

Tonbridge & Malling Borough Council  
and

Tunbridge Wells Borough Council

# **Statement of Common Ground**

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November 2024





# 1.0 Introduction

- 1.1 This Statement of Common Ground (SoCG) has been prepared by Tonbridge & Malling Borough Council (TMBC) and Tunbridge Wells Borough Council (TWBC). It sets out the position and understanding with respect to key relevant duty to cooperate (DtC) matters, and the shared position of the two authorities as at, November 2024. The relevant DtC matters included in this SoCG are ongoing and subject to review, as set out below. This shared position between TMBC and TWBC sets out the position in relation to the two Local Plans. For clarity these are:
- 1.2 Tunbridge Wells Borough Local Plan - The TWBC Submission version of the Local Plan (2020-2038), and the subsequent consultation on the Inspectors Initial Findings with the proposed revised development strategy (2024).
- 1.3 Tonbridge and Malling Borough Local Plan - Reference is made, where relevant, to the TMBC Local Plan (submitted 23 January 2019) which proposed to cover the period up to 2031 and the subsequent Regulation 18 Draft Local Plan covering the period to 2040 which was consulted on in Autumn 2022. These are referred to as the 2019 TMBC (Withdrawn) Local Plan and the 2022 TMBC (Reg 18) Local Plan.
- 1.4 This SoCG is not binding on any party but sets out a clear and positive direction to inform ongoing strategy and plan-making across the two Local Authority areas with a particular focus on any strategic cross boundary issues.

## Development Plans – current position

### TMBC

- 1.5 The current development plan for TMBC consists of the Tonbridge & Malling Core Strategy 2007, the Tonbridge & Malling Development Land Allocations Development Plan Document (DPD) April 2008, the Tonbridge Central Area Action Plan April 2008, the Managing Development and the Environment DPD April 2010 and the Compendium of Saved Policies April 2010. The Kent Minerals and Waste Local Plan also forms part of the development plan for all Kent Districts. There are no 'made' Neighbourhood Plans, but three parishes have been designated as Neighbourhood Areas (Ditton, West Malling and Hildenborough).
- 1.6 TMBC commenced work on a new Local Plan in 2012 and following a Regulation 18 consultation in 2016, and a Regulation 19 Pre-Submission consultation in 2018, the Local Plan was submitted on 23<sup>rd</sup> January 2019. This was within the transitional period for the revised NPPF (July 2018) and meant that the Plan itself was to be examined against the requirements of the 2012 version of the NPPF and the versions of the Government's Planning Practice Guidance that pre-dated the changes in July 2018. The 2019 Local Plan proposed to cover the period 2011 to 2031.

- 1.7 Hearing sessions were held in October 2020. On 22<sup>nd</sup> October 2020 the Planning Inspectors examining the TMBC Local Plan wrote to TMBC setting out significant concerns regarding legal compliance of the TMBC plan. This was followed by a letter on 15<sup>th</sup> December 2020 from the Inspectors providing the details of these concerns. TMBC provided a detailed response to this letter on 29<sup>th</sup> January 2021.
- 1.8 The Inspector's final decision was received on 2<sup>nd</sup> March 2021, confirming their provisional decision that there had been a failure of the Duty to Cooperate on the matter of housing need, and specifically unmet housing need from Sevenoaks District Council (SDC). TMBC responded to PINS on 11<sup>th</sup> March setting out that it would not be withdrawing the Plan and invited PINS to prepare the final report. The Inspector's final report was received on 8<sup>th</sup> June 2021. On the 13<sup>th</sup> of July 2021, TMBC Full Council resolved to withdraw the 2019 Local Plan and to commence work on an emerging Local Plan.
- 1.9 Work commenced on a new Tonbridge and Malling Local Plan in 2021 and a Regulation 18 Draft Local Plan (covering the Plan period to 2040) was consulted on between 22<sup>nd</sup> September to 3<sup>rd</sup> November 2022. The current Local Development Scheme sets out a timetable to produce the Local Plan. The Local Plan is now mid-way through its development. On 15<sup>th</sup> July 2024, TMBC announced that it would take stock of the new Government's proposed reforms and changes to national planning policy before proceeding to the next stage in developing its Local Plan, to ensure that the Plan is robust and in accordance with the latest national planning policy once this is published.

## TWBC

- 1.10 The development plan for TWBC consists of the Core Strategy 2010, the Site Allocations Local Plan 2016 and saved policies in the Borough Local Plan 2006. There are ten made Neighbourhood Plans – Benenden, Brenchley and Matfield, Capel, Cranbrook and Sissinghurst, Goudhurst, Hawkhurst, Horsmonden, Lamberhurst, Paddock Wood and Pembury. Sandhurst and Southborough are at the early stages of preparing Neighbourhood Plans.
- 1.11 TWBC is currently in the process of producing a new Borough wide Local Plan. The new Local Plan will cover the period 2020 - 2038. Regulation 18 consultations on an Issues and Options took place in 2017, and on a Draft Local Plan from September - November 2019. Regulation 19 consultation took place on a Pre-Submission Local Plan between March – June 2021.
- 1.12 Following the Pre-Submission consultation, the Council submitted its Local Plan for examination in November 2021. The Inspector appointed to examine the Plan conducted stage 1 hearings in March 2022, to consider Duty to Co-operate, Habitats Regulations Assessment, Sustainability Appraisal and other aspects of legal compliance. Following this, stage 2 hearings took place between May and July

2022 to consider the Spatial Strategy, Place Shaping Policies and Development Policies.

- 1.13 The Inspector wrote to the Council in November 2022 with his [initial findings](#). Further work was then carried out by the Council to consider and address the Inspectors initial findings and further consultation was carried out from January – April 2024 on the Councils response. The key changes that are set out as part of this consultation on the proposed revised development strategy include:
- a. The proposed removal of the strategic policy STR/SS 3: The Strategy for Tudeley Village from the Local Plan.
  - b. Revision of the strategic policy STR/SS 1: The Strategy for Paddock Wood and land at east Capel, including a reduction in the amount of residential housing growth by approximately 1,000 dwellings, with all housing being on Flood Zone 1 and employment land on Flood Zone 2, along with a reduction of employment provision, and reconfigured sport and recreation provision and secondary school education provision (as set out at Appendix D of the [Development Strategy Topic Paper Addendum](#)).
  - c. At Hawkhurst it is proposed to revise site allocation policy number AL/HA 5: Land to the north of Birchfield Grove, to include housing, and land safeguarded for primary school expansion (in accordance with a planning committee resolution on application reference 22/02664/HYBRID).
  - d. Also, at Hawkhurst, the Council proposes the removal of site allocation policy number AL/HA 8: Limes Grove (March's Field) from the Local Plan. This site was proposed for employment use in the Submission Local Plan.
  - e. Progression of a 10-year housing land supply position including the requirement for an immediate review of the Plan in order to plan for the remaining un-met need.
- 1.14 Stage 3 hearings are now currently underway to assess the soundness of the Council's amended strategy as set out above. A further stage of consultation has just concluded, seeking views on 'Stage 3 – new evidence base documents', following which, depending on the outcome of further hearings scheduled for mid-November, it is anticipated that a further stage of consultation will take place on 'Main Modifications' in order to make the Plan 'Sound'. It is anticipated that this will take place in late 2024/early 2025.
- 1.15 TWBC is in the process of updating its [Local Development Scheme](#) (the last LDS being dated June 2024) ahead of the next hearing(s) in November, to reflect the progress of the Examination and subsequent impacts on the timetable for remaining stages of the examination and adoption of the Local Plan.

# This SoCG and the Duty to Cooperate

- 1.16 This SoCG relates to the Local Plans produced and being produced by TMBC and TWBC. It covers strategic cross-boundary matters, such as housing need (including unmet need), housing provisions, gypsy and traveller provisions, employment and retail needs, natural environment and infrastructure. It demonstrates commitment by TMBC and TWBC to engage and be active on an on-going basis in relation to DtC matters in the preparation of their respective Local Plans, and future Local Plans.
- 1.17 Under Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by section 110 of the Localism Act 2011) and in accordance with the National Planning Policy Framework (NPPF) (December 2023) (Although the TWBC Local Plan is being examined as per the transitional arrangements against the earlier version of the NPPF), it is a requirement under the DtC for local planning authorities, county councils and other named bodies to engage constructively, actively and on an on-going basis in the preparation of development plans and other relevant planning documents.
- 1.18 Paragraphs 24-27 of the NPPF (December 2023) set out the requirement for maintaining effective cooperation and states that in order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance and be made publicly available throughout the plan-making process to provide transparency.
- 1.19 This approach is strengthened within the proposed amended NPPF (July 2024) which has recently been consulted on and a final amended version is awaited. This reinforces the need for strategic collaboration and paragraph 24 states that *“Effective strategic planning across local planning authority boundaries will play a vital and increasing role in how sustainable growth is delivered and key spatial issues, including meeting housing needs, delivering strategic infrastructure, and building economic and climate resilience, are addressed. Local planning authorities and county councils (in two-tier areas) continue to be under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries”*.
- 1.20 The Planning Practice Guidance (PPG) ([see Paragraph: 010 Reference ID: 61-010-20190315](#)) confirms that a SoCG is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It states that the SoCG should document where effective co-operation is and is not happening throughout the plan-making process and is a way of demonstrating at Examination that plans are deliverable over the plan period and based on effective joint working across local authority boundaries.

- 1.21 The TMBC withdrawn 2019 Local Plan was produced under the transitional provisions of the NPPF 2018, meaning that SoCG were not required for the TMBC Plan at that point. A Memorandum of Understanding between TMBC and TWBC was signed in January 2020 and is included at Appendix A2 of the Councils [Duty to Cooperate Statement for Pre-Submission Local Plan](#).
- 1.22 The administrative areas that are shown on the plan at **Appendix A** identify that TMBC and TWBC share a common administrative boundary along their southern, and northeastern boundaries respectively. The boundary between TMBC and TWBC lies to the north of Southborough, Five Oak Green and Paddock Wood in Tunbridge Wells, and to the south of Tonbridge in Tonbridge and Malling. The A21, a trunk road managed by National Highways, runs through both Councils' areas: it runs through the south-western corner of Tonbridge and Malling borough, before entering Tunbridge Wells borough just to the south of Tonbridge. The Ramsgate (via Paddock Wood) to London mainline rail corridor and the Hastings (Via Tunbridge Wells) to London mainline rail corridor, both pass through Tonbridge.
- 1.23 TMBC and TWBC agree about the range of issues to be covered by this SoCG and the need for full and frank deliberation. The extent of joint working between TMBC and TWBC has been discussed. Both agree that the most appropriate approach is one of continuing the regular liaison on cross-boundary matters to meet DTC requirements.
- 1.24 Liaison between the Councils reflect the nature of the strategic matters set out below. Responsibilities for agreement of this and future SoCG are set out under 'Governance Arrangements' and 'Actions and Review Timetable' in sections 7 and 8 respectively below.

## Structure of the SoCG

- 1.25 The remainder of the SoCG is structured as follows:
- **Section 2** – This section relates to housing provision for both local authorities and specifically housing needs (including reference to unmet need requests from neighbouring authorities), the Housing Market Areas (HMAs) for each respective area, and housing provision and gypsy and traveller provision.
  - **Section 3** – This section relates to the employment needs of each respective local authority area.
  - **Section 4** – This section relates to cross-boundary infrastructure requirements for both local authorities including relevant potential/proposed developments.
  - **Section 5** – This section relates to the natural environment and specifically the High Weald National Landscape, which overlays parts of both authorities, biodiversity and the nearby Ashdown Forest.

- **Section 6** – This section relates to agreed actions between TMBC and TWBC going forward with respect to their Local Plans and future plan-making.



# 2. Housing

## Housing Market Area (HMA)

- 2.1 A Housing Market Area (HMA) is defined in the PPG as a geographical area determined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work ([see Paragraph: 018 Reference ID: 61-018-20190315](#)). These can be broadly defined by analysing:
- The relationship between housing demand and supply across different locations, using house prices and rates of change in house prices. This should identify areas which have clearly different price levels compared to surrounding areas;
  - Migration flow and housing search patterns. This can help identify the extent to which people move house within an area, in particular where a relatively high proportion of short household moves are contained (due to connections to families, jobs, and schools);
  - Contextual data such as travel to work areas, retail and school catchment areas. These can provide information about the areas within which people move without changing other aspects of their lives (e.g. work or service use).

### West Kent HMA

- 2.2 The Sevenoaks and Tunbridge Wells Strategic Housing Market Assessment (SHMA) published in 2015 identified that Sevenoaks district, part of Tonbridge & Malling borough and Tunbridge Wells borough all fall within the West Kent HMA, and this extends to include Crowborough, Hawkhurst and Heathfield, essentially as the 2011 Travel to Work Area (TTWA).
- 2.3 In terms of the relationship to local authority boundaries, the TTWA covers most of Sevenoaks district, with the western part of Tonbridge & Malling borough, focused on Tonbridge itself, providing a key linkage. The central and eastern areas of Tonbridge & Malling borough are part of the Maidstone HMA, with a northern area falling within the Medway HMA.
- 2.4 The Sevenoaks and Tunbridge Wells SHMA states that *“the principal cross-boundary issue of relevance relates to any potential issues regarding unmet housing needs. If an unmet housing need arises from either of the commissioning authorities, it would be appropriate for them to approach other authorities with which they share an HMA to consider if needs can be met in these areas. The principal adjoining authorities with a strong relationship would be Tonbridge & Malling, Wealden and Rother. Equally the commissioning authorities would need to engage*

*with these authorities in respect of any unmet housing needs arising from these other authorities' areas....”*

- 2.5 TMBC has separately prepared a Housing Market Delivery Study (2022). This further confirms the understanding that Tonbridge and Malling borough predominantly falls within West Kent and Maidstone HMAs. It identifies that there are strong migration and travel to workflows between the borough and its immediate neighbours, Sevenoaks, Tunbridge Wells and Maidstone. However, the Housing Market Delivery Study does not identify a relationship between Tonbridge and Malling borough and north Wealden.
- 2.6 Given the evidence above, both Councils agree that the western part of Tonbridge and Malling falls within the West Kent HMA, but that interactions for TMBC are primarily with Royal Tunbridge Wells and Sevenoaks towns. These interactions have and will be considered when cooperating on strategic cross-boundary matters through the DtC process. It is recognised that housing markets are dynamic and will change in response to shifts in economic conditions, for example, the provision of new infrastructure and the growth (and decline) of centres of employment. This will be kept under review through the preparation of updated and new evidence in the future.

## Housing requirements

- 2.7 The housing need figures for both TMBC and TWBC in the respective plans, in dwellings per annum (dpa), are set out in the following table.

**Table 1: Housing need figures for TMBC and TWBC in dwellings per annum**

Housing Target Source	TMBC	TWBC
Statutory Development Plan	425 dpa under TMBC Core Strategy (2007)	300 dpa under TWBC Core Strategy (2010)
Local Plan	839 dpa (capped figure) 'Standard Methodology' under NPPF (2021) as published September 2022	660 dpa (capped figure) 'Standard Methodology' under NPPF (2021) as calculated June 2024

- 2.8 Housing will be kept under review having regard to the anticipated publication of the next NPPF and any revisions to the standard methodology, following the Government's July 2024 consultation. Due to revisions to the standard method, this is expected to significantly increase housing need for all West Kent planning

authorities. For Tunbridge Wells this could be 1045 dpa, Tonbridge and Malling 1057 dpa and Sevenoaks 1113 dpa, as identified in the Government's consultation.

## Unmet Need

- 2.9 Throughout the period of plan making since 2012, there have been discussions under the DtC between TMBC, TWBC and Sevenoaks District Council (SDC) (i.e. neighbouring authorities in the HMA) in relation to the ability or otherwise to meet housing need. This includes discussing significant constraints which could restrict any possible assistance with unmet need if required. Previously, these discussions related to SDC's withdrawn 2019 Local Plan, which did not fully meet identified housing need at that point. More recently a formal request was issued by SDC in May 2024 to authorities including TWBC and TMBC, requesting assistance with unmet housing need of 3729 homes. TMBC and TWBC both responded indicating that they would be unlikely to be able to assist due to having similar landscape and Green Belt constraints and anticipated challenges in meeting their own housing need.
- 2.10 Both TMBC and TWBC have received requests from Elmbridge Borough Council to help meet its housing need. Both TMBC and TWBC responded to the request stating that it would not be possible to meet Elmbridge's unmet need. It was also explained that there are limited housing market linkages between the authorities. TWBC has also received a request from Hastings Borough Council, and more recently requests to help meet needs from Wealden District Council and Rother District Council. TWBC is not able to meet the needs of either of these authorities. TMBC also received a request from Wealden District Council and responded in a similar manner given that there is a limited linkage between Wealden District Council and Tonbridge and Malling Borough.

## TMBC

- 2.11 The TMBC Regulation 18 Local Plan identified that the gross housing need over the period from 2021-2040 was 15,941 dwellings (839 dpa) and set out the Council's intention to meet this need in full, given worsening affordability and affordable housing need.
- 2.12 The Housing Market Delivery Study (July 2022) and Housing Needs Survey (July 2022) were published alongside the draft Plan, this evidence is currently being updated to ensure it reflects current national planning and economic policy as well as market circumstances. Updated evidence will be published as part of TMBC's next Local Plan consultation.

## TWBC

- 2.13 TWBC's approach to producing its Local Plan has been to assess sites, and consider a spatial strategy, unconstrained by an upper housing limit. Assessment

through the Sustainability Appraisal during all stages of plan preparation has included assessment of options which include meeting TWBC's uncapped need (accommodating some of SDC's unmet need, and meeting TWBC's uncapped need and some of SDC's unmet need

- 2.14 Between 2015 and early 2019, whilst flagging the constraints in Tunbridge Wells borough which may make accommodating its own need (or unmet need from neighbouring authorities) problematic, TWBC was only in a position (through the progression of work on its own Plan) to provide more definitive comments regarding the ability or otherwise to accommodate unmet need in early 2019, as work on the spatial strategy for the Draft Local Plan progressed. The considerations set out in DtC discussions in spring 2019, and the SoCG between SDC and TWBC (signed in May 2019) that TWBC could not assist in accommodating unmet need, and the reasons for this, were reflective of the work progressed on the TWBC Local Plan.
- 2.15 Notwithstanding these comments, TWBC continued to consider whether there was scope to accommodate any unmet need, including through the assessment of additional sites submitted in the Regulation 18 consultation on the draft Local Plan in autumn 2019 and beyond well into 2020, and through the Sustainability Appraisal of the Pre-Submission and Submission Local Plan. If TWBC considered that there was scope to accommodate part or all the SDC unmet need, then TWBC would have advised SDC and TMBC of this.
- 2.16 At submission the TWBC Local Plan made provision to meet its own Local Housing Need (678 dpa). There was, additionally, a buffer of approximately 1,050 houses. The buffer was planned for as it considered that it was prudent to provide a degree of flexibility in the actual housing supply, particularly having regard to the high contributions from the proposed strategic sites (Tudeley Village and Paddock Wood including land in east Capel).
- 2.17 It became evident through the plan-making process that TWBC is reliant upon the release of land from the Green Belt, including for a new garden village settlement on land currently in the Green Belt and doubling the size of Paddock Wood, part of which is in the Green Belt, as well as the allocation of sites for major development within the High Weald AONB, if TWBC were to meet its own housing needs in full.
- 2.18 Given that the NPPF (paragraph 137) requires LPAs to look beyond the Green Belt first before releasing such land for development, as well as limiting major developments in the AONB to where there are exceptional circumstances and in the public interest (paragraph 172), TWBC raised this issue with its neighbouring LPAs, including TMBC, and formally wrote to them in early October 2020 to ask what capacity they may have to assist, ahead of further consideration of these options in preparing the Pre-Submission version of the Local Plan.
- 2.19 In response, TMBC set out that it would not be able to assist due to there being insufficient sites within the part of Tonbridge & Malling borough that falls within the West Kent HMA to meet the borough's needs without removing sites from the

Green Belt: i.e. as established through the DtC there are no less constrained areas in Tonbridge and Malling, as relevant to the West Kent HMA.

- 2.20 Following the Inspectors Initial Findings letter, TWBC has sought to address the Inspectors concerns and has proposed the deletion of Tudeley Village and a reduction of numbers at the strategic extension of Paddock Wood. This has resulted in a reduction in overall housing numbers such that the Council can only now plan for 10 years supply of housing. TWBC is therefore currently unable to meet its own needs in full, and in progressing the Local Plan as revised, with a 10-year Housing Land Supply, is committed to an early review of the Local Plan in order to seek ways of meeting the unmet need towards the end of the plan period, and taking account of any uplift in its OAN housing need figure arising from the Governments recent consultation on the NPPF and updated Standard Method.
- 2.21 Both TMBC and TWBC recognise that housing needs, HMAs and constraints to development may change over time. Given the above, both TMBC and TWBC will continually consider their positions on capacity to meet housing needs as they progress. This will include considering the position further once a revised NPPF is published.

### **Actions**

TMBC and TWBC to continue to engage with each other and through wider engagement with relevant neighbouring authorities in relation to strategic housing matters, including capacity to meet local and unmet needs. This will include consideration of any future requests from other authorities including London authorities, if received.

## **Gypsies, Travellers and Travelling Showpeople**

### **TMBC**

- 2.22 The Council's most recent Gypsy, Traveller and Travelling Showperson Needs Assessment (GTAA) was published alongside the TMBC Regulation 18 Local Plan in September 2022.
- 2.23 The assessment concludes that there is an overall cultural need for 41 additional Gypsy and Traveller pitches across the borough over the Plan period from 2021/22 to 2039/40 (as previously projected). Of this need, 25 pitches arise from households who meet the Planning Policy on Traveller Sites (PPTS) nomadic habit of life definition, and 16 are from households who do not meet the PPTS definition as they no longer lead a nomadic habit of life. This takes into account the needs arising from existing households, households on unauthorised sites, newly forming

households, in-migrant households and also current vacancies on existing public sites.

- 2.24 There are currently two travelling showperson's yards in Tonbridge and Malling. The previous GTAA evidenced a need for 3 plots, and it is recommended this remains the figure for need for new showperson plots over the plan period to 2040 (as previously projected).
- 2.25 The Council intends to meet the identified gypsy and traveller pitch needs over the plan period to 2041. Work is progressing to explore all site opportunities, including the regularisation of sites with temporary planning permissions, as well as the possible further expansion or intensification of sites promoted through a targeted 'call for sites'. All sites situated within the Green Belt are also being assessed for their suitability as part of the council's ongoing Green Belt assessment work.
- 2.26 An updated GTAA report will be published alongside the next Local Plan consultation.

## TWBC

- 2.27 TWBC published its previous GTAA in January 2018 in support of its Draft Local Plan and in line with the revised definition for Gypsies and Travellers in the PTTS (August 2015). This identified a requirement for 32 permanent residential pitches. TWBC planned to meet this need in full in its Submission Local Plan.
- 2.28 The Council has recently prepared an updated Gypsy and Traveller Accommodation Needs Assessment following [correspondence](#) from the Local Plan Inspector in February 2024. He highlighted that TWBC's 2018 assessment no longer reflected national planning policy (which was updated in December 2023 after the Stage 2 Hearings and included a revised definition for Gypsies and Travellers) and that the surveys used to support the GTAA date back to 2017 and raised concerns about the age of this piece of evidence.
- 2.29 TWBC has therefore prepared an updated GTAA -[Tunbridge Wells Gypsy, Traveller, and Travelling Showpeople Accommodation Needs Assessment 2024-2039](#) that assesses accommodation needs for Gypsies, Travellers and Travelling Showpeople in accordance with the change in definition set out at Annex 1 of the PPTS (December 2023).
- 2.30 The Council has just concluded public consultation on the document, ahead of further discussion at a hearing session – scheduled for mid-November 2024. The Council considers that any unmet need arising from the findings of the new GTAA, June 2024, can be sought as part of the proposed early review of the Local Plan. Reference to this is made in the draft modified Policy STR1 the Development Strategy ([PS-109](#)) which has also formed part of the consultation, which addresses the early review of the Local Plan in more detail. TWBC responded to this

consultation supporting the council's approach and stressed that needs must be met in full through the Local Plan early review.

- 2.31 Maidstone Borough Council (MBC) has previously requested assistance from TMBC in meeting its Gypsy and Traveller need, this was addressed through its recent Local Plan Examination which concluded in 2024. Following adoption of the Plan MBC is currently preparing a Supplementary Planning Document to further assist in meeting their need.

### **Actions**

- TMBC is updating its Gypsy and Traveller need assessment and undertaking site assessments to support its emerging Local Plan.
- TWBC will review its Gypsy and Traveller evidence in undertaking an early review of its Local Plan.
- Discussions are continuing more widely with Kent authorities regarding the provision of a transit site(s) in the county, being led by Ashford borough.
- Both Councils will continue dialogue on matters relating to Gypsy, Traveller and Travelling Showpeople accommodation, including updated evidence and Local Plan policies.

# 3.0 Economy

## Functional Economic Market Area (FEMA)

- 3.1 In terms of a Functional Economic Market Area (FEMA), the PPG ([see Paragraph 019 Reference ID 61-019-20190315](#)) states that patterns of economic activity vary from place to place and that there is no standard approach to defining a functional economic market area, although it is possible to define them taking account of factors including:
- Extent of any Local Enterprise Partnership within the area;
  - Travel to work areas;
  - Housing market area;
  - Flows of goods, services and information within the local economy;
  - Service market for consumers;
  - Administrative area;
  - Catchment areas of facilities providing cultural and social well-being; and
  - Transport network.
- 3.2 It is agreed that Tunbridge Wells and Tonbridge and Malling form part of a wider regional economy, within which many areas share important economic relationships with London. There is also a more localised geography that has historically functioned as a sub-regional economy and which shares similar economic characteristics. It is considered that Sevenoaks district, Tunbridge Wells and Tonbridge and Malling boroughs share a functional economic market area (FEMA). This reflects evidence of commuting flows and has become defined as a sub-regional economy aligned to the West Kent Partnership.
- 3.3 TWBC commissioned an Economic Needs Study (2016) with SDC to inform their respective Local Plans taking into account the recognised functional economic relationships. More recently TWBC has carried out Retail and Leisure studies, completing this work in February 2021. This seeks to identify the retail, leisure, town centre needs over the Plan period, and identifies reorganised functional catchment areas for retail and leisure patterns across the wider sub-region.



# Employment land needs and provision

## TMBC

- 3.4 The TMBC Employment Land Review identified a net need for 46.8 hectares of employment land that the 2019 Local Plan needed to address. Sites were identified in the 2019 Local Plan for approximately 38.5 hectares of additional employment land at a number of sites across the borough, with the balance to be delivered through the intensification of existing sites.
- 3.5 An Economic Needs Study (2022) was published alongside the TMBC Regulation 18 Local Plan. This identified a range of future employment land scenarios over the plan period 2021-2040. The labour demand scenario provides the most balanced view of future requirements, indicating *“a need for 296,260 sq/m (69.8ha) across the Plan period”* (EDNS 2022 para 6.4). This work is updated and extended to cover town centre and retail needs, as well as consideration of the range of potential site opportunities that are available, to help inform the emerging Local Plan.
- 3.6 Due to the current stage of the emerging TMBC Local Plan, expected increase to local growth requirements as a consequence of any revised NPPF alongside progressing further evidence base work, TMBC cannot say whether it is able to meet any updated employment needs in full at this time. TMBC is approaching the matter in accordance with para 35 of the NPPF, on the basis of the Plan being *“Positively prepared - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs”...*

## TWBC

- 3.7 The Economic Needs Study was undertaken for TWBC (and SDC) by Turley, in association with Colliers. For TWBC it identified a need for at least 14 hectares of additional employment floorspace. TWBC is seeking to meet its identified employment land needs in full through the retention, intensification and extension of the existing defined Key Employment Areas, in particular a strategic expansion into the Green Belt and AONB at land at Kingstanding Way, Royal Tunbridge Wells (and on a smaller scale at Paddock Wood and Hawkhurst). This covers the range of site requirements.
- 3.8 As part of the considerations of the allocation of land at Kingstanding Way and given that the NPPF (paragraph 137) requires LPAs to look beyond the Green Belt first before releasing such land for development, as well as limiting major developments in the AONB to where there are exceptional circumstances and in the public interest (paragraph 172), TWBC raised this issue with its neighbouring LPAs, including TMBC. In early October 2020 TWBC formally wrote to TMBC to ask what capacity it may have to assist in terms of meeting employment need, ahead of further consideration of these options in preparing the Pre-Submission version of

the Local Plan. In response, TMBC set out that as there were no surplus sites (on the 2019 Local Plan) to meet its own employment needs (i.e. it was requiring a combination of new allocations and intensification of existing sites), it could not assist in meeting unmet needs from neighbouring authorities.

- 3.9 Given that TMBC is at an early stage of plan making and TWBC is seeking to meet its employment needs, the actions relate mainly to continued discussion as local plans progress and updated evidence is prepared.

### **Actions**

- TWBC and TMBC will continue to discuss economic matters under the DtC, including any updated evidence and the assessment of need / unmet need
- As necessary TWBC and TMBC will engage with Sevenoaks and other neighbouring authorities as relevant in relation to economic related matters, including employment land and retail and town centre development.
- Opportunities for joint commissioning of evidence will be explored where this is timely/appropriate/advantageous.

## 4.0 Retail

### TMBC

- 4.1 The 2019 Local Plan sought to maintain and enhance the role of the town and urban centres which offer a diverse range of shopping and service facilities. It included a policy for Tonbridge town centre, this is likely to be reviewed and carried forward in the emerging Local Plan, to support the council's regeneration ambitions. New town centre and retail evidence will be made available alongside the Regulation 18 consultation as part of an updated Economy Study that will inform emerging Local Plan policies.
- 4.2 Concurrently the Council is progressing masterplanning work for the regeneration of East of High Street, Tonbridge. This includes council owned land and assets which have significant potential to provide a range of uses including housing. When delivered this will bolster the vibrancy and economy of Tonbridge town centre. The council and appointed consultants will be engaging with a wide range of stakeholders to progress this.

### TWBC

- 4.3 The TWBC Retail and Leisure Study (April 2017) prepared by consultants Nexus used the study area of previous retail studies for the borough. It covers the Tunbridge Wells borough area as well as surrounding areas within Sevenoaks, Tandridge, Mid Sussex, Lewes, Wealden, Rother, Ashford, Maidstone and Tonbridge & Malling from where shoppers may be attracted to the Tunbridge Wells retail and leisure offer.
- 4.4 Nexus also undertook a Tunbridge Wells Retail, Leisure and Town Centre Uses Study Update (2021). This has identified that the retail economy has changed significantly over recent years and the trends which were emerging have accelerated exponentially as a result of the 2020/2021 Covid-19 pandemic. It is also expected that the increased movement towards home working and different times of working, hastened as a result of the Covid-19 'lockdown' periods, will structurally change the need, make up, and use of office space (including shared and flexible accommodation), and through this the operation of those town centre retailers which previously were linked to footfall associated with office employment.
- 4.5 The TWBC Submission Local Plan therefore proposes a Town Centre Area Plan for Royal Tunbridge Wells (which as the updated LDS sets out, will be adopted by 2026/27), together with the revitalisation of Paddock Wood Town Centre. Work has progressed in this regard, with TWBC publishing their 'Vision 2040' early engagement document under Regulation 18, for the Royal Tunbridge Wells Town Centre Plan. This underwent public consultation from February to April 2024, the

results of which are currently being considered by the Council and will inform a full draft Plan for further public consultation in 2025.

Given the above, the main actions therefore relate to ensuring that discussion and cooperation on town centre regeneration matters progress in the future, to support the East of High Street Regeneration in Tonbridge and Tunbridge Wells Town Centre Area Action Plan. Given their proximity these two towns have economic interdependencies and transport connections which should be strengthened where opportunities allow.

### **Actions**

TMBC and TWBC will continue to liaise on retail and town centre matters of both areas, having regard to likely changes affecting town centres and the evolving economic context. This will include collaborative support for and progression of masterplanning work for East of High Street Tonbridge and the RTW Town Centre Area Action Plan alongside discussion and cooperation on other relevant matters.

## 5.0 Cross-boundary Infrastructure

- 5.1 In terms of cross boundary infrastructure, both TMBC and TWBC are in a two-tier authority area, where both education, highways and transport are managed by Kent County Council (KCC). Given this, it is expected that these matters will require ongoing advice from KCC with regard to the implications arising from local growth.
- 5.2 TWBC and TMBC in the drafting of their Local Plans have had ongoing discussions with KCC as well as infrastructure and service providers, including National Highways in respect of impacts upon the strategic road network, including the A21 which routes through both boroughs.
- 5.3 TMBC has yet to publish draft site allocations, these will be included within the next Regulation 18 Local Plan consultation. TWBC has identified the following allocations within the Submission Local Plan which could have strategic cross boundary implications in terms of highway, transport, education, water and health matters:
- the garden settlement at Tudeley village was identified within the SLP, however this has now been removed as part of the revised Development Strategy;
  - the expansion of Paddock Wood;
  - employment land at Kingstanding Way, and;
  - a hotel allocation at Mabledon House.
- 5.4 Representations were made by TMBC in 2019 to the Draft Local Plan on these sites, in particular Tudeley regarding cross-boundary infrastructure implications. Concern was also expressed about a further allocation located at Mabledon Farm, which is not proposed for allocation in the TWBC Submission version of the Local Plan. TMBC submitted representations to the Regulation 19 consultation on 3<sup>rd</sup> June 2021 as well as subsequent stages of plan preparation. Further commentary on these matters is provided below.
- 5.5 TWBC and TMBC have engaged under the DtC, and there has been extensive liaison on these sites, particularly in relation to Tudeley Village, Paddock Wood and infrastructure provision.
- 5.6 A further update on TWBC's position on Tudeley Village is provided within [PS-109](#), one of the evidence base documents TWBC has recently consulted on and will be considered further through the ongoing Local Plan Examination. Tudeley Village is addressed at paras 4.50 – 4.57 of the document, concluding at para 4.57 that *"The findings in respect of Tudeley Village set out above mean that in carrying out the early review of the Local Plan, the Council will identify and assess reasonable options for meeting unmet housing needs, and without prejudice to any decisions*

*made about a future development strategy to meet this unmet need, will consider, all reasonable sites put forward through a 'Call for Sites' and other land identified by the Council to be assessed as part of the Strategic Housing and Economic Land Availability Assessment (SHELAA) process”.*

## Tudeley Village and Paddock Wood

- 5.7 TMBC (as well as Maidstone Borough Council) officers attended the TWBC “Strategic Sites Working Group” (SSWG) which comprises developers, infrastructure providers, consultees and relevant parish and town councils and their neighbourhood plan groups. The SSWG was set up to enable discussions around the strategic growth proposed at Tudeley and Paddock Wood. TMBC officers and members attended and were active participants in the autumn 2020 workshops held as part of the masterplanning work undertaken by TWBC’s consultant team (led by David Lock Associates). This demonstrates that TMBC and TWBC have and will continue to work in collaborative partnership on future growth and infrastructure matters.
- 5.8 The SSWG and the masterplanning work has actively involved health providers (the Kent and Medway Clinical Commission Group), KCC Education, Highways and Transport, National Highways and Network Rail, ensuring that relevant strategic cross boundary matters (including those raised by TMBC) have and will continue to be addressed.
- 5.9 Although the Local Plan is no longer seeking to allocate land for Tudeley Village in the emerging Local Plan, extensive discussions took place between TWBC and TMBC on the following matters;
- Education provision - The position of the secondary school which was planned to support the growth at Paddock Wood and Tudeley to be located within Tudeley Garden Village. Discussions are still ongoing in regard to the most appropriate way of delivering additional secondary education capacity and whether this is an expansion of Mascalls School in Paddock Wood or a new secondary school within Paddock Wood. TWBC is continuing to engage on this matter primarily with KCC Education and completed a related SoCG dated August 2024. One of the evidence base documents recently consulted upon ([document PS 097](#)) and a feasibility study ([document PS 096](#)) considers the provision of secondary education as part of an expansion of the Mascalls Academy at Paddock Wood.
  - Assessment of impacts on highways junctions has included that outside the boundaries of Tunbridge Wells borough (including in Tonbridge and along the A228): costs for relevant mitigation measures have been included in the viability assessment work undertaken for the strategic sites (indicating that these can be delivered and are viable). Through the masterplanning work and transport modelling, mechanisms to ensure that all developments make the necessary

contributions to fund this infrastructure are being developed, and TMBC will be involved in this.

- Work has taken place on active travel routes between the strategic sites and Tonbridge, including through direct liaison between the consultants instructed for both authorities. Routes connecting to Tudeley are not currently required following the proposed removal of the allocation.
- Provision for sufficient health care has been made within Paddock Wood and has been subject to viability testing. This is included in policy in the submission version of the Local Plan to ensure that this is delivered on-site. TWBC will continue to liaise with the Kent and Medway Integrated Care Board regarding implementation.
- Discussions have been held with Network Rail in relation to both capacity on the railway line and facilities at Tonbridge Station, and Network Rail have attended the SSWG. Network Rail has confirmed that the proposed growth in Tunbridge Wells borough does not require specific rail capacity interventions, and it is expected that there will be long term changes to commuting habits due to increased home working/different commuting times.

Both authorities will continue discussions and collaborative work on the strategic cross boundary implications of the proposed growth at Paddock Wood, or any other strategic sites which may be considered through the Local Plan Review. In doing so, regard will be had to TMBCs concerns regarding cross boundary traffic affecting the A228 and A26. The impacts of which will be understood through future Local Plan transport modelling and where required suitable mitigation will be identified to address any highways impacts and concerns.

## Kingstanding Way

- 5.10 Outline and reserved matters applications have been considered for this site. National Highways and KCC Highways and Transport have considered the impact of the development, including on potential cross boundary implications, and support the application. TMBC provided comments on this application and did not raise objection. Outline planning permission for this development has been granted. A subsequent reserved matters planning application was submitted to TWBC in March 2024 in relation to access, appearance, landscaping, layout, scale, which has a resolution to grant subject to the satisfaction of two outstanding highways matters. TMBC did not submit any comments on this application.

## Mabledon House

- 5.11 Policy AL/SO 2 – Land at Mabledon House, in the submission Local Plan for hotel use is of a considerably smaller scale than the strategic site and Kingstanding Way, however the site straddles the boundary of the two authority areas and is thus of

cross boundary relevance. The Inspector raised concerns in relation to the scale and justification for the development set out in the draft policy and requested that the Council consider both elements. TWBC liaised with officers of TMBC in the preparation of Action Point 19 – Local Plan Examination Note for Inspector in response to Action Point 19 regarding Mabledon House, Southborough – (TWLP/098) – September 2022. This Action Point note includes an assessment of sequentially preferable sites for a hotel use (in accordance with the NPPF and PPG), including sites within and around the towns of Tonbridge, Royal Tunbridge Wells and Southborough.

- 5.12 This site was also the subject of discussion at the recent Hearing session on the 18<sup>th</sup> June, where the Inspector asked in his ‘Matters, Issues and Questions’, how the Plan can be amended to be made sound? The Councils response to this is set out within document TWLP/122 – Issue 4: Land at Mabledon House – Policy AL/SO 2. Essentially TWBC is seeking to make main modifications to the Local Plan for effectiveness and consistency with national policy. These main mods are still subject to further consideration through the Local Plan Examination. TWBC will continue to liaise with TMBC on this site.
- 5.13 Both authorities commit to working together on detailed proposals for this site, including through any pre-application discussions and with KCC and National Highway in relation to vehicular access arrangements.

## **Mabledon Farm**

- 5.14 For the avoidance of doubt, the proposed allocation at Mabledon Farm indicated in the Regulation 18 Draft Local Plan for housing, between Southborough and the borough boundary, has not been carried forward into the SLP.

## **Leigh flood storage expansion and Hildenborough embankment scheme**

- 5.15 The Leigh flood storage expansion and Hildenborough embankment scheme, being led by the Environment Agency, is such an example where both authorities, through their individual actions and participation in the Medway Flood Action Plan, are working to support the delivery of these infrastructure improvements.
- 5.16 Both authorities support the raising of the storage level. The full scheme is due to be completed by Autumn 2025, although this is recognised as a complex programme and timings could change. Both authorities will continue to liaise on this programme with other bodies as necessary.

## **(Non-strategic sites related) active travel provision**



- 5.17 The A26 runs from Tonbridge through Southborough into Royal Tunbridge Wells. TWBC has a costed scheme for significant improvements to cycling provision along the A26. Both authorities will continue to work together in developing this scheme and identification in their respective Local Cycling and Walking Infrastructure Plans.

## Potential/proposed developments on or near the LPAs' common boundary

- 5.18 In the future, if there is further substantial development, particularly on or close to the administrative boundary of TMBC and TWBC whether through the plan-making or planning application process, then there will be a need to liaise over and coordinate the delivery of infrastructure improvements including the securing of any necessary funding.
- 5.19 It should be noted that TWBC and TMBC work with infrastructure providers to address matters relating to healthcare facilities, water supply, sewerage treatment works, gas and power networks and public transport provision, amongst other issues. Where cross boundary issues do arise on such matters (e.g. as has been the case with the Leigh/Hildenborough flood storage scheme) TWBC and TMBC will seek to agree the delivery of such infrastructure improvements, including the securing of any necessary funding.
- 5.20 Both TMBC and TWBC will continue to engage on highway and transport matters, including in relation to the A21 through ongoing discussions with National Highways and the operation of the Hastings to London and Ashford to London railway lines with Network Rail.

### Actions

- TWBC will continue to liaise with TMBC on matters relating to the delivery of strategic sites around Paddock Wood/land at East Capel.
- TWBC and TMBC will continue to discuss and liaise with each other and relevant infrastructure providers, on the cross-boundary implications of the proposed strategic allocations at Paddock Wood. Taking account of traffic growth and implications in future Local Plan transport modelling work.
- TMBC and TWBC will continue to engage on other cross-boundary infrastructure and planning issues, including proposals at Mabledon House.
- Both Councils will through membership and participation in the Medway Flood Area Plan, continue to liaise on the Leigh flood storage expansion and Hildenborough embankment scheme.

# 6.0 Natural Environment

## Ashdown Forest

- 6.1 Ashdown Forest is a European site and is designated as a Special Area of Conservation (SAC) for its heathland habitat and a Special Protection Area (SPA) for the bird species Dartford warbler and nightjar during their breeding seasons.
- 6.2 Cross boundary strategic matters have been identified in relation to air quality and visitor pressure.

## Ashdown Forest Special Area of Conservation (SAC) – Air Quality

- 6.3 TWBC is an active member and attends regular meetings of the Ashdown Forest Special Area of Conservation (SAC) Working Group, and TMBC is also a corresponding member.
- 6.4 Both TWBC and TMBC will continue to participate in the Ashdown Forest SAC Working Group, with TMBC's involvement being as relevant/necessary, given the distance of Tonbridge & Malling from the Ashdown Forest.
- 6.5 All future work in relation to air quality at Ashdown Forest will be developed in discussion with the Ashdown Forest SAC Working Group agreeing where possible on methodology and to cost sharing where appropriate.

## Ashdown Forest Special Protection Area (SPA) – Recreational Disturbance

- 6.6 This is not considered to be a cross-boundary matter between TWBC and TMBC, largely as all of TMBC lies well outside the 7km zone of influence, which is the extent agreed by all partner local authorities and Natural England. This is based on technical evidence from the Ashdown Forest Visitor Survey which the Strategic Access Management and Monitoring (SAMM) Strategy partnership jointly commissioned.

### **Actions**

That both authorities continue to work as part of the Ashdown Forest Working Group, with TWBC as an active member and TMBC as a corresponding member, in order to secure a common understanding and agreement on development impacts, mitigation and monitoring and if relevant to agree and cost-share future studies or surveys.

## **High Weald National Landscape**

- 6.7 As stated in the High Weald AONB Management Plan (2024-2029) ([see the High Weald AONB Management Plan](#)), both administrative areas of TWBC and TMBC contain proportions of the High Weald National Landscape. In the case of TWBC, the High Weald National Landscape covers just under 69% of the borough. It should be noted that Royal Tunbridge Wells is excluded from this designation but is wholly surrounded by it. In the case of TMBC, only a very small part of the borough falls within the High Weald National Landscape to the south of Tonbridge, with a further 27% in the Kent Downs National Landscape to the north.
- 6.8 Both authorities are members of the Joint Advisory Committee (JAC) and Officer Steering Group for the High Weald National Landscape.
- 6.9 The High Weald AONB Management Plan was agreed by the Joint Advisory Committee on 27 March 2024 for adoption by each of the Local Authorities, after public consultation and with input from both authorities. The Management Plan sets out the key characteristics of the High Weald National Landscape in terms of natural beauty and is an important guidance document for development within the National Landscape. The High Weald AONB Management Plan was adopted by TWBC on 20 June 2024 and TMBC on 14 June 2024.
- 6.10 Both authorities are committed to continue to work together in partnership, with the aim of ensuring that the objectives and actions set out in the High Weald AONB Management Plan are delivered in a timely manner.
- 6.11 Paragraphs 182 and 183 of the NPPF (2023) sets out the national planning policy for major development in AONBs (now National Landscapes). For TWBC, following representations received in relation to its Regulation 18 consultation, full Landscape Visual Impact Assessments have been undertaken to assess the landscape impact of major development sites in the National Landscape.
- 6.12 TWBC's reading of the NPPF is that it has to apply the tests in paragraph 183 in order to come to a conclusion in relation to individual sites. In this context, although not explicit in relation to opportunities outside its own area, paragraph 172(b) may be interpreted as expecting the 'scope for developing outside the designated area'

to extend to neighbouring LPAs as part of the consideration of exceptional circumstances.

- 6.13 TWBC has therefore previously asked TMBC whether (October 2020) it has scope to accept any housing need from TWBC, as set out at paragraphs 2.17-20 above, that would comprise major development in the AONB. TMBC consider that there are no less constrained areas in the western area of Tonbridge and Malling that falls within the West Kent HMA.
- 6.14 This has been factored into TWBC's considerations as part of the preparation of the Submission version of the Local Plan. It is acknowledged that, following the further evidence undertaken on landscape and visual impact, the amount of housing proposed as major development in the National Landscape has decreased significantly between the Draft Local Plan and the Pre-Submission version of the TWBC Local Plan.

### **Actions**

Both authorities will continue to liaise on cross-boundary matters relating to the High Weald National Landscape as follows.

- Implementation of the High Weald AONB Management Plan.
- Developments that are proposed close to or which straddle the administrative boundary, that are located within the National Landscape or its setting.
- Planning policy and guidance that is relevant to the National Landscape.

## **Biodiversity**

- 6.15 Under paragraphs 185-188 of the NPPF, it has been stated that Local Plans should seek to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. TMBC in its withdrawn Local Plan 2019, and TWBC in its Submission Plan, included policies for green infrastructure which have taken account of cross boundary proposals, and it is expected that the emerging TMBC Plan will update and carry this forward.
- 6.16 Both authorities also had/have policies in the (withdrawn TMBC Local Plan and TWBC Submission version of the Local Plan) which require actions in conjunction with relevant county stakeholder groups such as the Kent Wildlife Trust and Kent Nature Partnership. Cooperation on cross boundary biodiversity issues including biodiversity net gain between all Kent LPAs, is already occurring through

engagement with the Kent Nature Partnership and respective endorsement/adoption of the Local Nature Recovery Strategy.

### **Actions**

TMBC and TWBC will continue to engage with stakeholders including the Kent Nature Partnership and the High Weald AONB Unit to ensure a common and cooperative approach to biodiversity and biodiversity net gain across Kent.

## 7.0 Governance arrangements

- 7.1 It is noted under the PPG (see [Paragraph: 011 Reference ID: 61-011-20190315](#)) that a SoCG is expected to outline governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date.
- 7.2 The main officers from each Council to be engaged on a regular basis in relation to cross-boundary cooperation are the respective planning policy managers or designated lead officers. They will be responsible for drafting and maintaining an up-to-date SoCG between the Councils.
- 7.3 Service heads (or in their absence, relevant senior officer/deputy) will be responsible for making any formal requests and providing responses in relation to unmet (or potentially unmet) development needs.
- 7.4 Signing of the SoCG and any subsequent reviews, will be at the elected member level, normally the portfolio holder whose responsibilities cover strategic planning.
- 7.5 Liaison in relation to the SoCG and the wider DtC will be on a regular basis between relevant officers and, where appropriate elected members. It will be for the respective lead officer to keep their service head and portfolio holder briefed on activities in relation to the DtC and the SoCG, as appropriate.

## 8.0 Actions and Review Timetable

8.1 The agreed actions in this SoCG are reproduced below. This SoCG is an iterative document. Progress on the actions will be detailed in the next version of this SoCG.

**Table 2: Agreed key issues and agreed actions**

Key Issue	Agreed Actions
Housing	TMBC and TWBC to continue to engage with each other and through wider engagement with relevant neighbouring authorities in relation to strategic housing matters, including capacity to meet local and unmet needs. This will include consideration of any future requests from other authorities including London authorities, if received.
Gypsies, Travellers and Travelling Showpeople	<ul style="list-style-type: none"> <li>• TMBC is updating its Gypsy and Traveller need assessment and undertaking site assessments to support its emerging Local Plan.</li> <li>• TWBC will review its Gypsy and Traveller evidence in undertaking an early review of its Local Plan.</li> <li>• Discussions are continuing more widely with Kent authorities regarding the provision of a transit site(s) in the county, being led by Ashford borough.</li> <li>• Both Councils will continue dialogue on matters relating to Gypsy, Traveller and Travelling Showpeople accommodation, including updated evidence and Local Plan policies.</li> </ul>
Economy	<ul style="list-style-type: none"> <li>• TWBC and TMBC will continue to discuss economic matters under the DtC, including any updated evidence and the assessment of need / unmet need</li> <li>• As necessary TWBC and TMBC will engage with Sevenoaks and other neighbouring authorities as relevant in relation to economic related matters, including employment land and retail and town centre development.</li> </ul> <p>Opportunities for joint commissioning of evidence will be explored where this is timely/appropriate/advantageous.</p>
Retail	TMBC and TWBC will continue to liaise on retail and town centre matters of both areas, having regard to likely changes affecting town centres and the evolving economic context. This will include collaborative support for and progression of masterplanning work for East of High Street Tonbridge and the Royal Tunbridge Wells

Key Issue	Agreed Actions
	Town Centre Plan alongside discussion and cooperation on other relevant matters.
Cross Boundary Infrastructure	<ul style="list-style-type: none"> <li>• TWBC will continue to liaise with TMBC on matters relating to the delivery of strategic sites around Paddock Wood/land at East Capel.</li> <li>• TWBC and TMBC will continue to discuss and liaise with each other and relevant infrastructure providers, on the cross-boundary implications of the proposed strategic allocations at Paddock Wood. Taking account of traffic growth and implications in future Local Plan transport modelling work.</li> <li>• TMBC and TWBC will continue to engage on other cross-boundary infrastructure and planning issues, including proposals at Mabledon House.</li> <li>• Both Councils will through membership and participation in the Medway Flood Area Plan, continue to liaise on the Leigh flood storage expansion and Hildenborough embankment scheme.</li> </ul>
Natural Environment	<p><b>Ashdown Forest</b> - That both authorities continue to work as part of the Ashdown Forest Working Group, with TWBC as an active member and TMBC as a corresponding member, in order to secure a common understanding and agreement on development impacts, mitigation and monitoring and if relevant to agree and cost-share future studies or surveys.</p> <p><b>High Weald National Landscape</b> - Both authorities will continue to liaise on cross-boundary matters relating to the High Weald National Landscape as follows.</p> <ul style="list-style-type: none"> <li>• Implementation of the High Weald AONB Management Plan.</li> <li>• Developments that are proposed close to or which straddle the administrative boundary, that are located within the National Landscape or its setting.</li> <li>• Planning policy and guidance that is relevant to the National Landscape.</li> </ul> <p><b>Biodiversity</b> - TMBC and TWBC will continue to engage with stakeholders including the Kent Nature Partnership and the High Weald AONB Unit to ensure a common and cooperative approach to biodiversity and biodiversity net gain across Kent.</p>

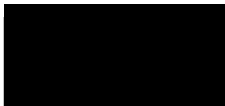





- 8.2 This SoCG will be updated as required to reflect the latest position on respective Local Plans and the preparation of evidence.
- 8.3 The Councils will work jointly to ensure that there is a SoCG in place ahead of the formal consultations on any Local Plan published by either Council (i.e. under Regulation 18 or 19).
- 8.4 Based on current Local Plan programmes, it is anticipated that this SoCG will be prepared and updated in accordance with the following timetable:

Document	Target Sign-Off Date	Reasoning
SoCG V1	October 2021	Ahead of TWBC Submission
SoCG V2	November 2024	Ahead of TWBC Hearing session – 14 November 2024

- 8.5 Further updates may be appropriate if substantive new evidence becomes available, or decisions are made.

## 9.0 Signatories/Declaration

Signed on behalf of Tonbridge & Malling Borough (Councillor)	Signed on behalf of Tonbridge & Malling Borough Council
<b>Cllr Mike Taylor</b> 	<b>Eleanor Hoyle</b> 
<b>Position:</b> <b>Cabinet Member for Planning</b>	<b>Position:</b> <b>Director of Planning, Housing and Environmental Health</b>
<b>Date: 13 November 2024</b>	<b>Date: 13 November 2024</b>

Signed on behalf of Tunbridge Wells Borough Council (Councillor)	Signed on behalf of Tunbridge Wells Borough Council (Chief Executive)
<b>Cllr Matt Lowe</b> 	<b>William Benson</b> 
<b>Position:</b> <b>Cabinet Member for Planning</b>	<b>Position:</b> <b>Chief Executive</b>
<b>Date: 13 November 20204</b>	<b>Date: 13 November 2024</b>

# Appendix A: The Administrative Areas of Tonbridge & Malling and Tunbridge Wells boroughs

