



Tunbridge Wells Borough Council

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# **Tunbridge Wells Borough Local Plan Schedule of Additional Modifications**

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### Introduction

This schedule contains additional (minor) modifications to the Royal Tunbridge Wells Local Plan. There are separate schedules for the main modifications and policies map modifications, which are published alongside this schedule.

The additional modifications are not considered soundness issues but are proposed to provide corrections, clarification and factual updates to the text of the [Pre-Submission Local Plan \(published in March 2021\)](#).

The additional modifications do not require consultation and are provided for completeness.

The first column in the schedule is the reference number of the suggested main modification.

The second column shows the relevant page number(s) of the Pre-Submission Local Plan.

The third column shows the policy/paragraph/table to which the additional modification applies. The additional modifications are listed in plan order.

The fourth and fifth columns of the schedule show the suggested additional modification and the reason for it.

Text shown as **bold and underlined** is proposed new text, text shown with a ~~strike through~~ is proposed to be removed.

In many instances, modifications to policies and text will require consequential policy/paragraph renumbering and alterations to cross-references, but these are not itemised in this schedule.

## Schedule of Additional Modifications

### Section 2: Setting the Scene

7AM Ref.	Page number	Policy/ Paragraph/ Table	Proposed Additional Modification	Reason for change
AM1	4	Foreword	<p><b>Foreword</b>  Delete existing Foreword text and replace with:</p> <p><u>The Local Plan is an important strategic document for our borough, critical to enabling its development to be planned and managed in an organised, structured way that benefits residents and reflects local ambitions. We think it is appropriate therefore to thank everyone who has engaged with the production of this vital piece of work for the borough of Tunbridge Wells, including the many residents, business and organisations who contributed comments and representations at the public consultations.</u></p> <p><u>From the very early stages of the process, providing the necessary growth in housing, together with supporting infrastructure has been a key part of the Plan. The Council has faced substantial challenges finding suitable land to help meet the growth needs, and decisions about the location of housing developments and the delivery of improvements to infrastructure were the subject of significant debate. Hard choices have had to be made, including the release of suitable land from the Green Belt and allocation of some sites for major development in the High Weald National Landscape. Allocating sites for development has been a challenging task, balancing multiple and often contradictory requirements as well as important considerations such as our obligations to respond more positively to climate change and to protect our natural and historic environments.</u></p> <p><u>A great deal of work has been done by Council staff with the relevant agencies to overcome these challenges and lay out a Local Plan which allows</u></p>	Update to reflect stage of plan making.

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			<p><u>development in suitable locations and makes sure that the people who live in these new developments will have the local facilities and infrastructure that they need.</u></p> <p><u>An important part of the Local Plan's evolution was the scrutiny of the proposals at the Examination stage, overseen by an independent Planning Inspector. This public scrutiny, and the related work to examine options and to refine and improve the submissions, together with the subsequent examination hearings and further work on the proposals have all contributed to the creation of this Local Plan.</u></p> <p><u>Our Local Plan sets out all the proposed site allocations for the borough, together with a set of important policies that guide their development. They include policies that will enable the Council to secure more affordable housing for our communities, policies to help to better meet the needs of an ageing population and policies that expect high design and environmental standards in new homes that are well integrated with our natural and historic environments. It also includes policies to maintain and encourage a vibrant economy in the borough so that residents and visitors can work and enjoy their free time here.</u></p> <p><u>Importantly, this Plan has been developed over the course of multiple administrations of differing political colours, and consequently benefits from cross-party support. It is a vital document and will help shape the future of our borough in the coming years.</u></p> <p><u>Thank you for your interest in the Tunbridge Wells Local Plan.</u>  <u>Ben Chapelard, Leader and Matthew Lowe Cabinet Member for Planning, TWBC</u></p>	
AM2		Throughout Local Plan	<p><b>Index of Policies</b>  <i>Correct title of parish strategy policies throughout the Local Plan as follows:</i></p> <p>STR/SO-4 <b><u>PSTR/SO 1</u></b></p>	Typographical correction.

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			<p>STR/PW 4 <u>PSTR/PW 1</u></p> <p>STR/CA 4 <u>PSTR/CA 1</u></p> <p>STR/CRS 4 <u>PSTR/CRS 1</u></p> <p>STR/HA 4 <u>PSTR/HA 1</u></p>	
AM3	15 - 16	Paragraph 1.18	<p><b>Section 1: The Local Plan process</b>  <i>Amend last sentence of paragraph 1.18 as follows:</i></p> <p>A full list of the responses received can be found on the Council's website under <del>Draft Local Plan comments and next steps</del> <a href="#">Previous Stages</a>.</p> <p><i>After paragraph 1.20 add the following new text and delete text in yellow box:</i></p> <p><b><u>Pre-Submission Local Plan</u></b></p> <p><b><u>The Pre-Submission Local Plan was published in Spring 2021 and subject to a 10-week consultation that ran from the 26 March 2021 to 4 June 2021.</u></b>  <b><u>In total 2,084 representations on different parts of the Local Plan were received from 650 organisations and individuals. All representations received are available to view on the Council's website on the Council's <a href="#">Representations and Next Steps webpage</a>.</u></b></p> <p><b><u>The main issues raised in response to the Pre-Submission Local Plan included concerns about the following matters:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>If there is capacity to assist with unmet housing need from neighbouring authorities;</u></b></li> <li>• <b><u>The impacts of the development strategy on the Green Belt and Area of Outstanding Natural Beauty, and consistency with national policy;</u></b></li> <li>• <b><u>The sustainability of the development strategy, specifically with regard to the allocation of strategic sites;</u></b></li> </ul>	Factual to reflect stage of plan making.

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			<ul style="list-style-type: none"> <li><u>The appropriateness of the strategic sites in terms of loss of Green Belt, infrastructure requirements and mitigations, and delivery programme;</u></li> <li><u>The suitability of the proposed site allocations, and of omission sites, for development;</u></li> <li><u>The consistency of the Development Management Policies with national policy and whether they reflect local circumstances, including matters relating to sustainable design/standards and wider climate change matters, heritage assets, biodiversity net gain, affordable housing, housing for older people, and traveller sites provision</u></li> </ul> <p><u>The Consultation Statement relating to the Pre-Submission Local Plan provides an overview of the public consultation and identifies the main issues raised. All representations were submitted to the Planning Inspector appointed to examine the Local Plan.</u></p> <p><u>Following the Pre-Submission Local Plan consultation, the Local Plan was submitted for Examination in November 2021. Stage 1 and 2 Hearing Sessions were held in the spring and summer of 2022, following which the Inspector issued his initial findings [<a href="#">document ID-012</a>] in November of that year. The Council conducted a public consultation on its response to the initial findings which ran from the 15 January to 12 April 2024. More recently the Council has carried out a further public consultation on its updated Gypsy and Traveller Accommodation Needs Assessment and other new, evidence base documents between the 11 September and the 23 October 2024.</u></p> <p><i><del>Details of the public consultation on this Pre-Submission version of the Local Plan can be found on the <a href="#">Local Plan</a> page of the Council's website. Following consultation, the Plan will be submitted to the Planning Inspectorate in June/July 2021 for subsequent public examination by an independent Planning Inspector appointed by the Government in late 2021. If the Local Plan is found 'sound', it will then be formally adopted by the Council in 2022 and at that stage will be given full weight in the determination of planning applications.</del></i></p>	

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7AM Ref.	Page number	Policy/ Paragraph/ Table	Proposed Additional Modification	Reason for change
AM4	Through out	Paragraph 1.22 and throughout Local Plan	<p><b>Section 1: National planning policy and guidance</b>  Delete reference to date of NPPF in paragraph 1.22 and all subsequent references throughout the Local Plan as follows:</p> <p>Government planning policy is set out in the National Planning Policy Framework (NPPF) (2019), with supporting guidance in the Planning Practice Guidance (PPG).</p>	Factual update.
AM5	17	Paragraph 1.26	<p><b>Section 1: National planning policy and guidance</b>  Amend final bullet point of paragraph 1.26 as follows:</p> <p><b>Consistent with national policy</b> – enabling the delivery of sustainable development in accordance with the policies in this Framework <b><u>and other statements of national planning policy, where relevant.</u></b></p>	For consistency.
AM6	17	Paragraph 1.28 and throughout Local Plan	<p><b>Section 1: Relationship with other strategies</b>  Amend paragraph 1.28 and for all subsequent references amend names of Highways England and NHS Kent and Medway Clinical Commissioning Group as follows:</p> <p>Furthermore, the Council has also been involved in extensive liaison with Kent County Council, notably in terms of its roles as the minerals and waste local planning authority, and as the local highway authority, and local education authority <b><u>and lead local flood authority</u></b>; as well as other organisations, agencies, and infrastructure providers including Highways England <b><u>National Highways</u></b>, ... and the NHS Kent and Medway Clinical Commissioning Group <b><u>Integrated Care Board (NHS Kent and Medway ICB).</u></b></p>	Clarification and factual update.
AM7	18	Paragraph 1.34	<p><b>Section 1: Sustainability Appraisal</b>  Amend paragraph 1.34 as follows:</p> <p>Stage 3a: Finally, at this third stage, the latest version of the Plan is accompanied by <b><u>to support the Pre-Submission Local Plan</u></b> - a further updated Sustainability Appraisal</p> <p><b><u>Stage 3b: The Submission version of the Plan was accompanied by an updated Sustainability Appraisal incorporating minor modifications</u></b></p>	To reflect progress of the Local Plan Examination and the more recent Sustainability Appraisal undertaken.



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			<b><u>Stage 4: A further Sustainability Appraisal was undertaken to support the Council's response to the Inspector's Initial Findings, received in November 2022, which included a revised Development Strategy.</u></b>	
AM8	20	Figure 2	<b>Section 2: Borough Profile and Context</b> <i>Add Ordnance Survey copyright to Figure 2</i>	Factual correction.
AM9	21	Paragraph 2.4	<b>Section 2: Settlements of the Borough</b> <i>In paragraph 2.4 under Cranbrook amend the third sentence as follows:</i>  Cranbrook also benefits from a good range of independent shops, a supermarket, <u>a</u> secondary schools, a sports centre, and other local services and facilities.	Factual change to reflect the fact that Cranbrook now only has one secondary school since the closure of the High Weald Academy in September 2022.
AM10	22	Figure 3	<b>Section 2: Settlements of the Borough</b> <i>Add Ordnance Survey copyright to Figure 3</i>	Factual correction.

## Section 4: The Development Strategy and Strategic Policies

AM Ref.	Page number	Policy/ Paragraph/ Table	Proposed Additional Modification	Reason for change
AM11	47	Paragraph 4.66	<b>Section 4: Brownfield Land</b> <i>Amend paragraph 4.66 as follows:</i>  To achieve the overarching need for sustainable development, the NPPF identifies the requirement to make effective use of land. This is set out at paragraph 117, which states:  "Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land" (except	For correct wording.

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			<i>where this would conflict with other policies in <u>this Framework</u> <del>the NPPE</del>, including causing harm to designated sites of importance for biodiversity).</i> "	
AM12	71	Paragraph 4.137	<p><b>Section 4: Neighbourhood Plans</b>  <i>Amend paragraph 4.137 as follows:</i></p> <p>For up-to-date information about the progress of neighbourhood plans in the borough, including details of the <del>one</del> 'made' Neighbourhood Plans <del>for Hawkhurst parish</del>, see the Neighbourhood Planning page on the Council's website.</p>	To update the latest position in respect of Neighbourhood Plans in the borough.

## Section 5: Place Shaping Policies

AM Ref.	Page number	Policy/ Paragraph/ Table	Proposed Additional Modification	Reason for change
AM13	73	Paragraphs 5.1 to 5.3	<p><b>Section 5: Place Shaping Policies</b>  <i>Amend paragraphs 5.1, 5.2 and 5.3 as follows:</i></p> <p><i>Paragraph 5.1:</i></p> <p>This section of the Local Plan sets out the spatial strategies and policies for different parts of the borough. The section is arranged by non-parished and parished areas, with a specific chapter covering <b>the</b> Strategic Sites.</p> <p><i>First sentence of paragraph 5.2</i></p> <p>The format used is intended to help provide clarity on the planning policy approach at the local level, for each parish (in parished areas); elsewhere, the main towns and the proposed strategic sites.</p> <p><i>In list of areas in paragraph 5.3 delete</i></p> <p><b>Strategic sites</b></p>	Consequential change following main modification MM85
AM14	77	<b>All policies in the Place Shaping chapter</b>	<p><b>Section 5: Place Shaping Policies</b>  <i>For all policies in the Place Shaping Chapter delete the supporting text following the Policy as follows:</i></p> <p><del>In addition to the criteria in the above Policy, the relevant Policies that should be referred to in the Local Plan include: Policies STR 1: The Development Strategy; STR 2: Place Shaping and Design; STR 3: Brownfield Land; STR 4: Ensuring Comprehensive Development; STR 5: Infrastructure and Connectivity; STR 6: Transport and Parking; STR 8: Conserving and Enhancing the Natural, Built, and Historic Environment; STR 9: Green Belt; STR/RTW 2: The Strategy for Royal Tunbridge Wells Town Centre; ED 1: The Key Employment Areas; TP 1:</del></p>	Such policy wording is not necessary since the Plan is read as a whole.

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AM Ref.	Page number	Policy/ Paragraph/ Table	Proposed Additional Modification	Reason for change
			<del>Transport Assessments, Travel Plans, and Mitigation; TP 2: Transport Design and Accessibility; TP 4: Public Car Parks; and OSSR 2: The Provision of Publicly Accessible Open Space and Recreation.</del>	
AM15	129		<p><b>Section 5: Southborough</b>  <i>Add new paragraph following paragraph 5.138</i></p> <p><b><u>Southborough Town Council is preparing a Neighbourhood Development Plan for the parished area of Southborough (which includes High Brooms), which will become an increasingly important consideration as it progresses through the different stages of plan-making.</u></b></p>	To reflect progress made on the emerging Neighbourhood Development Plan.
AM16	277	Paragraph 5.666	<p><b>Section 5: Land at Hubbles Farm and south of Hastings Road</b>  <i>Amend second sentence of paragraph 5.666 as follows:</i></p> <p>It includes three residential properties; 30, 30A, and 32 Hastings Road, and their curtilages and built development associated with Hubbles Farm Equestrian Centre.</p>	To correct a typographical error.
AM17	303	Paragraph 5.760	<p><b>Section 5: Sandhurst</b>  <i>Amend second sentence of paragraph 5.760 as follows:</i></p> <p>The Council is <del>declaring</del> <b>has declared</b> an Air Quality Management Area (AQMA) to the north of Hawkhurst crossroads because of this.</p>	Factual update to reflect that the AQMA has been declared.
AM18	304		<p><b>Section 5: Sandhurst</b>  <i>After paragraph 5.767 add new paragraph as follows:</i></p> <p><b><u>Sandhurst Parish Council is preparing a Neighbourhood Development Plan for the parish, which will become an increasingly important consideration as it progresses through the different stages of plan-making.</u></b></p>	To reflect progress made on the emerging Neighbourhood Development Plan.

## Section 6: Development Management Policies

AM Ref.	Page number	Policy/ Paragraph/ Table	Proposed Additional Modification	Reason for change
AM19	325	<b>Policy EN 1 throughout the Local Plan</b>	<p><b>Policy EN 1 Sustainable Design</b>  <i>Amend reference to Policy EN 4 and EN 5 in paragraph before section 2. Highway safety and access in Policy EN 1 and all subsequent references as follows:</i></p> <p>... EN 3: Climate Change and Mitigation and Adaptation; EN 4: <b>The</b> Historic Environment, <b>including heritage assets</b>; <del>EN 5: Heritage Assets</del>; EN 9: Biodiversity;            ...</p>	To reflect that Policies EN 4 and EN 5 have been combined (MM184).
AM20	372	<b>Policy EN 16</b>	<p><b>Policy EN 16 Landscape within the Built Environment</b>  <i>Amend first sentence in second paragraph of Policy EN 16 as follows:</i></p> <p>The effects of proposals on <del>A</del>areas of <del>L</del>andscape <del>i</del>nterest that are not</p>	To correct a typographical error.
AM21	417	Paragraph 6.397	<p><b>Section 6: Replacement Dwellings outside the Limits to Built Development</b>  <i>Amend first sentence of paragraph 6.397 as follows:</i></p> <p>Secondly, where the use is found to be lawful, in accordance with Policy EN 1: Sustainable Design, <u>consideration</u> should be given residential properties; 30, 30A, and 32 Hastings Road, and their curtilages and built development associated with Hubbles Farm Equestrian Centre.</p>	To correct a typographical error.
AM22	427	Paragraph 6.445	<p><b>Section 6: Key Employment Areas</b>  <i>Amend first sentence of paragraph 6.445 as follows:</i></p> <p>The Town and Country Planning Use Classes Order <b>was</b> <del>as recently</del> amended (4 in September 2020) <b>to</b> includes the introduction of two new use classes; E - Commercial, Business and Service uses and F - Local Community and Learning uses, which will replace some of the uses in existing classes A, B, and D.</p>	To reflect the amendments are no longer recent.
AM23	456	Paragraph 6.542	<p><b>Section 6: Transport and Parking</b>  <i>Amend first sentence of paragraph 6.542 as follows:</i></p>	To correct a grammatical error.

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			At the same time, the Council understands that private cars are, and will remain, an important and necessary part <b>of</b> life in the borough, and this is reflected in car ownership levels. Significant traffic movements are generated by workers, either through commuting to their jobs or travelling as part of their jobs, although it is likely that patterns of commuting will change in the years after the coronavirus pandemic, and also by those visiting for retail and leisure purposes.	
AM24	469	Paragraph 6.577	<p><b>Section 6: Safeguarding Roads</b>  <i>Amend second sentence of paragraph 6.577 as follows:</i></p> <p>Rather, as detailed in Policy STR 6: Transport and Parking, a part off-line new section of highway running to the north of a collection of houses along the <del>A228</del><b>A288</b>, together with other on-line improvements to the A228 to the west, and a new highway link bypassing Five Oak Green, is proposed.</p>	To correct a typographical error.

### Local Plan Appendices

AM Ref.	Page number	Policy/ Paragraph/ Table	Proposed Main Modification	Reason for change
AM25	497	Appendix 4 Table 21	<p><b>Appendix 4: Glossary</b>  <i>Amend Definition for National Planning Policy Framework in Table 21 as follows:</i></p> <p>The document that sets out the Government's planning policies for England and how these are expected to be applied. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in decisions on planning applications. It replaces Government planning policies previously set out in Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs). <b><u>The examination of the Plan was assessed for consistency in relation to the July 2021 version of the NPPF.</u></b></p> <p>Further guidance on particular topics, entitled Planning Practice Guidance, is provided on the Ministry of Housing, Communities and Local Government website. This is intended to supplement the NPPF and be updated as necessary.</p>	To provide clarification.