

**TUNBRIDGE WELLS BOROUGH LOCAL PLAN  
ISSUES AND OPTIONS**

**Consultation 02 May to 12 June 2017**

**RESPONSE FORM**

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**Your details (please give full contact details)**

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<b>Are you responding as an individual or as an agent on behalf of somebody else?</b>	<input type="checkbox"/> As an individual x <input checked="" type="checkbox"/> As an agent
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## SECTION 3: VISION AND OBJECTIVES

### Draft Vision

#### QUESTION 1

Do you agree with the new draft Vision for the borough?

No

#### QUESTION 2

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

*Please write your comments here:*

The 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 (the implication being that the rest can be spoiled, even if it is of high quality). The words “seek to” should also be deleted, since merely seeking to is not good enough: 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”.

The draft Vision could perhaps be reworked to make it more locally relevant: as it currently stands, it could be used by almost any local authority.

If the Borough Council does not wish to embark upon a major redrafting of the Vision, with the considerations above in mind we suggest that it should be redrafted in a slightly more concise form, as follows:

*“In 2033 Tunbridge Wells Borough Council will have conserved and enhanced its natural, built and historic environment while delivering new development necessary to meet the Borough’s local needs in a sustainable way. The Borough will be a beautiful and prosperous place where people want 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.”*

*Please continue on a separate sheet if necessary*

**QUESTION 3**

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

*Please write your comments here:*

Sustainable development that enhances the natural, built and historic environment and the quality of life of people in the Borough, and that enables the Borough to adapt well to changing circumstances.

*Please continue on a separate sheet if necessary*

## Draft Strategic Objectives

### QUESTION 4

Do you think these are the right Objectives?

No

### QUESTION 4a

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

*Please write your comments here:*

These are poorly drafted. There are really only three Objectives here:

Protecting the Borough's environment,  
Meeting development needs, and  
Delivering sufficient infrastructure.

The other five listed are all merely aspects of these three.

We think the strategic objectives in Ashford Borough Council's draft local plan are rather well drafted and would recommend their wording on some aspects of the Objectives. However, if the Borough Council wishes to retain approximately the present wording, some substantial changes are necessary.

Objective 1: This objective should refer to meeting realistic development needs and make reference to maximising the use of appropriate brownfield opportunities in a manner consistent with the National Planning Policy Framework.

Objective 2: The objective 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 (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.

The words "seek to" and "both" should be omitted (for "seek to" see our comments on the Vision, and "both" implies two things, not three!).

Objective 3: should mention water and sewerage infrastructure, energy provision, health, social care and education. It should refer to provision of superfast broadband to rural areas.

Objective 4: This objective 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. It could be replaced with an objective on sustainable living and energy use.

Objective 8: This objective focuses on "adequate" transport and parking capacity. Surely the objective should be for good transport and parking facilities, which will be adaptable to technological change. It should also refer to congestion and related air pollution and extend the objective to include the resolution of these issues, encouraging people to use more sustainable modes of transport.

**With this in mind, we recommend that the Objectives be redrafted as follows:**

**1. Protecting the Borough's Environment:**

**1.1 To conserve and enhance the natural, built and historic environment, recognizing that these are of exceptionally high quality throughout much of the borough;**

**1.2 To conserve and enhance biodiversity;**

**1.3 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;**

**1.4 To reduce light, noise, water and air pollution, preserving dark skies and tranquillity in the parts of the borough where they currently exist;**

**1.5 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;**

**1.6 To promote sustainable living and energy use;**

**1.7 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:**

**2.1 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;**

**2.2 To focus development at accessible and sustainable locations, prioritising and making best use of brownfield opportunities;**

**2.3 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;**

**2.4 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;**

**2.5 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:**

**3.1 To ensure the provision of sufficient infrastructure to support existing development and the delivery of new development;**

**3.2 To ensure the prompt delivery of water and sewerage infrastructure, energy provision, health, social care and education;**

**3.3 To ensure the delivery of superfast broadband and good mobile telephone coverage including throughout the rural areas;**

**3.4 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;**

**3.5 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;**

**3.6 To ensure the provision of high quality sports, recreation, community and cultural facilities that are accessible to all the borough's residents.**

Once decisions have been made as to how best to provide for new development and infrastructure, the Objectives could also perhaps be reworked to make them more locally relevant.

*Please continue on a separate sheet if necessary*

**QUESTION 5**

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

*Please write your comments here:*

Please see our response to Question 4a above

*Please continue on a separate sheet if necessary*

## SECTION 4: KEY ISSUES AND CHALLENGES

### NATURAL AND BUILT ENVIRONMENT

#### QUESTION 6a

Have we identified the main environmental issues facing the borough?

No

#### QUESTION 6b

If No, what environmental issues do you think are missing?

*Please write your comments here:*

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.

It is dishonest to say in para 4.5 that pressure for new built development “could” have direct impacts on landscape and environmental assets and their settings. Given the environmental constraints in the Borough it is abundantly clear that the housing numbers proposed under the SHMA cannot be accommodated without serious environmental damage, since all of the proposed options or combinations of options will undoubtedly involve building over greenfield sites in the green belt, the AONB and its setting and/or the former Special Landscape Areas.

Environmental issues listed should include

1. ‘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.
2. Delivering a net gain in biodiversity (paragraph 4.6). While protected sites are important, this should not be the sole focus of biodiversity conservation. All development sites should make space for nature and habitat connectivity is an important theme.
3. Ensure that the ‘setting’ of the AONB is considered in planning decisions. This is not the same as ‘adjacent’ (paragraph 4.8). The plan should refer to the AONB Management Plan, the consideration of which is a key means by which the Council can demonstrate decision making has met the statutory duty to have regard to ‘the purpose of conserving and enhancing the natural beauty’ of the AONB (CROW Act 2000, S85).
4. 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. Some authorities at the Kent Downs AONB have successfully retained local landscape designations (in former SLA areas in the setting of the AONB).
5. Tranquillity can be an important and valued feature of landscapes, and should be considered in the local plan, as should dark skies. Tranquillity mapping and light pollution mapping is available on the CPRE website.
6. Supporting documents: The value of agricultural land should be a key theme of the natural

environment or economy themes. Swale Borough Council commissioned a study titled: Value of Best and Most Versatile Agricultural Land in Swale. It is recommended that TWBC do the same, extending the work already done in its 2014 study for the sites in the Site Allocations DPD to the remainder of the Borough. The Green Infrastructure SPD is also important. Other documents that should be listed include the Kent Habitat Survey, Kent BOA's, High Weald AONB Management Plan, Historic Environment Record.

*Please continue on a separate sheet if necessary*

## INFRASTRUCTURE

### QUESTION 6c

**Have we identified the main infrastructure issues facing the borough?**

**No**

### QUESTION 6d

**If No, what infrastructure issues do you think are missing?**

*Please write your comments here:*

The infrastructure needs are recognised to be large. 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. This will have a major effect on the plan, and it is likely that the environmental effect of the infrastructure will, in some areas, be bigger than that of housing.

There is insufficient recognition of the importance of transport infrastructure and the extent to which it can be put under strain by, for example, school closures, policies to provide choice in education (leading to children being transported long distances by car to school) or the concentration of health facilities at “centres of excellence”.

*Please continue on a separate sheet if necessary*

## HOUSING

### QUESTION 6e

Have we identified the main housing issues facing the borough?

No

### QUESTION 6f

If No, what housing issues do you think are missing?

*Please write your comments here:*

We note that although the ratio of entry level house prices to earnings in the Borough is high compared with national and Kent averages, levels of over-occupied houses are below the Kent and national average. This suggests that the issue is in general one of price, reflecting the Borough's special environment which makes it a highly desirable place to live, rather than of a genuine lack of supply to meet local needs. However, within this overall picture **there are clearly some sectors of the housing market where there is a genuine undersupply (affordable housing, one and two bedroom properties, housing suitable for elderly and disabled people) but bulk building of market housing over green fields and in historic towns and villages is likely to damage the very things which make Tunbridge Wells a good place to live, without resolving the problems in these sectors. The main need in Tunbridge Wells is for affordable housing and given developers' ability now to argue that they should not have to provide affordable housing on grounds of viability, there is no real evidence that building market housing over the countryside will come anywhere near to meeting this need.**

One result of high house prices is an increase in the number of households with two adult generations living in them. In effect this is a reduction of the living space per person compared with the second half of the 20<sup>th</sup> century. This may not necessarily be a bad thing, given the increasing elderly population and the concomitant pressures on social care. However, the likely effects of this trend on the types and volume of housing now required should be considered.

The 2015 SHMA needs to be reviewed given that significantly fewer households are projected at 2033 in the 2014-based household projections, which were published in 2016. It seems sensible to wait, however, for the standard methodology proposed in the Housing White Paper.

The employment growth in Tunbridge Wells in the 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 the growth planned elsewhere in Kent and Medway. **This lack of realism on jobs must cast doubt on the economic feasibility of the population and housing growth that is being planned for.**

**The truth seems to be that the “environmental constraints” (including all those protecting the natural, built and historic environment) restrict the supply of specific deliverable sites to a level well below the Borough’s Objectively Assessed Need for market and affordable housing.**

There should be a proactive strategy to ensure suitable brownfield urban sites are identified and delivered, and a much greater focus on providing new housing developments at higher density, to minimise the loss of valuable countryside and to enable sustainable modes of travel.

There has been a dramatic shortfall in the provision of affordable housing during the current plan, and this is projected to continue in the new plan. There is only a very vague discussion on how this gap can be met: experience shows that the enforcement of affordable housing numbers on recent projects has been weak, partly due to central Government policy changes which have made enforcement of affordable housing more difficult for local authorities. The council needs to analyse the past 5 years to see what is a realistic number which can be achieved from private building.

*Please continue on a separate sheet if necessary*

## ECONOMY

### QUESTION 6g

Have we identified the main economic issues facing the borough?

No

### QUESTION 6h

If No, what economic issues do you think are missing?

*Please write your comments here:*

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What is missing is the link between the economic prosperity of the Borough and the protection of its natural, built and historic environment, which are strong reasons why people wish to live and work in, and visit the Borough.

In paragraph 4.29 mobile telephone coverage needs to be mentioned as well as broadband.

We are 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. This is particularly important in Tunbridge Wells, where so much of the employment consists of offices.

On the other hand, we 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, and whether some parts of these areas that are presently covered by large sheds of no architectural merit could be converted to elegant modern offices and housing.

We are not convinced that the future needs of local food production have been given sufficient weight in the economic study. The assumption seems to be that there will be a continued loss of jobs in and land required for agriculture, with perhaps the gap filled by imports from abroad. This seems 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.

*Please continue on a separate sheet if necessary*

## TRANSPORT AND PARKING

### QUESTION 6i

**Have we identified the main transport and parking issues facing the borough?**

**No**

### QUESTION 6j

**If No, what transport and parking issues do you think are missing?**

*Please write your comments here:*

The key transport issue which is not mentioned is the importance of rail services and connections to the life and economy of the Borough. While not the direct responsibility of the Council, rail services are of such importance that they cannot be ignored. Rail is the only form of transport that causes people who can choose to opt for public transport, rather than the car, because it is quick and convenient. (see also comments at Q7 below)

CPRE is pleased to see that the Council intends to refresh the Transport Strategy and intends to commission transport modelling work. Clearly these are essential. The Transport Strategy is essential to present and plan for a range of transport interventions, including those that go beyond the scope of the local plan, such as car parking, education, walking and cycling strategies, as well as significant infrastructure to deliver highway capacity. Transport modelling is essential to test site options and determine what impact the plan has on congestion, whether the plan is deliverable in terms of highway capacity and the extent of modal shift that can be anticipated. In particular 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.

In terms of air quality, CPRE is pleased to see reference to the A26 Air Quality Management Area. Clearly the Air Quality Management Plan should be a key supporting document. At paragraph 4.38, the text states: 'the new local plan should be supported of opportunities for improving air quality.' This should be approached in a much more positive manner, with the local plan preparation process seeking to ensure that it does not prevent the emission limits being met in the shortest time possible. There may even be opportunities for the local plan to positively assist.

*Please continue on a separate sheet if necessary*

## LEISURE AND RECREATION

### QUESTION 6k

Have we identified the main leisure and recreation issues facing the borough?

No

### QUESTION 6l

If No, what leisure and recreation issues do you think are missing?

*Please write your comments here:*

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.

The first sentence of paragraph 4.47 unnecessarily repeats the last sentence of paragraph 4.43.

The unsuitability of playing pitches for all year round use is largely a function of the clay soils in the Weald. Many of these pitches are significant open grassy spaces in the landscape, some in or adjoining conservation areas, and are used by the public for informal recreation when not being used for formal sports. We would be very reluctant to see many more of them converted to all-weather surfaces in the villages and rural areas, especially with the floodlighting that normally accompanies all-weather surfaces.

*Please continue on a separate sheet if necessary*

## SUSTAINABILITY

### QUESTION 6m

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

No

### QUESTION 6n

If No, what sustainability issues do you think are missing?

*Please write your comments here:*

The plan fails to recognise broadly accepted sustainability themes, such as the importance of location, access to services and accessibility of public transport. Perhaps the Council does not want to predetermine the options presented later in the document, but it should broadly demonstrate an understanding of the importance of minimising travel times by locating homes close to employment, services and good quality public transport. Given that location is key, it would be appropriate to mention the range of potential site based constraints that are also relevant to a sustainable strategy such as agricultural land quality, protected species, heritage assets and valued landscapes.

At paragraph 4.50, the Council discusses the contribution of sustainability appraisal to determining impacts and the mitigation need to reduce adverse effects and enhance beneficial effects. One of the key purposes of SA (and SEA in particular) is the recognition and testing of 'reasonable alternatives'. **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.**

Climate change is recognised as a critical issue at paragraph 4.52. The paragraph focuses on renewable energy, biomass and community heating schemes and recognises the importance of building design to meet carbon and energy reduction targets. It fails, however, to mention the importance of proactively designing site layout to reduce carbon emissions. This should include passive design principles to use site layout and building orientation to make use of local climate and site conditions.

This section should recognise the importance of SuDS. This should be integrated into landscaping schemes to improve the 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.

*Please continue on a separate sheet if necessary*

## SECTION 5: STRATEGY CONSIDERATIONS

### CROSS-BOUNDARY STRATEGIC PLANNING AND DUTY TO COOPERATE

#### QUESTION 7

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

Yes

#### QUESTION 7a

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

*Please write your comments here:*

The Borough is a long thin one, with the boundary of East Sussex right up against the edge of Royal Tunbridge Wells. Being located on the edges of the Borough, the towns of Royal Tunbridge Wells and Paddock Wood serve neighbouring districts in terms of health, education, retail and employment. On the other hand people from the eastern side of the Borough, including Cranbrook and Hawkhurst, tend to use Maidstone or Ashford as their main urban centre rather than Royal Tunbridge Wells. As noted at Q10a below, if a large amount of new housing is provided in the east of the borough, while this may technically satisfy government requirements on numbers 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. For these reasons there needs to be very close co-operation with adjoining boroughs on housing numbers and locations, and on transport and parking implications.

There is a set of cross-boundary planning issues arising from the structure of the rail network, which connects Tunbridge Wells (and High Brooms) well with boroughs to the south and north and with London, and connects Paddock Wood with London, Tonbridge and points east outside the Borough. It provides little transport connectivity between settlements within the Borough. This means that flows of passengers to and from the Borough for work, education, shopping and play are mainly not intra-Borough, which has implications for all planning policies which relate to housing, employment, leisure or education.

The plan must demonstrate that the development will not have an adverse impact on the integrity of the Ashdown Forest SAC. This issue is likely to be a key feature of local plan preparation. The importance of detailed assessment of the cumulative effect of housing allocation, taking into account the contribution of neighbouring authorities was clarified in the recent High Court Judgement: *Wealden v SSCLG* [2017] EWHC 351 (Admin). Appropriate

Assessment is likely to be required. Co-operation with Natural England and authorities neighbouring Wealden District Council and the South Downs National Park Authority will be essential. The statement '*ensuring adequate mitigation for the Ashdown Forest*' does not adequately reflect the challenges of this issue.

*Please continue on a separate sheet if necessary*

## SETTLEMENT GROUPINGS

### QUESTION 8

**Do you agree with the suggested groupings of settlements?**

**No**

### QUESTION 8a

**If No, what changes do you suggest to the groupings of settlements and why?**

*Please write your comments here:*

While Cranbrook and Paddock Wood may be comparable (with Hawkhurst somewhat behind them) in terms of existing services and facilities, the scope for sustainable development in Paddock Wood, not harming the natural and historic environment, is greater, though there would need to be substantial changes made to the road layout in the centre of the town: the road junctions and layout that arose in a village which sprang up as a hamlet of Brenchley parish beside a small railway halt are now totally unsuitable for a substantial town with an important railway station. We appreciate the flooding and sewerage issues, but these are matters which may admit of a technical solution.

On first reading we 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 (as has already happened in some cases since this study was done), unless there is to be a ban on such conversions (which we fear would not be possible under present Government guidance).

Not enough emphasis is placed on the speed and frequency with which public transport enables residents to reach the nearest town and railway station. The study fails to capture the 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 (e.g. Matfield to Paddock Wood), which makes the bus a viable alternative to the private car, and one that runs hourly and takes 25 minutes or more, perhaps with a change involved (e.g. Brenchley to Paddock Wood), which will simply not compete with the private car.

It is 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 many of which are at the national speed limit of 60mph. No-one in their right mind would consider it a safe route for people to use to access village facilities, or indeed for children to use for recreation.

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.

We 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.

*Please continue on a separate sheet if necessary*

## DEVELOPMENT BOUNDARIES

### QUESTION 9

Should the policy approach of defining settlement 'Limits to Built Development' continue in principle?

Yes

### QUESTION 9a

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

Should be redrawn

### QUESTION 9b

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

*Please write your comments here:*

CPRE supports the definition of settlement limits, which are essential to prevent suburban sprawl over the 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 to damage to rural lanes.

In line with the NPPF and the recent Supreme Court judgment in *Suffolk Coastal District Council v Hopkins Homes Ltd and another, and Richborough Estates Partnership LLP and another v Cheshire East Borough Council*, to ensure that the limits will be robust the limits should be redrawn to reflect existing built development and planned allocations.

*Please continue on a separate sheet if necessary*

## STRATEGIC OPTIONS

### QUESTION 10

Please let us know your preferred option or combination of options in order of preference (where 1 is most preferred and 5 is least preferred). If you tick the 'A combination of options' box, please state your preferred combination of Options in Question 10a.

Option 1

Option 2

Option 3

Option 4

Option 5

A combination of options

NONE OF THESE

### QUESTION 10a

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

*Please write your preferred combination of options here:*

**Housing on the scale proposed following the Strategic Housing Market Assessment is unacceptable because it cannot be achieved in a sustainable way, since the impact on the environment is too great.** Sustainable development as required under the NPPF is not achievable in this Borough because of environmental constraints which must also be taken into account under the NPPF. Even with the amount of development required under the 2012 Core Strategy (half as many dwellings per year as are now proposed), the precious medieval landscape of the Crane Valley in the High Weald Area of Outstanding Natural Beauty (AONB) near Cranbrook looks likely to be lost and almost all the suitable sites for development in the Borough have already been allocated. **None of the proposed options is in our view capable of delivering the Borough's Objectively Assessed Housing Need(OAN) while complying with the environmental requirements of the NPPF.**

We cannot choose between the proposed Options without a much clearer idea what each option would mean. However, we suspect that

Option 1 (focused growth) would result in the loss of large areas of exceptionally beautiful and supposedly protected countryside around Tunbridge Wells and Southborough, Cranbrook and

Hawkhurst. It would lead to the erosion or indeed the possible total loss of the remaining green spaces between Tunbridge Wells/Southborough and Rusthall, Bidborough, Pembury and Tonbridge, contrary to green belt and AONB policy. Much of the area between Tunbridge Wells/Southborough, Pembury and Tonbridge contains rare lowland heathland, ancient woodland and the new woodland being planted to replace the loss of ancient woodland to the A21 dualling. An attempt to concentrate the development within the towns could destroy the towns' historic centres by requiring high-rise buildings and garden grabbing, and in any case given the very limited availability of brownfield sites this would be insufficient to meet the housing requirement.

Option 2 (semi-dispersed growth) would have much the same effect as Option 1 but would also destroy countryside around Brenchley, Five Oak Green, Goudhurst, Lamberhurst, Pembury and Rusthall, all of which is either in the AONB or the green belt, or both. The large amount of new housing would substantially alter the character of these villages.

Option 3 (proportionally dispersed growth) would have many of the same disadvantages as Options 1 and 2, with the addition of loss of countryside around the other villages in the Borough. While all the villages will need to be allowed to grow to some extent, the development that could be required of them under this Option may be excessive.

Option 4 (growth corridor along the A21) would lead to ribbon development with many of the same disadvantages in terms of loss of valuable countryside as Options 1, 2 and 3. It would also absorb Pembury into the Royal Tunbridge Wells/Southborough conurbation, contrary to the purposes of the green belt. Given the amount of land required for the number of houses envisaged, it is unlikely to provide enough land without the loss of large areas of AONB and green belt land, including lowland heathland, ancient woodland and new woodland planted as mitigation for the loss of ancient woodland to the A21 dualling, and some exceptionally beautiful AONB countryside south of the A21 between Pembury and Kippings Cross. The ancient monument at Castle Hill could be affected. For houses built close to the A21 there would be noise, light and probably air pollution.

Option 5 (a new "garden village" settlement) envisages what would actually be a new town at least twice the size of Paddock Wood. We cannot see a suitable location within the Borough for such a huge greenfield development, which in order to be successful should have its own railway station or else a very good connection to an existing station or major road, which in turn would require the taking of further countryside for a tramway and/or large new road. In any case, given the lead-in time required for such projects, this Option would not meet the housing and employment requirement in the earlier years of the Plan period so it would have to be combined with major development elsewhere in the Borough. However, if (unlike the Borough's existing small towns) it is laid out with a view to further expansion in future decades, it might at least provide some future-proofing to help accommodate the needs of further generations/future government dictats. It only scores well in the Council's Sustainability Appraisal on the assumption that it will not affect the AONB or the green belt, which leaves the area to the east of Paddock Wood (floodplain), the north of Horsmonden and Goudhurst parishes (both of which are former Special Landscape Areas and affect the setting of the AONB) or the Frittenden-Sissinghurst area (former Low Weald SLA and setting of AONB). We note that a new settlement in any of these areas would be a considerable distance away from the Borough's main conurbation and so for the main part of the Borough's existing population this new settlement would be less attractive as a housing alternative than Tonbridge. If situated in the east of the borough it would be more likely to attract people from Maidstone or Ashford districts than from Royal Tunbridge Wells.

We accept that there will have to be new development within the Borough but this should continue to be at the rate previously required under the Core Strategy. Even that amount of development will cause environmental damage.

Concentration of development is a strategic tool to minimise environmental effects through limiting the greenfield land take, making public transport viable and providing easy walking and cycling access to a wide range of facilities. Increasing the density at which any new housing is built is therefore critical. To the extent that there is new development in villages (and we accept that there

will need to be some development in all the villages to meet local needs and preserve the villages' vitality) it should be concentrated as far as possible within the limits to built development, subject to preserving the conservation areas and their settings.

**QUESTION 11**

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

*Please write your comments here:*

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. The Council should treat any public support for Option 5 with great caution, since it represents a vote for “anywhere but here”.

See also our comments at 10a above.

*Please continue on a separate sheet if necessary*

**QUESTION 11a**

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

*Please write your comments here:*

See our comments at 10a above.



**QUESTION 12**

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

**No**

**QUESTION 12a**

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

*Please write your comments here:*

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 (as at Cranbrook in the recent Examination into the site Allocations DPD) will then be required to be fulfilled irrespective of how brownfield or windfall sites happen to arise elsewhere.

There may be brownfield sites at North Farm and High Brooms that will arise during the Plan period as retail converts increasingly from huge sheds in retail parks to online shopping with town centre showrooms and regional warehouses. The large number of car dealerships may also reduce as electric driverless cars are introduced and people move from owning cars to using car clubs and uber-type services.

Subject to the above, 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, to keep them economically and socially vibrant; encouragement of small scale development in the smaller villages to meet local housing and service needs; and an overall focus on locating development where it is sustainable, there are good transport links and the environmental constraints are not breached.

*Please continue on a separate sheet if necessary*

## SECTION 6: DEVELOPMENT MANAGEMENT POLICIES

### QUESTION 13

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

*Please write your comments here*

We will send our response to questions 13 to 18 separately at a later date.

*Please continue on a separate sheet if necessary*

### QUESTION 14

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

*Please write your comments here:*

See Q13

*Please continue on a separate sheet if necessary*

**QUESTION 15**

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

*Please write your comments here:*

See Q13

*Please continue on a separate sheet if necessary*

**QUESTION 16**

**Considering the topic areas shown in the green box, are there any other topics that you think the new Tunbridge Wells Borough Local Plan should include?**

*Please write your comments here:*

See Q13

*Please continue on a separate sheet if necessary*

**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)?**

*Please write your comments here:*

**See Q13**

*Please continue on a separate sheet if necessary*

**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?**

*Please write your comments here:*

**See Q13**

*Please continue on a separate sheet if necessary*

## GENERAL COMMENTS

### 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.**

*Please write your comments here:*

**Paragraph 2.1:** We are pleased to see the reference to valued local features and views inside and outside the AONB. The Council is advised to consider a focused consultation with local people and parish councils to begin identifying potential Local Green Space designations. Local Green Spaces are an important designation that can assist to protect locally valued spaces, and will go beyond the 'Commons, village greens and parks'. A focused consultation is necessary because a high proportion of the local population do not read the emerging local plan, nor realise the significance of the consultation, resulting in very few site proposals. For this reason the Local Plan Inspector examining the Swale Borough Local Plan asked the council to carry out a further consultation to 'call-for' potential Local Green Space sites before proceeding with the Examination on that Plan.

**Paragraph 2.23:** This paragraph should refer to Ancient woodland, and would also helpfully refer to key wildlife sites beyond the borough boundary. SAC's / SPA's are particularly important under European law and may require cross-boundary co-operation.

*Please continue on a separate sheet if necessary*

**END OF QUESTIONS**