This implies an assumption that economic conditions will be improved moving forwards, there will be no further periods of recession and thus net in migration from London will increase. This in invalid – 2 years after the SHMA study the reality is that economic conditions are difficult, Brexit has created uncertainty, and prices are rising and wage growth is lagging behind inflation. No sign that this situation is likely to change soon.
• Question why development in the towns previously is used as basis for setting target of 13,000 new homes. Logic must be that if there has been housing demand in the towns then there is further need for homes in the towns. If there has not been need for housing to same degree in rural areas, then no logic in burdening rural areas with new development. Therefore, basis is flawed and total of new homes to be built over the next 20 years should be reviewed on a more realistic basis.
• Should encourage Neighbourhood Plans in Vision to engage communities in broader borough initiatives providing appropriate social cohesion and housing mix in the villages.
• The villages do not have sustainable communities with increases in demands for infrastructure (schools, doctors surgeries etc.) that cannot be supported. The Vision only enforces notion they are dormitories for the larger urban areas.
• Larger developments (in village terms) are damaging to local communities as they place strain on local services and where alternative services require even more commuting.
• With reference to para. 2.10:- 16% increase is too great with costs of infrastructure and improvements required and the towns and villages will be too crowded.
• What is the local need around Hawkhurst and surrounding villages? Are houses going to be built in Hawkhurst to meet the quota, to meet the needs of people wanting to move here, or progress to upgrade?
• What is the Master Plan for the district?
Cross Boundary emphasis:

- Too much emphasis on RTW.
- Need to understand how these plans impact with/on other adjoining boroughs.
- Under the duty to cooperate cross boundary issues are extremely important, especially the provision of new housing in adjoining Wealden District (as a result of the protection of Ashdown Forest SAC and SPA). This will undoubtedly necessitate additional housing and employment development to be considered within the TW borough area.
- Work with neighbouring boroughs which have better opportunities for development, possibly due to their location e.g. close to the A21 or brownfield sites in areas such as Hastings for employment as well as housing development.

Environment:

- Development vision totally unbalanced in considering housing numbers a priority over rural environment and lifestyle.
- Should also be mention of preservation of historic buildings and historic setting of the villages.
- The countryside is diminishing in size as it is and the wildlife is having to battle to survive – what will happen if it becomes completely congested with houses and traffic and pollution?
- No recognition given to need of protecting/enhancing the distinctive character and quality of existing settlements. Even moderate amount of additional development has potential to dramatically affect the distinctive character of each settlement.
- Previously developed land should be starting point for new housing. However, given the lack of such sites and the scale of housing growth within the borough, a more positive/encouraging approach should be given to promote sites within sustainable locations within the countryside.
- Further provision needed for leisure facilities, open spaces and green areas in/ around borough.
- Make more use of brownfield sites for development and protect - at all costs - the green areas which contribute so much to the character of the town.
- TW grew from the spa waters in the Pantiles. The historic Stuart Georgian Regency and Victorian architecture should be retained. This is central to the character of the town along with its beautiful green spaces - common and parks.
- More attention should be paid to the requirements for agriculture, to grow our own food and encourage allotments.
- Serious threats to key elements in borough – such as Calverley Grounds and the Pantiles (current proposals for both diminish “exceptional quality”), which are the jewels in the crown and merit far more attention and protection in the Vision.

AONB/Green Belt:

- Plan should protect and preserve the unique asset of the AONB. Should also protect rural environment and recognise that character and environment of villages needs to be preserved.
- Protecting the ever reducing Green Belt and AONB should be at forefront of policy, followed by simple impact assessments on infrastructure and services before ill thought out schemes even considered.
- Vision should be more specific about the natural beauty of the area. Paramount importance to current and future generations that the character of the area is preserved. Also more
specific about how footpaths, views and careful evolution of buildings in the area over the centuries have made the borough a wonderful place to live.

- Through the Vision, Council should include recognition of need to review current Green Belt boundaries to meet needs for housing and employment growth in the period up to 2033.

**Transport/congestion:**

- Should include a specific commitment to lower pollution, and ease traffic congestion.
- Improve quality of road network within borough.
- Improved access into town centre, including access from rural areas.
- Consider Park and Ride as an option.
- Should include adequate and affordable parking.
- Congestion in TW and surrounding area is high and has an impact on the travel times where rush hour traffic speeds are below 10Mph for the school bus approaches to St Johns area of TW. Currently no evidence of this being addressed in the Vision.
- Cars are essential as bus services are not sufficient as very few run after 6pm from certain areas.
- Vision talks about housing and economic development, but says nothing specifically about transport infrastructure. Availability and suitability of this is a prime requirement.
- Current infrastructure around the A26 corridor is already saturated and unsatisfactory so the Vision must address this.
- Vision needs to be more aligned with existing schemes - in the case of Southborough, not known what impact will come from Southborough Hub along already crowded A26, so more housing development seems to be early in process relative to trying to resolve existing issues - A26 already extremely congested, access to doctors and schools etc. - further homes will worsen the issue.
- Lack of regular train services to London stations - new timetable proposed.
- Major road networks unable to cope with increased traffic.
- Add reference to public transport and cycling as preferred transportation modes for new developments.
- Should be reference to reducing impact of traffic on quality of life of residents in rural areas - applies to both speed and quantity/frequency of cars and HGVs. Enforcement speed cameras should be widely introduced and speed limits lowered in many areas. HGVs should be forced to avoid residential areas in villages.
- Need to prepare for technology permeating areas of life such as the transport system with driverless cars, new road developments, compliant with the latest thinking in road safety and requirements.

**Economic/technological issues:**

- Current loss of office and business space will drastically limit local employment and rateable income resulting in population being forced to travel further for work. Will severely impact road and communications infrastructure.
- Include improvements to TW as a shopping area - currently much lost to elsewhere where parking is easier and cheaper - town centre is "tired".
- Include/mention new theatre and cinema in town.
- Vision seems to be a continuation of yesterday’s trends - unimaginative and fails to recognise effects of significant changes already exerted by global influences. The concept of a job and transportation will be vastly different in 2033. Robotisation is already affecting employment and numerous people are working from home.
• New technology could lead to increased spare time (or greater unemployment) and therefore increased demand for recreational and leisure services. Hoped that with education, and increased affluence that this demand will also increase.

• Due to lack of infrastructure and means to employment capability, Vision is currently weak until strategy can define how it will work, grow, integrate, prosper and benefit all.

• This area has always been affluent and prosperous - no need to indiscriminately build and pretend by doing so, it will promote economic prosperity. Vision could also include reference to need to increase opportunities for local employment especially skilled employment, which decreases need to commute and improve sustainability.

• Better provision to help and support more flexible working within borough - higher and inclusive broadband infrastructure allowing residents to work more flexibly from home and reducing commuter congestion/stress.

• No mention of a vision for agriculture - countryside is not a tourist theme park nor land bank for economic/housing development but a source of food and employment. It sustains the appearance of the area and is a vital element in water management. Therefore Vision needs to support both small family farms and larger agricultural holdings, while accepting there are other pressures on agricultural land.

Sustainability:

• No consideration of impact of climate change on the region - whilst difficult to predict exact changes will occur, generally agreed that the weather will be more extreme, heavier rainfall, higher temperatures - leading to different disease spectrum.

• Greater emphasis needed on sustainability - not enough account taken of the number of car movements (adding to pollution and congestion) on a number of the sites proposed.

• Should be more emphasis on high quality, innovative design and use of materials.

• Introduction of a clean air zone in RTW recommended (like the planned Ultra-Low Emission Zone in central London). If we are serious about safeguarding citizens’ health and welfare a clean air zone should be a priority in the Vision.

Other:

• Part of Vision should be that citizens will have a much greater influence on any development in future, rather than government, councillors, council officers, and planning inspectors. Therefore consult and take notice of local opinions (consideration to the individuals and families already residing in an area) rather than prioritising discussion with developers.

• Reference made (with no comment) to Camp Field - Site 45 in SHEELA.

• Policy EN15 seems to conflict with the aim of the Vision ‘...protect and enhance the exceptional quality of the built, natural and historic environment.....’ - very bold aim which is unlikely to be able to be delivered.

• Planning until 2033 a worthwhile exercise provided that real world implications are reviewed regularly to ensure plan is pertinent to changing needs of borough and primary objective should be to protect lifestyle of existing residents.

• Specific reference made to Hawkhurst (a village, not a town) - has a way of life the community wish to sustain and significant increased development will reduce this quality due to pressure on the environment and use of resources. Specific issues raised, which will be worsened by new development:
  1. Traffic – extremely dangerous and toxic from a health perspective;
  2. Parking – 2 existing extremely small public car parks, 2 other two car parks which are not large and restricted by supermarkets in the village, resulting in congested on street parking;
3. Public facilities/infrastructure – the school and the surgeries are already over-subscribed. Not the infrastructure to sustain further significant development;
4. Public transport – terrible, so people have little option but to use their vehicles – adding to the traffic;
5. Developments have already been approved which will have a significant effect on the village;
6. AONB - must not be allowed to be eroded by continuous development. Also, TPOs and other environmental issues to consider - rural landscapes should be protected;
7. Vision talks about sustainable development – Hawkhurst cannot sustain any more building.

- Specific reference made to following identified sites: Site 90 (Mabledon, London Road), Site 179 (Mabledon Farm and land, London Road) and Site 180 (Nightingale Farm and land, London Road) - new builds of substantial size should be sited next to new infrastructure corridors and not existing, congested residential/infrastructure corridors (such as the A26) nor in/adjacent to AONBs, farmland or Listed Buildings.
- No reference to TW Site Allocations Local Plan (SALP) for which the Inspector’s Report concluded there is not a shortfall of allocated and deliverable land in RTW, Southborough and the rural fringe. Why was this not included as criteria for the current plan? The SALP runs to 2026 - no rationale for a new plan with increased housing targets to extend the original plan by a mere 7 years. The Issues and Options document mentions ‘changed circumstance since the adoption of the core strategy’, but it does not say what these changed circumstances are – therefore need for reviewing and updating the local plan questioned.
- The main driver for the plan appears to come from the NPPF published 27 March 2012. Is this report still valid or under review?
- Do not expect to set policy so far into the future. 2033 is too far off to be relevant. Choose goals which are achievable.
- People choose to live in towns or rural villages for very different reasons – the two are not interchangeable. It is invalid to assume that if the towns are full people will choose to live in rural communities. Separate housing numbers are required for urban and rural locations.

Suggested amendments to wording and focus of the Vision:

- The Council refers to "local needs". The NPPF requires LPAs to "boost housing supply" and make "every effort" to meet the SHMAs Objectively Assessed Housing Needs (OAHN), which requires the Council to meet its duty to cooperate with the other neighbouring LPAs. The use of the phrase "local needs" implies only a duty to meet TWBC local needs. Therefore the words "local needs" should be removed and replaced with the words meet its OAHNs.
- The vision statement should be strengthened by changing 'will' to 'must' - i.e.'New development MUST seek to protect and enhance the exceptional quality of ....’
- The ‘vision’ should be more specifically relevant to Tunbridge Wells and say for example:- ‘In 2033 Tunbridge Wells will remain an extremely attractive, predominately rural area with thriving towns and villages. The existing defined areas of the Green Belt and High Weald Area of Outstanding Natural Beauty will be largely unchanged. Residents will continue to enjoy a high quality of life in an improved environment. Development needs of its area will have been met, including affordable housing, provisions for the elderly, new schools, and enhanced cultural, leisure, and community facilities. Greenfield development will have been strictly limited to sites where no other option exists. Tunbridge Wells’ natural, built, and heritage assets will have been protected, and where possible enhanced, preserving the unique character of Tunbridge Wells.’
**Ethos of Vision supported, but would recommend a number of minor changes to provide complete certainty regarding the future strategy, namely:**

1. Amendment to clarify that the full objectively assessed local needs will be met; and
2. Insertion of a reference that the potential to accommodate the unmet need of more constrained boroughs will be explored;
3. Greater clarity that a range and mix of homes would be provided. Therefore recommend the vision be amended as follows:

‘In 2033 Tunbridge Wells Borough Council will have delivered development to meet its full objectively assessed development needs, and those of its constrained neighbours, in a sustainable way. This includes the development of housing, economic, leisure and recreation uses identified within the new Local Plan. New development will seek to protect and enhance the exceptional quality of the built, natural and historic environment while promoting economic prosperity to ensure the borough remains a special place. It will be a place where people want and can afford to live, work and visit and where they have easy access to the services and facilities that they require on a day to day basis’.

- The Vision appears to put development ahead of environmental protection and to suggest that only environment/heritage of “exceptional quality” will be protected. The words “seek to” should also be deleted, since: the Vision should be to **achieve** the conservation and enhancement. In order to reflect the wording in the Countryside and Rights of Way Act 2000, the word “conserve” could be used rather than “protect”.
- Although well intentioned in part, the Vision seems dull and bland and slightly complacent that could be applied to any place. This is meant to be a **Local Plan**, not a universal one, so possibly change wording to:

  "**Royal Tunbridge Wells, the Borough's only large town and its main urban area, is a nationally important historic town, and is set in outstandingly beautiful surroundings in the "Garden of England".** The town was originally established around the Stuart Court and it is characterised by a number of Stuart, Georgian, Regency, Victorian and other period buildings, together with remarkable open spaces, interesting topography, and unusual rock formations. Around the town, much of the rest of the Borough is designated as High Weald area of outstanding natural beauty, or Metropolitan Green Belt, or both. Our vision and mission is that of being able, through steadfastness of purpose, to pass on this very rich heritage for the benefit of future generations, by properly controlling the challenges and pressures that are likely to arise during the period of the plan”.

- **Narrative from “new development to on a day to day basis” should be removed.**
- The way the vision is currently written does not reflect the importance of meeting the needs of the local residents. Therefore suggested that first sentence is changed to: “In 2033 Tunbridge Wells Borough Council will have delivered development to meet the needs of the residents of the Borough in a sustainable way”.
- The draft Vision should have a stronger statement on the protection of the existing built, natural and historic environment. The draft Vision should make specific reference to the importance of the AONB. The draft Vision should as a minimum say “New development will **protect and enhance** the exceptional quality…”
- The wording in para 4.6 of the Issues and Options document - “will take full account of and reflect each site’s landscape, treescape and environmental sensitivities” provides a more flexible approach to development in the countryside - this wording should be incorporated into the Vision.
The phrase, “protect and enhance...” should be replaced with “take full account of, complement, and where possible, enhance...”.

Remove ‘seek to’ and ‘day to day’

Vision needs a better definition of sustainability – there are 2 definitions of "sustainable": 1. "causing little or no damage to the environment and therefore able to continue for a long time" and 2. "...is the property of biological systems to remain diverse and produce indefinitely..." These should be incorporated into the Vision.

The Vision:
1. Does not take into account the effect on the erosion of historical landscapes of the individual sites involved;
2. Does not take into account the long term effect on the High Weald AONB;
3. Opens the way for disregard of limitations on development in the AONB;
4. Opens the way for disregard of historical and current build limits;
5. Does not take into account the lack of services and facilities in the areas involved: roads, schools, doctors, shops, energy etc.;
6. Does not take into account the effect on traffic or provide for any analysis and solutions where there are already issues;
7. Does not take into account known accident black spots;
8. Does not take into account the lack of adequate access to proposed sites.

The Vision is at odds with the list of proposed development sites. You cannot concretise over AONBs and provide no further transport or environmental infrastructure while still claiming to be developing the borough in a “sustainable way”.

Concern that entire Vision is based on just cramming housing into already overcrowded villages and towns, instead of focusing on providing a sustainable quality of life.

Concern that the Vision does not reasonably reflect status of town of TW. The Vision seeks to meet ‘local’ needs. However, TW is one of the main settlements in Kent with good rail access and once the A21 is improved, good road access. Also within the sphere of influence of Gatwick and other regional employment hubs. The development needs of the Borough are more than just ‘local’ and this should be reflected in Vision.

The Vision should seek the growth of town of TW as a sub-regional settlement to address a wider housing need (including that of the under provision for Wealden District) and prevent retail and employment trade from being attracted to other main settlements. Must move away from providing for ‘daily’ needs and deliver needs on a strategic level (e.g. providing for weekly/ yearly shopping needs, major employment growth and large scale housing development). Even without this approach, the Vision is at odds with the need to deliver 648 dwellings per annum and the large scale strategic employment and retail growth that will be required to support these houses.

Vision should be balanced to both developing existing built town areas and preservation of the surrounding countryside and unique historic villages. Rural businesses rely on local communities and visitors lured in by the countryside environment, but seems to be ignored in the Vision.

Would expect Vision to be more impressive and commit the Borough to major challenging improvements in the quality of life – e.g. TW will by 2033 strive to be the premier centre for cultural activities in the south east of England outside of London; it will expand its green spaces through the designation of additional land to woodland and hedgerow development, the nurturing of local habitats for wildlife and improved accessibility for residents to the rural areas of the Borough; it will endeavour to demonstrate excellence in environmental protection; it will preserve the geographical and individual identity and integrity of the communities and villages within the Borough. It will preserve the historic legacy of the town.
and its environs through only permitting developments that are sympathetic to the architecture and character of the town.

- If you want the Borough to be as congested and purely urban as Croydon, Bromley or Clapham, need to be honest and state that wish to build on AONB countryside and make borough purely urban in nature. That is what is proposed in the local plan map, so stop trying to trick people the Council claim to represent.
- The Vision provides a perspective of a major urban and economic centre which does not reflect the very different environments/needs of the villages. It looks to a future based on a historic plan of urban and economic growth centred around TW and Paddock Wood which have the road and rail infrastructure to support extended growth.
- The vision should also look to how the borough will develop over a much longer period (beyond the proposed local plan) delivering sustainable growth over the next 50 years. Numbers should be based on growth that is sustainable over the long term not short term theoretical needs.
- The Vision places a strong emphasis on the protection of “the exceptional quality of built, natural and historic environment by new development. However, the wording “protection” unduly limits development of suitable sites within the countryside. A better approach would be to provide more flexibility for new development to take place within sensitive but sustainable locations in the borough.

Question 3: What should we be aiming and aspiring to achieve and why?

Summary of Responses

146 responses were received to this question.

Summary of Specific Issues/Concerns:

Infrastructure/Utilities:

- Focus on improving local infrastructure first and pushing back on national government.
- Local need is the key rather than development for developments sake – development must be based on facilities and infrastructure first.
- Focus on roads / traffic safety / parking / public services needed in rural areas.
- The villages are at full capacity in terms of schools, medical facilities, water and drainage.
- Lack of detail on infrastructure development to support volume of proposed housing in Southborough/Bidborough area - such as cycle lanes, school, playing fields, traffic flow improvements to cope with increased traffic from side roads onto A26.
- Adding 13,000 homes will stretch the infrastructure in the borough and beyond - road, rail, water, sewerage, electrical and gas.
- The target number for development requires a coordinated investment plan from multiple agencies. There is no mention of engagement or how that engagement might be coordinated to achieve such a target.
- Given a large part of housing need is estimated to come from migration then it is important that the infrastructure (roads, rail) forms a keystone of any future plan.
- If additional housing is required to be built then commensurate consideration needs to be given to schools, local infrastructure, hospitals, health centres and protection of the views, farmland, uncluttered routes, low crime areas that families have saved up to move into.
- At the moment bus routes are being reduced and health centres are at full limits with no plans for expansion and help to those that require it, especially the elderly.
- Local school places are full to capacity - any future pressure on schooling will see parents having to travel further to schools located in inconvenient locations.
- Ageing population - need accessible bus services and walkable facilities. This change in our demographic, needs to be clearly recognised and planned for – would be impossible to accommodate in the rural areas and provision should be made within the larger conurbations of TW, Southborough, Hawkhurst and PW.
- Focus on water resources.
- Focus on renewable energy.
- Improved internet connections needed.

Housing numbers/need:

- Should aim to build a limited number of houses that will be for local needs only - the number of proposed houses is massively too high.
- The local need is identified, quantified and capped - housing target of 12,960 homes in 20 years is a totally unrealistic target.
- Needs to be a balanced view of requirement against impact to current occupants. If there is a need for additional housing it makes sense to put it in TW where there are sufficient jobs, amenities especially health and education and infrastructure to support the large increase. Have studies concluded that this region will provide employment for occupants of the new houses proposed?
- The projected population growth in TW borough should be discouraged as it will inevitably result in pressure on housing, services, transport and infrastructure. Measures should be taken now to encourage London Boroughs to address their own housing problems rather than passively accepting the migration of Londoners to TW. The housing problems of TW are significantly caused by the exodus from London.
- Objective one should be modified to provide more certainty that the full ‘objectively assessed’ housing need will be met.
- Nothing in the vision about managing the impact of future growth on differing communities. Accommodating growth based simply on numbers could easily create dormitory towns with residents commuting to the borough’s economic centres and to London.
- 2033 is simply a milestone and not an end-goal and growth will continue. If the current target is barely achievable then any further growth beyond 2033 can only be achieved by removing all LBDs and dismantling AONB and Green Belt protections. If the growth achieved is not sustainable beyond 2033 then the target figure needs to be adjusted without wholesale removal of constraints.
- An aspiration to all good things - sustainability etc. is not a vision when combined with the SHMA housing numbers and call for sites. This just becomes a numbers game that ends up ignoring all the so called sustainable objectives. The presumption in favour of sustainability in the context of TW is flawed. Therefore half the number of houses.
- Housing needs to be suitable for local residents.
- There should be a brand new town/large village to accommodate expected population growth. Existing settlements have become too intensely populated.
- Any future housing developments should be genuinely affordable for local people (not line the pockets of landowners and large housing developers). Our younger people need this, to have a vision of owning their own home in the future. This vision would fit with the Council’s need for sustainable development ‘ensuring a strong, healthy and just society’
- Housing should be mixed with some affordable to key workers.
- Should be measured, realistic and carefully-planned growth, bearing in mind the value of countryside, agriculture and limits of economic/employment potential in the area.
• We live in a large, diverse country – therefore should be aiming to share the housing and stop concentrating it in the Garden of England. Stop cramming new housing in and start to think about the people already here. There comes a time when enough is enough. The glorious county we live in is being concreted over. If changes allowed to happen the countryside and villages will be destroyed forever.
• Provide low cost affordable housing for young people.
• Provide housing for middle income families.
• The Council must accommodate its full objectively assessed need as far as is achievable without conflicting with the policies of the Framework. The borough’s housing need cannot be adequately accommodated on brownfield sites alone. The Council recognises that there is lack of available land.
• The Council’s identified housing requirement for the plan period (2013 – 2033) is 648 units per annum. More than double that set out in the Core Strategy – 300 units per annum. Therefore, a clear need to develop some Green Belt land to assist in meeting the housing need.
• Also need to deliver 341 affordable units per annum as evidenced in the SHMA (September 2015). There is an important interlink between the delivery of market housing and the delivery of affordable units. The delivery of increased market housing is crucial to provide much needed homes across the Borough.
• A more robust, flexible future strategy is needed given lack of housing supply and past failure to achieve the Core Strategy housing requirement for the borough, resulting in release of several greenfield sites.
• Strongly support intention to meet need for development with particular attention to importance of the NPPF which requires councils to “boost significantly the supply of housing” (paragraph 47) and to prepare a strong evidence base in order to realistically assess and meet the level of housing demand locally (paragraph 159). The Council notes the affordability ratio for houses in the borough is high, and above both county and national averages, placing housing out of reach of many. The effect of this on communities is profound as, particularly young people, are forced to leave in order to find areas of more affordable accommodation. The Local Plan should aim to make housing more widely available and more affordable for all people, through the provision of sufficient market and affordable housing.
• Reference made to NPPF which recognizes the importance of maintaining a consistent supply of housing, both to meet social and economic needs - suitable housing, particularly in the larger towns, allows people to live close to a good range of employment opportunities. Council should focus on this.
• The suggested numbers are based mainly on migration to the borough. At Government level there is a firm commitment to drastically reduce immigration to the UK in general which in turn should see a lower demand going forwards in TW borough than previously experienced. Another reason the formula is flawed.
• The objective to meet the housing needs of the Borough should be seeking to achieve a proportionate balance of sustainable housing growth across the Borough through allocation of sites that are appropriately located to the principal urban centres and medium-scoring settlements. A strategy involving proportionate growth across medium-scoring settlements would be a relevant (and required) step-change to the longstanding approach applied by the Borough Council in previous Local Plan documents, which resulted in limited growth in the villages.
• There is a natural limit to growth and this needs to be defined through evidence from facts established by professionals in their fields.
• Providing housing for all needs - elderly or people wanting to purchase a bigger property or take the next step.
Environment:

- Protect the environment by building on brown field sites and inefficiently used space in the established urban environment (e.g. the cinema site) instead of green belt, agricultural, recreational and green field sites.
- Avoid any sites that are going to add significant congestion to the already congested A26 through Bidborough/Southborough/TW.
- Should also protect the views from and to our beautiful villages - what makes our area so special.
- Build new homes but only after careful consideration for the environment and impact on existing homes.
- Should aim to maintain the town’s character by not making it too big, even if this does impact the number of visitors.
- Emphasis is all about building and far too little about what makes the borough a pleasant place to live today - should aim to ensure all existing areas of green belt land, areas of landscape importance, AONBs and conservation land are not adversely impacted by new development.
- Aim to achieve a balance between the need for additional housing and keeping the rural aspects of the borough intact.
- Because of its unique history as a post-medieval spa town, set in exceptionally beautiful surroundings, TW is a very special place that needs careful treatment - However, recently things have been going badly wrong:- Union House scheme on the world famous Pantiles is completely out of keeping with its historic surroundings; the brash RVP scheme involves unnecessary demolition of locally listed buildings in the conservation area; and the proposed new Five Ways entrance would be a sorry advertisement for the "TW brand"; the cinema site remains a long-standing blot on the local scene; the listed Town Hall faces an uncertain future, and box-like new development threatens to have a seriously adverse effect upon the parkland character of Calverley Grounds. This does not add up to "sustainable" development to an attractive, unique historic town, which needs to be protected. This may not be easy, given the government’s disastrous NPPF, with its presumption in favour of almost any development that is supposedly "sustainable". Nevertheless a determined aim and aspiration might help to turn matters round.
- Protecting our natural environment, character and historical attributes of our built environment.
- Focusing development in area around new TW bypass would seem to be the most sustainable option as there are existing facilities and transport infrastructure.
- Whilst recognising need for more homes must be careful to ensure that TW, Southborough and surrounding villages do not become one huge urban sprawl - each has a distinctive character and future development should take this into account.
- Paddock Wood at risk of flooding.
- Should include the five guiding principles of sustainable development and three dimensions of the NPPF - "economic" "social" and "environmental".
- Need to analyse effect on the erosion of historical landscapes of the individual sites involved.
- Need to analyse long term effect on the High Weald AONB and the individual sites within it and provide adequate limitations on development of AONB.
- Need to provide adequate limitations on development - both historical and current build limits.
- The aim should ensure any future development is based on real local needs rather than seeking an expansion of TW. Both the town of TW and the surrounding areas are delightful with 70% designated as AONB. Should be seeking to retain charm of towns, villages and
countryside - reason people have chosen to move/ settle here. Aim should be to seek to
develop sensibly in a way that enhances people’s lives.

- Should consider a new focal point outside of TW - one to be built with new schools and new
  attractions where there are roads, infrastructure and or space/capacity to cope.
- Local Plan needs to address housing, social, economic, leisure and recreation uses in the
  borough but not to the detriment of existing areas especially the character and beauty of
  historic villages and surrounding areas.
- Makes sense to keep Town Hall in the existing art deco building alongside proposed new
  cultural hub of library/ museum/adult education buildings, used by many TW residents.
- Beautiful park with mature trees in Calverley Grounds must be maintained with no
  encroachment from an expensive new Town Hall/ theatre - an unnecessary expense.

AONB/Green Belt:

- Use brown field sites rather than greenbelt land.
- AONB should be protected and enhanced. The NPPF gives the AONB high status.
- Green Belt should be protected.
- Green Belt boundaries (largely unaltered since their definition in 1983) need to be reviewed,
  and strategically relaxed to accommodate the sustainable development required to meet
  future housing needs in terms of mix, quantity and quality, whilst offering significant social
  benefits.
- Green Belt buffer zones between TW borough and adjoining boroughs need to be created to
  prevent other boroughs from building on our borders and making use of our infrastructure
  without contributing to its upkeep/ further expansion (e.g. 49 homes on Benhall Mill Lane in
  Wealden DC).
- With regard to option 4 – Corridor Option, some of the Green Belt land lost could be used to
  create a buffer of Green Belt between Hawkenbury and High Weald.

Transport/congestion:

- Proposals for new development should be designed around major, Council led transport
  upgrades. Significant investment required in local transport networks, in particular
  public transport.
- Reduce reliance on car use. Should invest in a park and ride service and ensure train and
  bus services are more interlinked to encourage use of public transport (would not only
  have environmental benefits but also an economic benefits by reducing travel/sitting in
  congestion time).
- Should invest in cycle network - economic, environmental, social benefits and healthy
  lifestyles (resulting in reduced pressures on local health care services and absence from
  work due to illness).
- Greater attention required to achieving actions in the Transport Strategy 2015-2026, i.e.
  reducing continual and worsening road congestion, (especially A26 route).
- Considerable improvement of existing roadwork necessary before building more
  housing. The A26 cannot cope with any more traffic. The trains are always full and could
  not cope with extra demand, and there is absolutely no parking around T W station.
  New flats have been built in the town centre with no extra parking. Therefore cannot
  add any more developments.
- The big challenges in the Southborough and TW area are congestion due to high number
  of car journeys and concentration of schools in the area.
- Update and repair the existing roads.
- Provide safer environment for pedestrians.
Prior to new development, analysis needed for:- traffic impact/congestion, accident black spots and how these may affect individual sites and issues concerning the lack of adequate access to proposed sites.

Investment should be made in smaller towns and villages across the borough to spread transportation and move it away from the already heavily congested central TW - to reduce traffic, parking and air pollution problems.

How are 1000s of new residents meant to commute into London and fit on such trains?

Better parking and better public transport provision is needed to reduce congestion in the villages.

With external transport lines such as rail into London at 100% capacity during rush hour, should aim to concentrate development where infrastructure capacity is adequate to avoid additional congestion and deterioration of quality of life for local residents.

Improve transport network to allow residents to move around the town easily to promote the economic development of TW centrally and at North Farm - currently preferable to go to Tonbridge than TW/North Farm.

With regard to Hawkhurst - roads are heavily congested and do not conform to the Kent Design Guide and are therefore totally unsuitable for further additional traffic resulting from new development.

Southborough is already contributing to housing numbers with new development around the hub, also along Speldhurst Road, Pinewood Court, the Old Dairy and old hospital sites – although welcome these will contribute to traffic volume.

Economic/technological issues:

- TW should not try to compete with larger towns and cities with regard to economic development, but provide a distinctive and differentiated offering to its citizens. Should be a place where people enjoy living, as well as attracting tourists/visitors because of the diversity it has to offer in culture, environment, architecture and retail.
- Where will jobs come from? Without adequate jobs, crime will occur - thus without a solid infrastructure the local plan will not be complying with the Crime and Disorder Act 1998 Sec 17.
- With on-going improvements to the A21 and good rail links to London, the borough and TW in particular able to raise profile as a place to live and do business. TW should therefore be promoted to a sub-regional status in terms of retail, employment and a place to live - will enable existing/proposed transport links to be used effectively and assist in providing for unmet needs in surrounding areas.
- If there is a need for large numbers of additional housing, needs to be provided where jobs, amenities (especially health and education) and the infrastructure is available to support it. Have studies concluded that this region can provide employment for all future occupants?
- The Council should consider splitting up housing developments, so that local builders can be used, providing local employment
- Low cost business rates for local businesses.
- Update and extend existing leisure facilities within surrounding available land.
- Encourage part home working / flexible working days based on improved IT connectivity to reduce number of skilled workers commuting outside the borough to work.
- Social, cultural and economic activities too focused on town of TW, denying other settlements of such attractions. This in turn attracts increasing levels of investment and population in the town (TW), with lost opportunities to invest in other settlements such as PW, Cranbrook and other small towns/ villages across the borough.
- Encourage economic growth in villages to provide job opportunities.
• Good but dated Objectives i.e. 1970/80s objectives - think of future lifestyles under influence of new technologies (in hospitals, in work, in homes).
• The historic towns and villages of the area are important on many levels not least the amount of tourism to the area and the support this provides to the local economy.

Sustainability:

• Whilst reference is made to Sustainable Development, the definition in Appendix 3 appears woolly and circular. The word Sustainable appears 40 times and deserves a better explanation.
• Sustainability features a lot in the overall document and in the NPPF but is not discussed as a long-term objective.
• Concern for the long term sustainability of wildlife and the environment.
• Need to lower C02 emissions by building new sustainable and affordable houses near train stations.

Other/general comments:

• Should be aiming to achieve a balance of development and restraint where necessary. People’s needs change and local government needs to be agile and proactive when thinking about the future.
• Should all be aiming to formulate sustainable development for our society, so that agreements with public sector providers and the private sector are looking forward to enhance mental, physical health and wellbeing for our borough. Encouraging that TW borough is working closely with number of local town/parish councils, to support local needs e.g. Neighbourhood Centre in High Brooms and Southborough.
• Key objective should be to value and maintain things that make this area a special place to live, whilst providing work and tourism opportunities to keep it vibrant, and providing the needs for housing that are required.
• Proposal to revise/ remove LBDs as part of a wider overview of growth strategy is welcomed – hoped it will open up opportunity for credible sites that have previously been overlooked to be allocated for residential use with a robust methodology to underpin the allocation process.
• Overall, should aim to ensure that the quality of life for all residents whether in the home, at school, at work, or at leisure in 2033 is better than today.
• Should be aiming and aspiring to make own decisions on development and not be dictated by central government. Whole process is far too complicated and interlocked with too many strategies, guidance, plans, frameworks, assessments, reviews, etc. - little wonder few ordinary people respond to ‘consultations’ like this when in reality it is ‘going through the motions’ with the outcome ultimately decided by a single unelected government planning inspector.
• Undertake better communication with the local residents – overcome ‘them and us’ mentality by actively listening to residents and consulting in a more engaged fashion.
• Stick to your original local plans, rather than changing or revising these (upwards) – if plan has to change, why can’t they be revised downwards in certain areas where large development has already been approved. Current approach creates difficulties and cynicism amongst existing residents - creates a sense that you couldn’t care less.
Objectives

Introduction

This section relates to the eight draft Strategic Objectives needed to realise the Vision, which are (i) Meeting development needs, (ii) Protecting and enhancing the borough’s distinctive environment, (iii) Delivering sufficient infrastructure, (iv) Providing high quality housing, (v) Making provision for economic growth, (vi) Ensuring adequate leisure and recreational facilities, (vi) Delivering sustainable development and (viii) Delivering adequate transport and parking capacity. The following three questions were asked in relation to these draft Objectives:

Question 4: Do you think these are the right Objectives?

Summary of Responses

162 responses were received to this question. 95 respondents (about 59%) disagreed with the draft Vision, 62 respondents (about 38%) agreed; while a further 5 respondents (about 3%) did not indicate a view. Overall, of those who expressed an opinion, the majority of about 60% disagreed with the Vision, while about 40% agreed.

Question 4a: If you answered No, please explain why you don’t think these are the right Objectives.

Summary of Responses

106 responses were received to this question.

Summary of Specific Issues/Concerns:

Infrastructure/Utilities:

- Whilst the Objectives are reasonable cannot plan for building without first looking at the infrastructure of the borough, particularly in the more built up areas. This should be listed first in the Objectives list.
- Plan needs to first consider how to solve the infrastructure problems of today if it is ever going to cope with the future.
- Internet connectivity is poor in many areas.
- Outer lying areas can have sewage and water supply issues, cycle paths don’t link up effectively. Also, rural services for health provision (difficulty registering at a doctor’s surgery), needs of the elderly and public transport need reviewing.
- New development should only be permitted where adequate schools, health care, drainage, public transport and other infrastructure especially roads and parking can be reliably provided without affecting AONB.
- Delivering sufficient infrastructure: Local Plan proposes a significant increase in level of development in the borough. The word “sufficient” in this objective suggests a minimum or average level. The Local Plan should ensure infrastructure to support new development can be provided to a very high standard.
Objective 3: should mention water and sewage infrastructure, energy provision, health, social care and education and provision of superfast broadband to rural areas.

Housing numbers/need:

- Seems to be conflict between Vision and para. 5.7 where there is a commitment to deliver significantly more new homes than planned for in previous Local Plans - no indication of where land for these houses will come from. This needs more attention.
- Objective 2 fails to consider the role of appropriate mitigation in protecting and enhancing the environment. In ensuring the Council makes "every effort" to meet its housing needs, the inclusion of mitigation within the strategic objective text would enable the Local Plan to achieve the NPPF sustainable objectives.
- No local needs for housing were identified in the survey for the Goudhurst area - so focus development where there is a proven need.
- More emphasis should be placed on protecting our villages and slowing their relentless growth.
- How will the plan ensure that housing provision is affordable particularly to the young so they can stay? It is clear that there is a need in RTW for new housing, but also clear that affordable housing and the desire for quality, expensive and desirable accommodation is quite different and impossible for many. Deliverable land has to be appropriate and meet the needs of different age groups within the Local Plan.
- We need housing to genuinely meet local needs.
- The information provided does not seem to prove the case that there is a local need to build number of houses required by local population. Council should be strong in representations back to Central Government that they need to resolve the growing issue of Central London becoming a ghost City with thousands of empty properties lining the Thames. Forcing landlords to release this unused housing stock onto the rental market is key to any future South East housing strategy.
- One respondent makes detailed reference to the SHMA and various figures and tables within it and that it makes clear that the SHMA does not set the housing target. Overall, suggested that the population and property growth projections included in the SHMA are too high for TW, and that they are out of alignment with the projections used by the water authorities at least, if not the power supply authorities. The SHMA figures are meant to be an estimate and not a target, and therefore the consultation should include consideration from parish councils as to the acceptability of this figure so that a reasonable target can be agreed upon, in a justifiable manner.
- Objectives talk in generalities without an overriding vision of how such a number might be achieved. In the urban setting investment in jobs and infrastructure can be incremental as distances between facilities are relatively low and a major investment in for example a new or significantly expanded primary school (to provide another year group) benefits a broad catchment area. Outside of the major towns incremental investment does not deliver the same benefit. Schools, medical facilities, roads, parking etc. are generally constrained on sites and building new facilities is not practical for the given catchment area.
- Cannot simply extend an urban development philosophy to encompass the villages and smaller communities. It is irrational to extend the urban growth figure to the rest of the borough which has not benefited from past investment and, other than as a place to put new houses, will not benefit from future investment.
- The long-term vision is defined but there is nothing in the vision about managing the impact of future growth on differing communities. Accommodating growth based simply on numbers could easily create dormitory towns with residents commuting to the borough’s
economic centres and London. Given a large part of housing need is estimated to come from migration then it is important that the infrastructure (roads, rail) forms a keystone of any future plan.

- Sustainability features a lot in the overall document and NPPF but is not discussed as a long-term objective. 2033 is simply a milestone and not an end-goal and growth will continue. If the current target is barely achievable then any further growth beyond 2033 can only be achieved by removing all LBDs and dismantling the AONB and Green Belt protections.
- If the growth is not sustainable beyond 2033 then the target figure needs to be adjusted to reflect a number that can be assimilated into the borough without wholesale removal of constraints.
- Objective 4: should refer to an appropriate mix of sizes, types and tenures to meet housing need. It should refer to ‘sustainable locations’.
- There is nothing in the objectives about creating social cohesion or balanced communities. The objectives discuss a housing mix but this is again from the perspective of existing major urban settlements. Delivering a mix of housing to promote social cohesion is a different problem in the villages.

Cross-boundary emphasis:

- Overall objective to support sustainable growth and development is positive and recognises the way NPPF is directing authorities. However, enhancements to the A21, the high level of housing delivery required and lack of consideration of unmet need from an adjoining district indicates that Objectives need to be amended to recognise this and make a bold statement which goes beyond just referencing the borough’s needs.

Environment:

- Protect environment by choosing brown field sites and inefficiently used space instead of green belt/green field sites.
- Objective 1: Should refer to meeting realistic development needs and make reference to maximising use of appropriate brownfield opportunities in a manner consistent with NPPF.
- Objective 2: Too general to be meaningful. Natural and built environment should not be conflated, and separate Objectives on climate change and preservation of quantity and quality of natural resources (such as water and soils) is essential. Currently, the natural, built and historic environment reference does not adequately recognise the environmental challenges faced by the borough.
- Need to add views (visual) from and to villages.
- The distinctive environment is as now - massive development will destroy it.
- Protecting the natural environment should be a far higher priority. Focus of new housing should be that it is environmentally sustainable, creative, innovative; not current new housing of appalling quality, monotony and resulting in urban sprawl.
- New housing estates in an old village never have/will fit in - modern and sprawling, single style of housing which overshadows original character of village and monotonous road layouts. Local Plan needs to offer other methods of housing development and not rely on large scale developers to build modern, generic estates.
- Objectives do not take account of effect of erosion of historical landscapes of individual sites involved or the long term effect on AONB.
- Objectives 1 and 2 are largely contradictory - can’t do both. New development is never going to protect/enhance both the natural, built/historic environment.
• Stronger emphasis required on need to protect rural environment - one of the borough’s greatest assets. Should also be greater emphasis on quality and type of housing - we do not want our countryside covered in estates of "executive" homes that do nothing to solve the housing shortage.

• Difficult to see how transport/infrastructure can be improved/extended without a major adverse impact on the nature of the borough.

• Place particular emphasis on Objective 2 with regard to countryside - should have a clear commitment to respect, protect and maintain the AONB status of 70% of the borough (vitaly important if a new Garden Village).

• Objective 2 does not reflect need to protect and enhance the distinctive character of individual settlements - particularly important given five proposed Options for Growth. Objectives should make clear that new development should also seek to protect/ be sympathetic to the distinctive character of existing settlements when considered individually and cumulatively with other development in such settlements.

• More needs to be done to protect the village residents and businesses. Additional housing needs to be culturally compatible and not impact existing village culture. Large housing developments should not be considered in the villages. Residents choose to live in a village and not an extension of a town culture.

• To provide high quality housing: The Objective to meet local needs is positive. Neighbourhood Plans contain a lot of information about suggested architectural standards and build quality and any development should have close regard to the guidance contained in Neighbourhood Plans.

• Delivering sustainable development: the Local Plan should “Ensure there are no negative economic, social or environmental impacts.....” The wording of this Objective is not strong enough to properly protect the special environment of the borough as a special place to live.

• In respect of Hawkhurst- the Golf Course is to be dug up for 500 new houses. How does this help meet the Objective? Particularly concerned about loss of wildlife as there is a tremendous diversity of birds in this area.

• Special care needs to be considered with so many developments on green sites that would normally protect existing towns from flooding.

AONB/Green Belt:

• 70% of the land is classified as AONB. Given this special status and need to protect it, there should be a specific Objective of protecting the landscape value of the AONB.

• The majority of Objectives would be difficult to deploy within the existing TW boundary, especially when directly impacting Green Belt and AONB.

• Any development should continue to support both village life and the AONB.

• NPPF states that AONB has same high status of protection as National Parks (largely been sacrosanct as far as housing development concerned). Are we now to build all over the AONB and destroy a beautiful and unique landscape?

Transport/congestion:

• Residents spend large amount of time sitting in traffic queues. The town was not built for the number of vehicles we already have.

• Traffic congestion in and around TW already a huge problem. If to be another 12,960 houses built, likely to increase car usage by at least two per household. How will road infrastructure, parking etc. cope when it is already failing? How will pollution be managed?
• Transport absolutely key - many roads in Southborough and TW, especially A26 and parts of the A264, are already inadequate for volume of traffic that they carry, particularly at busy times of day, and no realistic prospect of improving them. Priority should be not to build in Southborough and TW adding to already overloaded roads.
• The town is suffering badly in terms of transport and parking facilities. The villages often have poor public transport and the parking situation in TW itself is dire. Town centre street parking must be enhanced for short visits along with new long stay parking facilities. Much of existing parking is swallowed up on weekdays by those working in the town.
• Implies more use of cars, yet roads already congested and rail services already under threat of reduction and station car parks are full. Pointless providing better transport if need to get to a train station but not enough parking and trains only every hour. No analysis has been done of lifestyle - rail services are being reduced but the nature of modern lifestyle means many will still travel to London to work. Transport suggested does not run in parallel to SE trains and plans to reduce services.
• Infrastructure in Hawkhurst is terrible - current traffic and speed problems. High Street and Moor Hill will only be more congested with new development. Existing roads should follow Kent Design Guide (witnessed accidents and disabled people and the youth not having enough space on Moor Hill/Highgate Hill as pavement too narrow). Crossroads in centre of village also a major problem and Kent Highways have never come up with any feasible solution.
• The Local Plan proposes a significant increase in development. Villages are particularly dependent on car transport and without implementation of a high quality public transport system there is a strong likelihood of congestion, damage to air quality and increased local accidents.
• An additional Objective should relate to reduction in impact of traffic on residents of rural areas – speed and frequency of cars and lorries.
• Objectives do not take into account known accident black spots, the lack of adequate access to proposed sites nor the effect on traffic in providing an analysis and solutions where there are already issues.
• Objective 8: This Objective focuses on “adequate” transport and parking capacity - surely should be for good transport and parking facilities, adaptable to technological change. Should also refer to congestion and related air pollution and extend Objective to include resolution of these issues, encouraging people to use more sustainable modes of transport.

Economic/technological issues:

• Sustainable economic prosperity is important. Retail growth in terms of more retail outlets unnecessary in digital age, especially if simply attracting big brand names to the town. Any retail growth should be focused on independents and be within town and villages, not out of town locations.
• For a 15 year plan, adequate leisure and recreational facilities is far from challenging - should be of excellent quality, as befits the town.
• Objectives do not take account of existing residents and businesses.
• Economic growth potential may be limited by external factors (national economic downturn).
• Objective 1 assumes development land must be provided. This is flawed in an already congested area. Many existing properties are under utilised or dormant, especially high streets and industrial estates.
• Objectives assume certain levels of employment and retail growth which are likely overstated - whilst employment growth is to be encouraged, sectors that are well represented in TW are those most likely to be hit by Brexit so cannot be taken for granted.
• Retail in TW is currently shrinking significantly – as can be evidenced from the number of empty units in RVP. Wage growth is lagging behind inflation; people have less money to spend. The continued growth in on-line retail is also impacting local shops.
• Must include needs and space requirements for agriculture and farming and growing own food.

Sustainability:

• Not enough emphasis on sustainability or environmental protection and developments allowed under previous plan not of high quality despite same kind of Objectives being used in past.
• "Sustainability" is almost impossible to define.
• Further emphasis should be placed on need to mitigate and adapt to climate change including moving to a low carbon economy.
• The recommendations of paragraph 5.1.2 of the Sustainability Appraisal should be incorporated into the Objectives.
• Objective 7 unnecessary and repetitive - could be replaced with an objective on sustainable living and energy use.

Other/general comments:

• Growth pattern over next decades not a smooth curve, but a series of steps at which further investment is required. If no mention of investment in order to realise this growth, then little hope of obtaining it. Obtaining investment from central government is crucial.
• Rather than focus Plan on development and housing, focus sustainable quality of life and set of aligned Objectives in terms of the distinctive environment, achieving and maintaining sufficient infrastructure, leisure and recreation facilities, and transport and parking.
• Almost an automatic presumption in favour of growth - should be challenged, as faced with many serious environmental and structural issues and question whether should be pursuing lower impact options, recognising the constraints on water supply and carbon consequences of further extensive development, as well as constraints of funding on acceptable/timely infrastructure. Also, given impact of Brexit on UK economy and rapid advancement of e-technology, many of assumptions in Plan regarding modes of work (office space) and retail behaviour (floor space) already appear antiquated.
• Wild assumption, based on false premises, regarding preferred housing and other land use development. 'Call for sites' places too much weight on profit motivation of private landholders (land banks, subsidised farmers etc.) who see Plan - and government limitations on challenge - as an opportunity to 'cash-in' on otherwise low-value assets, irrespective of true costs/ benefits to wider community.
• Objectives 3, 7 and 8 should be included in Vision.
• Difficult to support or object to such ambivalent objectives written in typical ‘planning speak’.
• Suggest minor modification to ensure Plan is positively prepared and fully aligned with provisions of NPPF. Specifically, Objective one should provide more certainty that the full ‘objectively assessed’ housing need will be met.
• No mention of needs/aspirations of existing residents. Should not disrupt/deteriorate people’s lives and livelihoods.
• Objectives are incompatible with realities and constraints that are TW.
• Objectives not particularly specific to TW and could apply to almost anywhere.
• Objectives are vague and lack specific detail.
• Objectives attempt to cover matters listed in para.7 of NPPF- economic, social and environmental roles. However, insufficient focus placed on need to support a community's health, social and cultural well-being.
• Objectives contradictory when you include Objective 7 on sustainability i.e. strategy to build required housing numbers and then mess about with a bit of tree planting or hedgehog preservation to tick sustainability box. This type of strategy will not sustain life in medium to long term and will result in severe environmental impacts.
• Delete Objective 4 and prioritise 2 and 3. Future threats to this county will be diffused and so resources, population and economic activities need to be spread out and not concentrated in the South East. Threats such as fuel blockades, pandemics, cyber attacks and Brexit all suggest that vibrant regional economies with good housing are what is needed, not putting all effort into South East and leaving other regions to wither.
• Strategic Objectives/Options for Growth should necessitate preparation of, and consultation on, a revised Issues and Options document in due course, as opposed to progressing to next stage of plan preparation. Clarification sought on this.
• Key studies should have been subject of review and presentation within Issues and Options report to inform Options for Growth being presented – e.g. SFRA will ‘sift out’ areas for residential use because of flood risk issues; the Green Belt study that is timetabled to be released in summer 2017 (vast swathes of Green Belt and ancient woodland correspond to area of study for Growth Option 4). Reader should have opportunity to cross-refer to a robust evidence base to inform their response to the Growth Options. As the evidence base remains under development, with key pieces of information not available for the Issues and Options consultation, there is a clear disconnect.

Suggested amendments to wording:

• Wording requires strengthening to avoid loop hole and misinterpretation. Suggest on point 2- the word seek is substituted with Must.
• Objective number 2 should be as follows:- The borough’s distinctive environment: all new development is minimised, will protect and enhance both the natural, built and historic environment to ensure that its special character (both rural and town) is maintained.
• Wording in Objectives very open to interpretation - “seek, sufficient and adequate” are not good enough. The language needs to be specific and clear.
• Poorly drafted. Really only three Objectives: - protecting the Borough’s environment, meeting development needs, and delivering sufficient infrastructure (other five listed are all merely aspects of these three). Strategic objectives in Ashford BC’s draft local plan are rather well drafted and would recommend this wording on some aspects of TW Objectives. With this in mind, recommend that the Objectives be redrafted as follows (once decisions have been made as to how best to provide for new development and infrastructure, the Objectives could also be reworked for the draft Local Plan to make them more locally relevant):

“1. Protecting the Borough’s Environment: - To conserve and enhance the natural, built and historic environment, recognizing that these are of exceptionally high quality throughout much of the borough; to conserve and enhance biodiversity; to plan for climate change, ensure resilience of new and existing development, reduce vulnerability to flooding and keep water consumption within local carrying capacity limits; to reduce light, noise, water and air pollution, preserving dark skies and tranquillity in the parts of the borough where they currently exist; to provide, protect and enhance
an extensive green infrastructure that links urban green spaces to the wider countryside, providing connected wildlife habitats, spaces for quiet recreation and safe routes for walking and cycling; to promote sustainable living and energy use; to create the highest quality design which is sustainable, accessible, safe, promotes a positive sense of place and which is in keeping with the prevailing character of the area.

2. Meeting Development Needs:- To provide sufficient developable and deliverable land, in accordance with the requirements of the National Planning Policy Framework, to provide for a mix of uses in order to meet the borough’s realistic development requirements to 2033; to focus development at accessible and sustainable locations, prioritising and making best use of brownfield opportunities; to meet the Borough’s realistic housing requirements, with high quality housing in sustainable locations providing an appropriate mix of sizes, types and tenures to meet local housing need; to deliver the Local Plan’s economic requirements in relation to employment and retail growth in order to deliver jobs and long term economic prosperity; to ensure the retention of best and most versatile agricultural land and to accommodate development necessary for local food production, in order to promote resilience in food supply while protecting the landscape.

3. Delivering sufficient infrastructure:- To ensure the provision of sufficient infrastructure to support existing development and the delivery of new development; to ensure the prompt delivery of water and sewerage infrastructure, energy provision, health, social care and education; to ensure the delivery of superfast broadband and good mobile telephone coverage including throughout the rural areas; to deliver good transport and parking facilities, which will reduce congestion and be adaptable to technological change, in order to fulfil the transport needs of the borough and its residents and businesses, and to provide easy access to services and facilities; to promote access to a wide choice of easy to use forms of sustainable transport, including bus, train, cycling and walking to encourage as much non-car based travel as possible and to promote healthier lifestyles; to ensure the provision of high quality sports, recreation, community and cultural facilities that are accessible to all the borough’s residents.”

- Boroughs distinctive environment: Objective is not worded strongly enough and needs to state clearly that “all new development will protect and enhance both natural, built and historic....”
- Objective 2: omit the words “protect and enhance”, which is overly restrictive. Wording should be replaced with phrasing that aligns with the wording within paragraph 4.6 in the Natural Environment section. Use of words “...in facilitating development, proposals take full account of and reflect each site’s .... environmental sensitivities.” This approach would respond to acknowledged need to protect countryside, whilst enabling some growth to come forward on suitable sites on edges of town that benefit from sustainable advantage.

Question 5: Are there any amendments required or other Objectives that you think should be included?

Summary of Responses

127 responses were received to this question.
Summary of Specific Issues/Concerns:

Infrastructure/Utilities:

- Objectives should include aim to improve present inadequate infrastructure for the existing population (especially in the more built up areas) and detailed requirements for new growth. Should be listed first in the Objectives.
- Query on use of word "ensure" with regard to infrastructure etc. What is sufficient? Inadequate infrastructure at present ... how will this be funded? Will this be tackled before development?
- Rural services already being compromised and suffering, e.g. Hawkhurst - traffic unbearable, infrastructure certainly not being improved, huge waiting lists at doctors surgeries and school won’t cope with any more new families.
- Allow new development only where adequate schools, health care, drainage, public transport and other infrastructure can be reliably provided.
- Current residential areas of TW, Southborough and surrounding villages all at breaking point causing problems with parking, traffic congestion, dangerous levels of air pollution, oversubscribed schools, medical centres and other facilities.
- Power: is there sufficient electric production to serve both residents and new industry required for employment?
- Water: Currently under stress (frequent hosepipe bans).
- Waste: Availability of additional capacity in landfill sites.
- Water runoff due to destruction of natural drainage.
- Medical facilities: Insufficient supply of hospital facilities, extended waiting lists, shortage of doctors. Was new Pembury hospital sized to deal with the increase in head count?
- Education: currently no places at schools - very small catchment areas for good schools.
- Recognise ageing population and need for accessible bus services and walkable facilities e.g. Sandhurst Road, Birken Rd/Liptraps are often at gridlock at busy times and very dangerous to cross when the traffic is moving - often had to help seniors to cross.

Housing numbers/need:

- Must be very sure there is a local development need and not just a Government target to meet.
- Discrepancy in stated amount of housing likely to be built.
- Unrealistic housing targets should be dropped by Council and a quantifiable and realistic housing target specified.
- Housing Options flowing from flawed SHMA proposal is largely build ourselves out of a recession so let’s build anywhere - rather than housing or business need generated.
- Limit amount of housing to specifically meet genuine local needs, and which can be absorbed into local scene without detracting from character of this very special place.
- Section 2.13 states need for 12960 homes over next 20 years, Page 21 of adopted Site Allocations Local Plan 2016, total development per settlement taking updated information into account 2006-2026, is 6000? How can it be predicted in less than a year, more than double the amount of homes need to be built in the next 20 years?
- Concept of future sustainability v supporting growth is in opposition. Continued increasing growth not possible without removing significant number of policy based and broader environmental constraints. Critical mass is within urban areas and growth based on number identified does not take into account town and country divisions in the borough. Any new development of housing needs to be matched by the creation of jobs in the borough.
Another objective should relate to balance of growth and development across the borough. Objectives seem to maintain status quo, without looking at how the many rural communities in the borough will be sustained economically over next 15 years. If villages do not have/achieve sufficient economic independence from TW and London there is a real risk they will lose their ability to sustain a local community. Without this there will be a continued influx of people moving to central TW area where there are established schools, employment etc. - could mean continued increase in house prices thereby continuing to cater for those migrating from London rather than families already here.

Ensure housing development that increases real affordable housing for local citizens, especially key service workers, first time buyers and the elderly. In addition build council housing. Set specific targets for these provisions

If a need for more housing, emphasis needs to be on low cost housing to purchase and rent. Left to building industry, emphasis will be on large, luxury housing as most profitable for them. Whole Plan is therefore not “joined up” or based on what is needed or sustainable.

Housing focus or mix should predominantly focus on 2/3 bedroom properties aimed at new and growing families, whilst keeping to the style of the local area. The dominance of new builds is either small 2 bedroom flats or large 4/5 bedroom houses, which generate more income for the developer per square metre.

Cross-boundary emphasis:

Objective 1 needs to be expanded to address development needs of cross boundary districts where appropriate (e.g. unmet need from Wealden DC).

Work with neighbouring boroughs as better development options exist within the local area, either in brownfield sites or areas with less congestion.

Encourage/improve integrated bus and rail services working with Maidstone BC to support and enhance rail services to Headcorn, Staplehurst and Marden – all heavily used by TWBC residents - as well as the stations in TWBC itself.

Objective 8 should think beyond needs of the borough. A21 serves a number of authority areas including Hastings and Rother District and requires consideration of more than borough wide needs.

Environment:

Should be a commitment to development housing only on brownfield sites and respect other designations such as Green Belt - this should be an Objective.

Include protection of beauty and character of rural villages - if more houses built will increase amount of air pollution in travel, especially as train service is about to be cut.

Priority must be given to protecting the land and heritage.

Set targets for areas of open space e.g. fields, woodland and amenity space available for citizens within walking distance of all local housing. Protect this space.

Preserve character and integrity of individual communities within the borough.

Look at rural lifestyles, businesses and communities. Only consider development which would not require massive building of roads and infrastructure. Planning should be restricted to urban fringe only and reject any quota that cannot be accommodated within that zone.

To be able to pass on borough’s rich built and natural heritage for benefit of future generations.

Ensure design of new development really does respect context and reflects local distinctiveness, and if necessary adopt a historical style, rather than a modernist idiom.
- Protect environment and assist existing local community with improvements that are identified - broadband, mending potholes roads, ensuring there is an accessible post office/bank.
- Need to analyse and completely understand effect on erosion of historical landscapes of individual sites involved.
- Objective 2 – Proposals for development both in Green Belt and part of AONB absolutely contradict this Objective and such sites should be discounted on basis they would destroy borough’s natural environment and potentially lead to a reduction in tourism generated income.
- Concerns Objectives 2 and 3 will not be carefully considered whilst trying to meet main development targets of Objective 1. Most villages (such as Hawkhurst) are slowly being paved over with uninspiring cheap mass builds just to meet corporate targets.
- Protect a sensitive environment by not encroaching on/penetrating its lifestyle with excessive developments, not wanted by communities.
- No analysis done on users’ lifestyle – those that live in countryside areas do by choice and do not wish to be part of a built up development.
- Protection of the environment should be a stand alone Objective without reference to development.
- Danger to ancient woodlands due to removal of underground drainage as a water supply.
- Additional Objective to enhance recreational areas (including woodlands, rural footpaths and amenities) - adjacent to communities and villages both for local resident use and use by wider community and tourism. Historic woodland, in particular, should be afforded special protection.
- Building should be in keeping with area, so character of rural areas and villages not destroyed (including minor roads) and housing should be affordable.
- Retain existing compact nature of Southborough.
- High density housing in villages is not appropriate and will destroy the feeling of the Weald.
- Live CCTV must be maintained to keep a safe environment.
- Noise levels from festivals and outdoor events must be monitored.

**AONB/Green Belt:**

- Protection of Green Belt and AONB paramount - the green areas make this such a special area and cannot be replaced.
- Need to analyse long term effect on High Weald AONB and individual sites within those areas.
- 70% of the borough is AONB - this special status and need to protect it should be uppermost and mentioned as one of the Objectives.
- Maintain the Green Belt area between Southborough and Tonbridge so two towns remain distinct.
- In meeting development needs, consideration should be given to release of Green Belt land for development of suitable sites that offer opportunities to accommodate development without significantly compromising purposes of Green Belt.
- Should be noted at para. 3.8 of the document that NPPF specifically misapplies the presumption of sustainable development in respect of development within the AONB (NPPF paragraph 14 and footnote 9).
Transport/congestion:

- Road infrastructure - congestion in TW, A21, A26 - need to be addressed before any additional load is placed on region.
- Current areas around Southborough and TW already so congested - consider rerouting through traffic away from A26, reducing pollution and improving access to schools and doctors.
- Encourage use of public transport - promote RTW as a bus node, serving rest of borough and further links to Brighton, Eastbourne and elsewhere.
- Encourage adequate linkage between town centre shopping area and North Farm retail park and a parking policy to support TW as a vibrant shopping centre.
- Improve public transport to outlying villages and set a target that all settlement centres have access to a bus service.
- Delivering adequate transport should be a priority (Objective 1) as all other Objectives cannot be achieved without access. Good quality transport systems attract other development and other market led development will follow to meet the other Objectives.
- Invest in environmentally clean transport services. The current services are a disgrace and lead the pollution scales on our local roads
- Rail infrastructure - major routes to London already at capacity. No consideration given to SE trains at maximum running capability and Southern trains which are mostly cancelled or on strike.
- Reduce reliance on car - clean buses, better timetables, lower fares, proper cycle paths and heavily incentivising people to get out of their cars for journeys of 5 miles or less. If Winchester and Cambridge can do it, then TW has no excuse.
- Need to take into account known accident black spots, lack of adequate access to proposed sites, effect on traffic in providing analysis and solutions where already issues.
- ‘Park and Ride’ Scheme for TW will take pressure off busy roads and reduced need for multi-storey car parks.
- Town centre car parking very expensive as is bus travel. Can be difficult to access the centre. Would be sad to see TW become a dormitory town.

Economic/leisure/technological issues:

- Seek a balance between any population growth and the provision of local employment opportunities, so TW does not become a dormitory suburb.
- Manage town and borough’s primary/secondary retail services, particularly in light of on-line shopping, with a view to maintaining RTW’s role as a particularly attractive, distinctive and varied regional shopping centre, and seek adequate retail provision for more rural areas of borough.
- Attract visitors/tourists to the town and establish it as a tourist centre for West Kent/ East Sussex - should maintain town’s character by not making it too big.
- Plan talks about 10,000 new jobs – however, noting our history in insurance and finance just as the latter is in danger of migrating out of UK as a result of Brexit. Also, traditional employers in TWBC area have been relocating their businesses, digitising them or outsourcing, all of which has led to a reduction in jobs.
- Promote TW as a tourist destination and cultural centre, with places of entertainment, open spaces, recreational facilities, and other attractions for the benefit of visitors and residents alike.
- Objective 5 should acknowledge the wider role of Tunbridge Wells in the sub-region.
- Where are the commerce and industry that will provide employment for residents of the additional housing?
• Give greater prominence to agriculture in the Objectives.
• Potential 'industrial and commercial' development along A21 corridor is at first glance naïve as there is only road access to this area and not sustainable when national policy is to encourage use of public transport and reduce use of the car.
• Respond to changing nature of society: encourage use of new technologies, providing services to respond to changing needs such as remote working hubs and allowing entrepreneurial communities to come together, high speed broadband, encouraging and supporting new technology businesses to start up in the region.
• Sport - Ensuring leisure and sporting facilities can adequately provide many different skills and opportunities. Access to green spaces and countryside (walking/cycling) encourages healthy living. Need playing fields, especially for younger footballers unable to use community facilities close to crematorium area when field is waterlogged/not drained properly. Also better ground maintenance needed at County Cricket Club (Neville Park).
• Develop better IT infrastructure that enables new sustainable ways of working within borough but with high economic potential for a global presence.
• Demand for business premises needs to be monitored and managed to ensure that i. new sites meet the need of a changing business community and ii. new development is not at expense of existing centres e.g. out-of-town retail putting pressure on high street.
• TW is a special place and the centre needs to be carefully managed to ensure it remains so for the broader community and continues to provide a cultural and retail heart of the borough.
• Stop converting current office and light industrial parks to residential development.
• Concern about number of shops going out of business in Cranbrook and Goudhurst.

Sustainability:

• Objectives should include climate change issues.
• Include specific objective to lower pollution and improve air quality (the word 'pollution' only appears twice in context of noise pollution, and air quality only 4 times).
• Objective 8 should make reference to need to minimise impact on residents of air and noise pollution (major issue affecting North Southborough Ward - poor air quality due to traffic volumes and increased noise due to Gatwick flight paths).
• Start point should focus on sustainability and quality of life and full assessment of risks of development to overall carbon footprint is essential - notion, therefore, of developing housing in a largely rural borough remote from the prime SE employment hub (London) should be firmly challenged. If accept need to expand housing stock, then a negative response from TWBC and a firm commitment to the development of housing in London city-centre/fringe brown/green field sites (including the so-called 'green belt') would provide a much more sustainable and low-carbon option.
• Drastically improve air quality on all roads, at present contributing to a national crisis of over 40,000 premature deaths per year in UK. Will involve allocating space for local employment, local retail/services (not out of town) and infrastructure.
• Emphasise local aspect of sustainability in TW- where any new development to meet present needs must not compromise ability of future generations (residents and tourists) to meet their own needs with the key being the continuous enjoyment of rich heritage of historic town and surrounding countryside.
• Take “sustainability” seriously, - access to bus service does not mean people in new developments will cease to use private cars. Suggestions for doing so:- better support for small rural shops; encourage parents to send children to local schools; insist on solar panels on roofs of new buildings (unless strong aesthetic objections); better use of technology to reduce travel.
Other/general comments:

- Evidence base that sits behind/will underpin the Objectives should have been further developed to inform the Issues and Options document.
- Whole Plan does not make sense, is not “joined up” - not what is needed or sustainable.
- Primary Objective should be to make this area one of very best locations in the UK.
- Objectives do not show if new development will raise or lower existing house prices.
- Retain all public assets.
- Little mention of how TWBC is going to "ensure" or deliver" most of these objectives. No mention of funding.
- Language should be carefully overhauled to ensure not subject to gross misinterpretation allowing endless debate on whether a submission complies or not. i.e. the word seek is too wishy washy in any context. Words such as must and comply should be used.
- Seek public ownership of the Commons.
- The two Calls for Sites at such an early stage in the consideration of the Plan make it clear that the availability of land and plots with owners actively seeking involvement and profit will carry weight in decisions taken. It seems that this may temper the importance of the Draft Strategic Objectives, and this should be acknowledged.
- Have too many Objectives and will fail at most. Keep it simple.
- Focus should be on what is needed to satisfy the future lifestyle/demands of the existing residents. No mention of the needs and aspirations of local people.
- Need to be clear about the hierarchy of Objectives. The proposed plan has been driven by housing numbers which may be flawed and make no distinction between urban and rural need. Everything else appears to be secondary – and the sustainability related issues including transport and parking are way down at the bottom of the list. In reality these are absolutely key to achieving the best outcome for all residents so should be the starting point for building a plan.

Suggested amendments to wording:

Be more definitive in the wording, i.e. use ‘...will protect..’ not ‘...seek to protect...’, ‘Provide leisure and ......’ rather than ‘Ensure adequate leisure..’ etc.

Section 4 – Key Issues and Challenges

Introduction

This section identifies the key issues that the Local Plan will need to consider and address when putting forward a strategy and policies for delivery of growth. These key issues are:- (i) Natural and Built Environment, (ii) Infrastructure, (iii) Housing, (iv) Economy, (v) Transport and Parking, (vi) Leisure and Recreation and (vii) Sustainability. Two questions were asked relating to each issue, as follows:
(i)  **Natural and Built Environment**

**Question 6a: Have we identified the main environmental issues facing the borough?**

**Summary of Responses**

157 responses were received to this question. 96 respondents (about 61%) disagreed that the main environmental issues facing the borough have been identified, 52 respondents (about 33%) agreed, while 9 respondents (about 6%) did not express an opinion either way. Of those who expressed an opinion, the majority of about 65% disagreed, while about 35% agreed.

**Question 6b: If No, what environmental issues do you think are missing?**

**Summary of Responses**

107 responses were received to this question.

**Summary of Specific/Missing Issues:**

**Infrastructure/Utilities:**

- Sustaining the infrastructure.
- Infrastructure and natural resources have been largely ignored when considering rural TW.
- Issues are correct but what is missing is the provision of water for many more people if a number of housing developments go ahead.
- Plan talks of flooding but not provision.
- With reference to para 4.54, borough is within an area of serious water stress. How will situation be improved by 'ways of reducing consumption' when addition of 13,000 households will require an additional 1,430,000,000 litres of water per annum over and above the current consumption?
- Need to take account of total infrastructure capacity of an area - transport, electronic communications, water effluent and drainage, school availability, shopping, car parking. How much can those services support any development without serious damage to the wider environment and ensure these facilities are adequate/in place from the outset?

**Housing numbers/needs:**

- Issues are correct however, flawed as disconnected from reality of housing build numbers, selected location options and constraints of TW geography, AONB etc.
- If need for village based housing (as opposed to urban) can be demonstrated then should consider building one or more new high quality villages (option 5) in most sustainable locations, rather than destroying ones already have.
- Para 4.8 indicates Council’s preference is for larger developments rather than dispersed development on smaller plots. Very worrying as the term “Garden village” recently suggests large scale developments of 5000-10000 house estates - not a village, but a small town that would need large infrastructure to support new residents. The indisputable detrimental impact to the environment of the “Garden Village” approach should be clearly highlighted in this section of the document.
Cross-boundary emphasis:

- Fails to reference moratorium imposed by Wealden DC in April 2017 on any new development that could generate additional traffic in the Ashdown Forest Special Area of Conservation (SAC). This is a significant position statement reached by Wealden District that should influence the growth strategy of TWBC at the earliest possible opportunity in the plan preparation cycle. However, only comment is under section 5.1- refers to ensuring adequate mitigation for the Ashdown Forest. TWBC’s options for growth should pick up and respond to moratorium imposed by Wealden DC.
- TWBC Interim TWBC Habitats Regulations Assessment indicates how impact of growth across TW borough could impact upon Ashdown Forest - Section 3.2 clarifies that Option 3 represents most positive growth option with least effect on traffic flows past Ashdown Forest. A point that is not ‘fleshed out’ within the body of the Issues and Options document and if not approached correctly by TWBC, could significantly delay progress of new Local Plan.

Environment:

- Sustaining both the exceptional natural and built heritage of the borough should be the Key Objective to which the various others should have due regard.
- Housing numbers proposed under SHMA cannot be accommodated without serious environmental damage - all of the proposed Options/combination of Options will undoubtedly involve building over greenfield sites in the Green Belt, AONB and its setting and/or former Special Landscape Areas.
- Tranquillity and dark skies should be considered in Local Plan (as on the CPRE website).
- Should mention green and recreational spaces within and surrounding villages.
- Entitling a map showing extensive Green Belt and AONB "rural fringe" in an attempt to justify options for development is bordering on insulting.
- Little mention of Green Infrastructure throughout document and role it plays in terms of developing a multifunctional approach to managing our natural environment and delivering benefits.
- With 650 TPOs in a borough of 326 square kilometres, more resource should be provided in TWBC to maintaining/enhancing the tree population - should be a tree planting program introduced - say 10,000 trees in the next 20 years (funded by sponsorship if possible). Resource should be there to check that planning decisions re tree replacements are carried out. With just one tree officer in the Council - indicates how little importance is given to environmental factors within TW.
- Destroying areas of Green Belt, ancient woodland and effect on local ecology must be addressed.
- Important to recognise value that gardens, green spaces and trees/shrubs within them, make to character and appearance of areas. These spaces should be maintained to prevent cramped development and protect the character and appearance of the local area (NPPF para.53 states that LPAs should consider case for setting policies to resist inappropriate development of residential gardens, e.g. where development would cause harm to the local area).
- Core policy 4 of the Core Strategy 2010 specifies - in recent years, cumulative effects of windfall housing developments within large residential gardens, particularly in RTW, have been perceived to pose a threat to residential character. This guidance and policy approach should be extended into the new Local Plan.
In considering impact on urban landscape, account should be taken of reality of low quality developments (ticky-tacky boxes), likely to be foisted on the community by builders who place profit above anything else. Should be built in modern, challenging but sympathetic manner.

Main environmental issues completely ignored in Draft Vision - preserving environment not consistent with proposals presented.

Must preserve our distinct landscape for now and future generations. Building on countryside, irreversible damage to landscape - once built on, gone forever.

Development should be rejected if part of unique fruit belt landscape and/or has distinctive Kent woodland features such as gullies and ghyls.

Ancient Woodland should be preserved and not marred by development - an irreversible loss for future generations.

No weight given to loss of concept and reality of the village – If build in ever increasing onion layers around villages, soon won’t be villages anymore and will have destroyed one of the very things which should be protected.

Focus development on brownfield sites.

Minor issues in some areas which may crucially affect building – e.g. springs which constantly damage roads and local flood points around Frittenden, (have blocked roads, almost cutting off the village from surrounding villages and the main railway line).

Hawkhurst is in the AONB with many important wildlife species which will be severely damaged by this very unsympathetic, non-ecological mass development plan. Smaller housing development is much more sympathetic.

No commitment to protecting heritage of our towns (e.g. demolition of Victorian theatre in Southborough, to be replaced by a plastic 1960’s box).

Need stronger emphasis on preservation of the historic built environment.

No design/architecture guidelines to ensure that any building fits in with the local traditional style.

Should include landscape scale habitat conservation, referring to Biodiversity Opportunity Areas (High Weald and Medway and Low Weald Grassland and Wetland), habitat connectivity, and the contribution this must make to climate change adaptation.

To achieve a net gain in biodiversity, all development sites should make space for nature and habitat connectivity, not just protected sites.

Protection of species of wildlife and biodiversity cannot be achieved through an impact study on each planned build. Nature does not work like that. We need an overall plan for the natural environment in our area.

No measurable wildlife targets for protecting or even increasing our local fauna and flora.

No plan for connecting up corridors of countryside to enable wildlife to survive over this planning period.

Should be a requirement for all developments to have wildlife corridors including hedgehog friendly fences.

Major characteristic of this part of Kent is many major routes run along tops of ridges - makes beauty of the landscape much more obvious and accessible. But this imposes a duty on planning authorities (both TWBC and others) to consider visual impact of development as seen from distant, as well as nearby viewpoints.

Endorsement of Paras 4.3-4.13 which include opportunities for making/improving linkages between different parts of our urban area. Could, however, have a significant overall result on natural and built environment of settlements within High Weald ANOB and RTW itself.

Good to note new Plan will give due regard to need to protect locally important views – no tall buildings.

Supporting documents at end of the environmental section should at least include the RTW and Rusthall Conservation Area Appraisal, alongside the Landscape Character Assessment.
- Listed buildings important to keep historic areas of our town (only tiny mention in the plan).
- Parks and green spaces important.
- Sensitivity of key areas like Calverley Grounds is under-supported - much new development, like proposed new entrance to Calverley Grounds, framed by large angular new buildings is at variance with subtle gentility of current tree-framed entrance. This is just one, although a very significant one, of many examples.
- Light pollution, particularly in rural areas, needs consideration.
- A real consideration of environmental impact is missing - not just effect on landscape (urban and countryside) but of water supply issues and flood risk and carbon footprint impact of development.
- Mention should be made to considering existing housing communities within main urban area (TW/Southborough) and views to possibly having additional housing estates imposed within their area. This allowing developers to make major financial gains and leaving the area over populated and ruining existing environmental qualities.

**AONB/Green Belt:**

- That AONB and Green Belt should be protected and not built on.
- The natural environment of AONB is jewel in the crown of TW. If allowed to degrade due to careless development then that loss can never be made good.
- AONB should be specifically protected as should rural lanes, biodiversity and ancient woodland as well as unique Kent characteristics.
- Importance of Green Belt in retaining separation between built areas.
- Should refer to the AONB Management Plan - key means by which Council can demonstrate decision making has met statutory duty to have regard to ‘purpose of conserving and enhancing the natural beauty’ of the AONB (CROW Act 2000, S85).
- Should consider success of the landscape character approach, and evaluate if restoration of local landscape designations would assist to protect the setting of the AONB.

**Transport/Congestion:**

- Not enough emphasis on sorting out traffic and infrastructure - must be key priority. The rest will then have a framework.
- Need coordinated approach to transport to remove/reduce dependency on motor vehicles or prevent unplanned, random development of another North Farm estate - journeys from shop-to-shop by car because the pedestrian/other mechanisms never considered.
- Need to address air and noise pollution, particularly along A26. Building more houses near existing road infrastructure is going to add to both of these.
- No mention of increased noise, air pollution (especially from diesel engines) or congestion or threat to health. Already long queues of traffic in our towns and villages (traffic management does not function adequately) because large numbers of houses have been built - not sustainable development.
- Concentrating jobs and investment in urban areas has already caused increases in traffic from the villages and beyond and any significant increase in dispersal of housing will only increase these volumes, dependencies on the car and need for parking.
- No Park and Ride schemes and bus services from outlying areas are not real alternatives to the car.
- New housing development should be located near to or with ready access to rail and bus services.
• Mention is made of small-scale developments being easier to accommodate - however, locating high percentage of development in main urban area cannot continue, due to access, pollution, lack of parking and travel restrictions.
• No plan to change the transport infrastructure that is polluting us.
• More cycle ways/links.
• No measurable plan for transport replacement to eliminate harmful emissions from public transport, HGVs and in particular diesel motors from our towns.
• Need to consider impact on road usage through intra-borough travel, increased freight usage, as well as extra-borough impact on increased commuting journeys to London and other urban centres.
• Rural Lanes cannot take any increase in traffic - are already being eroded and hazardous for local population to walk on. An increase in traffic would also lead to erosion of unique character of our rural areas.

**Economic/leisure/technological issues:**

• No mention of sustaining existing communities.
• Reasonable but higher priority for agriculture and allotments and local farming needed.
• Farmers and their families who have provided food faithfully on valuable agricultural land, should not disappear from local areas because other land is demanded.

**Sustainability:**

• No discussion on carbon load from proposed massive increase in house building, required infrastructure and loss of countryside. This should be calculated.
• Air Quality/reduction in air pollutants are critical environmental issues.
• Noise pollution, particularly from Gatwick aircraft flights – recent reports show detrimental impact of noise on health and Local Plan should highlight potential impact of Gatwick expansion/changes to flight paths.
• Any form of noise pollution should be considered.
• Electric cars should be encouraged to counteract air pollution and support renewable energies. TWBC should badge itself as an electric car friendly borough, supported with planning policies that encourage car charging points across the borough.
• Due to existing traffic routes through Southborough, pollution monitors are recording above normal levels. With additional development, will increase - not sustainable.
• No reference to rapidly increasing light pollution -should aim to reduce light pollution, especially in AONB.
• Sustainability should be more prominently placed in the Issues.
• No consideration for climate change and impact it will have on the region – more extreme weather (higher rainfall and temperatures) leading to different disease spectrum.

**Other/general comments:**

• Council’s Landscape Character Assessment sets out basic characteristics of borough’s landscape but fails to assess it’s capacity to deliver housing, especially in sensitive settlements in AONB. A previous detailed landscape capacity report did include such a study but it is not referred to in the supporting documents of this Local Plan -An important component of the SA of the Local Plan evidence base and should be referred to or updated.
• Assumed people with sufficient expertise have been employed to identify all environmental issues affecting the borough.
• Environmental Issues have mostly been identified but are at odds with/ignored in development Options.
• Knowledge of this new Local Plan is not being widely broadcast to existing residents and needs more than four exhibitions for future releases.
• Value of agricultural land should be a key theme of the natural environment or economy themes. Swale BC study titled: Value of Best and Most Versatile Agricultural Land in Swale. Recommended TWBC do the same, extending the work already done in its 2014 study for sites in the Site Allocations DPD to the remainder of the borough.
• The Green Infrastructure SPD, Kent Habitat Survey, Kent BOA’s, High Weald AONB Management Plan and Historic Environment Record should all be referred to.

(ii) Infrastructure

Question 6c: Have we identified the main infrastructure issues facing the borough?

Summary of Responses
138 responses were received to this question. 91 respondents (about 66%) disagreed that the main infrastructure issues have been identified, 41 respondents (about 30%) agreed; while a further 6 respondents (about 4%) did not express an opinion. Of those who expressed an opinion, the majority of about 69% disagreed, while about 31% were in agreement.

Question 6d: If No, what infrastructure issues do you think are missing?

Summary of Responses
99 responses were received to this question.

Summary of Specific/Missing Issues:

Infrastructure/Utilities:

• Needs to be an infrastructure plan before allocating sites for housing. Very obvious our current infrastructure cannot cope with population in the borough as it is.
• Infrastructure needs are recognised to be large. Calculation needed of amount of land required for work places, schools, shops, community and health facilities, green spaces, roads, cycle lanes etc. to fit forecasted population growth. Will have a major effect on the Plan and likely that environmental effect of infrastructure will, in some areas, be bigger than that of housing.
• Insufficient recognition of importance of transport infrastructure and extent to which it can be put under strain by e.g. school closures, policies to provide choice in education (leading to children being transported long distances by car to school) or concentration of health facilities at “centres of excellence”.
• This section talks about limited broadband services in rural areas. However, broadband services are not always robust and fast enough in the urban areas for a population increasingly dependent on broadband to stay socially connected as we all as for employment purposes. Improvements to fibre optic broadband and mobile coverage therefore needed.
• In the villages, provision of sewage is poor with a large percentage of housing not on mains drainage; water provision is poor with low pressure and flow rates; and lack of gas supplies also means development will need to rely on high-sulphur fossil fuels to provide heating.
• Housing estates built with no local amenities such as shops.
• Overpressure on already struggling sewage and drainage systems.
• No current support for a very basic infrastructure for many small villages (cannot stop banks or post offices from closing down, rail services from reducing) so TWBC not in a position to actually control infrastructure on many levels.
• Need to consider following services in rural and urban areas (both existing and for further development): Schools, nursery facilities and further education; health centres; policing; water supplies per person; IT bandwidth capability per person via backbone fibre connections; adequate flood defences; noise protection; drains, water and sewage; electrical supply.
• More consideration for primary care for the aged (in both rural and urban areas) - social care, care homes and supported housing for the ageing population in conjunction with expansion of GP surgeries, pharmacies and other ancillary medical facilities.
• Infrastructure plans will need to make provision for supermarkets and shopping facilities.
• Hawkhurst - school already bursting. Options and choices should always be available to all. Drainage on the High Street another main problem which has never been properly addressed.
• Unfortunately Kent does not have a good track record of responding quickly to infrastructure problems – e.g. building a new school for Benenden Primary, which has taken about 25 years, is still not being built.
• Provision of water supply a key issue in progressing with larger scale “Garden Village” proposal.
• Energy and water companies and health and education providers will definitely need to target areas of need and support levels of growth set out within new Local Plan.
• Consider flood risk especially at PW with intensive water management on the western edge of the town.
• No mention of critical thresholds for schools, medical services, policing, fire services and government offices such as social care and job centres etc.

Housing numbers/need:

• The Issues are correct but flawed as they are disconnected from the reality of the housing build numbers, selected location options and the constraints of TW geography, AONB etc.
• Size of developments Vs impact on village.
• Adding 13,000 houses to borough requires a coordinated strategy from multiple agencies which would include road and rail services and all utilities. This level of cooperation is complex and historically it has proved very difficult to manage even in small developments.
• Does the Plan require this number of housing for an already over congested area. Has there been consideration as to whether this is purely due to government targets or actually for local need?

Cross-boundary emphasis:

• Concern about how level of development planned in TW will be mirrored in other boroughs (Rother, Tonbridge & Malling) - with lead times required for major infrastructure changes the lack of integrated management between external agencies cannot meet the demands
that will be placed upon them to deliver in timeframe of TW or other local plans. Improving the A21 at North Farm will make commuting from further afield more practical.

- Not clear how TW Plan dovetail with objectives of Tonbridge & Malling, whose plan may have different areas of emphasis (may not be consistent and coherent). Lack of this detail is disappointing given that most significant infrastructure in the borough is located along boundary of these two boroughs.
- Greater consideration of neighbouring Tonbridge. A26 options cannot be considered in isolation, as any development in Tonbridge will add to infrastructure problems already experienced along A26 as people move between the two towns.

**Environment:**

- Listed buildings are important to keep the historic areas of our town (only tiny mention in the plan).
- Parks and green spaces are important.
- What about the RTW Conservation Area?
- Built and natural heritage should be a top priority.
- Community lifestyle impact.
- Must be careful not to destroy rural villages by building houses everywhere and then building roads throughout the AONB, thus destroying our beautiful countryside which is the reason for migration to TW in first place. Overall aspirations and objectives of TW Plan are consequently not joined up.
- Need to address flooding issues.
- Preservation of rural lanes - unique feature of rural landscape and should be protected. Getting more congested and hence more dangerous.
- Reference made again to sensitivity of key areas like Calverley Grounds - much new development, like the proposed new entrance to Calverley Grounds framed by large angular new buildings is at variance with the subtle gentility of current tree-framed entrance.

**AONB/Green Belt:**

- Concern not enough stress has been made of the importance of not building new roads through the AONB and neither building additional roads that increase traffic through the countryside.

**Transport/congestion:**

- Rail connections to London have not been addressed (existing or future and consideration of possible reduction in services).
- Address parking problems.
- Existing road network does not support existing housing / school / employment situation. 2 mile commutes to school take over 30 minutes on public transport with standing room only.
- Important that PROW footpath network be properly maintained and enhanced. New footpaths should be created to improve overall accessibility of existing network. Opportunities to walk and cycle in the countryside/AONB should be developed to advance the physical and mental health and general well-being of residents.
- Management of traffic congestion and pollution on roads should be included.
- Important to manage impact of future housing developments to avoid increased congestion. Accommodating future traffic needs should not be at expense of character and community of the environment.
- Would make sense to widen Halls Hole Road so more traffic can by pass the town centre safely.
- Adequate road/ road surfaces, traffic calming, pavements and lighting particularly in rural areas needs to be better addressed.
- Cycle network collaboration beyond the boundaries of this consultation (joining/improving existing National Cycle Paths/Lanes).
- Need a local transport links (bus/train) impact analysis.
- Road systems have major bottlenecks that at times create serious congestion. Additional development outside of the urban areas will only exacerbate the situation as more traffic will funnel towards TW and other economic centres and rail links which represent the major sources of employment.
- Improve public transport in rural areas.
- Many existing roads are historic drovers lanes, and the main arteries are already running through towns and villages with little thought to traffic density, size of vehicles etc. Making this worse is not an option. Clearly the rural parishes cannot support more traffic or even new-build infrastructure.
- Better traffic control needed.
- Too much road traffic seems to be directed unnecessarily through TW. Seems likely that development of the A21 will simply compound the traffic congestion that exists around the town generally. More opportunity should be taken to by-pass traffic around TW out into the wider borough. Shortening journey times into South and Eastern parts of borough can only add to development of the economy in those areas.
- Parking problems at railway stations.
- In Hawkhurst problem with traffic, speeding and limited access through the village.
- Need to address serious infrastructure issues caused by excessive traffic and how these will be exacerbated by further development and safety issues caused by this traffic.
- Major infrastructure to reduce traffic congestion to the main urban area identified in the IDP 2015 has not yet been recognised.
- The improved A21 only moves some traffic to the A264 from the A26 when accessing TW. Further growth must be moved away from the main urban area.
- School transport needs to be addressed.
- Address rail and bus service frequency and integration at the stations used by TWBC residents (including those in Maidstone Borough).
- Adequate maintenance of existing roads and provision of new roads where needed to ensure easier connection with trunk route networks.
- Effective management of HGV routes to ensure that HGVs are restricted to roads which can cope with them.

**Economic/leisure/technological issues:**

- Need to consider needs of an increased entrepreneurial and flexible working population - may crave social interaction but do not necessarily travel to a company office on a regular basis.
- Increased demand for leisure and recreation facilities for not only the growing and ageing population, but also a population potentially with more leisure time, and expectations.

**Other/general comments:**

- Para 4.16 states 'It is also important to recognise that a series of small piecemeal developments within an area can create similar pressures on the infrastructure of a local
area as one larger development’. Large and small developments tagged on to existing settlements put lasting pressure on local infrastructure. In the long run this type of development is likely to lead to demands for improvements which will destroy the character of our existing settlements. The opportunities that could come with the development of a new settlement to build in infrastructure requirements at the outset and minimise the lasting pressure on existing infrastructure is not even mentioned.

- The Vision proposes a significant amount of new development. The infrastructure needs would be best articulated within an Infrastructure Delivery Plan (IDP) to sit alongside the Local Plan. Assumed that future publication versions of the Local Plan will be supported by a clearer understanding of the infrastructure needs associated with planned growth. Comments should be sought from local residents on the new IDP.
- Infrastructure must be addressed first. The Section on infrastructure (4.14 to 4.18) is the shortest part within Section 4 and yet is the most important issue. To state an infrastructure plan will follow is totally ducking the issue; reality is there is no infrastructure plan that can be prepared to handle the existing population, let alone additional housing.
- This section has, effectively, no content other than wishful thinking. Infrastructure of all sorts (water, waste, transport etc., including low impact transport such as cycling and walking) is severely constrained and will continue to be under increasing threat (budget-constrained, post-Brexit economy). Hoping for cooperation in developing a plan (especially from developers, whose real interest is profit) is simply not good enough. This is not a plan at all.
- The current infrastructure delivery plan within the adopted Core Strategy plan is insufficient as it is only based on 6000 homes and not on the proposed 12,960.
- Hawkhurst - very heavily congested roads such as Moor Hill and Highgate Hill (these do not conform with Kent Design Guide). Villagers have asked for better speeding restrictions and changes in road infrastructure to reduce speeding but TWBC do not want to listen. Why should TWBC be trusted for future development when they don't want to listen to Hawkhurst residents on improving current road infrastructure?
- Strong endorsement of para. 4.18 - Council will need to ensure that any existing capacity issues are documented and pursue ongoing cooperation between a number of levels of local government, national agencies and infrastructure.

(iii) Housing

Question 6e: Have we identified the main housing issues facing the borough?

Summary of Responses

163 responses were received to this question. 111 respondents (about 69%) disagreed that the main housing issues facing the borough have been identified, 43 respondents (about 26%) agreed; while 9 respondents (about 5%) did not have an opinion. Of those who expressed an opinion, the majority of about 72% disagreed, while about 28% were in agreement.

Question 6f: If No, what housing issues do you think are missing?

Summary of Responses

127 responses were received to this question.
Summary of Specific/Missing Issues:

Infrastructure/Utilities:

- In considering expansion of housing along A26 greater consideration needs to be given to increased population as schools are already oversubscribed at primary and secondary level.
- Secondary education of great concern - options outside grammar schools are limited and competition fierce as local children having to compete with children well out of borough. This itself compounds dreadful congestion coming into TW from outer areas, particularly the A26. Note there are 3 grammar schools and 2 state secondary schools on/just off the London Road – The A26 is obviously one of the main routes to these schools.
- Health infrastructure - can the already overwhelmed Pembury hospital cope with an increased population? GP surgeries also already stretched. Has this been taken into account?
- Any new developments require available infrastructure e.g. schools, access to doctors and not increasing intolerable congestion on the roads.
- Knights Park is a very good example of providing new homes without adverse impact on existing homes.
- There is too much proposed building in the town and the infrastructure cannot cope already.
- Families want to locate to where there are good schools, fast rail links, good public transport and local amenities. Rural proposals put people a long way from these facilities. Those needing affordable housing who may not use a car/struggle to afford petrol need to be in walking distance to these services or access to regular bus services.
- Infrastructure investment takes many years of planning and delivery and cannot simply be created without detailed planning.
- An increase in population will increase crime - very few police stations within reasonable force reaction times this is an issue in a satisfactory existing quiet environment with low crime rates.

Housing numbers/need:

Numbers/density

- The TW Strategic Housing Market 2015 document indicates 12,960 dwellings are required for 2013-2033 period to serve a growth in population of 19,200 for similar term. These figures provide an average of 1.48 persons per dwelling. Is this correct?
- No breakdown included of the types of housing stock required.
- Unrealistic housing target of 12,960 dwellings over next 20 years or 648 per annum - our small borough, cannot sustain this increased level of housing need whilst maintaining its unique character.
- No explanation to large increase in growth from numbers shown in the 2016 Site Allocations document, covering period to 2026.
- Need for housing is surely an SHMA town projection not a need for increased rural TW development. If development needed this should be close to where people work not bringing more people into the villages.
- Has been tendency of TWBC to accept relatively low density in new developments, but CPRE suggests that this needs to be changed with the enormous housing target for the new Plan. With strong attention paid to density the amount of beautiful countryside spoiled by housing can be reduced by at least half.
- Affordable housing - over the past decade the building of affordable housing in relation to larger housing has fallen well short of target. Appears that land footprint of affordable
housing is at most 25% to 33% of equivalent market built for private sale. An increase of 1000 affordable homes within the plan would therefore ‘save’ the land for at least 2000 houses.

- Encourage higher density - subdivision of large houses and commercial buildings into apartments and the inclusion of terraces and three or more storey houses/apartments in developments. Increased density also reduces environmental impact of infrastructure required, by reducing land take and enabling more sustainable travel.

- Does not highlight flaws of previous restrictions on development outside LBD – e.g. taking hard line on sustainable infill plots, residential conversion schemes and redevelopment of previously developed land outside of settlement confines has resulted in current lack of housing land supply.

- Council has had to release greenfield land to supplement housing supply against much reduced Core Strategy housing target. This release could have been avoided had a more flexible approach been taken in delivering sustainable development outside of settlement boundaries.

- Historical growth in villages has been low volume, meaning lack of infrastructure and how planning/investment has been managed. Expanding numbers of houses in the villages will make process of assimilation of families into rural communities impossible and will stretch local services beyond capacity with no plan or possibility of resolution.

- The SHMA is based on trends and assumptions e.g. that immigration will continue at a high rate from London. This inward migration from Greater London is mainly because London Boroughs have failed to sort out their own housing problems. This has not been addressed by TWBC head on and the housing shortfall in TWB can arguably be mainly due to this inward migration, not to a massive growth in local demand. These views must be fully considered in this consultation. Why should we accept this pressure on our community and natural and built environment?

- Previous target of 300 houses p/a was too high but sustainable over plan period.

- The housing challenge boils down to what type of town do we want to be in 2033 - assumption being made that we want to grow our population. On what basis is this assumption made?

- A rigorous challenge of the OAN must be completed before any further key steps are taken.

- Whole projection now needs updating following Brexit decision - additional housing needed due to immigration, if this is to be controlled then the whole basis for the projections is invalid and potentially flawed.

- Does the 12,960 homes include the 1409 dwellings still to be built by 2016 from the Site Allocations schedule (2016)?

- One respondent strongly supports that Council must plan to meet Objectively Assessed Need (OAN) for housing over plan period. An adequate supply of new housing is vital for the social and economic prospects of the borough in coming years. Important to keep OAN under review, so that it continues to adequately reflect current need for housing. Assume review of OAN will be ongoing following the new methodology in the government White Paper.

- If more housing needed should be done carefully by increasing existing settlements by a small amount, sharing it out across all communities.

**Need**

- There is need for affordable housing for young people and families, not large ‘luxury’ houses or developments.

- There is a need for development on smaller sites to protect the rural environment.
- Need in rural villages for small scale development of rented housing – either permanent Council properties or Housing Association properties with no right to buy.
- Convert existing properties to change the balance give local young people housing opportunities. Support these in a way which deals with parking and provision of local amenities.
- The assessed need in the SHMA of 13,000 new dwellings is flawed because it reflects a need based on an urban projection of growth and not on the need of the borough as a whole. If the town is considered to be full then the answer is not to simply equate town and country and share the burden with the rest of the borough. Key missing issue is the borough is made up of two distinct groups. The methodology for assessing the growth need does not account for the two differing environments, their level of infrastructure and economic development. There is a town and country divide and the two cannot be equated.
- Building houses across the borough in pursuit of a target number will only end with the majority of households commuting to the major urban areas for work.
- To create an inclusive population should be housing enabling people to downsize or adapted for disabled users. Recent permission given in village to demolish a bungalow and replace with semi detached houses - madness. Small scale developments should include bungalows.
- Huge housing need for young professionals - teachers, doctors, solicitors being forced to move away from the area that they were born/raised in. Better part-buy options might be a way of addressing this.
- Elderly and predominantly all should be aimed at very local needs, be that starter homes or large detached to encourage wealth to stay in the area, especially in rural villages such as Five Oak Green.
- The new Plan needs to be supported by Local Housing Needs Study to understand and define housing needs across all parish areas. Housing Needs studies are a key component of the evidence base that is currently lacking.
- Strong possibility that OAN for borough will be revised upwards following endorsement of the new standardised methodology in the government White Paper, that will prompt further site allocations to demonstrate housing needs will be met for plan period.
- Steps taking to provide affordable housing not clear.
- Should not commit to all housing needs - should be where possible and reasonable to do so taking into account nature, historic significance and protection of rural areas and preventing development on Green Belt and recreational land.
- Cost value of each type of dwelling required should be included.
- Affordable housing issues should be translated into clear, pragmatic policies that reflect how providers of affordable housing deliver housing, including need to meet local aspirations to purchase, and allowing for tenure negotiation where this will assist higher overall delivery of affordable housing.
- Housing White Paper proposes wider range of tenures being incorporated into national definition of affordable housing - important to ensure new Local Plan takes a flexible approach to meeting local housing needs. Starter Homes less of a priority for the Government, while tenures including Rent to Buy are gaining greater recognition for benefits these can bring to local communities - should be reflected in new policies.
- More housing is needed around Hawkhurst, but simply not to this scale.
- Fixation with building individual homes - which inevitably turn out to be small boxes - Council should use best European examples where apartments cater for the vast majority of housing.
- Will need to deliver a mix of housing types and tenures to reflect needs of the community.
- More affordable housing for rent urgently needed and failure to provide it is contributing to the area’s traffic as lower paid employees are forced to commute into the town rather than living sustainably within it.
• Plan should resist any provision over/above genuine local needs, in view of adverse effect this would have on exceptionally important natural, built and historic environment of the particular administrative area, which needs to be sustained.

• No mention of Self Build or working with communities through CLTs.

• Dramatic shortfall in provision of affordable housing during current plan, projected to continue in new plan. Only very vague discussion on how this gap can be met: experience shows that enforcement of affordable housing numbers on recent projects has been weak, partly due to central Government policy changes making enforcement of affordable housing more difficult for LAs. Council needs to analyse past 5 years to see what realistic number can be achieved from private building.

• One result of high house prices is an increase in number of households with 2 adult generations living in them. In effect this is a reduction of living space per person. May not be a bad thing, given increasing elderly population. However, likely effects of this trend on the types and volume of housing now required should be considered.

• No need shown for affordable homes in Goudhurst - already meets the needs of the residents who choose to live there.

Cross-boundary emphasis:

• SHMA limits housing market area assessment to Sevenoaks, Tonbridge and TW authorities. Common knowledge and recognised within report that TWBC adjoins districts of Rother and Wealden. Both have extreme housing needs pressures and direct housing and employment links to TWBC. The SHMA refers to its duty to cooperate with these authorities but has excluded them from any input into Councils SHMA.

• SHMA identifies OAHN for TWBC as 12,960 over the plan period but has not considered the unmet housing needs of any of its adjoining neighbouring authorities including London.

• Should be further acknowledged that any unmet housing need from SE Plan housing calculations for borough should be added to Local Plan housing need calculation. Current trend based assessment has been influenced by "policy on constraints" covering the period 2010 to 2026 within the Councils latest SHMA. This does not accord with NPPF and other Government Guidelines.

• Not clear that other borough plans i.e. Tonbridge are being considered alongside TW plan. High levels of housing density in Tonbridge and TW will create issues for local infrastructure, and if Tonbridge proposals are not referred to in Local Plan, difficult to fully determine overall impact of separate borough plans.

• Issue of accommodation for Gypsies/travellers: vital liaison with neighbouring councils (especially Maidstone) is ongoing and effective - sites just on TW's border have been permitted often by default, orders not enforced, raising suspicion of "dumping" of unwelcome communities by a neighbouring borough. Consequences: antisocial behaviour, rubbish-dumping. Fair distribution of traveller sites is essential - some Kent boroughs have none.

• Duty to cooperate indicates some of Wealden DC's unmet housing need ought to be provided in adjoining districts. TW, with improved A21 links would be an appropriate location. Unmet needs from an adjoining district is a key consideration that the new Local Plan needs to address.
Environment:

- Housing development should be of a very high quality to reflect environment that we live in. Architectural style, scale of development and energy efficiency are important issues and development should not impact adversely on character, integrity and appearance of area.
- Essential new development makes best use of land, whilst also ensuring high quality and that it does not have an unacceptable adverse effect on character and setting of borough’s natural, built and historic environment.
- Council should look at innovative housing plans such as micro building to save space, reduce cost and make housing more affordable for those starting out, while also protecting the limited land.
- Ensure new homes built are of sufficient quality not to blight the town in 10 years time – like Ashford or Basingstoke.
- Building on precious countryside instead of developing existing brownfield sites will not address the issues. Once the countryside is gone, it is gone forever.
- Should be a specific policy for villages so that their essential character is protected.
- Plan says housing should be provided but does not recognise that it is not realistically possible in this area due to the constraints.
- Large scale developments in Pembury area (such as proposed option 4) is unacceptable. Pembury should be kept separated from TW. Creation of a new conurbation would be disastrous.
- Having gone through the process of the A21 improvements with all its environmental considerations and then use it as the basis of huge development around it, would blight existing woodland and countryside.
- The creation of a new garden village is undesirable – it is the back-door route to further urbanisation which is happening at an alarming rate in Kent.
- Priority should be given to building on brownfield sites – e.g. cinema site which could be transformed into residential (small affordable housing units for young couples, retired). Town centre location where transport is not needed and would help breathe more life into town centre.
- Recognised there is a lack of brownfield land, a significant challenge facing the borough-TWBC will need to apply a sequential approach to identify, and allocate, suitable sites for allocation. Successive local plans have also exhausted number/supply of suitable and available sites, which prompted TWBC to allocate rural fringe sites (release of sites from the Green Belt). In new plan TWBC should release/support sites that are well related to settlement and would not result in loss of valued landscape and/or public space.
- Must be very clear site allocations and criteria against which housing development should be assessed when it comes forward. Green space and gardens, and the trees and shrubs within them, which are valuable to character and appearance of an area must be protected (as per Para.53 of the NPPF).
- No mention of aspiring to higher quality of housing.
- High density town development offers families space and modern facilities with communal parks and local employment close by. This suits urban environment but not the character required for rural sites. Affordable homes not compatible with aspect offered in rural areas.

AONB/Green Belt:

- Section needs more specific comment on AONB constraints.
- Should be no development outside current LBDs in AONB. Protection of AONB should be equivalent in importance to protecting Grade I listed buildings.
• Should be no large-scale alterations to Green Belt, and no development within it unless very good reasons for odd exception to be made.
• Absolutely essential that Green Belt remains as it now stands, otherwise will end up with Urban Sprawl.
• Development of Southborough will cause a merger with no distinction between towns and villages which is supposed to be a key objective of Green Belt.

Transport/Congestion:
• Traffic congestion, - London Road is already heavily congested with back to back traffic for most of the day through entire Southborough area, back up to Bidborough Ridge turnoff. Inconceivable how roads could tolerate any increase in traffic when so severely congested already.

Economic/leisure/technological issues:
• Employment growth in TW in years 1991 to 2013 was zero, and although employment growth since then has been at a higher rate, there must be doubt, as the SHMA says, about whether this will continue, especially given growth planned elsewhere in Kent and Medway. This lack of realism on jobs must cast doubt on economic feasibility of population and housing growth planned for.
• Can housing development be done by local builders to provide local employment?
• Perhaps there should be incentives in RTW town centre for small scale conversion of space over traditional shop premises for residential use?
• Supporting Economic Growth – No mention of lack of jobs growth leading to assumption of commuting and/or more affordable housing.

Sustainability:
• Housing built should be eco housing, of mixed character, with focus on reduced energy consumption and local architectural design (not identikit boxes).
• Housing should be ecologically friendly and sustainable and solar/wind generation on new build developments should be compulsory.
• More housing is not consistent with what should be the Vision - sustainable quality of life.

Other/general comments:
• 2015 SHMA needs to be reviewed given significantly fewer households are projected at 2033 in the 2014 based household projections, published in 2016. Seems sensible to wait, however, for standard methodology proposed in Housing White Paper.
• Will OAN drop when Brexit is introduced?
• Gypsies and travellers now live in houses. Transient families should use campsite for only 28 days a year as per normal planning policy.
• Plan has no substance other than reactive to past general immigration and trend.
• Has Council considered the building for profit by opening up of these regions and how do they intend stopping it?
• Noted that Final Report (September 2015) for the Sevenoaks & TW SHMA was prepared by GL Hearn Limited - a property consultant that have a vested interest in the development
of housing across the region. Therefore question validity of information in this report some of which is pure speculation.

- Development at the hub and camp fields had no discussion at local level and the little we had was ignored
- Plan does not pay enough attention to possible brown "field" sites. Of course, if TW Council stopped selling brown field sites to OAP "villages" and care for the elderly profit making companies, perhaps the new Plan proposal to build on Green Belt wouldn't be an issue.
- Issues relating to concentration of population in the borough not clear and adverse effect high population levels will have on the local area, including air pollution, adequate education and health infrastructure and traffic congestion.
- The ‘call for sites’ is a dangerous way to kick off process of selection of sites where housing may be built. Encourages developers to buy land/ properties in unsuitable areas and house owners to offer land for development in hope of making significant profit, without due consideration of impact on their neighbours and the environment.
- This section brings word 'objective' into disrepute. How can a 100% change in a plan be delivered in such a short timespan? What future plan changes might we anticipate? Conclude that this Plan is driven by lobbying pressures at governmental level rather than anything objective at all.
- Assumes development and growth is good - this is not a given at all. Assumes can accurately 'assess' needs, whereas all evidence suggests this is not the case. Also makes assumptions about home ownership (as against rental options in a properly-controlled market) and the sustainability of access to low-cost options that are at best unproven.

(iv) Economy

Question 6g: Have we identified the main economic issues facing the borough?

Summary of Responses

136 responses were received to this question. 80 respondents (about 59%) disagreed that the main economic issues have been identified, 48 respondents (about 35%) agreed; while a further 8 respondents (about 6%) did not express an opinion. Of those who expressed an opinion, the majority of about 63% disagreed, while about 37% were in agreement.

Question 6h: If No, what economic issues do you think are missing?

94 responses were received to this question.

Summary of Specific/Missing Issues:

Infrastructure/Utilities:

- In para.4.29 mobile telephone coverage needs to be mentioned as well as broadband.
- Hospitals and Health Provision (Key workers) not mentioned - probably the third biggest industry.
- Education (Key workers) not mentioned - probably the fourth biggest industry.
With more residents in the area they will require local jobs too. Where will these come from if supporting infrastructure is not available?

Housing numbers/need:

- As the target number is so far out, the rest of the assumptions are similarly of little use.
- Presumption in favour of growth should be challenged. It is not necessarily ‘good’ and may in fact be a ‘harm’ given other impacts, especially on environment.
- Very sceptical about need for this. Seems majority of any increased population will not require jobs within the borough – retired people and those commuting elsewhere (mainly to London).
- Extra housing does not solve economic challenges. House price/earnings ratio in this area is higher than county and national averages due to proximity to London and M25 - does not have to be reduced artificially by creating more supply.

Environment:

- Link between economic prosperity of borough and protection of its natural environment missing - strong reasons why people choose to live, work in and visit borough.
- Lots of sites within current built up areas of Southborough through to St Johns in disrepair. Why aren’t some of these areas (built up, but not occupied) being considered for redevelopment as part of plan?

AONB/Green Belt:

- Beauty and easily accessible Green Belt and AONB are why TW is a tourist destination. Proposing mass development in the area is counter intuitive. Protection of these green spaces, while bolstering and helping existing businesses within the existing infrastructure is surely the way forward.

Transport/congestion:

- Cannot increase business or retail growth without making transport in the town better - roads already too congested.
- Has Council considered how many of these new jobs will be filled by people travelling to work from outside the borough? How are these people going to get to work on roads that are already too busy?
- Key economic issue is the adverse economic impact of traffic delays and congestion due to inadequate accessibility given to out of town sites. Not only is the industrial estate an ugly sprawl of big stores and other businesses, it is a major bottleneck at certain times of the day.
- Tourists do not want to visit towns which are clogged with traffic, and businesses do not want to relocate to such towns. Productivity is lost at an alarming rate due to the transport difficulties.
- Plans for Southborough Hub - what provision for transport and parking have been made if this does prove to be the catalyst for a revival in fortunes?
- Public transport is terrible - few buses between rural villages and towns. Feel sorry for older generation and very young who are stuck in an area with no work or sufficient facilities.
- Assumption would appear to be for growth in housing but not employment. Therefore need for public transport links or increased local employment should be a part of policy.
- Transport issues in TW need to be addressed before any commercial retail or office increase will become viable - far easier to purchase online than spend half an hour getting into TW on a Saturday morning.
- Need to address high car parking charges and bus fares.

**Economic/leisure/technological issues:**

**General**

- No reference to where new employment is to be housed - new offices, commercial units and factories that will provide employment.
- Not aware there are any economic issues facing the borough, which is probably one of the wealthiest in the country.
- Economic aspirations of the borough are of no value unless based on reality and articulated. The jobs statement is fine as an objective but of limited value if an undeliverable wish. Without the how, it is not a Policy. The build plan and the business plan are not joined up - without a valid business plan the extra houses and 30,000 people are going to be either retired, children or commuters, which calls for the location to be in the proximity of TW and Tonbridge where the schools and train links are located.
- Should be a focus on jobs related to environment.
- Questioned whether so much of “industrial estates” at North Farm (now largely converted to retail) will continue to be needed for that purpose as shopping shifts increasingly online, and whether some parts of these areas covered by large sheds of no architectural merit could be converted to elegant modern offices and housing.
- No mention of level of business rates and impact on small and large businesses - differential between sites needs to be addressed as will drive business to look for lower cost premises. Priority should be to maintain and enhance existing retail locations.
- Less out of town retail development - preferable regeneration of towns and villages and encouragement of small independent shops – less reliance on car.
- Key issue - why businesses are not taking opportunity to move into existing business parks/outlets e.g. Speldhurst Business Park
- Dominance of certain business owners in taking over key premises/initiatives within the borough is an issue. Growing concentration of TWBC businesses in the hands of few successful entrepreneurs is not healthy for the town - creates reliance on these businesses for employment and gives them disproportionate power in negotiations with TWBC. Same problem with major supermarkets – along St Johns Road/Southborough especially due to the traffic holdups/congestion they cause.
- Fails to take account of wider economic drivers - e.g. negative impact of Brexit.
- Fails to take account of changes in employment patterns (home and remote working, gig economy) and in shopping patterns (exponential growth of internet shopping).
- Seems to favour 'big options' - larger scale office/retail sites etc. Perhaps we should be supporting lower-impact, local options and more artisan-driven shopping solutions - less transport/less carbon footprint. A refreshed approach to rates for small local businesses might be much more valuable than making space available for dinosaur corporate stores.
- The new Economic Needs Study, carried out in 2016 by the current Council seems promising for new employment land allocated to meet future growth and will add better results for the next 20 years.
- The borough is missing an opportunity to set itself up as a global player supporting both business and residents with a more adventurous approach to broadband infrastructure and a more sustainable, local approach to work, reducing commuting and pressures on roads.
• Not enough Employment Land - 11 to 15 hectares is not sufficient and needs to be located close to transport links. The housing provision also needs to be located near to employment development to reduce emissions from cars.

**Rural/Agricultural**

• Not convinced future needs of local food production have been given sufficient weight in economic study. Assumption seems to be there will be a continued loss of jobs in and land required for agriculture, with perhaps the gap filled by imports from abroad. Questionable, given global population trends and political uncertainties. A loss of orchards and livestock would have a particularly damaging effect on the landscape of the borough, especially the AONB.

• The rural economy needs much more focus.
• Suggest small workshops available for start up business in rural areas.
• Rural development is at conflict with small rural businesses and tourism brought in by the character of the Weald. Economic growth is not limited to large businesses and also idea that leisure has to be built is narrow minded. Many footpaths, parks and gardens offer 'leisure' opportunities without being part of a development plan.
• Agriculture a priority (no mention at all of probably the largest industry in the area) - especially given the potential impact of Brexit.
• Rural economy should be just that with a local community to support it. By expanding a rural community into a small town, the charm and purpose of a rural community will lose attraction and destroy tourism and purpose of a rural community.
• Broadband connectivity is very patchy in rural areas, (even where high speed provision) - makes running a business challenging.

**Retail**

• Plan needs to look at characteristics that make TW special shopping destination and devise policies to sustain them. Current retail areas need to be improved and reflect what attracts people to shopping here.
• Location of new retail floor-space important - particularly as the town now has 2 shopping areas (town centre and North Farm). Perhaps like Tonbridge develop industrial sites as a mix of housing and new retail.
• Issues identified seem based on historical data that precedes major shift in retail activity seen over last 5 years. Level of empty retail space has grown over last 3 years with even RVP no longer immune. Also shift from bricks and mortar to online services - investment in additional retail space inappropriate and out-of-step with current trends.
• Needs to be a valid business plan. Do we need all this retail space now, or is it in anticipation of the 30,000 odd people who will live in the “new” developments?
• TW and PW have many closed shops or charity shops. Dealing with what is happening now would be more beneficial to borough residents.
• Shopping centres should remain out of town e.g. Bluewater/Lakeside - increasing retail would attract more people into RTW and surrounding areas which would cause more travel and infrastructure chaos.
• Need policies to provide retail space for and support small independent shops in TW town centre so that it isn’t just a carbon copy of everywhere else in the UK.
• Plan needs to look at characteristics that make TW special as a shopping destination - defining properly Primary and Secondary shopping areas, and devising policies to sustain
them e.g. current plan has left areas such as parts of Camden Road and Grosvenor Road in a state of planning limbo.

- With major import of goods and online sales, are warehousing/economic developments really required to volume shown?
- Are the retail floor space targets really valid given the number of voids in the town centre now?
- Lower sales density 'discount' supermarkets should be allocated in the convenience retail floor space.
- Economic targets highly questionable – decline of high street and internet shopping. Plan should include targets for what should be done with the spare retail capacity not going along with developers projections that clearly no longer apply.

**Office**

- Concern about way employment uses, particularly offices, are being forced out of towns and villages in favour of conversion to residential under new permitted development rules. This is particularly important in TW, where much of employment consists of offices.
- There are some empty office buildings which could be renovated to become more attractive to businesses.

**Tourism**

- Tourist Industry of great economic importance and much more should be done to promote TW as a tourist destination. Need for more/better attractions particularly in the historical part of town (The Pantiles) and the new Cultural Hub should feature in the plan.
- Paras 4.33 and 4.34 have too much urban/investment emphasis, and insufficient policy detail for encouragement of tourism in rural/historic parts of the borough.
- More wealth could be attracted into the area through increased tourism, from other parts of the UK - improved transport links, especially public transport availability and cost, would play a part in this.
- Provision of tourist facilities and encouraging tourism to take advantage of the AONB and historic villages as well as the historic centre of TW is not identified as an attractive aim.
- Talk of tourist industry yet call for sites include areas such as Mabledon, Birchwood and Nightingale Farm. Such areas are essential as they structure the beauty and amenity value which attracts tourists to Kent and the Weald.
- Amount, type and location of hotel accommodation ought to be reviewed as part of the Plan.
- Tourism important, however, minimal development should be considered in rural areas to maintain the natural beauty of the area and therefore, enhancing the tourism experience and subsequent economic benefit to the area.

**Other/general comments:**

- Fact area lies in commuter belt land and will always mean it sees a movement of its population to London on a daily basis has been missed completely in the Plan as an observation and consideration.
- This is an affluent area - people are attracted to it because of its character and countryside, schools etc. Compared to other parts of the UK there are no economic issues. Economics are not a reason for unnecessary development.
- No need to spend £72m on new town hall.
• Looking at issues alone does not address what the economic vision could be. More work is needed on the Vision, and then translated into a strategy that can be implemented.

(v) Transport and Parking

Question 6i: Have we identified the main transport and parking issues facing the borough?

Summary of Responses

150 responses were received to this question. 105 respondents (70%) disagreed that the main transport and parking issues have been identified, 32 respondents (about 21%) agreed; while 13 respondents (about 9%) expressed no opinion. Of those who expressed an opinion the majority of about 77% disagreed, while about 23% were in agreement.

Question 6j: If No, what transport and parking issues do you think are missing?

Summary of Responses

132 responses were received to this question.

Summary of Specific/Missing Issues:

Infrastructure/Utilities:

• Large developments - PW nearly 700 new homes - impact heavily on surrounding rural community with little/no change to infrastructure.
• Options 1 and 2 are in an area already overloaded with problems including access to schools, and medical facilities and difficulties accessing and using the A26. These options will make situation much worse.

Housing numbers/need:

• Error noted in housing forecasts for TW which shows the new households by 2031 to be 6000. Even if currently projected increase in households of almost 13000 is not reached, final figure is likely to be at least 11000.
• SHMA forecast figure for 20 year period to 2033 is 12,960. This is more than double the annual increase shown in the Network Rail study (South Eastern Rail services) and thus invalidates the proposal to reduce rail services between Tonbridge and Ashford.

Environment:

• CPRE is pleased to see reference to A26 Air Quality Management Area. Clearly the Air Quality Management Plan should be a key supporting document and the local plan preparation process seeking to ensure that it does not prevent the emission limits being met in the shortest time possible.
• Park and ride would completely destroy the character of RTW where the ability to pop in to RTW and drive round is essential to the maintenance of a thriving in-town retail opportunity,
which is especially important because of the spread-out nature of the main shopping streets.

- Has an assessment of air quality been conducted in the centre of Hawkhurst where the traffic is almost always at a stand still?

**AONB/Green Belt:**

- Need to mention increased traffic delays and pollution to our Green Belt areas and AONB.

**Transport/congestion:**

*Traffic/roads*

- TW already strangled by problems of traffic congestion and parking problems. Development which requires increased traffic on existing roads should be avoided. Idea of bringing thousands and thousands more people into the area would only grid-lock everywhere.
- Options 3 and 5 likely to produce huge increases in traffic in search for jobs, schools and “the Town”. Only option 4 or a variant will not do this.
- Hawkhurst - Volume of traffic and lorries/heavy goods vehicles flowing through is huge and dangerous – should not be a designated route for this type of vehicle going to Hastings / Maidstone. Car traffic is extremely congested and getting worse – new development will make this worse.
- The Longfield Road estate solutions show how creative thinking and co-operation can achieve real results in dealing with block spots.
- Roads in the rural areas are collapsing and need urgent resurfacing and cannot cope with the current level of traffic - any increase will increase the problem and reduce safety levels.
- Further mass development alongside A26 would clearly be detrimental to existing residents, and an already overloaded infrastructure.
- Additional development outside of the urban areas will only exacerbate congestion/bottlenecks as more traffic will funnel towards TW, other economic/employment centres and rail links.
- Goudhurst - cannot sustain increased traffic with current road network. Has one small car park with on street parking in the High Street which combined with the heavy lorry use regularly causes severe congestion.
- Need better, safer and properly 'policing' roads.
- Insufficient acknowledgement of high level of unsustainability of placing further traffic burdens on rural roads such as A262 i.e. options 2 and more so option 3 or depending on location of option 5.
- A21 Scotney to Flimwell - development of the A21 further up the borough is going to increase traffic issues further south / shift the problem along to the first undeveloped area of the A21.
- HGVs contribute to congestion and danger on all major village routes. Central government needs to look at solving the problem outside of borough using the M26, M25 and A21 to divert heavy vehicles away.
- A26 also accommodates lots of school traffic as a result of the 5 secondary schools located directly off the London Road. There are also several primary schools along the A26 route. The road also brings commuters into TW station and High Brooms and out to
Tonbridge Station. In addition people coming into TW to work at vast amount of offices and shops – needs to be addressed.

- A21 Blue Boys to Lamberhurst roundabout should be included.
- Options 3 and 5 likely to produce huge increase in traffic in search for jobs, schools but all options will inevitably create more air pollution because of increased car use. 13,000 houses will in fact produce at least 26,000 extra cars on our roads, driving or parking. This will make life in this part of South East unbearable for inhabitants. Only option 4 or a variant will not do this, because close to the A21 corridor it is possible to add another railway station between High Brooms and Tonbridge.
- No mention of biggest blight on transport system – speeding. Well aware that KCC Highways constantly fob off protestors (such as Speedwatch) with platitudes. The problem is not going away and needs to be addressed within this area.
- Southborough - London Road, Speldhurst Road, Yew Tree Road junction recently redesigned has not made any improvement. Needs to be a firm commitment to improve A26 in general.
- Options 2 and 3 are likely to lead to increase transport and parking issues as people travel for work, school and town, and increasingly as people drive short distances from the outskirts of their settlement to the centre (many people choose not to walk even relatively short distances).
- Options 1 and 4 could potentially have the least impact on parking and transport.
- Should we not be reviewing a TW bypass in some form?
- Introduction of 20 mph zones around primary schools.
- Sherwood’s Lip Traps Lane, Birken Road and Sandhurst Road - development elsewhere has adverse impact on these residential roads, now used as feeder roads, allowing access to developments. Need to address serious deterioration in quality of life for residents.
- Major development like the proposed Town Hall and Theatre pose major short-term (construction) and long-term threats to our existing road infra-structure.

**Transport**

- Key transport issue not mentioned is importance of rail services and connections to the life and economy of the borough. While not direct responsibility of the Council, rail services are of such importance that they cannot be ignored.
- Improve frequency of train services to London between Ashford and Tonbridge - currently very poor and infrequent service.
- Train services already stretched – standing only at peak times.
- Increase public transport in rural areas and more regular services to stations at peak times. The proposals of a reduced SE train service between Tonbridge and Ashford International would seem ridiculous in the face of new housing developments.
- A significant amount of people already travel into London and this will only increase with the new developments. Traffic to Staplehurst will increase.
- Transport needs to be integrated. A large number of people travel up to London during the week and proximity to train stations is very important for new development.
- More housing in rural areas will put more pressure on overstretched rail network and station parking provision - not a sustainable strategy for the borough. There are very few options for sustainable transport in rural areas.
- TW borough residents also use stations outside of the borough e.g. Marden. A large number of new houses have been built recently in Marden where there is a proposal to cut train services and the station car park is already full to capacity. Bringing more people into the
borders of the borough that need to commute to London would have a detrimental impact for the people of Marden and current commuters.

- One missing transport issue is the long-term aspiration for reinstatement of an alternative rail link to London and the South Coast via the West Station. Spa Valley Railway is a much needed attraction that may or may not be able to operate as or alongside a more conventional service.
- Bus services should be improved and increased (not reduced) – i.e. extended into the evening and made to connect with train services where appropriate. Buses are full at capacity during peak hour times.
- Needs to be more consideration to residents, particularly the elderly who do not have access to vehicles - current public transport system is insufficient and access to local amenities is therefore restricted.
- No designated bus lane along A26 between Mabledon and Southborough common. Buses already heavily congested so children getting on at Bidborough Corner are finding the buses full with children coming from Tonbridge and further afield. More buses would be required with an increased population. However would be inconceivable given the road is not capable of widening.
- There must be cross county pressure to ensure bus services for rural areas.
- Look at Park and Ride in TW? Though this could impact the economic viability of the town. Many local people would probably start to shop at other locations (outside the borough) if nipping into town meant driving to the park and ride and taking a bus.
- Needs to be joined up transport thinking in the borough between trains and buses. The outlying villages have no public transport options. Employment opportunities limited for non-drivers.
- Public transport needs to be drastically improved, provide a commitment to investigate especially now that the bus garage is due to close. There needs to be a public transport link between Southborough centre and High Brooms/Industrial estate.
- A plan for improving availability and cost of public transport is needed.
- The main bus station should be located close to the train station and safe cycle routes and cycle parking should link up to the station.
- A single local authority bus pass that covered all bus services across the borough would encourage bus use.
- If school children were encouraged to use public transport by having a single subsidised bus services across district and encouraged to cycle through safe cycle networks, would change culture of travel in this area and teach children from an early age to be independent and not rely on use of cars.
- Need to look at congestion charging for traffic to fund a cheap bus service (e.g. on A26 at Bidborough turn off) which has done a huge amount to reduce traffic in London, or possibly free bus passes for borough residents (funded by Council Tax).

Parking

- More parking encourages more cars. .
- Parking is packed already in TW at peak times and in general. More car parking needed, especially if new development.
- New homes as witnessed on developments around Maidstone are never given adequate parking leading to untold neighbour disputes.
- Public parking in Hawkhurst is practically non-existent – anyone working in the village is very limited as to where they can park for the day as facilities which are in place are short-term.
- One hour free on street parking should be encouraged wherever practical.
• Where car parking charges have increased (or introduced - Yew Tree Road, Southborough) parking overflows into neighbouring streets causing congestion - not a good policy.
• Transport to and parking at railway stations.
• Increasingly car parks and residential roads of towns/villages on the way to railway stations are being used to park cars. This prevents shoppers, friends/families from finding space to park and causing road safety issues.
• Limited parking in Southborough area - rarely spaces available in Pennington Road CP, real issue around Southborough Primary and Bidborough Schools. Parents having to drive to school due to limited spaces in schools more local to them.
• Parking and moving about the borough is problematic now and would only get worse in the future regardless of which option is chosen. Option 4 may not have as detrimental effect as options 3 and 5.
• Car parking fees should be cheaper in towns with some designated free parking areas.
• All new developments must include a requirement to provide sufficient spaces for parking for family/visitors. Each dwelling should have 2 off road car parking spaces.
• Much more use of well-advertised free parking days or half days would help.
• Arguments restricting parking to residents in some residential streets are spurious – especially where properties along these streets have off-road parking anyway.
• Parking for TW station is totally unsatisfactory, especially for those meeting trains or for dropping off travellers. Nearest parking is too far away.
• Should be a restriction on owners of car parks in TW in allocating increasing number of parking spaces to business clients or developing/changing use of car parks that are open to the public.
• Ensure parking availability for visitors to the town for shopping, leisure - as much as for residents within the town.
• Staplehurst station car park frequently under stress resulting in on street parking and imposing a further burden on local road system.
• Hawkhurst already struggles with parking - recently one of public car parks became resident only. With current developments taking place more cars a strain on parking, pollution, more congestion.
• Adapt parking spaces for small and large cars.
• Disagree with residents’ parking restriction of 5-8pm introduced in many areas of the town centre – firstly, shops are open until 5.30pm. Secondly, town centre is for everyone not just the residents.
• Council should review all single yellow lines in borough to see if they are really necessary and if so, are the restrictions appropriate?
• Virtually no parking available in village centre of Pembury (perhaps one reason there are hardly any shops).
• Insufficient parking at Pembury Hospital leading to missed and late appointments - leads to extra costs and delays.
• Differential charging in car parks based on peak and off peak times of day would be beneficial.
• Does not address transportation and infrastructure plans - recognises congestion and lack of parking could be a deterrent to visitors, but this is not being reflected in practice.
**Cycle/Paths/Other**

- Cycle safety along A26 may increase an uptake in greener travel options. However, route disappears through Southborough exactly where the road is narrow and dangerous. The area proposed to reduce the speed limit to 20mph is too small.
- To promote cycling as a viable option to car use, children, and adults, need spaces that they can learn to cycle. Off-road paved cycle ways between destinations need to be developed. Driver education needs to become a much greater focus nationwide.
- Cycle route between Tonbridge and TW improved. However, currently cyclists cycle on the very narrow pavement in this area making it dangerous for pedestrians and cyclists alike. Makes it unlikely that traffic problems could be eased by cycle routes.
- Tonbridge – Vauxhall Lane - No cycle routes here so no alternative means of transport. Pavement is very narrow and dangerous along here - many near misses with motorbike and cyclists mounting or riding pavements and nearly striking children walking to bus stops or school.
- Encourage development of safe cycle network and more footpaths in rural areas to encourage people not to use cars.
- No provision for transport of bicycles on buses in the borough which is a further deterrent to commuter cyclists.
- Walking and cycling is a health risk at certain times of the day and evening – air pollution.
- Cycle lanes need to be safe for unaccompanied children - unlike Pembury Road which is not because of difficult road crossings and blind accesses with prior rights across the 'cycle lane'.
- Progressive technologies are not catered for in the local plan - electric recharge points, expansion of cycle parks at main hubs TW and Tonbridge stations.
- Think technology ….driverless cars ... new lanes...provide charging points.

**Economic issues:**

- Assumption that car is dominant mode of transport – By defining local employment as a policy for development, the need for increased traffic, parking and pollution is reduced - A policy towards business incubators, agriculture and light industry needs to be a part of any future development, alongside the necessary increases in essential services.
- Park and ride would completely destroy the character of TW where the ability to pop in to TW and drive round is essential to the maintenance of a thriving in-town retail opportunity, this is especially important because of the spread-out nature of the high streets.

**Sustainability:**

- No section on sustainable transport and inevitable explosion of electric vehicles within next 5 years. Needs a separate section to articulate how borough will provide incentives to help encourage zero emission technology to become embedded in its policy and practices. This should also include rollout of suitable charging infrastructure across the county which at the moment is at best poor and worse non existent.
- Diesel emissions continue to be a problem - Electric vehicles need to be promoted together with charging facilities.
- Good air quality within the whole borough should be given greater priority.
- Progressive technologies not included - electric recharge points, expansion of cycle parks at main hubs TW and Tonbridge stations.
- NO2 pollution levels - no full disclosure of impact or coherent plan on how to deal with the vastly increased level of traffic.
- Impact of vehicle emissions on global warming.

Other/general comments:

- CPRE pleased Council intends to refresh Transport Strategy and transport modelling work. Transport Strategy essential to present and plan for a range of transport interventions- car parking, education, walking and cycling strategies and significant highway infrastructure. Transport modelling essential to test site options and determine impact on congestion, whether the plan is deliverable in terms of highway capacity and the extent of modal shift that can be anticipated.
- No transport plan in the report. An update of the Borough Transport Strategy is urgently required and please can local residents be consulted on this.
- The Borough Transport Strategy 'sets out a vision'. Having a vision for the borough is excellent; having a plan to achieve the vision would be even better. Policy is based on supporting documents that run only until 2026 not the end date of the 'Vision' 2033.
- The crossroads in the centre of Hawkhurst should be included among the list of congestion, capacity and air quality locations in paragraph 4.35.
- There is no strategic plan for integrated transport in (or beyond) the borough. Consultation is progressing when serious suggestions are being made to cut rail options from stations in the borough to London. This is not joined up - no real plan for a cycling network (battery-aided bikes are now becoming much cheaper and will present a real option for many people, but this requires a cycling network such as seen in much of Europe); no sensible discussion on balance between parking and traffic volumes; no recognition of severe impact of HGV traffic within and very importantly through the borough or of the carbon and pollutant impact of failing to address these issues.
- Seems to be a general platitude about traffic and transport problems in our villages with no real suggestions how to solve these problems - more housing in villages will just add to already unsustainable traffic issues.
- Appears solutions to traffic issues lag way behind the pace of housing and business development - should be ahead or at least in tandem.
- Borough Transport Strategy 2015-2026 outlines issues and intent to resolve, but how it will be done and paid for?
- Apart from A21 dualing, little happening on activities described within the Borough Transport Strategy 2015-2026. The new Local Plan must show reduction in road congestion in/ out of the main urban area, by moving future development outside the urban location. This will also assist the air quality hazard with the A26 access.
- Issues around transport and parking are not well understood - solution must be broader, longer term, and more radical. Current Council has an opportunity to do something imaginative and really exciting.
- Development Constraints Study October 2016 identifies roads with specific capacity and traffic flow issues. These have not all been carried over into this section of the Issues and Options paper. The allocation of new development across the borough should involve specific consideration of these pre-existing issues and development should be allocated away from areas where solutions to such pre-existing problems are not achievable.
- Absence of realistic policy intention to reduce car use, increase public transport use and significantly reduce transport-caused pollution.
(vi) Leisure and Recreation

**Question 6k: Have we identified the main leisure and recreation issues facing the borough?**

**Summary of Responses**

135 responses were received to this question. 69 respondents (51%) disagreed that the main leisure and recreation issues have been identified, 57 respondents (about 42%) agreed; while 9 respondents (about 7%) did not express an opinion. Of those who expressed an opinion, the slight majority of 55% disagreed, while 45% were in agreement.

**Question 6l: If No, what leisure and recreation issues do you think are missing?**

**Summary of Responses**

81 responses were received to this question.

**Summary of Specific/Missing Issues:**

**AONB/Green Belt:**

- Include protection of MGB and AONB.

**Transport/Congestion:**

- TW leisure centre is on the A26 – again traffic issues.
- Greater opportunities to reduce dependency on private car transport e.g. A26 from Tonbridge to TW could be much safer for cyclists.
- Fails to recognise link between transport provision and recreation - not just benefit of an integrated cycle plan, but also low-cost and frequent transport within the borough. Many children are effectively priced out of participation in leisure and recreation as they do not have adequate transport options.

**Leisure/recreation issues:**

- New Local Plan will need to ensure that sports and leisure facilities, including parks and green spaces, cultural and/or existing provision enhanced where necessary, depending on the local requirement - will undoubtedly have positive links to health and wellbeing.
- Ideas especially of locating leisure facilities and specialities throughout the borough are unrealistic. If they are economically valid, which is improbable, they will result in a trans-borough “rat-run”. TW is a great town and should be encouraged to thrive not divested of services.
- Glaring omission is enjoyment of the countryside –use of public rights of way and visiting the AONB, nature reserves and other protected areas. In particular more public bridleways needed, to provide more joined up access to the countryside by cycle and on horseback and more options for sport that avoid excessive car use.
- Retain woodland, common land and green spaces to be enjoyed by all.
• Plan must ensure that as a result of development access to open areas and PROWs will be protected.
• Walking is one of most important leisure pursuits - more footpaths should be opened up and maintained. Wrong to consider leisure is all about football pitches and tennis courts.
• Facilities in RTW far outweigh any provision in rural areas - more emphasis on helping rural communities with provision of facilities.
• No mention of designated green spaces such as village greens and other open spaces that are not clearly defined as a sport field.
• Need more recreation suitable for teenagers.
• Rural areas already filled with noise and leisure activities: Risebridge Farm polo competitions, Bedgebury camping/music events. Really a need to congest these areas with more of the same?
• Places like Cranbrook already have leisure facilities. Why divest TW of that vibrancy and build where it is not wanted/needed.
• We are not missing any! It’s why we live here! Don’t spoil it.
• Local residents use local open green spaces for recreation, health benefits (to improve physical and mental health). By building new homes, the reason for wanting to live in these areas is taken away and ruins the reason for having AONB.
• Tourism - currently easily accessible Green Belt and AONB spaces attract trade/income to support these wonderful "green" gyms. Removal of theses naturally green spaces could have a significant impact on health tourism.
• With an ageing population - more should be done to encourage middle age plus, which should reduce health costs for the older generation if they are generally healthier.
• Need to take account of increased demand for leisure and recreation services based on changes in the population general behaviour and exacerbated by technology and changing patterns in working.
• No need for these spaces - they already exist - aside from AONB - many sports fields, leisure centres and there is no shortage which needs to be addressed. The county is already excellently served with a diversity of leisure amenities.
• More (not less) green spaces and school playing facilities.
• More cultural facilities in TW - proposed new theatre good step forward. Why not strive to make TW a cultural centre in the SE- the place to visit for quality drama, music and arts?
• Hawkhurst - Golf and Squash Club important leisure/recreation centre - provides healthy form of exercise for all ages. Also area around Horn Hill has wonderful well used footpaths in AONB which should not be developed. Cannot get rid of all leisure and green sites for development.
• Hawkhurst – improvement of facilities should be taken into account - cinema is a private business, other clubs are conducted on a voluntary basis. Would be an improvement for TWBC to invest into this aspect of community life.
• Dunorlan - increasingly being used for large scale running events (popular and encourage good health) but the park is not large/resilient enough to accommodate this on a regular intensive basis without damage/degradation. Consideration should be given to utilising other sites in the town or acquiring land to create a country park.
• All schools should have access to playing fields.
• Crucial that new plan is clear that existing playing fields will be protected from development in accordance with paragraph 74 of the NPPF – prevent loss of playing fields to development given important environmental and social role they play.
• Extremely important to ensure that playing pitches and outdoor facilities are functional all year round.
• Unsuitability of playing pitches for all year round use is largely a function of the clay soils in the Weald. Reluctant to see more of them converted to all-weather surfaces in rural areas, especially with the floodlighting.
• Swimming has not been mentioned and those facilities are not particularly flexible.
• With an aging population, there is a greater requirement for place to walk than ever before, the leisure and recreation plan does seem to be competing for space with the housing plan.
• Important to recognise many people are not attracted to leisure centre environment/competitive sports. A variety of other opportunities for physical activities exist e.g. classes in local halls - collectively they make a significant contribution to the health and wellbeing and should be facilitated and encouraged alongside formal LA provision.
• Provide/encourage use of outdoor gym facilities in parks/commons.
• Encourage development of new sports facilities e.g. Skinners wanted to provide a new astroturf pitch at Southfields but was denied because of various objections, which school tried to overcome. If TWBC are serious about promoting leisure then a rethink of stance and a positive attitude is needed.
• No mention of areas where dogs can be walked.
• Ensure that schools and town have sufficient sport and leisure facilities - so important for kids’ health, and engenders good habits for the future.

Other/general comments:

• 4.43 Statement '.provision is either increased and/or existing provision is enhanced where necessary...' is a good objective - needs to be enforced.
• 4.44 - Not sure how this clause can be met without some sacrifice, what sacrifice will be allowed?
• The first sentence of paragraph 4.47 unnecessarily repeats the last sentence of paragraph 4.43.
• Nothing more than a pipe dream to find 'a number of areas ... playing pitches and equipped play spaces ...' as well as finding space for 12,000 new houses and land for expanding business activity.
• The plans should include measurable, quantifiable objectives for leisure and sporting space and should not be overridden by each planning proposal that comes in.
• If drafted words are real - then why has the provision of sports pitches at Southborough been reduced to allow for Southborough Hub?
• The recently commissioned Open Space, Sport and Recreation Study - greatly encouraged as this will be vital for youngsters developing their skills.
• Settlement Role and Function Study recently undertaken by Council encouraging - includes a record of recreational open space and leisure facilities, playing fields, sports centres and equipped children's play areas.
• Progress on work in Calverley Grounds playspace - a number of happy youngsters in RTW will be overjoyed!
• States the importance of recreation, sports and open public spaces but then goes on to propose to build on them. e.g. Plot 45 - Bidborough - 200 houses on Green Belt, AONB, surrounding and overhanging ancient woodland. Southborough – building houses on Ridgewaye playing fields, reducing number of pitches available for Saturday/Sunday training to a club which has a thriving youth team.
• Opposed to Civic Complex Draft Planning Framework and against it becoming a Supplementary Planning Document.
• Given foreseeable financial constraints, focus in 4.43-4.48 should be redrafted. The best leisure example is the Theatre. A high public subsidy would be needed for decades. Financially this is not sustainable. Therefore focus should be on intelligent use of existing resources - combine the work of Assembly Hall and Trinity theatres.

(vii) Sustainability

Question 6m: Having regard to the prepared Sustainability Appraisal Scoping Report (link given here in I/O document), have we identified the main sustainability issues facing the borough?

Summary of Responses

136 responses were received to this question. 83 respondents (about 61%) disagreed that the main sustainability issues facing the borough have been identified, 38 (about 28%) respondents agreed, while 15 respondents (about 11%) did not express an opinion. Of those who expressed an opinion, the majority of about 69% disagreed, while about 31% were in agreement.

Question 6n: If No, what sustainability issues do you think are missing?

Summary of Responses

101 responses were received to this question.

Summary of Specific/Missing Issues:

Infrastructure/Utilities:

• Building rate and issues of schools, water, electricity, limiting more CO2 emissions, Broadband, refuse, road congestion do not match up - making a terrible mistake.
• Borough is divided into two distinct groups: 1. Urban areas where there are cleaner fuels (gas), sewage to every household 2. The countryside where there is a reliance on high-sulphur fossil fuels to provide heating of water and buildings and no public sewage systems.
• Need to consider effect of increasing housing/population on education and health infrastructure.
• As at para.4.54, borough is in an area of serious water stress - how will situation improve when 13,000 additional households will require an additional 1,430,000,000 litres of water per annum over and above current consumption (based on SE Water annual consumption estimates) - water industry already struggles to meet demand and finding additional reserves (reservoirs) will take years to plan/develop.
• Needs to be a plan to limit fly tipping - better waste options in rural areas would help this.
• Waste - the availability of additional capacity in land fill sites.
• Water runoff due to destruction of natural drainage.

Housing numbers/need:

• Whilst many of the listed issues may be correct they are contra-indicated to the borough build plan (13,000).

Environment:

• Lack of environmental sustainability in the scope is concerning - once sites are developed, there is no going back and no environmental sustainability.
• Significantly reduce light pollution in borough - Scoping Report states that 'some of the best dark skies in the South East are south of Tunbridge Wells (outside of the Borough)' and that 'the new Local Plan should seek to protect dark skies'.
• Effect of development on air and noise pollution.
• Effect of development on groundwater flooding - given the hilly nature of much of TW terrain. Issues such as flooding and overloaded drainage systems not addressed.
• Air Quality needs to be monitored – e.g. Southborough, pollution monitors are recording above normal levels. With additional residents, will increase and is not sustainable.
• Proposals do not support enhancement of biodiversity within borough. e.g. sites adjacent to and linking ancient woodland and nature reserves should be avoided. Destruction of such corridors would damage protected species and reduce biodiversity.
• Noise and Pollution – rural areas are peaceful and tranquil, people have chosen to live there for this reason, to enhance physical/mental well being. Due to lack of infrastructure in these areas, people in new housing development will be forced to use their cars for transport, which will have a noise impact on our tranquil landscape and be polluting in terms of emissions adding to climate change, this is not a sustainable development approach.
• Disruption to wildlife – building in rural areas, has a major impact on wildlife. Preserving our natural environment is paramount. Therefore, development in rural areas is not sustainable.
• The sustainability section should include reference to the points made above regarding long-distance visual impacts and cycling / public transport.
• All new buildings should be Zero Carbon and Low Impact e.g. should have mandatory solar panels for electricity/ hot water, rainwater collection for flushing toilets.
• Protect our historical and natural heritage as first priority.

AONB/Green Belt:

• There is insufficient emphasis on maintenance of the Green Belt and AONB connected with the development of so many new homes.
Transport/Congestion:

- Plan should recognise further accepted sustainability themes such as the importance of location, access to services and accessibility to public transport – villages/rural areas poorly served and therefore less suitable for expansion without additional infrastructure.
- Should demonstrate an understanding of importance of minimising travel times by locating homes close to employment, services and good quality public transport, whilst taking account of site based constraints such as agricultural land quality, protected species, heritage assets and valued landscapes.
- More cycle routes needed.
- Increased housing and population will increase traffic congestion and parking need in the borough.
- New economic development will only increase the draw of major towns for employment and shopping. As a significant number of 13,000 reflects inward migration then the pressure on rail services, where parking is already inadequate will be much greater.
- Due to lack of transport infrastructure in rural areas it can be difficult to provide for economic and social needs and is therefore not sustainable.
- With an ageing population - not sustainable to develop in rural areas, where lack of infrastructure. Need to have accessible bus services and walkable facilities.
- Any increase in traffic through Southborough will raise pollution even more. Site 45 will necessitate access onto A26 - this will not be sustainable (as more than 2 miles from the nearest train station may also necessitate a car journey).
- Not enough emphasis on sustainable transport - roads already carry too much traffic with the associated effects of excessive noise and poorer air quality.
- Sustainability will mean increased development around major existing sites and around key transport hubs.

Economic/leisure/technological:

- Electric cars should be encouraged to counteract air pollution and support renewable energies, supported by planning policies that encourage electric car charging points across the borough.

Sustainability:

- Sustainability is the key issue and must be a priority when considering larger (10+) properties developments.
- Contrary to “presumption of sustainability” it is prima facie NOT sustainable – e.g. AONB has same high status as National Parks, and should not be built on. When will we stop building houses, especially in the SE? Will house building on this scale continue beyond 2033? Should be a moratorium on house building for some years to enable monitoring of quality of life in whole borough.
- Climate change is recognised as a critical issue at paragraph 4.52 - fails to mention importance of proactively designing site layout to reduce carbon emissions. Should include passive design principles to use site layout and building orientation to make use of local climate/site conditions.
- Mentions climate change in terms of reduction of greenhouse gases but says little on addressing changes in climate that will occur.
- This section should recognise importance of SuDS - should be integrated into landscaping schemes to improve sustainability performance of sites: - to incorporate water storage,
surface water flood management, groundwater recharge, attractive open spaces and connected habitats.

- Light pollution should be considered and given full weight.
- TW and its rural area already fail the sustainability test in that quality of life today is lower than it was 20 years ago. Large-scale development is equivalent to further loss of quality of life.
- Recycling facilities abused by businesses or inadequate. People should not need to transport glass (heavy) in cars (polluting) to recycling. Provide more recycling facilities (glass) and give the public confidence that it actually takes place.
- Missing focus on sustainable quality of life. Stop the focus on sustainable development.
- Inevitably, SA examines performance of each growth option against pre-defined criteria set out in the relevant methodology. However, relative scoring of each growth option as a spatial approach is too high-level and may eliminate prospect of sites with strong credentials, such as site 231.

Other/general comments:

- Badly written and edited set of points, including some (e.g. pockets of deprivation) not appropriate here.
- Numerous "should consider" and "need to recognise" type of points, but very little meat. Too many paras, such as 4.51 and 4.52, are empty and toothless.Para.4.50 - One of the key purposes of SA (and SEA in particular) is the recognition and testing of ‘reasonable alternatives’. An alternative approach to plan development informed by the SA should improve the plan contribution to delivering sustainable development, rather than simply relying on mitigation.
- Several respondents commented that the website link to the Sustainability Appraisal Scoping Report was not functional.
- Para 4.51 – very little on how this will be achieved/adhered to particularly when sites in the past have scored negatively but have proceeded to be allocated. What assurances does the Plan provide for future site allocations?
- If Plan was to go ahead as options 3 and 5 it would exacerbate:- noise pollution, waste problems, lack of healthcare, education, lack of employment, landscape, biodiversity.
- Can the adopted five objectives listed in the Core Strategy be scheduled within the Local Plan, if they are to be considered within all development considerations?
- Assessing individual policies, plans and application sites against a set of sustainability criteria will not prevent unsustainable piecemeal development in the context of 13,000 homes. Sustainability should be at heart of process – preferred approach/areas should be identified based on these criteria – after which sites can be identified and acquired.
- Lack of vision disturbing - Needs to be longer term thinking and more radical solutions.
- Sustainable issues are well documented in the Appraisal Report (SA). Valuable to follow SA Scoping Report with pg. 29 of "Local Plan Issues and Options" including useful diagrams, examples of business growth, education, services, employment, sustainable transport, landscape and biodiversity.
- With regard to noise and land pollution, encouraging that new Plan should consider potential noise pollution from both roads and aircraft.
• Encouraging able to identify under social dimension of sustainability that new Plan aims to meet the demand for elderly/specialist healthcare services as well as seeking to promote/achieve improved physical activity rates, especially for low income population groups (should address pockets of deprivation - fuel poverty and access to green space/recreation facilities).

• Important indicators not presently included for wellbeing need listing: Air quality, road noise, landscape loss in the Green Belt/ AONB, long term and waste water security/resources.

• Rather than starting with Climate Change as a driver - a well designed development will tie together Passivhaus standards for individual buildings, local employment, utilities, communications and transport issues that all measurably improve both quality of life and emissions.

• At what point will investment be required in infrastructure of water, waste and energy required before we hit current limit for development? A more sustainable design will push those inflexion points further apart.

• Sustaining exceptional natural and built environment of TW is "golden thread" that should run through whole of Local Plan process. In the Draft Sustainability "Heritage" (presumably natural and built) is item 10 in a list of 19 Sustainability Objectives that could be applied elsewhere, and appear to be treated with equal importance – however, Para 4.49 of the consultation document states that plans "should take local circumstances and opportunities into account".

• In response to question 1 and 3 of the Draft Sustainability Appraisal - whole scoring system highly suspect, and para 3.2.6 of that document seems to confirm this by discouraging readers from adding up negative or positive scores.
Section 5 – Strategy Considerations

Introduction

Under this section, there are a number of strategic considerations which include:- (i) Cross-boundary Strategic Planning and Duty to Cooperate, (ii) Settlements in the Borough, (iii) Development Boundaries and (iv) Strategic Options (Five possible options – 1. Focused growth, 2. Semi-dispersed growth, 3. Dispersed growth, 4. Growth Corridor-led Approach and 5. New Settlement growth). At least two questions were asked relating to each of the strategic considerations as follows:

(i) Cross-boundary Strategic Planning

Question 7: Are there any specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?

Summary of Responses

136 responses were received to this question. 98 respondents (72%) agreed there were specific cross boundary issues that should be considered, 26 respondents (19%) disagreed, while 12 respondents (9%) did not express an opinion. Overall, of those who expressed an opinion, the vast majority of 79% agreed that there were specific cross-boundary issues that need to be considered.

Question 7a: If Yes, what are the specific cross-boundary planning issues that you think the Council should consider in preparing a new Local Plan?

Summary of Responses

108 responses were received to this question.

Summary of Specific Issues/Concerns:

Infrastructure/Utilities:

- A combined approach with all Kent and East Sussex authorities on the provision of essential services, utilities and infrastructure is imperative.
- Located on the edges of the Borough, RTW and Paddock Wood serve neighbouring districts in terms of health, education, retail and employment. Many people from eastern side of the Borough, (including Cranbrook and Hawkhurst) tend to use Maidstone or Ashford as their main urban centre rather than RTW. Therefore needs to be very close co-operation with adjoining boroughs on housing numbers and locations, and on transport and parking implications.
- Schools – TW and Tonbridge have a reputation for excellent schools and many students travel from outside borough/ county to attend selective/non-selective schools. This in itself causes major congestion on the roads and trains. A further 12000+ houses in borough would increase requirements for primary/secondary school places. Already a major shortage of secondary school places (270 Year 7 places needed in 2018).
• Children in Wealden may apply for school places when the new development in Hawkenbury completed.
• Healthcare - it’s already virtually impossible to get an appointment at local medical centres without booking weeks in advance. Access to medical centres elsewhere (for example Warders, Tonbridge) puts a strain on local congestion and parking.
• Healthcare - much improved Pembury facility is located “out of town” and is therefore a car journey. Have waited 10 minutes to get a space in the car park, indicating that the facilities infrastructure near capacity.
• Residents outside borough do/will also use health facilities.
• The borough is divided into two distinct groups:- Urban areas where there are cleaner fuels (gas) and sewage to every household; and the countryside with a reliance on high-sulphur fossil fuels to provide heating of water and buildings and public sewage systems not available.
• Strategic issues need to be discussed with East Sussex and KCC because they have to provide highways, schools and other infrastructure.
• Should consider development proposals for housing and business in Tonbridge and in particular effect that this will have on shared infra-structure (particularly road infrastructure) given close proximity of such two significant conurbations.
• Consider provision of and additional source of water supply in the form of new reservoir for region - dual benefit of providing additional supply with further leisure opportunities.
• Development of housing by High Weald on fringes of TW will put strain on borough infrastructure - in particular, places for schools and GP surgeries are already at a premium, not to mention the traffic situation.
• Waste management.
• Use of non TW borough facilities (schools, train services, medical services etc) by TW borough residents .e.g. Marden and Staplehurst facilities.

**Housing need/numbers:**

• If large amount of new housing is provided in east of borough, this may technically satisfy government requirements on numbers but will not meet local housing growth needs of RTW, who will be more likely to look for housing in Tonbridge if they cannot find it in TW/Southborough.
• Regard must be had as to whether TWBC can meet unmet need of other boroughs from Kent, Sussex, Surrey and London overspill. (respondent has promoted land at Speldhurst Road and Leggs Lane, Langton Green to assist with this process).
• Concerns over limited area covered by SHMA - excludes Rother DC and Wealden DC within the assessment and no statement made on duty to cooperate on these matters with neighbouring authorities. Therefore unsure whether the Council has identified its Full Objectively Assessed Housing Needs? Also concern that TWBC have not properly considered constraints jointly with these authorities in attempting to agree a strategy that would help meet OAHNs of this area- Rother DC (87% coverage of AONB) and Wealden DC (environmental issues concerning the Ashdown Forest).
• Growing concern that this region of the SE will significantly fail to meet it's accumulative housing need and this need will not be met elsewhere.
• It has been evidenced by all neighbouring local authorities, with which TWBC shares a boundary, that there is unmet housing need in their boroughs and districts. In light of this, and given evident lack of housing supply in the borough, TWBC should assess the capacity of the borough more comprehensively, including considering suitable sites in the greenbelt.

Cross-boundary emphasis:

• Appears to be no helicopter perspective across Kent...this needs Boroughs to work together.
• Should be discussion between TW, Tonbridge and Maidstone for possible joint development along the boundaries plus a new station between Tonbridge and Paddock Wood with huge parking facilities and with access to the now duelled A21 and thus the M25.
• Needs to be very close co-operation with adjoining boroughs on housing numbers and locations, and on transport and parking implications.
• Should consider development proposals for housing/business in Tonbridge and in particular effect this will have on shared infra-structure (particularly road infrastructure) given the close proximity of such two significant conurbations. Imperative that any plans for Tonbridge are considered alongside TW as without doubt developments in Tonbridge would bring increased movement of workers and children into TW.
• Wealden DC moratorium - Issues and Options document fails to reference the moratorium imposed by Wealden District Council in April 2017 on any new development that could generate additional traffic over concerns on the Ashdown Forest Special Area of Conservation. This is a significant position statement reached by Wealden District, and one that should influence the growth strategy for TWBC at the earliest possible opportunity in the plan preparation cycle. However, the only comment in the Issues and Options document is under section 5.1. TWBC’s options for growth should respond to the Wealden DC moratorium. An initial indication as to how the impact of growth across TW borough could impact upon the Ashdown Forest SAC is provided within the findings of the TWBC Interim TWBC Habitats Regulations Assessment, notably section 3.2, which clarifies that option 3 represents the most positive growth option with the least effect on traffic flows past Ashdown Forest. This is a point that is not ‘fleshed out’ within the body of the Issues and Options document. Accordingly, it is expected that the Issues and Options consultation document should endorse Option 3 as the preferred option for growth. This is a significant item that, if not approached correctly by TWBC, could significantly delay progress of the new Local Plan.
• Flexibility.
• Considering that a development of say 7000 homes in a 'Garden Settlement' format is most likely to be required, can this matter be discussed with other boroughs to review any cross-boundary areas that could be utilized?
• With regard to cross boundary housing needs, the Council needs to do much more than have an exchange of correspondence with neighbouring authorities, as currently suggested in the Issues and Options document at Para 5.5. Duty to cooperate requires active and sustained engagement and Council needs to do much more than have a “discussion as necessary”. The Duty applies to the pre-submission stage of plan making. This has to happen now as otherwise a non-compliant plan will fail the examination process. To achieve this, should consider advice set out in Para 181 of NPPF – “by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy”.

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Alternatively, where specific and available residential sites have already been identified on the borough border, formal planning agreements should be drawn up to demonstrate both authorities’ commitment towards bringing sites forward.

- TWBC and Wealden DC should consider an urban extension to the south of the town very seriously. However, development land cannot come forward without the full backing from both authorities. Therefore urge both authorities to prepare a joint strategy now in the form of a formal planning agreement to deal with this cross boundary matter (2 respondents have put sites forward in this area).

- Essential to work with neighbouring boroughs to achieve best outcome – the boroughs are artificial lines for administrative purposes. Development on this scale generates sustainability, environmental and infrastructure challenges (and opportunities) that cannot be dealt with at borough level alone.

- Plan does not take account of plans being put forward by the adjoining councils – seems to be planning by numbers imposed by central government, missing the need at the more regional level.

- No evidence that discussions have taken place with neighbouring councils and their reactions to satisfying possible unmet needs of the TW borough.

- Surely must have held some discussions on considered growth in a sustainable and acceptable fashion and as other boroughs are unable to assist need to indicate that TW unable to accept new and increased growth figure. Although SHMA document is dated 2015 and perhaps running late on the matter.

- Essential that planning/building new developments are considered in a cross-boundary way – e.g. importance of Staplehurst, Marden, Headcorn.

- Garden Village – if idea is pursued this is far too big an issue to be confined to a single local authority which would mean putting artificial constraints on its location. Consideration should be given to cooperating with neighbouring LPAs as it may be the most appropriate and sustainable location for such a new settlement is within a neighbouring LPA to meet cumulative needs.

- Consider cross boundary issues with Tonbridge & Malling, Maidstone and Ashford Borough Councils for opportunities of development along Ashford to Charing Cross railway line. Perhaps the form of development for the 4 lines, and so far as reasonably practicable, opportunities outside the ANOB and Green Belt.

**Environment:**

- That the area is prone to flooding is not a sensible argument if one considers that 1/3rd of the Netherlands is below sea-level. (The lower Weal floods largely because the communities have not kept the ditches clear since the 1950’s).

- Develop the buffer area between Tonbridge and TW - currently a bit of a no man’s land but now linked with the A21 so a ‘perfect storm’ as regards an area ripe for new housing.

- Do not build on Ashdown Forest.

- Should consider cross boundary settlement, where there is the capacity and in non AONB areas.

- Detrimental impact of increasing level of housing near borough borders must be taken into account and adjacent local authorities consulted.

- Strategic planning should be regional as well as local. Point made in Q 6b regarding long-distance visual impact of developments is particularly relevant (for example from where respondent lives in Pembury can see south-facing slopes of greensand ridge south of Maidstone and views of north downs to the north of Maidstone (Bluebell Hill) and views of
north downs near Wrotham in other parts of Pembury. Important all authorities within area are aware of visual impacts of development on wider landscape.

AONB/Green Belt:

- Green Belt dividing Southborough from Tonbridge is under constant threat and needs to be protected.
- Challenge the assumption of protecting the Green Belt (often a rusty belt of scrub, pylons and small infill). Obvious and environmentally preferable place to develop an expanding city is proximate to it, not in a distant rural borough. National planning needs to confront this (politically sensitive) issue, not duck it. TWBC can help in making this challenge or can hide.
- A Green Belt buffer zone should be created on the periphery of TW to protect it from encroachment.

Transport:

- Should be cooperation with Tonbridge & Malling to look at developing A21 corridor further from Pembury to the A26 where new roads are nearing completion and easy access to train stations and M25 already in place.
- Cross-boundary planning issues arising from the structure of the rail network, which connects TW (and High Brooms) well with boroughs to south, north and with London, and connects PW with London, Tonbridge and points east outside the Borough. Little transport connectivity between settlements within the Borough. Means that flows of passengers to/from the borough for work, education, shopping and play are mainly not intra-borough, which has implications for all planning policies relating to housing, employment, leisure or education.
- Make sure main trunk roads are usable i.e. A26 and A21 - proper maintenance and pothole prevention.
- Routing of heavy goods vehicles on A26.
- The A26 should not be opened up to greater traffic use. Is a narrow road and already heavily congested. It is stationery for long periods several times a day and suffers from high pollution. Also assess impact of the recent junction works (Yew Tree Rd/Speldhurst Rd) as there seems to be no improvement.
- Strategic HGV routing and control to stop and, in future, prevent damage to rural villages by routing HGVs through them.
- Should consider what proportion of employed people in TW will be commuting to/from new housing developments that have been/will be constructed in Tonbridge.
- Work with the railway to consider an out of town commuter 'hub' station with good access and lots of parking.
- Discuss possible cross-boundary transport routes that could pick up existing main line train routes i.e. Ashford connections from Cranbrook area etc.
- DoT has recently published a consultation that contemplates reducing current train services to smaller stations between London and Hastings/Ashford. These stations are heavily relied upon by residents of the borough who commute to London. If services reduced, likely people will drive to different stations, increasing road congestion in/outside the borough. Council should seek to cooperate with neighbouring LPAs to resist such reduction, to
recognise the likely affect on commuting habits and to mitigate any impact if it does take place.

- Integrated transport planning - road, rail, parking.
- Opportunities to improve smaller railway stations e.g. West Malling, to improve links to London and beyond. No such scope within the borough, particularly in rural areas.
- As a significant number of the 13,000 reflects inward migration then the pressure on rail services, where parking is already woefully inadequate, will also be much greater.
- Young people need to travel into East Sussex for college education. Public transport links bus/rail are dreadful. A route and branch change would enable 16-24 year olds and people on recognised Apprenticeship Schemes (on low paid part time incomes) to access public transport. Car ownership is a luxury - freedom to travel opens up opportunities that are deserved by all our young people.
- Development in the borough will create demands on road, rail and other infrastructure but similar development in other boroughs will amplify the issues. The A21 provides key route to/from UK road network and although welcome improvements to the A21 in TW will ease pressure, additional development in other boroughs will mean other roads will see increased volumes. The development of 13,000 houses in the borough coupled with similar growth in other boroughs will create new bottlenecks.
- Key to the issues faced with HGV’s is the access (or lack of it) at the M25/M26 junction. This needs to be specifically highlighted as it creates cross country traffic that could otherwise use motorways and trunk roads.
- Should be discussion between TW, Tonbridge and Maidstone for possible joint development along the boundaries. If ANY development would need to be a new train station or at least more parking facilities at those already existing.
- Bus services.
- New housing should be within walking or cycling distance of railway stations.
- One respondent strongly in favour of joining two main roads from Sussex into RTW (A26 and A267) in Sussex, making use of Bunny Lane, thereby enabling Nevill Street to be closed to traffic and The Pantiles re-united with King Charles Church, Chapel Place, the High Street and the rest of the town.

Economic/Technological issues:

- New economic development will only increase the draw of major towns for employment and shopping.

Sustainability:

- Whilst many of the listed issues may be correct they are contra-indicated to the borough build plan (13,000). Contrary to the “presumption of sustainability” it is prima facie NOT sustainable.

Other:

- Hawkhurst should not be in Group A alongside larger towns in the area – Hawkhurst is a village, not a town – approval of increased planning appears to be a strategic decision to
push Hawkhurst into becoming even larger; why not concentrate on other outlying villages and undertake a plan which provides for smaller developments across wider areas?

- Reference following identified sites: - Site 90 (Mabledon, London Road), Site 179 (Mabledon Farm and Land, London Road) and Site 180 (Nightingale Farm and Land, London Road) - there must not be any residential merging of areas between TW and Tonbridge – Southborough / Hangmans Hill to A21/A26 intersection as this is AONB and local agricultural land.
- Consider provision of sites for Gypsy and Traveller communities
- Duty to cooperate is likely to fly in face of resident needs and wishes within the borough. Decisions continue to be taken which adversely impact the quality of life. (e.g. doubling size of Langton Green Primary School was not to meet the demand from Langton Green, but from elsewhere in the Borough. No consideration was given to views of local residents and has resulted in unprecedented levels of traffic at certain times of the day).
- Whilst the duty to cooperate with authorities outside the borough has been laid out, the views of rate payers within the borough must be of paramount importance. TW should not be forced to develop new housing which will be gobbled up by Londoners or speculators from outside the borough. TW should stand up to Government and argue the case for its residents strongly.
- 2 respondents agreed with the comments of the RTW Town Forum (Strategic Planning Working Group) on this question
- As the gateway to Europe what consideration is being made for a mass influx of refugees? Kent is the first stop and cannot become a dumping ground.

(i) Settlement Groupings

Question 8: — Do you agree with the suggested groupings of settlements?

Summary of Responses

162 responses were received to this question. 34 respondents (about 21%) agreed with the suggested settlement groupings, 114 respondents (about 70%) disagreed, while 14 respondents (about 9%) did not express an opinion. Overall, of those who expressed an opinion, there was a significant majority of 77% that disagreed with the suggested groupings.

Question 8a: If No, what changes do you suggest to the groupings of settlements and why?

Summary of Responses

124 responses were received to this question.

Summary of Specific Issues/Concerns:

- Not enough emphasis on speed and frequency with which public transport enables residents to reach nearest town/railway station. (e.g. huge difference between a bus service which runs half-hourly throughout the day and takes 5 or 10 minutes to reach the nearest town and railway station and one that runs hourly and takes 25 minutes or more and unable to compete with private car).
The method of choosing the groups seems very subjective and inaccurate and changes in weightings produce a wide range of different outcomes. Extremely flawed methodology. Illogical means of providing an indication of level of sustainability/appropriateness of any settlement to accommodate further growth because status of range of services and facilities available is highly unstable. In creating a settlement hierarchy, the groupings need to reflect the levels of deliverable development, ease of growth and access to areas of employment and/or access to train services. Difficult to ascertain the thinking behind the groupings - is it geography, resources etc? The weighting of some of the criteria is not appropriate. e.g. a Primary school scores 3 and Secondary school scores 5, but this fails to reflect there are only 9 state secondary schools within whole borough. More sustainable for development to be located closer to these secondary schools. Given each existing settlement has its own primary school, more sense for primary schools to be attributed 1 point rather than 3. Stronger justification of the associated groupings could be presented within the Issues and Options document to support the evidence base. Grouping settlements by ‘focusing on the range of services and facilities available’ is totally inadequate – means many other factors to be taken into account when allocating land in rural areas/settlements, such as transport, environmental considerations, landscape and flooding issues are being given less importance than services and facilities – wrong way round. Availability of facilities/services is not the same as spare capacity – places with the widest range of facilities and services may have the least spare capacity. If facilities and services are already full then new ones must be built (suggests options 4 and 5 may be most appropriate). Sustainability, infrastructure and transport issues must be considered from the outset. Group A should be subdivided into two groups. Group A should contain only Cranbrook and PW - these are by far the two largest settlements in the borough (other than TW/Southborough) with widest range of services and existing infrastructure. Group B should contain Hawkhurst, Pembury and Rusthall - which are significantly smaller than Cranbrook and PW but larger than the next group of villages. Role and Function Study is flawed in a number of respects - will not stand up to scrutiny at forthcoming Local Plan Examination and any policies based on it could not be considered "sound" for purpose of NPPF and Planning and Compulsory Purchase Act 2004. Revised study should be undertaken on correct basis. The basis of Options 2 and 3 settlement allocation hierarchy is a facilities cascade - seems a flawed basis for allocation of development to the parishes. The allocation hierarchy is based on number of shops, pubs and facilities ignoring location, transport links, and other constraints, however:-

- Goudhurst, 5 - 8 miles from nearest town and therefore has a few of its own facilities and is placed top of the parish development hierarchy. Wrong conclusion.
- Whilst Matfield, which has excellent transport links, is close to the A21 and to major shops in PW and TW has less own shops and has been placed at bottom of development cascade. Wrong conclusion, again.
- Lamberhurst with its access to the A21 also boasts a much better infrastructure than Goudhurst surely making it more desirable in terms of development potential.
The methodology for assessing the capabilities in each village is consistent but it does not reflect any real-world constraints around the viability of these settlements. e.g. Goudhurst is on a steep hill while Matfield is flat.

Goudhurst has geographical constraints with a very narrow main street and is far from wider amenities - should be lower than group B.

Goudhurst should be in group C or D. There is no logic in it being in higher group than Horsmonden.

Goudhurst and Brenchley placed too high - consideration should be given to transport links. Goudhurst is 5 miles from Marden Station and 5.1 miles from Cranbrook (shopping equivalent of PW without a station). Goudhurst is 10.1 miles from the major shopping centre at TW. At maximum they should be Group C.

Matfield is in too low a group as it has excellent road links to the A21 (1.2 miles to the Kippings Cross roundabout) and Paddock Wood (2.7 miles), where there are excellent facilities such as shops (including supermarket) and a main line station. It is only 5.4 miles from the main TW shopping centre and 6.7 miles from Tonbridge.

Not adequately described purpose of groupings and what this categorisation might mean.

Access roads have been ignored and water and sewage limitations.

Proximity means that societies, groups, facilities are also centred around larger communities and where distant communities support local needs.

Some villages (e.g. Goudhurst) are on the tourist route which means local shops have broader community of customers to support continued trading.

Most people will use their car with two determinants of choice: - i. distance/time and ii. parking and choice.

While Cranbrook and PW may be comparable in terms of existing services and facilities, the scope for sustainable development in PW without harming the natural/historic environment, is greater. However, would need to be substantial changes to the road layout in town centre and technical solutions found to address flooding and sewerage issues.

On first reading found odd that Horsmonden, Benenden and Matfield not thought to be broadly comparable in terms of sustainability with Brenchley, Goudhurst and Lamberhurst.

Too much emphasis placed on availability of shops, post offices, pubs, nurseries/pre-schools and surgeries which can swiftly disappear and be converted to residential use, unless there is a ban on such conversions (not possible under present Government guidance).

Ludicrous for Study to give sustainability points for Sustrans Cycle Route 18 - this is an on-road route, with no dedicated cycle lanes, on winding, highly hazardous 60mph roads. Not safe for people to use to access village facilities, or children to use for recreation.

Brenchley and Matfield School is situated on the outskirts of Brenchley between the two villages – therefore incorrect to say Brenchley has a school and Matfield does not.

Questioned whether each nursery/pre-school should be given an equal score - as with shops, the existence of a service is surely more important than additional ones which merely provide further choice.

Unclear how these groupings will influence decisions on future development.

Pembury should be in Group C - Tesco, Notcutts, and TW Hospital serve a much larger area than Pembury village and should be excluded from calculations of it’s unique facilities.

Bidborough is a small village and camp field site is considered a rural site within it (it would be accessed by the small residential roads in Bidborough and use Bidborough services and facilities, including the village school and shop). Therefore inappropriate to categorise it with
the main urban area of TW and Southborough just because it is close to these major urban centres.

- Bidborough should be linked with Southborough in a group.
- Cranbrook is a very small historic town and should not be in the same grouping as PW, Pembury ad Rusthall - should be in group B.
- Proximity of Rusthall and Pembury in relation to TW enables them to enjoy high level of facilities available in the town centre. Would be misleading to suggest these two settlements operate separately to TW.
- Rusthall and Pembury should not be classified in Group A. If classification is required at all, these suburbs should be in Group C (similar in nature to Langton Green).
- Hawkhurst is a village with limited facilities, no train links and a lower population level and should not be grouped with PW, Cranbrook, Rusthall or Pembury - grouping of settlements in this way doesn't work. Should be in Group B.
- The score for Hawkhurst (particularly under the 1st and 3rd methods) is significantly lower than Cranbrook and PW. It is closer to Rusthall in scoring terms than to Cranbrook. This difference would be even greater if Study and Scoring system was carried out on a correct statistical basis.
- There are two villages Highgate and the Moor and therefore this is not an accurate assessment and shows a lack of local knowledge. Should be separated so they would fall into different lower groups.
- The score for Highgate and the Moor has been aggregated but the same approach has not been adopted for Cranbrook and Sissinghurst which have a similar relationship.
- Hawkhurst should be considered as one settlement rather than continued reference to two settlements, Highgate and Moor. There is a suspicion that this may be a concealed means of imposing further development on the village.
- Hawkhurst is already acutely stressed by traffic issues (e.g. cross roads) and lack of services.
- Hawkhurst is also surrounded by AONB which is under threat as a result of focus on development.
- Calculations used to assess Hawkhurst and the Moor were flawed - using a method that double counted the village score was inappropriate e.g. pubs, as noted by the Hawkhurst PC.
- Major fear is that Hawkhurst is meant to be a village - if sites get agreed will lose that status. Understand there are needs to be met. However residents live in these areas to stay away from urban.
- Since the survey was carried out the "facilities" at the Moor no longer exist, all the shops have gone.
- No weight has been given to existing populations - Hawkhurst is closer to Goudhurst in population terms than either Cranbrook (including Sissinghurst) or PW.
- Scoring indicates there are two primary schools in Hawkhurst. However, Marlborough House School is a private preparatory school also outside the LBD of the village and should not be included. Similar private schools should be included for the other settlements – e.g. Benenden.
- Para 3.32 - for the Second Method of Scoring 1 point is allocated for a train station within 3 miles. Hawkhurst (both Highgate and the Moor) are noted as being 5 miles from a station - therefore not clear why 1 point attributed to both Highgate and the Moor as they fail this test.
- Approach is overly simplistic - majority of Hawkhurst to London commuters drive to Staplehurst, TW or Tonbridge as they are closer to London, rather than Etchingham which is
in the "wrong" direction. A proper survey should be undertaken that properly assesses actual commuting habits.

- Scoring of Hospitals is again simplistic - the small Hawkhurst Cottage hospital (which only caters for out-patients) is given the same score as the main Pembury hospital. This fails to reflect the actual contribution each makes to health services in the borough.

- Welcome proposed settlement hierarchy and position of PW in Group A - in recognition of sustainability and wide range of services. However, question methodology used to assign scores- in particular, value of a train station has been significantly underestimated (e.g. given same weighting as a post office used a couple of times a week). PW train station provides a service to London in 52 minutes (as well as rapid access to continental Europe via Ashford International). This single factor has a significant influence on housing buying or business location. Range of employment opportunities this opens up to residents of PW clearly places it above other towns in borough (except RTW). Train travel is a highly sustainable mode of transport, allowing access to high-quality employment without use of a car. Suggested that weighting given to train line is reconsidered, and PW elevated in settlement hierarchy to reflect this.

- By their more rural nature, Hawkhurst and Cranbrook should be in a different category to Pembury and PW.

- Agree High Brooms/Southborough Ward should be within Main Urban area. However, North Southborough Ward should not as it has retained, and should continue to retain many of its “village” characteristics around Southborough Common and between Common and boundary with Tonbridge - more akin to Rusthall (Group A).

- Not clear why part of Southborough, specifically Nightingale Farm and Mabledon Farm not grouped with Bidborough in Group D (given it is highly proximate to it).

- Southborough has urban areas and also rural areas - such as those related to Site 45 which is in the Green Belt, an AONB and is adjacent to ancient woodland.

- Southborough should not be included with TW. It is the South Borough of Tonbridge and does not have the same issues that the town centre faces. The two settlements have different characteristics, traditions and ethos.

- Southborough is classified as "Urban" area. Recognition needs to be given to the fact that parts of Southborough are very rural in character.

- Southborough and TW need to retain there own grouping. If they are one planning area the opportunity to build between and consequently combine the two areas would impact the personalities of both towns.

- Needs to be clear where Southborough and Bidborough begin and end.

- Five Oak Green should not be within Group B. Assessment data incorrect. Five Oak Green sits within Capel Parish but as a stand alone village does not have facilities Goudhurst has.

- Five Oak Green has 1 place of worship not 3. No access to medical facilities within the village nor by public transport. It does not have good pavements throughout. It has a PO and a new deli but nothing else. To earmark Five Oak Green for development on incorrect data is not acceptable.

- No mention of flooding issues (this applies to all settlements) which is a serious problem in Five Oak Green. Residents also have serious issues about parking as the B2017 is already overloaded.

- Classification afforded to Speldhurst represents a higher status than that in the adopted Core Strategy as a ‘village’. Therefore, one can intuit that the Local Plan should seek to
allocate a greater number of housing units within medium-scoring settlements than was the corresponding level of allocation under the ‘village’ classification.

- In accordance with other progressing/adopted (NPPF complaint) Local Plans across Kent authorities, settlements categorised as medium-scoring or higher are routinely allocated a proportionate amount of housing growth. Accordingly, medium-scoring settlements, defined by the Role and Function Study, warrant allocation of sites for residential use (subject to local circumstances). In the case of Speldhurst, there is robust justification to revise the LBD boundary to include site 231 within the settlement limits in order to provide much-needed housing that will ensure the centre continues to thrive into the 21st century.

- Speldhurst has similar facilities to Bidborough (minus the petrol station) and far fewer facilities than Langton Green and Sissinghurst - should be in Group D.

- Langton and Rusthall could easily be grouped together and in with RTW.

- As a rural hamlet, Petteridge is not large enough to be classed as a settlement and therefore not in a grouping as such. By their very nature, small hamlets have little or no facilities and should not be considered for any development - not sustainable.

- Categorising settlements purely on range of services/facilities available without taking into account location and accessibility is misleading. While a settlement may not have a village shop, it may be very close to another settlement that does and is easy to get to. e.g. Langton Green is in Group C - however it is on the edge of TW and has good bus links into the town centre. Wide range of facilities is easily available and reasonably accessible, making it a sustainable place to consider for new development. Groupings do not reflect such factors and are unhelpful.

- In reality residents of Langton Green have much greater access to jobs, leisure and retail opportunities than residents of group B settlements such as Lamberhurst and this should be reflected in any future distribution of growth.

- Adjacent settlements should be grouped together e.g. Rusthall, Langton Green, Speldhurst and Bidborough.

- Although the principle of scoring in Settlement Role and Function Study is sensible, weightings used in three scoring methods lack granularity and scoring must be amended to reflect an accurate representation of the value of a facility/service. e.g. a mobile service is 1 point which is the same as other convenience/comparison shops/health services. Neither reasonable/logical a mobile service, available only for a few hours on one day a week will provide same level of service as a shop open 5 - 7 days each week.

- Mobile van may stop serving a particular location, at any time, more than a conventional shop. This scoring fallacy resulted in Horsmonden's score being inflated by 2 points (in each of the 3 methods and thus the average) for having a mobile Fish and Chip van and Pizza van.

- Another anomaly of current scoring method means Horsmonden's small convenience store and two mobile vans has a combined greater value than Waitrose in Hawkhurst (methods 1 and 2) same value (method 3) when service value of Waitrose is obviously far greater.

Other issues/concerns:

- Plans for rail travel does not take account of government proposal under renewal of SE franchise 2018 to reduce train services from “intervening rural stations” between Ashford and TW to London to just one per hour. Will result in 1. Reduced demand for houses in the areas where commuters travel from nearby stations of Staplehurst, Marden and PW; 2. Negative impact on sustainability from increased traffic on rural roads to Tonbridge/TW for decent rail services.

- Building large numbers of houses away from economic and rail services increases the volume of traffic and long term dependency on the car.

- Need to avoid access onto the already congested London Road (A26) or Vauxhall Lane.
• No development in Green Belt or ANOB.
• Infrastructure and transport should be as important as the planning of new developments.
• Would dispute statement in para. 5.6 that consideration should be given to villages making a greater contribution to housing delivery. This approach is contrary to whole vision and objectives of the Plan in respect of transport, infrastructure and sustainability. Huge increases in housing in small villages will permanently damage character of such villages.
• Reference made to sites 90 (Mabledon, London Road), 179 (Mabledon Farm and Land, London Road) and 180 (Nightingale Farm and Land, London Road) - must not be any residential merging of areas between TW and Tonbridge – Southborough / Hangmans Hill to A21/A26 intersection as this is AONB and local agricultural land. Air, noise, traffic pollution along A26 - further mass development would only increase these issues.
• Whole raison d’etre for this grouping methodology is based on need for housing development. It is wrong to assume that the biggest issue facing a village is affordable housing. e.g. young families are moving into Langton Green and, whilst affordability may affect some moving in, it is far from universal truth. Where is the evidence that the biggest issue in Langton Green, Speldhurst and others is affordable housing? Rural villages should not have their character destroyed because urban communities have failed to manage developments within urban centres.
• Consideration of planning approach should be unified, not based on sub-divisions - can be seen as an attempt to 'divide and rule'. One plan please. Start without presumption that growth is either a) good, b) unavoidable or c) (in terms of targets) in any way truly objective.
• Two respondents felt unqualified to comment and not known what meant by question.
• Poor vision has impeded the thinking here.
• Should do analysis first and then construct a list of possible sites and strategies based on local ‘headroom’ to grow in each area. Grouping of settlements takes no account of existing services in each area, and whether any headroom for expansion. Lack of public transport and infrastructure together with existing constraints of AONB, water supply and other services should be considered in the construction of such a list.
• Should be no large-scale alterations to or development within Green Belt, unless very good reasons for the odd exception to be made.
• Any large-scale development in Pembury area (such as proposed under option 4) is unacceptable – should be kept separate from TW. Creation of a new conurbation would be disastrous.
• To have gone through the process of the A21 improvements (with all its environmental considerations) and then use as basis for huge development around/near its south end (blighting existing woodland/countryside) unacceptable.
• If more housing is needed in this area, should be done carefully by increasing existing settlements by a small amount - sharing it out across all communities.
• Creation of new garden village undesirable - back-door route to further urbanisation.
(ii) Development Boundaries

Question 9: Should the policy approach of defining settlement “Limits to Built Development” continue in principle?

Summary of Responses

183 responses were received to this question. 152 respondents (83%) agreed that the policy approach of defining Limits to Built Development should continue, 4 respondents (about 2%) disagreed, while 27 respondents (about 15%) did not express an opinion. Overall, of those who expressed an opinion, the vast majority of 97% agreed that the policy approach of Limits to Built Development should continue, while 3% were in disagreement.

Question 9a: Should the defined Limits to Built Development as currently drawn be retained in their current form or in order to maintain settlement patterns, or be removed to enable the delivery of suitable sites?

Summary of Responses

182 responses were received to this question. 144 respondents (about 79%) agreed that Limits to Built Development should be retained in their current form, 12 respondents (about 7%) thought that they should be removed, while 26 respondents (about 14%) did not express an opinion. Overall, of those who expressed an opinion, a significant majority (about 92%) felt that the Limits to Built Development should be retained in their current form.

Question 9b: If the currently defined limits are to be reviewed/redrawn, what criteria do you think should be applied in redrawing the boundaries?

Summary of Responses

122 responses were received to this question.

Summary of Specific Issues/Concerns:

Remove

- Remove but with better provision/consideration of wider areas – e.g. Hawkhurst must be removed from same designation as towns – it is a village and has already had significant development approved. This and existing environment should be taken into account.
- No need for arbitrary lines drawn on plans. Each case and each settlement should be judged on its own merits. Subject to clear general policies on preventing urban sprawl and safeguarding the countryside, development boundaries are unnecessary.

Retain

- Previous Local Plan (2006) uses LBDs to control growth around all urban areas and villages aiming to prevent unrestricted sprawl into the surrounding countryside, to maintain the separate identity/character of settlements, prevent coalescence and erosion of largely
undeveloped gaps. These aims still stand and this control mechanism which has been very effective is needed now more than ever.

- A LBD provides a defined boundary, carefully drawn in accordance with the criteria in the previous Local Plan (2006), and includes allocated sites showing where development is expected. It also shows where exceptional, justifiable development may be accommodated without a free-for-all approach which would devastate the Kent countryside - “Once taken for built development, the countryside cannot be easily replaced or restored”. LBDs should remain.

- Sustainability Assessment of LP (2006) Policies H5, H8-11, H13 and T3 demonstrate the policies’ stature and effectiveness and they should be retained.

- Without these limits - risk of creating an urban sprawl which cannot be reversed. Should first use all brownfield sites available before touching Green Belt. Has been done in London - Enfield Island Village. May be decontamination costs, but at least that land has been reclaimed and put to residential use. Once Green Belt/AONB eroded - will not recognise "this green and pleasant land."

- Existing controls are in place, working and should be maintained.

- Retain, while permitting some villages to expand.

- CPRE supports definition of settlement limits, essential to prevent suburban sprawl over countryside, ribbon development along roads and development which because of its location and lack of density leads to reliance on the private car as the only means of transport and damage to rural lanes.

- LBD prevents one great sprawl of housing leaching in to the countryside. Need this restriction now more than ever as more and more land is being consumed. If our agricultural land continues to be built on how will we feed our people? Can't take land back once built on and if new properties fall short on quality/space they scar countryside forever.

- Repeated emphasis on meeting so-called needs almost grinds us respondents into eventually accepting that some development is needed, and considering least-worst options (clearly intentional and diverts from the much more important discussion of overarching beliefs/objectives) - Should both retain the existing limits and tighten them wherever possible. Also as a disincentive to profit, landholders selling land for development should be required to give any proceeds above the existing agricultural land use value to a 'sustainability fund' for the benefit of the whole community.

- Reviewing the policy to adapt to a demand for housing is eroding principles against which the plan was put in to protect.

- With reference to following sites:- 90 (Mabledon, London Road), 179 (Mabledon Farm and Land, London Road) and 180 (Nightingale Farm and Land, London Road) - there should be no extension of the LBD into the Green Belt and our areas of AONB and Farmland.

- With reference to the TW SALP (July 2016) - there has been no further evidence presented for a change to TWBC Policy since this document was approved so there is no justification for the currently defined limits to be reviewed/redrawn.

**Review/Redraw/Criteria**

- If redrawn then a 5-8% flexibility for increase should be possible with local community consent (that would enable agreement for local need).
• Concept of walkability and scooter mobility to community centres/services should be retained to ensure wider location does not lead to large traffic increases.
• If LBD for major urban areas considered then a broad remove/retain strategy might be appropriate. When extended to the villages, impact is much more significant - removing boundaries could have a catastrophic effect on small communities.
• Idea of a blanket removal seems reckless although relaxing boundaries against defined criteria may be a benefit.
• Proposition assumes infrastructure exists and services provided in a uniform way across the borough. In towns extension of services is a practical proposition but in the villages the same levels of infrastructure are not in place and not easily extensible - villages in general have no access to gas, making expansion highly reliant on sulphur fossil fuels.
• In line with the NPPF and recent Supreme Court judgment Suffolk Coastal District Council v Hopkins Homes Ltd and another, and Richborough Estates Partnership LLP and another v Cheshire East Borough Council - ensure limits will be robust and should be redrawn to reflect existing built development and planned allocations.
• If limits redrawn - Green Belt or AONB should be excluded and look to retain farmland and ancient woodland.
• Settlement boundaries should be modified to allow organic growth of all settlements. However, key consideration is drafting a policy that provides greater flexibility for redevelopment of problem sites - infill, conversion, ill sited uses in areas outside LBD.
• Redefine and categorise areas ... towns need to have something that defines them ... (don't turn them into conglomerates).
• LBD boundaries around Pembury should not be altered in any way - but if the former Park and Ride site at Woodgate Corner became available for development, this would be a prime site for high density housing with little effect on countryside surrounding Pembury village, no coalescence with TW and no alteration to the Green Belt boundary.
• Criteria for defining LBD boundaries should be based on a robust up to date evidence base, assessing and meeting the housing needs of the borough and specific communities; making use of appropriate assessments on landscape, highway and sustainability and considering role of mitigation where appropriate to balance sustainable needs of the Local Plan as set out in the NPPF.
• Need to assess sustainability of any extended limits, and whether justifiable based on relevant criteria such as (a) current/future availability of additional local infrastructure (i.e. healthcare, schools and roads) to adequately support such development and (b) harm to the environment (in terms of destruction of prized habitats and noise and air pollution).
• LBDs should encompass all of a recognised village and be drawn with care. In Five Oak Green MGB is often in parts of gardens and some properties fall outside of the LBD therefore making it hard for individuals to obtain PP for granny annexes etc., whereas an immediate neighbour can.
• If redrawn then a 2-5% flexibility for increase should be possible with local community consent, local need having been identified.
• Redrawn only in close consultation with local Parish Councils - would allow accurate assessment and knowledge of local area with those best placed to be familiar with opportunities and needed improvements.
• Some options will require these to change, but redraw only in exceptional circumstances.
The boundaries should not be redrawn in rural villages, only in urban centres.
Hamlets could have their own LBDs.
If redrawn then ability to get to facilities without using a car should be paramount or the new boundaries will not provide for sustainable development.
Should be removed or at least re-examined in near future following Brexit and results of the draft analyses, taking into account historic value, need for housing, leisure and infrastructure to avoid overcrowding and traffic congestion/pollution.
Use of LBDs has successfully limited the urban spread into Green Belt and should be continued. Could be some relaxation on fringes of main towns and more flexibility in use of brownfield sites within towns/ villages where development is often refused for no good reason. These sites are often poorly maintained and become eyesores.
The boundary should be reviewed/redrawn to enable delivery of further suitable sites on the periphery of sustainable settlements. A review of the Green Belt and landscape designations (such as the AONB) should be undertaken to assist with this process. e.g. the landscape quality of some land to the south of TW is limited- given over-riding need for more housing, considered such land should be released for housing.
Should not be re-drawn unless the community concerned wishes them to be.
If redrawn, essential to ensure people in rural villages can easily walk to the centre of their village. There are no sensible public transport options for short journeys and many people will not walk far. There is a real risk that larger villages will lead to significant traffic congestion in village centres.
Should not be removed altogether but amended to include land which would make it easier for edge of settlement sustainable sites to come forward quickly.
Review of boundaries should be based on criteria:

i. Infrastructure – accessibility of roads, utilities, cultural, sporting, school and medical facilities (this would favour new town developments). ii. Access to road and rail transport links – should be a factor in determining where housing density can be increased with minimal impact, close to stations and access roads, such as the A21 Tunbridge Wells By pass or train stations south of Tonbridge (benefitting from the increased rail capacity at the London Bridge station).
Council’s approach to distribute majority of housing within sustainable settlements or within defined LBD is noted and welcomed. In reviewing/redrawing limits, sites with good access to existing services and facilities or sites with potential to create sustainable links with the core of the settlements should be taken into account.
Should not prevent limited redrawing of boundaries within existing Rural Fringe land if this would enable delivery of suitable/sustainable sites. (only to include greenfield and existing Rural Fringe land, not Green Belt or ANOB).
Current LBDs were defined some time ago and should be carefully reviewed to see if they remain appropriate to deliver in a sustainable way and consistent with new national policy.
Great weight should be given to protecting/enhancing distinctive character of individual settlements, including need to protect key vehicular and pedestrian approaches to settlements, in particular “green gaps” on such approaches which form a key transition from the rural countryside to the urban settlements.
• Would need to be considered on a case by case basis with community consultation in each area, informed by professional architects, the AONB and planners to determine best approach.

• To allow scope to deliver much needed housing the LBD could be widened in some circumstances e.g. where a new road/dual carriage way has isolated an area of land next to a village such as the A21 Pembury bypass which has defined a potential new village boundary to allow building in Pembury.

• If reviewed - strong application of common sense and firm regard for natural and built heritage needed.

• Windfall sites are an important component of housing land supply and tightly drawn LBDs should be avoided, otherwise smaller settlements cannot grow organically to meet longer term local needs.

• Consideration should be given to wider LBDs which include garden land.

• LBDs should be only be redrawn on basis of concentrating development around existing sites or where there is improved transport links, enabling sustainable living.

• LDBs should only be redrawn where potential developments would allow: walking distance to schools – especially primary schools; walking distance to shops and local facilities; existing infrastructure is strong enough to allow extra capacity on roads; Infrastructure to allow/encourage walking and cycling.

• Principle of distributing housing of varying character, (particularly tile hung and other local styles) amongst rural and urban areas at no more than 5% in any one locality, should be emphasised in order to preserve the character of the borough.

Other Issues/Concerns:

• Essential that any development retains the character of the area.

• Built development should only be infill and not extend beyond the Green Belt- essential for Pembury, which is bursting at the seams. Facilities such as schools and the surgery are oversubscribed. Also, the main drains running through Stone Court Lane are an ongoing problem.

• Development needs to focus on Band A as this is where sustainability is more readily in place.

• If we build in more and more layers around our villages they soon won’t be villages anymore and we will have destroyed one of the very things we want to protect.

• If splitting housing need into urban and rural establishes that rural dwellings are in great demand then we should build a new rural community rather than destroying the ones we have.

• In the short term, option 4 seems to be best as various infrastructures required (shops/transport/medical/schools) are available. Longer term, identifying a 'garden village' option would be preferable to over-expanding the villages. The problem with spreading the development across the villages is the difficulty of providing schools/transport/medical-facilities.

• Development in eastern areas of the borough should be limited -insufficient services, transport, health care, education to warrant further development.

• Option 3 is the least bad.
• Road infrastructure and capacity – A26 cannot cope.
• Allow small infills in all villages to ensure village shops will continue & schools retained.
• Reference made to para 3.8 of TW Borough Local Plan 2006, which explains the approach/criteria for defining the LBD and applied to call for site 231. Justification for site 231 to be included within a redrawn LBD for Speldhurst advocated through application of following criteria: SW boundary is an historical field boundary; Site 231 is the only undeveloped land parcel within area TW14 of the Council’s Landscape Sensitivity Appraisal that meets the criteria established by the assessment; it is in a semi-rural location adjacent to LBD boundary; Green Belt could be reviewed (as Elmbridge Green Belt Review) as site makes low contribution to Green Belt principles; Habitat data (Defra MAGIC) identifies site (improved grassland) shares common attribute with the habitat type of residential properties immediately adjacent.
• Overriding importance to respect views of local residents - TWBC should examine results of comprehensive residents’ survey in Speldhurst parish, conducted in 2015, and the Speldhurst Parish Plan which was adopted last year.
• The Council’s current estimate for the number of new dwellings required before 2033 is 12,960. This may increase significantly as a result of the inability of London to meet its own housing needs. As the Council’s assessment suggests, there is insufficient brownfield land to accommodate the very high levels of housing demand/need in the Borough. This is the context in which defined LBDs need to be assessed. Construction on urban fringes of sustainable towns/larger villages, and where necessary redrawing LBDs to accommodate this, will be vital for the Council to meet housing targets. PW is a clear example of this - highly sustainable location, (reflected in grouping - Group A of draft settlement hierarchy). However, development is now strait-jacketed by the settlement boundary. Therefore, representation accompanied by proposals for development to west of PW, on land north of Badsell Road. Envisaged development could provide around 700 new dwellings, on land which is available, and developable. Such a development could be designed to work with natural features and provide robust and defensible new Green Belt boundaries. Land benefits from strong physical boundaries, with Tudeley Brook to the west, the B2017 to the south and the railway line to the north.
Section 5 – Strategy Considerations

(i) Strategic Options (Five possible options as above)

Question 10: Please let us know your preferred option or combination of options in order of preference.

Summary of Responses

242 responses were received to this question in terms of ranking strategic options in order of preference. 79 of these respondents preferred a combination of options as set out in Question 10a below.

Of those who ranked the strategic options, 110 respondents (65.6%) ranked Option 4 (Growth Corridor-led Approach) as their most preferred option, 26 respondents (16%) ranked Option 5 (New Settlement Growth) as their most preferred option, 18 respondents (10.4%) ranked Option 1 (Focused Growth) as their most preferred option, 11 respondents (6.8%) ranked Option 3 (Dispersed Growth) as their most preferred option, while 2 respondents (1.2%) ranked Option 2 (Semi-dispersed Growth) as their preferred option. Overall, the vast majority of respondents selected Option 4 as their most preferred option.

Question 10a: If you prefer a combination of options, please state which ones.

Summary of Response

111 responses were received in terms of stating which specific combination of options was preferred, summarised as follows:

- 55 respondents (49.6%) chose a combination of Option 4 (Growth Corridor-led Approach) and Option 5 (New Settlement Growth) as their preference.
- 29 respondents (26.1%) chose a combination of Option 4 (Growth Corridor-led Approach), Option 3 (Dispersed Growth) and Option 1 (Focused Growth) as their preference.
- 8 respondents (7.2%) chose a combination of Option 1 (Focused Growth) and Option 4 (Growth Corridor-led Approach) as their preference.
- 4 respondents (3.6%) chose a combination of Option 3 (Dispersed Growth) and Option 5 (New Settlement Growth) as their preference.
- 3 respondents (2.7%) chose a combination of Option 2 (Semi-dispersed Growth) and Option 4 (Growth Corridor-led Approach) as their preference.
- 3 respondents (2.7%) chose a combination of Option 1 (Focused Growth) and Option 2 (Semi-dispersed Growth) as their preference.
- 3 respondents (2.7%) chose a combination of Option 1 (Focused Growth) and Option 5 (New Settlement Growth) as their preference.
- 3 respondents (2.7%) chose a combination of Option 4 (Growth Corridor-led Approach), Option 3 (Dispersed Growth) and Option 5 (New Settlement Growth) as their preference.
- 1 respondent (0.9%) chose a combination of Option 3 (Dispersed Growth) and Option 4 (Growth Corridor-led Approach) as their preference.
• 1 respondent (0.9%) chose a combination of Option 4 (Growth Corridor-led Approach), Option 1 (Focused Growth) and Option 2 (Semi-dispersed Growth) as their preference.

• 1 respondent (0.9%) chose a combination of Option 3 (Dispersed Growth) and Option 2 (Semi-dispersed Growth) as their preference.

Overall, the majority (49.6%) chose a combination of Option 4 (Growth Corridor-led Approach) and Option 5 (New Settlement Growth) as their preference.

**Question 11: What views do you have about the possibility of a new settlement somewhere in the borough providing for future development needs?**

**Summary of Responses**

156 responses were received to this question.

**Summary of Specific Issues/Concerns:**

- Placing such an enormous number of houses elsewhere in the rural borough would destroy rural TW wherever it is located.
- To place the projected town development elsewhere makes little sense, just creates massive traffic.
- A new settlement would only work if it linked closely to existing key infrastructure. This would limit it to the A21 dual carriage way extension.
- It would destroy a new area of our environment.
- Describing option 5 as a 'Garden Village' is misleading and misrepresents the facts. A settlement of 5000 - 7000 homes is a town. It will be very difficult, if not impossible, to find a suitable location within the borough for a new settlement of that size.
- Should be planned in a way that might accommodate further expansion in future Plan periods should this be required.
- A large new settlement within the boundaries is unfeasible given the geography and limitations of access and infrastructure.
- Would take a very long time to come about, during which potential developers of other sites could argue that TWBC does not have adequate provision of housing allocation and override TWBC and local communities’ wishes.
- Care must be taken to ensure it does not become isolated from the rest of Kent.
- Any development that has a significant impact on local roads should not be considered.
- Trying to meet the borough’s total need in a single location ignores the fact that those needs are borough-wide. Need should be met where it exists, not in an arbitrary new place.
- Make it sufficiently architecturally variegated to make it attractive to settle in.
- Must be self-sufficient, sustainable, and have no impact on existing already heavily developed and populated areas.
- Due to high level of AONB landscape (70%), such a large scale development will not be possible.
• A new settlement in the borough will not be sustainable in terms of transport infrastructure, as it could not be located near a railway station.
• A suitable site would need to have reasonably close access to roads and employment opportunities.
• Any new settlement would have to have all the necessary schools, doctors, leisure facilities and transport links in place before any people move in.
• If a “new settlement” relates to Call Site 26 on the plan, then any development in this area does not qualify as provision for future needs. It is remote; lacks adequate access, has no parking for current residents of Stone Court Lane; any road widening would impact upon houses in Herons Way.
• Current ‘issues’ with de-population of outlying villages indicates little benefit for younger people and retired people who will want to be close to services of a town.
• Should be adjacent to an existing or new railway station where commuters can walk or cycle to the station.
• As part of the wider sustainability agenda, there is a social obligation to ensure that all existing rural settlements are provided with the opportunity to evolve organically. Any strategic development must therefore be supplemented by suitable land releases throughout the settlement hierarchy.
• Caution is needed to ensure that the preferred strategy allows sufficient time for a garden village to be properly planned and before a reliance is placed on its delivery.
• As part of the evidence gathering process for a garden village proposal, would strenuously recommend analysing delivery rates from strategic sites in other boroughs to ensure assumptions are credible.
• Concerned that such a development would create an entity without history, diverse character or community.
• Detrimental to farmland and agriculture.
• Must not be in AONB or green field area.
• This is around 7,000 houses, 5 times the size of Cranbrook and clearly not a village. The Council could be in danger of possible litigation for providing a false and misleading interpretation to the community.
• The employment offer on a new settlement would also have to not ‘out-compete’ an existing centre of population.
• Without a shared vision from all landowners then the vision of a new settlement will not materialise into a successful conclusion.
• There is no clear indication presented within the Issues and Options paper whether CPO powers would be endorsed, and if this were the case if TWBC would be acting as applicant.
• A growth options study would need to be undertaken to robustly justify why a selected location has been chosen over-and-above other plausible options.
• TBWC have already made cuts to public services and are closing down – not opening up public amenities. There is a nationwide shortage of GPs - not possible simply to say you would build a new surgery.
• Impact of increased traffic, pollution, light pollution, noise and inevitably crime and litter which always increases when there are housing estates would be a disaster plan for this beautiful area of the Garden of England.
• Assuming a percentage of new development would have to be affordable homes, the proposal to site development where reliance on cars for daily use is necessary will hardly be economical to living costs.

• Impact of more traffic on rural roads is a poor solution for the environment. Planning should be based on reducing reliance on cars and less, not more road use.

• Must stand alone and not overshadow another community.

• Ensure that facilities are in place to sustain a truly mixed community, with a commonly shared area at its core.

• Any new 'garden village' should be outside the borough altogether.

• The Council should treat any public support for Option 5 with great caution, since it probably represents a vote for “anywhere but here”.

**Question 11a: Where do you think a possible new settlement could be located?**

**Summary of Responses**

138 responses were received to this question.

**Summary of Specific Issues/possible locations:**

- New Settlement to the north of the borough near to Marden or Staplehurst on the Ashford to Tonbridge Railway line.
- Create a new settlement between TW/Pembury/Tonbridge.
- Any new settlement should be outside the AONB.
- Brown field sites.
- The only possible location would be in the A21 corridor.
- Knights Park - close to A21.
- Capel/Five Oak Green area.
- As close to the existing railway stations at Staplehurst and Headcorn as possible, i.e. to the north of Frittenden.
- Consideration should be given under the duty to co-operate to locating the new settlement outside the borough boundary close to an existing train station.
- Would need to be within one of the lower-lying areas, to minimise visual impacts. The most obviously relatively “empty” areas on the map are either NW or SW of Goudhurst.
- Exclude Green Belt.
- Major development of existing communities such as Hastings, Bexhill.
- Cranbrook region.
- A development to east of the Ashdown Forest, South of TW and south of the Weald would be the minimum impact on the environment and AONB.
- Understand it would be possible to reinstate the railway line from Eridge/TW for commuter operation to London etc. - therefore towards Crowborough could be considered.
- South East of PW – not too far from the train line.
- West or east of PW in Maidstone Borough.
• Should be worked out using GIS mapping software to identify those areas that best meet the primary criteria of sustainability, environmental impact, visual impact, new transport opportunities, infrastructure requirements and so on.
• Separated from existing settlements to enable their character to be retained.
• Should preferably not be built on a flood plain or land prone to flooding.
• There is an area opposite Pembury Hospital.
• Near the Pembury bypass.
• In between Lamberhurst and Pembury or PW and Southborough.
• To the South East, towards Cranbrook and Hawkhurst.
• Use the existing Bewl country park.
• The issue with any possible siting is that most people will have the following view - not in my back yard.
• PW and Five Oak Green are already settlements so should not even be considered as appropriate for a new village/town.
• PW/East Peckham seems to be the obvious location since the landscape value there is more limited.
• A site north of North Farm Industrial Estate between the railway line and the A21 would be the least worst option.
• A sustainable site with good access to facilities such as schools, shops, employment, medical facilities, rail line, etc.

**Question 12: Do you think we have considered and identified all reasonable options for accommodating future development growth within the borough?**

**Summary of Responses**

134 responses were received to this question. 53 respondents (39.6%) agreed that all reasonable options for accommodating future development growth have been considered, while 81 respondents (60.4%) disagreed. Overall, there was a majority of those in disagreement.

**Question 12a: If No, please set out what other options for accommodating future development growth within the borough you think should be considered.**

**Summary of Responses**

98 responses were received to this question.

**Summary of Specific Issues/Concerns:**

• The target number from SHMA should be challenged.
• A more detailed assessment should be undertaken to consider the impacts of all 5 proposed Options against the NPPF as a whole.
• One aspect not explored sufficiently is wider scale compulsory purchase, the purpose being to allow development in run-down areas, rather than green field areas.
• There are areas just outside the borough where development would make more sense – e.g. Marden and Staplehurst.
• Need to start building upwards. Current developments use far too much land.
• Would suggest a real focus on brownfield sites and under-utilised areas.
• The Options are all based on a single number of houses than can apparently be put anywhere in the borough to satisfy demand. That is not the case.
• As retail undergoes a paradigm shift to online we should not be looking to increase retail space in new developments - sites like the cinema site should be maximised for housing.
• There should be more focus along the A21 corridor.
• Some of the un-named villages in the borough could accept small scale development of up to 10 houses.
• Lack of imagination in suggesting real options for new settlement development (cannot believe that genuine options have not been considered - these should have been shared).
• In view of environmental importance of the borough the allocation OAN is far too high. The political and economic environment has also changed since the study was carried out in 2015 and the central numbers should be reviewed.
• The Options for accommodating future development growth do not review the contribution that could be made by promotion landholdings that form part of the Public Estate.
• Would be useful to have explored further the idea of a brand new settlement rather than just getting views in principle.
• A much greater emphasis on density is required.
• A harder look at second home ownership is needed.
Section 6 – Development Management Policies

Introduction

This section considers the policies that are currently in place in the Tunbridge Wells Borough Local Plan 2006 and identifies the key topics that may merit and necessitate new development management policies, especially in the light of government guidance in the NPPF (2012) and any updated local evidence. Three questions were asked relating to (i) existing policies, two questions relating to (ii) new policies and one question relating to (iii) detailed policies, as follows:

(i) Existing Policies

Question 13: Which policies do you consider are suitable for continued use?

Summary of Responses

37 responses were received to this question.

Summary of policies identified to be suitable for continued use:

- Particularly important policies include:
  - EN11 Ancient trees and woodland
  - MGB1 – Green Belt
  - LBD1 – Limits to Built Development
  - Policies relating to landscape protection
  - Policies on Rural Fringe land
  - Policies for the specific protection of the AONBs and buffer areas to AONBs

- All environmental policies are of utmost importance. Namely:
  - EN11 Parks and Gardens
  - EN13 Tree and Woodland Protection
  - EN15 Local Nature Reserves
  - EN21 Areas of Open Space
  - EN22 Areas of Landscape Importance
  - EN25 Development controls impact to rural landscape
  - MGB1 Green belt

- All of the policies listed especially MGB1, LBD1, and EN8.
- The majority of policy themes remain relevant.
- CS4 School provision and TP19 Highway improvement
- All EN policies are still valid and workable.
- Policy EN19 could be retained in order to alleviate the pressure to build on historic and natural environment.
- None scrap them all and start again.
- In general, where saved policies can be sensibly incorporated as they stand, it will make for consistency.
Question 14: Which policies do you think may be out of date or no longer necessary?

Summary of Responses

22 responses were received to this question.

Summary of Policies considered to be out of date:

- Rather than maintain them rigidly or abandon them, each policy could be reviewed so that they do not inhibit most attempts to provide new houses.
- Policy of land development to meet housing needs is outdated.
- CS4 - outdated.
- TP10 - work on A21 bypass nearing completion - no need for this policy.
- Policy R6 - no. 3.
- Policies T1, T2, R6, CS4.
- References to other plans i.e. those dated 1996 and 2006 will no longer be valid.

Question 15: Which policies do you think could be updated or amended, and how?

Summary of Responses

25 responses were received to this question.

Summary of policies suggested for updating/amendment:

- Policies relating to the Limits to Built Development need updating to reflect a more positive approach to planning in rural areas.
- Travel sustainability policy should be updated to account for proposed reduction in rail services at PW, Marden and Staplehurst.
- H4 Gypsy-Travellers to have regard to PPTS.
- MGB1 needs a review following the review of Section 5 of the Local Plan.
- Chapter 5:
  o 5.26 There is no Royal Victoria Hall and Council offices now and there will likely be a mixed use development by the time the plan is published.
  o 5.90 Incorrect as there are numerous convenience provisions including Tesco, Premier Southborough Stores and Osbornes.
  o 5.91 Incorrect as there are no plans for a supermarket in the proposed Hub development.
  o 5.93 References to the Royal Victoria Hall refurbishment should now be deleted.
  o 5.96 Now incorrect as the plans for the area are specific in terms of parking.
  o 5.97 ‘high quality’ and ‘high standard’ are subjective and cannot be measured.
  o 5.98 Incorrect reference to the RVH again.
  o 5.100 – 5.103 are to be redrafted post Southborough Hub development.
  o Policy CR7 will likely need redrafting.
  o 5.149 refers to recycling. This aspect should have more significance and a commitment for better provision be promised.
• Chapter 6:
  o 6.56 revise - there have been a number of piecemeal developments granted since the original plan.
• Chapter 11:
  o 11.128 and TP121 still stand but with amendment.
  o 11.130 will be out of date following the Southborough Hub development as there are parking provisions re provided throughout the area.
• EN4, EN8, EN18, EN20, EN21, EN22, CR1, CR2, CR3, CR7, H1, ED1, ED2, ED3, ED5, R1, R2, TP9, TP11, TP18 and TP19 should be reviewed and amended to show updated proposals and latest status.
• Add Hawkhurst Colonnade to EN6.
• EN13 - Tree protection. Any trees removed should be replaced by 3. If a TPO tree is "in the way" of development, an alternative site should be sought rather than remove our special trees.
• EN23 - Add Hawkhurst's green approaches.
• TP26 - car parks in Hawkhurst are now limited to a few public spaces in North Grove, some parking at the primary school and short term convenience store car parks.
• Policy R6 no.3- No current allotment site should be used for development on the pretext that there is no better alternative.
• Concern that existing policies for public transport and cycling have not resulted in adequate improvements. These aspects should be emphasised much more strongly within the policy documents.

(ii) New Policies

Question 16: Considering the topic areas above, are there any other topics that you think the new Tunbridge Wells Borough Local Plan should include?

Summary of Responses

43 responses were received to this question.

Summary of suggested New Topic Areas/Policies:

• Under "Natural Built and Historic Environment", policies should be included to protect the distinctive character of existing settlements.
• Impact of climate change.
• Infrastructure - waste disposal, care of elderly, roadway repairs, noise pollution.
• Air pollution.
• Ecology and protected species.
• Brownfield sites under natural, built and historic environment.
• Add infrastructure improvements to roads, paving and lighting.
• Providing public conveniences to the smaller towns and villages.
• Traffic problems and how to alleviate them.
• Careful use of natural resources.
• Maintaining biodiversity and green spaces.
• New policies should encompass a policy supporting renewable energy.
• A clear statement on carbon emissions and energy consumption targets is needed projected to at least 2050, and a view on how this is aligned with the Paris climate change agreement.

**Question 17: Are there any topics that you consider do not require any further detailed development management policies because there is sufficient coverage already in place, i.e. in national guidance (the NPPF)?**

**Summary of Responses**

19 responses were received to this question. 11 respondents (57.9%) stated no, 5 respondents (26.3%) stated they were unable to comment on this/did not know and 3 respondents (15.8%) made other comments.

(iii) **Detailed Policies**

**Question 18: Are there any specific planning issues affecting the borough of Tunbridge Wells that you consider are not adequately covered by the NPPF or already referenced in this chapter and which you would like to see addressed in a policy?**

**Summary of Responses**

32 responses were received to this question.

**Summary of Specific Issues/Concerns:**

- Probably stuck with NPPF until planning goes so wrong that public opinion causes a future government to think again.
- Shape the future rather than leave to market forces, retaining key assets for the future and generating income to support community health and welfare.
- Identify robust constraints on development and focus on affordable housing.
- Create at least one sustainable Garden Village in the borough as a new community with schools, health services, employment and transport infrastructure, including new or existing railway stations.
- Develop a network of high quality, integrated sustainable transport solutions and infrastructure focussing on walking, cycling and public transport for short journeys.
- Within RTW, increase the quantity and quality of local employment, building on existing core sectors while developing new sectors such as media, health, tourism, arts and culture, and designate new zones dedicated to employment use.
- Maintain the high visual amenity and cultural value of the landscapes within and on the perimeter of the town that contribute to its economic health.
- Moving developments away from main urban area to ease traffic congestion.
- Air quality caused by traffic congestion.
- Borough policy to conserving the Green Belt and AONB areas.
• Separate policy to indicate clear activities scheduled to be undertaken to reduce traffic congestion to the A26 area.
• Add infrastructure improvements to roads, paving and lighting.
• The High Weald AONB Unit should be an automatic planning consultee.
• Need for a good supply of local needs housing.
• Concentrate on TW town centre to ensure all buildings are used and it provides a good shopping environment.
• Need to take crime prevention into account as a serious consideration in the planning/design of new buildings and developments.
• Where will the water supply come from – given the South East is a water shortage area?
Conclusion

Introduction

This final section allowed the opportunity to comment on any other planning and development related matters that should be considered or have not been mentioned in the Issues and Options document; and also for any general comments to be made, under the following question:

**Question 19:** Are there any other planning and development matters that you think the new Local Plan should consider or cover that have not been mentioned in this Issues and Options document? You can also make any general comments here.

Summary of Responses

395 responses were received to this question. More than half of these comments (approximately 65%) were objections in relation to specific sites from the Call for Sites process.

Summary of Specific Issues/ General comments:

Settlement specific

- Goudhurst is an historical Village and could probably take a few houses, however the infrastructure and road network is not capable of supporting large developments.
- Marden has already taken on an extra 600 houses which is approximately 3 miles away from Goudhurst - going to put huge pressure on commuters as already problems finding seats and parking for the train.
- Do not believe there is a need for 4/5 bedroomed houses in Goudhurst (recent plans approved for the garage site). May be a want but not a need. What is needed are more small houses/apartments for elderly residents.
- More houses needed in Frittenden to help keep the very good school going, the very small shop running and the garage etc. Enormous lot of houses being built in all villages and towns around here but not in Frittenden.
- There is no comment on the subject of the traffic light controlled cross roads in Hawkhurst. For much of the day this operates well above capacity.
- Facilities in Kilndown are very limited and infrastructure basic. Any development would be inappropriate unless for a very small number of affordable dwellings in the north side of the village.
- Distance from Hawkhurst to Etchingham station is treated as reasonable and possible within a short time. Travel to this Station (and indeed Staplehurst) is usually a much longer journey at rush hour than in the intervening periods.
- With neither a mainline train station nor any accident-and-emergency hospital nearby, a dramatic expansion of housing in Hawkhurst is not in keeping with the Vision on Transport and Parking.
- A village the size of Horsmonden (945 households) can only take developments which annually totals no more than this number of dwellings every few years without a serious
impact on services and infrastructure and successful integration into the community – so the built village area should expand no more than 0.55 hectares each 2 -3 year period.

- Suggestion that Goudhurst (and I assume Kilndown) has sufficient infrastructure to support significant growth, is ludicrous.
- Concerned about the high number of proposed sites in the Green Belt of Horsmonden.
- Grange Road Allotments should be deleted for the "saved site allocations 2016". They are fully utilised and have statutory allotment status.

Consultation process

- The publicity for this consultation was very limited with many people only being lately aware of it.
- Four days for public consultation exhibitions were not properly promoted and were hardly adequate to do justice to the importance of the subject in hand.
- Time for consultation was far too short and with summer approaching most normal people have other matters on their minds. The period included two bank holiday weeks, a half term holiday, school exams, a County Council election, and a General Election.
- The consultation 'exhibitions' were all at the beginning of the consultation period and over before most people had a chance to hear about them.
- One of the four 'exhibitions' was at Matfield, an interesting choice bearing in mind the size of the village. Is this anything to do with the fact that the Councillor responsible for TWBC planning and a cabinet member lives in Matfield?
- The so called 'consultation' is fatally flawed as people are being asked for their views and choice of Options on incomplete evidence.
- Consultation should be reopened as soon as the complete 'call for sites' evidence is available, so that consultees can base their views on all of the possible sites.
- Officers at the Cranbrook event did not know that Staplehurst Secondary school facilities were mainly at Cranbrook and PW. Also had little knowledge of the state of play for the many Parish Local Plans within TW, or any cross border including Sussex ones.
- For the average Joe this document is difficult and time consuming to understand and complete. The percentage of the population able to adequately respond must be very low.

Issues & Options document

- Overall I&O paper provides a vision from the perspective of a major urban and economic centre which does not reflect the very different environments and needs of the rest of the borough.
- The Vision should look to how the borough will develop over a much longer period (beyond the proposed local plan) delivering sustainable growth over the next 50 years.
- The villages do not have sustainable communities and the Vision only enforces the notion they are dormitories for the larger urban areas.
- The Objectives talk in generalities without an overriding vision of how such a number might be achieved.
- Nothing in the Objectives about creating social cohesion or balanced communities.
• No mention of increased noise and air pollution or congestion.
• Paper does not discuss need for a coordinated approach to transport to reduce dependency on motor vehicles.
• Discussion in 3.25 on expected levels of migration is vague, simply stating generalities and expectations without any significant backup justification.
• Stated the aim of the Plan is to ‘protect and enhance the character of the region’ - not possible if large developments are to be sanctioned in the area.
• Use less subjectivity such as ‘adequate’, ‘ensure’, ‘seek to’ be more definitive.
• Two general criticisms - it includes nothing on aircraft noise and there should be something on innovative traffic management, such as shared space schemes in towns and villages.
• Options 2 and 3 would lead to undesirable development in Brenchley and Matfield. These options would be contrary to TWBC stated strategies, objectives and policies.
• Inclusion of village of Hawkhurst as a focused growth target in Options 1, 2, 3 and partly 5 does not take account of the road situation.
• Seems to be a significant and viable option missing from proposals - The Rail Corridor.

Housing

• Whole basis of calculating the build target is flawed as the rates of migration to TW in future are likely to be substantially lower than in the past due to Brexit and the central Government’s commitment to controlling immigration to the UK.
• Additional housing should not be forced on the rural community when clearly there has not been anywhere near the same historic demand for building.
• Seems some bias in the draft, favouring RTW as against the rest of the borough.
• At a time of considerable economic and political uncertainty (Brexit, possible change in government) together with rapid technological change, it seems rash to inflict such major changes in terms of housing development on the borough.
• Building large numbers of houses away from economic and rail services simply increases the volume of traffic and long term dependency on the car.
• No clue about delivery of housing and other sites once identified as suitable for development would be phased over the 15 year period.
• Maybe housing targets can be shared with Tonbridge and Malling Borough Council if TWBC assists with freeing up brown field sites?
• As TW Hospital is one of largest employers in the borough, TWBC should push for more dwellings to be built in walking distance of hospital.
• If must build houses, build them in the towns, motorways and near the schools and hospitals.
• Population and property growth projections included in the SHMA are too high for TW and out of alignment with projections used by water authorities at least, if not the power supply authorities.
• Council should seek to develop housing on brownfield sites scattered across the borough particularly eyesores and disused housing. e.g. old cinema site in TW, abandoned sheltered homes in St Andrews, Southborough and old gas works on Sandhurst Road.
• Concerns other adjoining Councils are openly not complying with their quota (Wealden).
Transport

- Road systems have major bottlenecks that at times create serious congestion.
- Borough has 3 train stations which is the reason why development has concentrated around TW, High Brooms and PW. If want to spread development across the borough should consider what other transport links could assist with Plan.
- Another way of opening up the borough is resurrecting the PW branch line that went from PW via Horsmonden and Goudhurst to Hawkhurst.
- All very well to include cycle storage in planning applications, but roads are too dangerous to cycle on at peak times.
- For pedestrians, which includes many school children, additional traffic will bring more pollution and make it unbearable to walk down the street.
- Hope the Borough would make submissions to Southeastern as part of on-going, extended consultation by that company, against any reduction in the service.
- HGVs are getting bigger, and in rural areas smashing down verges, walls and hedges, and frequently cause blockages (Goudhurst High Street, Hawkhurst crossroads and many others).
- Building substantially in any of the villages doesn’t just grow the road traffic in the source village - but channels it along specific road arteries across the borough.
- If a new ‘Garden Village’ is thought a viable option, then it needs to be in a position that minimises car journeys generally and within-borough journeys especially. Hence it ideally needs to be located on the rail network with a new station.

Infrastructure

- Narrow lanes generally in a seriously bad condition due to the present numbers of delivery vehicles and rise of the 4X4 - cannot take inevitable additional damage that will follow development.
- Could find no mention of a review of the fundamental infrastructure capacities.
- With all the proposed development in PW, the Colts Hill Bypass should be built to stop all the traffic thundering through Colts Hill and Matfield.
- Area has regular water shortage issues and an increase in households will only make this worse. No provision for recycling or capture of grey water is ever included in planning applications.
- Already hard enough to get a doctor’s appointment, so will be almost impossible if large numbers of new properties are built.
- The additional 7,000 properties, accounting for nearing 20,000 people are likely to increase water demand by 3 million litres per day by 2033 - out of the range of uncertainty accounted for in headroom by the water company.
- Hope this time round there will be more forward vision from TWBC. In the 80’s they closed down two secondary schools in TW (Ridgeway & Huntleys), only now to have to rebuild schools.
- “Rural Lanes” SPG needs to be considered to protect such lanes from development.
- Have not developed a concrete infrastructure plan for each Option. Therefore impossible to choose an Option without knowing what exact infrastructure will be behind that Option.
**Economic / Retail**

- The proposed business development will not create number of jobs required to support 13,000 households and the proposed mix of jobs is merely an extension of historic development activities.
- The differential business rates between sites needs to be addressed as will only drive business to look for lower cost premises where priority should be to maintain and enhance existing retail locations.
- Investment in additional retail space seems very inappropriate and out-of-step with current trends.

**Leisure / Recreation**

- Instead of taking away attractive facilities like a golf course in Hawkhurst, leisure activities and facilities should be kept and preserved to make the villages and towns in the countryside attractive for residents, businesses and visitors.
- If TWBC want to create sporting hubs, maybe it should consider expanding the facilities at Putlands Leisure Centre so it acts as an alternative to the TW Sports Centre, St Johns Road.

**Settlement Role and Function Study**

- Particular concern TWBC appear to have categorised Hawkhurst in the same group as PW, Cranbrook and TW - Hawkhurst is not a town. Please could TWBC change their designation in line with previous agreements.
- Goudhurst is 5 - 8 miles from nearest town and therefore has some of its own facilities and is placed top of the parish development hierarchy. Wrong conclusion.
- Matfield, which is close to major shops in PW and TW has less own shops and is bottom of the development cascade even though it has excellent transport links to services. Wrong conclusion.
- Using resource availability to drive hierarchy is flawed as the proximity to other larger towns determines the ability of a community to support services such as basic retail or societies.
- In creating a settlement hierarchy, the groupings need to reflect the levels of deliverable development, ease of growth and access to areas of employment and/or access to train services.
- No explanation as to why the data for Highgate and the Moor has been added together.
- Strong objection to Hawkhurst being described as two separate settlements (Highgate and The Moor). Suspicion that this is leading to further development imposed on the village by deceit.
- Cross-roads in the centre of Hawkhurst are not staggered as stated.
- Some of statements and research are at fault. There is a single village hall in Hawkhurst that is situated in Copthall. One remaining bank in Hawkhurst is to close in September. The Moor has no shops at all, and the Post Office is a visiting Office only for some days.
- There are a few facilities/services that have been given a higher status than their actual utility. Hawkhurst Cottage Hospital is not a Hospital in the true sense. Cinema has limited
capacity of less than 100 seats. Tesco Metro Hawkhurst is not a supermarket but a Metro store. Both GP surgeries are small and not accessible for elderly and disabled.

Other

- Given large proportion of borough is within AONB, the High Weald AONB Unit should become an automatic planning consultee.
- Would like to see more national government emphasis on regeneration in the north of the country, where employment would be welcomed and many towns have spare housing and development capacity.
- Council is advised to consider a focused consultation with local people and parish councils to begin identifying potential Local Green Space designations.
- Borough should encourage Neighbourhood Plans in their vision to engage communities in broader borough initiatives.
- Major concern that the level of development planned in TW will be mirrored in other boroughs.
- Council has details of owners/potential developers of sites. Why have they not been disclosed?
- TWBC encouraged local Parish Councils to produce Parish Vision/Parish Plans which several have now produced at a cost to them and ultimately the tax payer. Would like assurance from TWBC that these are considered to avoid a complete waste of people’s time and money.
- Enforce requirements of the plan; previous requirements have been constantly overridden.
- Lack of joined up thinking between TWBC Local Plan Options and the TWBC LCA 2017 - especially with regard to the rural villages - and the High Weald AONB.

Specific Issues for Sites within Call for Sites:

Approximately 260 (approx. 65%) of the 395 overall comments were objections to specific sites promoted in the Call for Sites process. Site 45 had by far the largest number of objections, with approximately 185 comments made objecting to this site (almost 50% of Question 19 comments). Site 52 and Sites 90/179/180 also received a substantial number of objections from respondents.

Sites 30, 199 and 235

- If the developments do go ahead, would like to see major highway improvements such as a ring road around built up areas of RTW town centre and Southborough.
- Would like to see improvement of junctions of Speldhurst Road/St. John's Road as well that of Yew Tree Road/London Road.
- Improvements needed to air quality on the A26, and all road surfaces in and adjacent to A26 are in need of repair.
- A sufficient buffer zone would be needed to separate RTW from Southborough.
- Any user of Reynolds Lane will tell you it is a rat run during the day and impassable during peak hours. Any development must include a thorough traffic survey to improve traffic flow and widen the road.
Sites 41 and 127

- Petteridge is a small rural hamlet of around 130 dwellings, with no services and public transport is very infrequent.
- Building 200+ homes would radically change our natural landscape and the unique rural character of our hamlet.
- Development on these sites would be in direct contravention of the Strategic Objectives of the borough council; Objective 2 – to protect distinctive natural environment, and Objective 8 – to deliver adequate transport facilities.
- Area is in AONB and surrounded by Ancient Woodland.

Site 45

- Very concerned about adding further to already exasperating volume of traffic on A26 at peak times.
- This is an important Green Belt site - 2006 Local Plan, Chapter 3 on Green Belt, Rural Fringe and Limits to Built Development states an aim to prevent the unrestricted sprawl of towns by the "erosion of largely undeveloped gaps". Development of this site would complete the blurring of borders between Southborough and Bidborough.
- Southborough and Bidborough Primary Schools are over subscribed, the latter having no space for building.
- Has historic value as being cited in local parish press as the site where King Harold bivouacked before the Battle of Hastings.
- Surrounding footpaths and woods are used and enjoyed by many people.
- Views from that field are stunning which is why it is designated AONB.
- Slow worms are seen on the footpath running alongside Camp Field which means it is highly likely they also live in Camp Field- slow worms are a protected species in the UK.
- Air pollution already exceeds acceptable limits on the A26. Further development would be dangerous for air pollution levels.
- Proposed site is adjacent to ancient woodland on two sides.
- Site is adjacent to a foraging area for bats and there are deer living in nearby woods.
- Would breach existing TWBC Local Plan policies MGB1, LBD1, EN1, EN15 and EN25 (to the extent they are saved into the new Local Plan in similar form).
- Development of site would breach the landscape strategy and landscape considerations in Core Policy 4.
- Development of site with (say) 200 houses would result in a 50% increase in effective number of households in Bidborough, having an exacerbated impact on the already limited local facilities and be unsustainable by any measure.

Site 52

- Horns Road has a record of speeding and dangerous driving, and is therefore unable to support further development of any kind.
- Delmonden Lane is already a shortcut to avoid the traffic lights, and this would certainly be exacerbated by additional housing on this side of The Moor.
• Hawthurst has fulfilled its quota for new houses, and this site should not be allowed to proceed as future development.
• The proposals fly in the face of the AONB.
• Proposal to erect nearly 50 houses on this site is out of keeping with the surrounding properties.
• Next to this site is a burial ground. Building on this site would lead to noise pollution and take away views from the grounds, disrupting mourners and leading to opposition for people with loved ones buried there.
• Hawthurst cannot withstand an increased volume of traffic.
• Walking distance to village facilities is about 1.2 miles. The pavements are narrow and do not allow two people to walk side by side safely. Also, there is no continuous run of pavement, requiring continuous crossing and re-crossing of the road.
• Bus service is infrequent, and there is no public transport to the nearest railway station.

Site 53

• Development of this site would only serve to increase the volume of traffic along this already busy and dangerous road.

Site 86

• Would require access on to Highgate Hill, which would make the traffic intolerable and unsustainable.
• Site is grade A1 agricultural as well as being located in AONB.

Sites 90, 179 and 180 (between Southborough (Bidborough Corner) and the A21)

• Any development on these sites will significantly exacerbate problem of vehicle backlog, noise and pollution levels.
• The sites are on esignated Green Belt and form part of an important historic green corridor between Tonbridge and TW.
• Any development on these sites will bring it closer to coalescing with Tonbridge.
• The sites are within the AONB – spectacular, far reaching views and woodland are enjoyed by the local residents and wider community.
• Designated wildlife site (site TW50) - abundance of wildlife including migratory and indigenous birds including birds of prey, bats, newts, frogs and toads, deer and owls as well as a varied insect population including bees and stag beetles. Also an extensive range of flora and fauna including rare orchids.
• The sites are adjacent to a number of Grade II listed properties of historic architectural significance and development would have an adverse effect on their setting.
• Pedestrian access to bus stops on the opposite carriageway is already difficult and dangerous and would not be practical for high volume footfall, particularly children, likely from new housing developments.
• This section of the A26 does not appear to be covered by the TWBC Air Quality Management Plan however traffic problems mean that residents in this area are already suffering severe air quality issues much of the time.
• A26 can barely cope with the volume of traffic at the moment. There are several developments already in train which will increase this volume. 3 more large developments would result in gridlock with knock on effects on the A21.
• Development would adversely affect highway safety or convenience of road users. A26 is already prone to many car and pedestrian accidents, speeding cars, inability to exit or access residential driveways due to the traffic speeds or congestion - overuse will only multiply problem along A26 between A21/A26 interchange to Southborough.
• Pollution levels along A26 already very high and would increase. Also on flight path.
• Not enough schools or GPs to cope with extra people.
• All 3 sites incorporate ancient woodland, important for the environment and ecology.
• Adverse effect on residential amenity of neighbours, by reason of (among other factors) noise, disturbance, overlooking, loss of privacy, overshadowing, loss of existing views etc.
• Unacceptably high density / over-development of the site, especially if it involves loss of garden land or open aspect of the neighbourhood.
• Visual impact of the developments.
• Proposed development will be over-bearing, out-of-scale or out of character in terms of its appearance compared with existing developments in vicinity.
• Adverse effect on character and appearance of the Conservation Area (AONB).
• Also need to consider:
  • Effect on public transport provision – trains, bus services.
  • Parking problems.
  • Policing.
  • Water supply, drains, sewage and flood protection.
  • IT bandwidth capability per person via backbone fibre connections.
  • Noise protection.
  • Wildlife protection.
  • Electrical supply.

**Site 115**

• Hawkhurst Golf and Squash Club is an important recreational amenity for the village.

**Site 121**

• Traffic and access issues are the primary concern.
• The site is adjacent to AONB, plus at least one listed building, and any development would likely be detrimental to the character of the area.
• There are significant amounts of surface water in wet weather in the immediate vicinity.

**Site 146**

• Difficult access to the site - there is no vehicular access to the second (North West) “parcel” of land without crossing or use of privately owned track through the site.
• Surrounding roads including Rusthall Park, Rustwick and Bishops Down Park Road are private roads with no public access.
• Report should include how site currently provides an important environmental green corridor from the north of TW through Hurst Wood (owned by the Woodland Trust) to Rusthall Common and SSSI at Toad Rock right down to High Rocks and beyond.
- Land does not have a public right of way but the private road/track across it is used very extensively.
- There are springs and streams on the site which may flood or cause flooding if diverted, particularly as the site is generally very hilly.
- Number of omissions in this document; the site boundary is more open with Rustwick where treatments are more domestic in character. It is also open to properties in Rusthall Park, Bishops Down Park Road and Manor Park. There is a more exposed view from private properties in Rustwick, and extensive views from private properties in both Rusthall Park and Bishops Down Park Road and Manor Road.
- Ownership of portion of land at the end of Rusthall Park adjoining Bishops Down Park Road and Coniston Avenue is uncertain.
- There is a culvert at the bottom end of Rusthall Park which will not stand up to heavy traffic.
- The golf-course is designated Green Belt.
- Wildlife is present in the area: owls, deer; herons and badgers.

Site 150

- Disused quarry has over many years acquired landscape, environmental and habitat value. Development would be of detriment to the village conservation area.
- Development of this site would increase traffic congestion, and decrease air quality close to the Parish Church, public house, village hall and primary school, which all surround the site.
- This site is integral to the heart of the village, forming part of the beautiful and iconic village green.
- Would have negative consequences for the identity of the village, the value of the properties around it, local wildlife, and the potential continuing prosperity of excellent village pub.

Site 201

- Proposed plans for a total of 9 houses will put children and residents at risk from traffic accidents.
- Infrastructure is not in place to support this development.
- Selling off school sports facilities for housing development seems fundamentally wrong.
- Some of new properties will overlook school playing grounds, which could put children's safety at risk.
- The original school building is magnificent and because it sits within the AONB, this historical and educational landmark must be preserved in its rural setting.
- Would demand access on to High Street which would increase the traffic on this already very busy stretch of road.

Site 202

- Concerned St Marks Road would be too narrow for construction vehicle access and subsequent residential access.
- Site is within 9.5km of Ashdown Forest SPA/SAC - although no reference to Ashdown Forest buffer zone in the summary sheet.
Natural Features of the site are not correctly reflected in the summary sheet. There are notable habitats on site, including ponds and other water bodies suitable for Great Crested Newts, mature trees suitable for bats, foraging and commuting habitat suitable for badger as well as reptiles and also suitable scrub and woodland edge habitat suitable for Dormouse.

- No reference given to presence of European Protected Species or badgers which frequent the site.
- Although the SHELAA states that consideration will be given to the suitability of site for other uses such as open space and community facilities, there is no mention of this in the summary.

Site 231

- Number of consistent responses stating that site 231 makes a low contribution to the principles of the Green Belt.
- Whilst site does not currently benefit from a highway access, the site could be satisfactorily served by a highway access at a suitable point along the eastern boundary.
- Presents ideal attributes to accommodate small-scale development, which could be include self or custom build housing.
- Site owners strongly advocate that TWBC grasps opportunity to allocate site 231 for residential use - sustainable location, infill development within existing village envelope, is in private ownership and is very well screened by boundary planting.
- Site presents very strong credentials to be included within a revised settlement boundary for Speldhurst in accordance with defined criteria.
- Site is available and deliverable- crucial attributes when the borough is to determine what sites to allocate for housing.

Site 264

- Clearing the basement of CCTV monitoring is wrong on several counts, as there is strong local support identified for active CCTV coverage.
- The Town Hall was built deliberately in a prominent central location, i.e. there is a very good reason for retaining it on its current site.
- Given what has happened opposite on the old cinema site- considerable local concern that this might be repeated with the Town Hall site.

Sites 356, 367 and 358

- Site 1 below The Fir’s pitch playing field is across a beautiful vista, and would destroy a superb view in the heart of this community. It is already an AONB.

Pembury sites

- One obvious error in the Pembury list of sites is the statement in many if not all of the cases that a site is adjacent to the LBD.
Site 26 - absolutely essential that the Green Belt remains as it now stands, otherwise will end up with urban sprawl. There are clear access issues for this site and there is a footpath WT248 that is not mentioned in the report.
If you require this document in another format, please contact:

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