

Local Plan Regulation 19 representations in document order

Comments on Section 5: Place Shaping Policies: Rusthall

Local Plan Regulation 19 representations in document order

**Comments on Section 5: Place
Shaping Policies: Rusthall: Policy
PSTR/RU 1: The Strategy for Rusthall
parish**

Comment

Consultee	Julie Davies [REDACTED]
Email Address	[REDACTED]
Company / Organisation	CPRE Kent
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	CPRE Kent [REDACTED]
Comment ID	PSLP_588
Response Date	28/05/21 13:15
Consultation Point	Policy PSTR/RU 1 The Strategy for Rusthall parish (View)
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	CPRE Kent
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
PSTR/RU1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Yes
Is sound	Yes

Complies with the Duty to Cooperate

Don't know

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

CPRE Kent supports policy PSTR/RU1 and the proposed housing allocation at the Lifestyle motor site on Langton Road. This is a welcome use of brownfield land which can reduce the pressure for development within the green belt.

We also support the proposed density which is in line with intensification referred to in paragraphs 2 and 3 of policy STR/RTW1.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Because Sites 146 and 22 are a key part of the green belt, preventing coalescence of Rusthall and Royal Tunbridge Wells and also act as an important wildlife corridor, we should wish to participate at the Examination Hearings to counter any representations which may be made at the hearing sessions on behalf of promoters of the sites. In the event that none such are planned, we should not need to be heard.

Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

CPRE Kent strongly supports the decision of the Council not to entertain development on sites identified in the 2021 version of the SHELAA and in the Sustainability Appraisal as Site ref 22 Dingley Dell and Site ref 146 Spa Golf Course within the green belt.

It is there acknowledged that very great harm would arise if these sites were released from the green belt and we share that judgement.

Site 146 provides an important wildlife corridor to and from nearby Hurst Wood linking into the Rusthall Common. It maintains an attractive setting to the edge of Royal Tunbridge Wells and prevents coalescence between the settlements of Tunbridge Wells and Rusthall. Site 22 partly adjoins it and shares the same characteristics.

Supporting Information File Ref No: SI_89

Comment

Agent	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Lambert Smith Hampton
Address	180 Oxford Street London W1D 1NN
Consultee	Targetfollow (Pantiles) Ltd ([REDACTED])
Address	Riverside House 11/12 Riverside Road NORWICH NR1 1SQ
Event Name	Pre-Submission Local Plan
Comment by	Targetfollow (Pantiles) Ltd (1011802)
Comment ID	PSLP_1677
Response Date	04/06/21 14:52
Consultation Point	Policy PSTR/RU 1 The Strategy for Rusthall parish (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	PSLP_1677_Lambert_Smith_Hampton_(Targetfollow)_SI_Ecology_Scoping.pdf PSLP_1677_Lambert_Smith_Hampton_(Targetfollow)_SI_Greenbelt_Assessment.pdf PSLP_1677_Lambert_Smith_Hampton_(Targetfollow)_SI_Land_at_Tunbridge_Wells_2021.pdf PSLP_1677_Lambert_Smith_Hampton_(Targetfollow)_SI_Access PSLP_1677_Lambert_Smith_Hampton_(Targetfollow)_SI_Flood
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Targetfollow
Question 2	

Agent's Name and Organisation (if applicable) Lambert Smith Hampton

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy PSTR/RU 1 The Strategy for Rusthall parish

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

On behalf of our client, Targetfollow, please find enclosed a representation to the Tunbridge Wells Draft Local Plan Regulation 19 consultation. We welcome the opportunity to engage with the Council for the duration of the Local Plan process.

This representation relates to the Land at Tunbridge Wells Golf Course and aspirations for the site to be allocated in the draft Local Plan for the delivery of up to 100 residential (C3) dwellings (mix of affordable, market and retirement units), public open space and community facilities. The representation outlines a detailed draft masterplan and assessment of the site and our recommended changes to the draft Plan so that it can be found sound.

This letter is supported by the following suite of technical documents, which are to be read as a single representation:

i. Vision Document for the site, prepared by Lambert Smith Hampton; ii. Flooding and Drainage Technical Note prepared by Logika; iii. Access and Trip Technical Note prepared by Sweco; iv. Green Belt Assessment prepared by Pegasus; and v. Ecology note prepared by Eight Associates.

Background

Representations in relation to the site were submitted to the Regulation 18 consultation in November 2019. Since then, Targetfollow has instructed a full consultancy team to review the previous Regulation 18 representation submission to strengthen the masterplan to ensure that it is robust and adequately responds to previous feedback from officers. Amendments to the masterplan have therefore been made in line with the recommendations set out in the supporting consultants' reports as well as responding to various planning policy designations that impact the site.

The Site

The site comprises a golf course which measures 14.6ha. Part of the site also includes an area of Ancient Woodland. The site is located adjacent to the settlement boundaries of Rusthall to the west and Tunbridge Wells to the east. The site is bounded to the north by residential development and open countryside and to the south by Langton Road.

The site is located In Flood Zone 1 and is therefore at low risk of flooding. The site is located in the metropolitan Green Belt.

There are no heritage assets located within the site boundaries but the site is located adjacent to the Tunbridge Wells and Rusthall Conservation Areas. The site will be accessed by the existing access onto Langton Road. An Access and Trip Technical Note has been prepared by SWECO and is appended to the enclosed representation. The note concludes that the site is accessible by sustainable modes of transport such as bus, walking and rail. The site is therefore a sustainable location for development.

Regulation 19 – Draft Local Plan Assessment

Site Proposals and Assessment

The draft Local Plan identifies an overall housing need of 12,204 dwellings (approximately 5,814 affordable) across the plan period. Although 5,259 units are identified through extant planning permissions and windfall allowances there is a consequent need for the draft plan to allocate additional sites to provide a minimum of 7,221 dwellings. In addition, we note that Tunbridge Wells Council has only delivered 86% of its Housing Delivery Test measurement (2020) in the last three years, and consequently there is a need for the Council to prepare an Action Plan to ensure that sufficient sites are delivered in accordance with the requirements of the National Planning Policy Framework (NPPF).

The draft Local Plan outlines that the AONB and the Green Belt collectively cover 75% of the Borough. This has put a constraint on housing delivery within the Borough. The Council acknowledge that the release of Green Belt land is required to meet housing demand and therefore the draft plan proposes the release of approximately 5% of green belt land in the Borough for development.

The Tunbridge Wells Golf Course is located within the Green Belt and at this stage in the plan process has not been allocated for development. The enclosed representation promotes the land for allocation within the draft Local Plan to provide up to 100 residential (C3) dwellings (mix of affordable, market and retirement units, subject to viability), public open space and community facilities. The representation includes a detailed draft masterplan, which is set out in the enclosed Vision Document.

New community facilities and a new cricket pitch or leisure facilities, for use by the local community, are proposed in the central and southern portion of the site. A country park will extend from the north of the site along the existing water course. It is proposed that the cricket pavilion and pitch will replace the existing facilities on Rusthall Common and that the land at Rusthall Common would be returned to common land.

We acknowledge that the provision of appropriate facilities for outdoor sports and recreation are considered to be, in principle, acceptable in the Green Belt and therefore the provision of outdoor community or leisure facilities alone are not sufficient to justify an amendment to the Green Belt. Nevertheless, the proposals for residential dwellings on site have been assessed on the weight of the 'exceptional circumstances' that justify proposals within the Green Belt (in line with the requirements of paragraph 136 of the NPPF) against the substantial weight accorded to the harm of inappropriate development in the Green Belt.

It is therefore appropriate to assess the benefits of amending the Green Belt boundary in order to promote the use of the site for residential use (including affordable, market and retirement units), which is considered in further detail below.

Proposed Layout

The proposed layout has been designed to minimise the harm of the proposals on the Green Belt. The proposed residential accommodation is located on the western boundary of Tunbridge Wells and the eastern boundary, acting as logical extension to the built up settlement. The Council's Green Belt review has acknowledged that Rusthall and Tunbridge Wells are considered to be one settlement and therefore development of small parcels of land within the site would not contribute to coalescence of settlements.

The two parcels are relatively well screened from the remainder of the site due to tree planting undertaken for the development of the golf course and are therefore not considered to be a strong

contributor to the openness of the site. The preservation of the existing central ancient woodland and the proposed location of the community facilities to the south, ensure that the open nature of the site is preserved.

An allocation in this location is not considered to contribute to urban sprawl or coalescence. This is because the proposed residential units will be contained within three small development parcels. Given that the extent of development will be limited to the three development parcels, development will not extend northwards beyond Grange Road and Thirlmere Road. Consequently, the proposed development is not considered to contribute to encroachment of development on the countryside.

In accordance with paragraph 136 of the NPPF, the 'exceptional circumstances' that would be considered in respect of development proposals on this site are considered to be the contribution that the development of the site would make to housing needs in terms of delivering much needed affordable, market and retirement units and community facilities.

Exceptional Circumstances

a) General Housing Need

Whilst a site's contribution to housing need alone is not considered to be an 'exceptional circumstance', unmet housing demand can be weighed against the harm to the Green Belt in combination with other factors. This approach has been confirmed by the Inspector in the appeal decision for a retirement living scheme in West Malling (APP/H2265/W/18/3202040). The appeal also included that the provision of specialist properties and extra care housing contributes to housing need figures. Therefore the ability for the site to meet the Borough's pressing housing need is relevant to this consideration.

As noted previously, the draft Local Plan is required to allocate sites to provide an additional minimum of 7,221 dwellings. Whilst the draft Local Plan has allocated some sites to meet the identified need a significant proportion of the need is to be met through two large scale allocations at Capel and Paddock Wood (STR/SS1) and Tudeley Village (STR/SS3). Capel and Paddock Wood has been allocated for the delivery 3,490-3,590 residential units, across four masterplan areas whilst Tudeley village has been allocated for the delivery 2,800 residential dwellings, 2,100 of which are to be delivered within the plan period. These two draft allocations account for approximately 47% of the Borough's housing allocations across the plan period.

The strategic allocations outline that 40% affordable housing should be delivered at the site. The sites combined would provide circa 2,276 affordable units, which equates to approximately 39% of the Borough's affordable housing need across the plan period. Additional allocated sites, such as the Golf Course, should therefore be identified to contribute towards meeting this potential shortfall in affordable housing need.

Whilst we recognise the ambitions of the Borough to aid the delivery of the draft allocations across the plan period, we consider that the draft plan is overly reliant on large scale allocations. The delivery of enabling infrastructure works and the scale of such proposals are likely to incur a level of delay during the planning and construction period and therefore it is unlikely that all the required new market and affordable homes will be delivered across the plan period within the required five year period.

To ensure that the Council can deliver the required market and affordable housing need across the plan period, we strongly recommend that the Council ensures that sufficient numbers of small and medium sites that can be built out in the short term, including the Golf Course site, are allocated through the Local Plan process. This will help to provide variety and also aid with the provision of smaller sites that do not rely so heavily on the need for new infrastructure or funding to unlock delivery and meet the potential shortfall in allocated sites.

b) Older Persons Housing Need

In addition to the Borough's general housing need, the TWBC Housing Needs Survey (2018) details that there is expected to be an approximate 40% increase in the population of over 65s (TWBC's definition of 'older people') within the Borough across the plan period. This equates to approximately an additional 9,200 older residents within the Borough. Whilst the majority of respondents surveyed expressed a desire to remain in their homes, approximately a quarter of those surveyed would consider living in alternative specialist accommodation. Based on the data within the needs survey approximately 10% of older residents will consider relocating to sheltered accommodation/ Extra Care units. Therefore the Council will need to ensure that there is a sufficient supply of specialist retirement accommodation to accommodate the growth of older residents within the Borough.

Paragraph 6.363 of the draft plan states that the need identified within the Housing Needs Survey will be addressed through a combination of site allocation policies and planning permissions being granted. Whilst many of the larger draft site allocations have been worded to state that, if deemed appropriate, part of the site's residential offering could be used for delivering housing for older people; there is no policy requirement to provide certainty that such housing must be delivered.

There are only three draft allocation sites that specifically include a provision for the delivery of retirement (C3) housing for older people. These include:

(1) Site AL/RTW 4 (Arriva Kent and Sussex Ltd, Bus Depot, 36-40 St. John's Road, Royal Tunbridge Wells) is allocated to provide 65 residential dwellings or approximately 90 dwellings for older people; (2) Site AL/HA 1 (Land at The White House Highgate Hill, Hawkhurst) is allocated for the provision of 43 retirement apartments; and (3) Site AL/PE 6 (Woodsgate Corner, Pembur) is allocated for the provision of specialist housing for older people this is either as extra care housing (approximately 80 units) and/or residential care (approximately 120 units).

The draft allocations within the Regulation 19 Consultation document, therefore, equate to the provision of maximum 213 retirement living/ sheltered accommodation/ extra care units. Although the Housing Needs Survey does not detail a specific numerical housing need for the over 65s, based on the data within the survey the authors (Arc4) would expect approximately 920 older residents to seek extra care units/ sheltered accommodation across the plan period. This is a significant increase when compared with the number of units allocated in the draft plan and suggests there is likely to be a significant shortfall in housing for older people.

The Housing Needs Survey concludes that the range of housing options available to older people within the Borough will need to be diversified to meet the projected growing need. At present, the draft Local Plan is largely relying on future planning applications to meet the need, rather than through allocating sites in the Local Plan. Based on the available data in the Housing Needs Survey, this approach is likely to result in an under-supply of accommodation for older residents, and an already aging population, within the Borough. Accordingly, we recommend that additional sites should be allocated to address this serious shortfall.

Furthermore, we have undertaken a review of recent and current proposals for older persons housing within the Borough. At present a proposed scheme for 43 retirement living units at The White House in Cranbrook (19/01271/FULL) has been approved and a scheme for 42 retirement living units have been approved at Pinewood Court in Tunbridge Wells (17/01191/FULL). The approvals should result in a total of 85 units for older people being delivered within the plan period. Nevertheless, it is important to note that the approval at Pinewood Court was for the demolition of 39 vacant retirement flats and the erection of 42 units. The net increase in approved provision of units for older persons is therefore only 46 units. At the time of submission of this representation, there are currently no applications for older persons housing (C3 use) pending. It is also relevant to note that, in establishing if there were 'very special circumstances' to permit development in the Green Belt, the demand for extra care housing could be attributed substantial weight (West Malling appeal decision APP/A0665/W/18/3203413).

The NPPF (2019) encourages the need for housing for different groups to be reflected within planning policies. Whilst it is acknowledged that draft Policy H6 (Housing for Older People and People with Disabilities) confirms the requirement for the provision of homes for older people, in line with the requirements of the NPPF and taking into account recent approvals, the draft Local Plan would be more robust if the provision for retirement units was increased further via an explicit additional site allocations in the draft Plan. As currently drafted, therefore, we conclude that the Regulation 19 Local Plan is unsound although this could be remedied through the allocation of the Golf Course site.

c) Public Benefits

The site is considered to be underused. A number of public benefits would arise from the proposed development on site. The proposed community facilities and cricket pitch/leisure facilities will provide the local community with modern community facilities and access to new public open space. The proposed layout of the site will also provide improved access to the ancient woodland, improving the accessibility of this natural asset to the local community. Additionally, as aforementioned, it is proposed that the cricket pavilion and pitch will replace the existing facilities on Rusthall Common and therefore the land at Rusthall Common would be returned to common land. This would result in the common being accessible to the public and therefore provide a significant public benefit to the local community.

Furthermore, the proposed cricket pitch and ancient forest could be designated as village green land to protect against future development of the land. This would ensure that the land is protected for community use, providing a direct public benefit of any development on site. Pegasus' Green Belt Assessment concludes that the potential harm to the Green Belt in this case is clearly outweighed by other considerations including a clear housing need (including retirement units), the creation of infrastructure which would be a community benefit and the creation of a sustainable development proposal.

A full planning assessment of the site is outlined in section 9 of the enclosed Green Belt report. Our assessment concludes that at present there is a risk that the draft Local Plan will not be found sound due to an over reliance on large strategic allocations to meet the required housing need and the under provision of new homes to meet the assessed older persons housing need. The Tunbridge Wells Golf Course site is located in a sustainable location and would contribute to meeting the required housing need across the Borough.

Green Belt Impact

In determining that the site is suitable for limited release from the green belt, we have undertaken a detailed assessment of the key characteristics of the site and prepared an indicative masterplan that demonstrates how the development could provide limited infill sites that would not harm the overall function of the green belt in this location.

A Green Belt Assessment has been undertaken by Pegasus and should be reviewed in full as part of this representation. A summary of the assessment of the site and the proposed development's contribution to the Green Belt principles is assessed against the Borough's Green Belt Assessment within Section 7 of the Vision Document.

The Green Belt Assessment confirms that from a landscape and visual perspective, the site is located in a sustainable location contiguous with an existing residential neighbourhood. The site benefits from a considerable degree of physical and visual containment due to the surrounding mature tree cover and existing residential development and as such, development of the site is only likely to have a bearing upon views within the site itself, and not beyond the wider surrounding countryside. As a consequence, the sense of openness associated with the wider landscape would remain unchanged if the site were developed in line with the masterplan. Vehicular and pedestrian access linkages to the wider area and the adjacent residential neighbourhood could be effectively provided. From a landscape and visual perspective, the site is suitable for residential development as it can be effectively assimilated into the surrounding existing green infrastructure and wider environment.

The site benefits from an existing access point off the main road to the south. Beyond the site itself, the sense of visual and physical separation between the settlements of Rusthall and Tunbridge Wells would continue to remain in terms of the sense of openness associated with the existing Green Belt beyond the site. The visual amenity of the area which is designated as Green Belt would not be materially adversely affected by the proposed development as it would be substantially screened from wider views by the existing and proposed topography, together with tree cover. It is considered that the proposal would not harm the openness of the Green Belt accordingly.

The assessment therefore concludes that having analysed the proposals it is considered that the proposal would not conflict with either the Framework (NPPF) in that it would not harm the openness of the Green Belt nor harm the purposes of the designation.

Transport and Road Safety

Sweco has prepared an Access and Trip Technical Note which has been used to inform the amendments to the proposed masterplan.

As outlined on the illustrative masterplan, the proposals will retain the existing site access to Langton Road. As existing, this access has reduced visibility to the east along Langton Road. As shown on the Main Site Access Arrangement drawing in Appendix B of the Technical Note, improvements can be made to this access and it is advised that the proposals include the provision of a more formal kerbed radii access junction with footways and improved visibility parameters to ensure suitable safe access arrangements to the site. The suggested access upgrades have been incorporated into the illustrative masterplan layout to provide safe access to the site.

In addition to re-using the existing site access to Langton Road there are potential pedestrian/cycle access points to the surrounding area some of which could be utilised as an emergency access.

The Technical Note also assessed the sustainability of the site and outlined that the site is accessible by sustainable modes of transport other than the private car. Frequent bus services are available from stops less than 100m from the existing and proposed site accesses with Tunbridge Wells Railway Station located an 18 minute walk to the east of the Site.

The Technical Note outlines that when taking into account the permitted use of the Site the net increase in traffic of the proposals will equate, on average, to about 2 additional vehicle movements every 3 minutes during the peak hours. This is based on a proposed housing scheme that does not include retirement units. It is important to note that inclusion of any retirement dwelling in the proposals will reduce the peak hour vehicle movements. The proposals are therefore considered to be acceptable in terms of trip generation.

The Access and Trip Technical Note concludes that the site could support development with appropriate mitigation without affecting highway safety or capacity and promote travel by sustainable modes. The masterplan has been designed, in line with the safety advice set out within the note and now proposes a safe site entrance via onto Langton Road. The masterplan therefore aligns with the requirements of draft Local Plan Policy TP2 (Transport Design and Accessibility).

Flooding and Drainage

The Flood and Drainage Technical Note, prepared by Logika, concludes that the proposed masterplan takes into account the potential flood risk on the Site associated with the on-Site watercourse. The pluvial flood maps have been considered to ensure the masterplan is designed robustly with all development located outside of the 1 in 1000 year flood extent. Easements are provided to ensure that the watercourse is protected, and a highly sustainable drainage strategy will be incorporated into the detailed design of the scheme. The masterplan therefore aligns with the requirements of draft Local Plan Policy EN25 (Flood Risk).

Ecology

Eight Associates prepared an Ecology Scoping Note to support the proposed representation and draft masterplan for the site. The Scoping Note confirms that the site is located within a SSSI Impact Zone. The proposed development does not, however, fall into any of the at-risk categories for this SSSI Impact Zone.

The site is bounded by stretches of woodland to the north, east and west, with residential properties bounding the remaining areas. Parcels of wood pasture and parkland Biodiversity Action Plan (BAP). Priority Habitat, ancient woodland and deciduous woodland are present within 500m of the site and extend inside the site boundary, acting as an ecological corridor to green space and designated sites within the wider local area. The proposed illustrative masterplan layout has, however, been designed to protect the parcel of Ancient Woodland within the site boundary and to seek to limit the loss of trees which are important in the landscape or as natural habitats, or historically.

The site is located within a Natural England network enhancement zone, which seek to connect existing patches of primary habitat, with land that is likely to be suitable for the creation of primary habitat, such as the site. The Ecology Scoping Note recognises that this has been considered as part of the amended masterplan design, incorporating a landscape framework of green corridors with retained trees and water courses will provide a significant boost to public open space in Tunbridge Wells.

The Ecology Scoping Note identifies that the proposals include green corridors of public open space that will provide setting for the new development, accommodate SuDs and provide a resource for the new and existing communities as well as promoting ecology. Therefore there is an opportunity for the development to enhance the ecology of the site in line with draft Local Plan Policy STR 8 (Conserving and Enhancing the Natural, Built and Historic Environment).

Conclusions

The required amendment to the Green Belt boundary, as set out in this representation, is considered justifiable in order to meet the Borough's need for retirement and market/affordable housing. Draft Policy H6 requires proposals for residential care homes and retirement living properties to be located in accessible locations. The site is located in a sustainable location on the edge of Tunbridge Wells, approximately 1 mile from the town centre, 0.7 miles from the Pantiles shopping centre and 0.9 miles from the station. The site is adjacent to the Rusthall Road bus stop, providing a regular service to both the town centre and the Pantiles. The site is also in an accessible location and is therefore considered suitable for retirement units.

Previous concerns regarding the safety of the proposed Langton Road junction have been addressed in the masterplan, in line with the junction improvement advice set out in Sweco's Access and Trip Technical Note. As such, it has been determined that the site could support development without affecting highway safety or capacity and promote travel by sustainable modes.

Through architectural design and layout it is considered that any potential impact on the historic character of the Tunbridge Wells Conservation Area can be mitigated and the heritage asset can be preserved and enhanced.

As outlined in the representation, the Local Plan as drafted is overly reliant on large strategic sites to deliver housing. Due to the scale of such proposals and the requirement for the delivery of enabling infrastructure works, it is likely that delays in delivery will be incurred. Therefore, it is unlikely that all the new homes required will be delivered across the plan period within the required five year period, resulting in a shortfall of housing provision.

In order to ensure that the Council can deliver the required housing need across the plan period, we strongly recommend that sufficient numbers of small and medium sites are allocated for development in the short term, including the Golf Course site. This will help to provide variety and also aid with the provision of smaller sites that do not rely so heavily on the need for new infrastructure or funding to unlock delivery and meet the shortfall in allocated sites. This approach would also allow the Plan to be found sound.

Regarding potential impact on the Green Belt, the supporting Green Belt Assessment has demonstrated that the proposals are not considered to conflict with either the NPPF as the proposals would not harm the openness of the Green Belt nor harm the purposes of the designation. The proposed country park, cricket pavilion and grounds, or leisure facilities, will incorporate public open space and a significant public benefit to the local community that can only be facilitated through the minor amendment of the Green Belt boundary and the proposed allocation of the site.

In summary, the site presents an opportunity for the development of an accessible site for the provision of much needed retirement housing within the Borough. The site's ability to contribute to the provision of housing for older people, alongside the site's contribution to the Borough's general housing need and provision of community facilities is considered to justify the limited amendment of the site's Green Belt boundaries via the Local Plan process.

This representation has, therefore, demonstrated that there are exceptional circumstances for amending the Green Belt boundary and allocating the site for development of up to 100 residential units (including market, affordable and retirement units).

Proposed Amendments to the Draft Local Plan

To ensure that the Local Plan can be found sound at examination, we urge the Council to allocate the site at Tunbridge Wells Golf Course, for older persons housing and standard housing together with public open space, to ensure that the housing need across the Borough can be met and delivered within the plan period. Below is our suggest text for a site allocation policy for the Golf Course site:

'Policy AL/RU 2 Tunbridge Wells Golf Course, Langton Road

The site, as defined on figure xxx, is allocated for residential (C3 development) up to 100 dwellings (mix of affordable, market and retirement units), public open space, leisure and community facilities.

Development on the site shall accord with the following requirements:

- 1. Vehicular access shall be taken from the existing accesses onto Langton Road (see Criterion 2 of Policy EN 1: Sustainable Design);***
- 2. Pedestrian linkages shall be provided into wider network (see Policy TP 2: Transport Design and Accessibility);***
- 3. Proposals should conserve and enhance the Conservation Area (see Policy EN 5: Heritage Assets);***
- 4. Improvements to existing allotments, amenity/natural green space, parks and recreation grounds, children's play space and youth play space in accordance with the requirements of Policy OSSR 2: Provision of publicly accessible open space and recreation. It is expected that***

contributions will be required towards the following if necessary, to mitigate the impact of the development:

- a. Improvements to public realm;**
- b. Any other highway related works;**
- c. Improvements to bus services’.**

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Supporting Information File Ref No: SI_109a-n

Comment

Agent	Mr Steve Brown [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Woolf Bond Planning
Address	[REDACTED] [REDACTED] READING [REDACTED]
Consultee	[REDACTED]
Company / Organisation	Millwood Designer Homes Ltd
Address	[REDACTED] [REDACTED] Tonbridge [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Millwood Designer Homes Ltd [REDACTED]
Comment ID	PSLP_1856
Response Date	03/06/21 14:53
Consultation Point	Policy PSTR/RU 1 The Strategy for Rusthall parish (View)
Status	Processed
Submission Type	Email
Version	0.7
Files	App 01b P352 Rusthall - Access improvements.pdf App 05 Calverton v Nottingham City 2015 EWHC 1078 Admin.pdf App 01c Plan WBP1 - Land at Home Farm, Rusthall.pdf WBP Reps for Millwood - Rusthall - 3 June 2021.pdf App 03 Sevenoaks Final Report Mar 2020.pdf App 04 Sevenoaks DC v CLG [2020] EWHC 3054.pdf APP10E~1.PDF APP09U~1.PDF App 07 Hundal v S Bucks DC 2012 EWHC 7912 Admin.pdf App 01d Home Farm - Site Context Plan WBP2.pdf APP08T~1.PDF APP02I~1.PDF APP06S~1.PDF

Data inputter to enter their initials here KJ

Question 1

Respondent's Name and/or Organisation Millwood Designer Homes Ltd

Question 2

Agent's Name and Organisation (if applicable) Woolf Bond Planning

Question 3

To which part of the Local Plan does this representation relate? Policy

Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy PSTR/RU 1 The Strategy for Rusthall parish

[TWBC: full representation attached has been separated into Policy STR1 (PSLP_1839, Policy STR9 (PSLP_1848), Policy PSTR/RU1 (PSLP_1856) and Policy STR/SS3 (PSLP_1857). See also appendices attached].

Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the

legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

1. INTRODUCTION

1.1 Our clients (Millwood Designer Homes Ltd) control the land at Home Farm, Lower Green Road, Rusthall (SHLAA Site Ref: 60). This site has been promoted through earlier stages in the Local Plan as an additional location for growth in the Borough, taking account its credentials as a sustainable location for growth adjoining the acknowledged suitability of Rusthall, as indicated in the Council's SHLAA. In contrast to other locations, the development of new homes at the site will ensure the embedment of behaviour associated with the sustainable living unlike other locations in the Borough, especially the new community proposed at Tudeley Village.

1.2 Further to our submissions on earlier stages in the preparation of the Local Plan, the Council has failed to provide an appropriate strategy which seeks to meet the Borough's development needs, especially with respect of housing." Consequently, for the reasons outlined in these submissions, it is not considered that the Draft Submission Plan adequately addresses the Borough's housing needs in locations which are accessible to existing infrastructure and services such as those available at Rusthall which include those relating to health, education, leisure, retail and employment. Such locations should be considered in advance of the unjustified removal of land from the Green Belt which as detailed in the representations would be wholly consistent with the approach of national policy in the NPPF. We therefore advocate changes to the Local Plan to address these matters.

1.3 Have regard to the concerns with respect of the appropriateness of the approach and its challenges of delivering sustainable growth, we therefore advocate the removal of the proposed allocation at Tudeley Village with replacement with an allocation at Home Farm, Rusthall. For the reasons detailed in this submission, growth at Home Farm, Rusthall due to its relationship with existing development and facilities would result in achievement of sustainable development. Furthermore, the proximity of the Home Farm site to services and facilities that residents will need to undertake their daily life ensures that sustainable behaviours are embedded in residents from initial occupation of the homes.

1.4 This contrasts with that at Tudeley Village which due to the limitations of these in the local area will result in need for longer journeys to undertake daily lives, which are therefore likely to result in increased use of the car. Once this behaviour becomes the normal for residents in Tudeley, it will be harder to encourage them to switch to more sustainable alternatives once they become available.

1.5 The reports and documents submitted with this representation demonstrate the suitability of the approach advocated. As detailed in the representations, this land is not subject to constraints which would prevent its delivery for development at an early stage during the emerging plan period should this be confirmed through the examination of the Plan.

1.6 We also have several comments/representations on the policies within the Draft Submission Tunbridge Wells Borough Local Plan which should be addressed prior to its submission for examination by the Secretary of State.

2. REPRESENTATIONS AND SUPPORTING INFORMATION

2.1 Our comments upon the various draft policies and proposals are set out below and are accompanied by the following Documents:

- Duly Completed Response Form.
- Copy of submissions on behalf of Millwood Designer Homes to the Council's Draft Local Plan Regulation 18 Consultation (November 2019) (Appendix 1)
- Copy of Inspector's assessment of the Tonbridge & Malling Local Plan (15th December 2020) (Appendix 2)
- Inspector's Report into Examination of the Sevenoaks Local Plan (2nd March 2020) (Appendix 3)
- Sevenoaks DC v Secretary of State for Communities, Housing & Local Government [2020] EWHC 3054 (Appendix 4)
- Calverton PC v Nottinghamshire County Council [2015] EWHC 1078 (Admin) (Appendix 5)
- St Albans City & District v Hunston Properties [2013] EWCA Civ 1610 (Appendix 6)
- Hundal v South Bucks DC [2012] EWHC 7912 (Admin) (Appendix 7)
- Tandridge LP Inspector's interim conclusions (11th December 2020) (Appendix 8)
- Uttlesford Local Plan post Stage 1 hearings Inspector's letter to Council 10th January 2020 (Appendix 9)
- North Essex Authorities (Braintree, Colchester & Tendring) Inspector's Report (10th December 2020) (Appendix 10)

2.2 Our client's representations upon the Draft Local Plan can be summarised as relating to the following:

Policy

Representation

Policy STR1: The Development Strategy and extent of Built Developments

Objection

Policy STR8: Conserving and enhancing the natural, built, and historic environment

Objection

Policy STR9: Green Belt

Objection

Policy PSTR/RU1: The Strategy for Rusthall Parish and the omission of land at Home Farm, Lower Green Road (Site Ref: 60)

Objection

Policy STR/SS3: The Strategy for Tudeley Village

Objection

Omission site – Land at Home Farm, Lower Green Road, Rusthall (SHLAA Ref 60) – failure to include as an allocation in policy PSTR/RU1

Objection

3. OVERARCHING POSITION

3.1 We have a strong belief in the principle of the plan-led system and in setting out our representations upon these policies, we hope to be able to work with the Council between now and the formal submission of the Draft Local Plan pursuant to Regulation 22 of The Town and County Planning (Local Planning) (England) Regulations 2012 (as amended), to ensure the Local Plan satisfies the tests of soundness at paragraph 35 of the NPPF.

3.2 We have considerable experience and expertise in dealing with and realising development schemes through the planning system. In this context, a principal constraint to the timely delivery of housing is the way in which policies for the allocation of sites have been formulated.

3.3 Local Plans must be capable of delivering from the point at which they are adopted. This means scrutinising the policy wording to ensure the Plans are sound and that the allocations contained therein are capable of being delivered at the point envisaged. This is particularly the case in relation to the need for Councils to collate a robust evidence base to justify the imposition of certain policies and/or their wording so as not to over burden and/or stifle sustainable and appropriate development.

3.4 In this instance, the draft Local Plan needs to be amended in order to ensure it robustly plans for the delivery of sufficient housing to address a housing requirement established in accordance with national planning policy and guidance. This therefore indicates that the Plan must seek to deliver the minimum of 14,364 dwellings between 2020 and 2039 rather than 12,204 dwellings from 2020 to 2038 as currently envisaged.

3.5 To address this requirement for additional homes, we contend that land at Home Farm, Lower Green Road, Rusthall should be allocated for residential development (SHLAA ref 60). This site can accommodate 25 dwellings (including a policy-compliant level of affordable housing) and as indicated in these representations and the supporting documents would be a sustainable addition to the village.

3.6 The representations also highlight a failure of the plan as currently drafted to contribute towards addressing the acknowledged unmet needs of neighbouring authorities and the allocation of Home Farm, Rusthall can also supply homes to resolve this issue.

3.7 As detailed in the representations, the Home Farm site would be a logical addition to the existing development in Rusthall and should consequently be included in the defined extent of the village, alongside its removal from the Green Belt.

3.8 We also advocate other revisions to the Draft Submission Local Plan to ensure it is consistent with the evidence base prepared by the authority.

3.9 We are concerned to ensure that the Local Plan is robust, and it is in this context that we set out our representations.

4. THE NPPF TESTS OF SOUNDNESS

4.1 Section 3 of the NPPF (Feb 2019) sets out the principal components to be included in Local Plans. Paragraph 35 requires that to be “sound” a DPD should be positively prepared, justified, effective and consistent with national policy.

4.2 A positively prepared plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other Authorities so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.

4.3 In order to be justified, the Draft Submission Local Plan must have an appropriate strategy, taking into account reasonable alternatives and be based on proportionate evidence.

4.4 Effective means the document must be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred and evidenced by the statements of common ground.

4.5 The Local Plan should seek to meet the Council’s full housing need. However, we have concerns regarding the rationale for and robustness of the housing numbers the Council is seeking to accommodate within the Draft Submission Local Plan. We also have concerns regarding the appropriateness of the sites selected for contributing towards addressing the Borough’s development needs.

4.6 For the reasons set out in these representations there are several shortcomings with the Plan, as currently drafted, that result in the need for amendments.

4.7 These amendments relate to the need to increase the level of housing provision within a more appropriate plan period, thereby ensuring the emerging plan is consistent with the Government’s planning advice and policy. They also advocated changes to the extent of the defined settlement area of Rusthall alongside consequential revisions to the Green Belt together with amendments to other policies of the plan.

4.8 These amendments would reflect our view of the clear sustainability advantages of growth at Rusthall in preference to unsustainable locations where development conflicts with the approach of the NPPF i.e. Tudeley Village. In the case of Tudeley village, due to its identification in advance of locations which are to be preferred having regard to the approach of the NPPF, we contend that the new settlement proposal should be omitted from the Plan with the site retained in the Green Belt.

4.9 Furthermore, to address the additional identified housing need, we advocate that land at Home Farm, Lower Green Road, Rusthall (SHLAA Ref 60) should be included as an additional allocation within draft policy PSTR/RU1.

4.10 The remainder of this submission is focused on providing responses to the Council’s draft policies in the Local Plan.

7. POLICY PSTR/RU1: THE STRATEGY FOR RUSTHALL PARISH

7.1 This policy provides an overview of the allocations and development proposed for the parish of Rusthall.

7.2 In order to be consistent with the amendments advocated elsewhere in these representations it is essential that the policy is revised to ensure that it reflects the changes associated with the allocation of Home Farm, Lower Green Road.

9. OMISSION SITE: FAILURE TO INCLUDE ALLOCATION OF LAND AT HOME FARM, LOWER GREEN ROAD, RUSTHALL AS AN ALLOCATION WITHIN THE LOCAL PLAN CONSISTENT WITH POLICY PSTR/BE1 (SHLAA ref 222)

General

9.1. Through the other representations submitted to the policies of the plan, there is a need to allocate additional land for housing development. Having regard to the representations and the earlier promotion of the Home Farm site for residential development, it is clear that this is a suitable location for allocation. These reasons for this are detailed below.

9.2. Our client’s site comprising land at Home Farm, Lower Green Road, Rusthall (SHLAA Site Ref: 60) is submitted as an additional housing allocation. The Site is edged red on Plan WBP1 attached and extends to approximately 1.3ha.

9.3. We have undertaken a thorough assessment of the character of the site and surrounding area and consider that it affords a sustainable development opportunity for approximately 25 dwellings.

9.4. The site is well related to the urban area and is well contained from the wider Green Belt, which conclusion is supported by the Council's assessment of the site as set out in Appendix A of the Council's Green Belt Study (Stage 2) (LUC) (July 2017). This indicates that assessed parcel 2b of this study (which includes the Home Farm site controlled by our clients) made the following contributions to the purposes of Green Belt.

[TWBC: see full representation attached for table showing 'extract of the assessment of parcel RU1a in the Stage 2 Green Belt Study (2017)]

9.5. Consequently, the maximum contribution of the parcel including our clients' site is a "moderate contribution".

9.6. Whilst the Stage 2 assessment indicates that the maximum contribution of the site to Green Belt purposes is moderate, within the Site Assessment Study for our clients' land (SHLAA site ref 60), the conclusion is that its release would have a moderate – high harm. This is therefore inconsistent with the finding of the Council's own assessment.

9.7. Furthermore, the Site Assessment Study suggests that there is a significant concern regarding the ability to provide a safe and satisfactory means of access to the site. However, the response to the preferred options consultation (appendix 1) included details indicating that a safe and satisfactory access can readily be achieved for the site (Accompanying Plan No. P352/MDR explains how improvements to the site access can be achieved in order to provide for a safe means of access to serve development of the site for housing). Therefore, the reasons why the Council discounted the suitability are not supported by the further information submitted through the preparation of the Plan.

9.8. Development of the site for approximately 25 dwellings would enable a high-quality housing scheme to be located within walking distance from local services and facilities, including the High Street which is within an easy 0.5km walk to the south of the site.

9.9. Access can be readily achieved from Lower Green Road, and there is a pedestrian footway to the High Street which enables safe and convenient access to local services and facilities by foot.

9.10. The site is also within a short 0.25km walk to a bus stop which provides regular services to Tunbridge Wells.

9.11. The proximity of the site to local services is shown on supporting Site Context Plan No. WBP2 included with the representations.

9.12. Overall, the site has no physical constraints, and is well-related to the existing residential development. It is in close proximity to local services and facilities such that it affords a sustainable location in helping to meet identified housing needs whilst providing for sustainable patterns of growth.

9.13. We therefore consider that part of the solution to addressing the identified shortfall is to allocate land at Home Farm, Lower Green Road, Rusthall for residential development alongside consequential changes to the Policy Map.

10. OVERALL CONCLUSIONS

10.1. The representations to the draft submission Local Plan have identified a number of concerns with the document as drafted, especially with respect of its soundness.

10.2. As indicated in the representations, changes to policies of the Plan are advocated, including the borough's housing requirement in policy STR1.

10.3. To ensure adequate supply of housing arises, the land at Home Farm, Lower Green Road, Rusthall (Site Ref: 60) should be included as an allocation.

10.4. These matters can consequently be addressed through Main Modifications to the Plan allowing for a Sound Plan.

11. FINAL REMARKS

11.1. We trust the above comments are of assistance in preparing the necessary main modifications to provide for a sound Local Plan.

11.2. We welcome the opportunity to engage in constructive dialogue with the Council in relation to our observations, including the allocation of our client's site at Home Farm, Rusthall (Site Ref: 60).

11.3. Additionally, we confirm that we wish to be notified of each further step in the preparation of the Local Plan, including its submission to the Inspectorate for examination.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Changes sought to the Local Plan with respect of the Policy PSTR/RU1

7.3 The Plan therefore as currently prepared is not sound with respect of:

a) Not positively prepared as the policy (alongside others in the document) fails to meet the areas housing needs, including a contribution towards unmet needs of neighbouring authorities, b) Is not justified as the evidence does not support the exclusion of the Home Farm site whereas other sites are included which are inconsistent with the assessments and appraisals of the Council; and c) The policy is not consistent with national policy as it fails to deliver sufficient housing to meet the Borough's needs, including that arising in neighbouring ones.

7.4 To address these matters of soundness, several amendments are proposed. The proposed changes are.

1. That policy PSTR/RU1 and STR1 relating to the Limits of Build development is amended to ensure that it acknowledges the allocation of Home Farm, Rusthall as a development site with consequential amendments made to the document reflecting its identification.

Change sought to the Local Plan

9.14. To ensure that the plan is therefore sound as detailed in the representations, land at Home Farm, Lower Green Road, Rusthall should be included as a residential allocation for circa 25 dwellings, with consequential amendments to settlement boundaries.

Question 7

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

Question 7a

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To clarify any points the Inspector has with respect of the detailed representations submitted

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan

Supporting Information File Ref No: SI_156

Comment

Consultee	Strategic Planning ([REDACTED])
Email Address	[REDACTED]
Company / Organisation	Kent County Council (Planning and Environment)
Address	Invicta House County Hall MAIDSTONE ME14 1XX
Event Name	Pre-Submission Local Plan
Comment by	Kent County Council (Planning and Environment) (Strategic Planning - [REDACTED])
Comment ID	PSLP_2220
Response Date	04/06/21 16:56
Consultation Point	Policy PSTR/RU 1 The Strategy for Rusthall parish (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	Kent County Council-full representation.pdf
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Kent County Council (Growth, Environment & Transport)
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	Policy PSTR/RU 1 The Strategy for Rusthall parish

[TWBC: see attached full representation, which has been input against the following: Section 1 (PSLP_2164), Section 2 (PSLP_2168), Section 3 (PSLP_2169), Policies STR1 (PSLP_2170), STR2 (PSLP_2171), STR4 (PSLP_2172), STR5 (PSLP_2174), STR7 (PSLP_2175), STR8 (PSLP_2176), Section 5 (PSLP_2177), Section 5: Royal Tunbridge Wells (PSLP_2178), Policies AL/RTW1 (PSLP_2180), AL/RTW5 (PSLP_2181), AL/RTW7 (PSLP_2183), AL/RTW14 (PSLP_2184), AL/RTW17 (PSLP_2185), AL/RTW21 (PSLP_2187), STR/SO1 (PSLP_2188), AL/SO1 (PSLP_2190), Strategic Sites (PSLP_2192), STR/SS1 (PSLP_2193), STR/SS2 (PSLP_2195), STR/SS3 (PSLP_2196), STR/PW1 (PSLP_2199), AL/PW1 (PSLP_2200), STR/CA1 (PSLP_2201), AL/CRS1 (PSLP_2202), AL/CRS2 (PSLP_2203), AL/CRS3 (PSLP_2204), AL/CRS4 (PSLP_2205), AL/CRS6 (PSLP_2206), AL/CRS7 (PSLP_2207), STR/HA1 (PSLP_2208), PSTR/BE1 (PSLP_2209), PSTR/BI 1 (PSLP_2210), PSTR/BM1 (PSLP_2211), PSTR/FR1 (PSLP_2212), PSTR/GO1 (PSLP_2213), PSTR/HO1 (PSLP_2214), AL/HO1 (PSLP_2215), PSTR/LA1 (PSLP_2216), AL/LA1 (PSLP_2217), PSTR/PE1 (PSLP_2218), AL/PE4 (PSLP_2219), PSTR/RU1 (PSLP_2220), PSTR/SA1 (PSLP_2221), AL/SA1 (PSLP_2222), PSTR/SP1 (PSLP_2223), EN1 (PSLP_2224), EN3 (PSLP_2225), EN4 (PSLP_2226), EN5 (PSLP_2227), EN8 (PSLP_2228), EN9 (PSLP_2229), EN10 (PSLP_2230), EN12 (PSLP_2231), EN13 (PSLP_2232), EN14 (PSLP_2233), EN18 (PSLP_2234), EN19 (PSLP_2235), EN20 (PSLP_2236), EN25 (PSLP_2237), EN26 (PSLP_2238), H1 (PSLP_2239), H3 (PSLP_2240), H7 (PSLP_2241), ED1 (PSLP_2242), ED2 (PSLP_2243), ED3 (PSLP_2244), ED4 (PSLP_2245), ED5 (PSLP_2246), ED6 (PSLP_2247), Town, Rural Service, Neighbourhood, and Village Centres (PSLP_2248), Policies TP1 (PSLP_2249), TP2 (PSLP_2250), TP3 (PSLP_2251), TP4 (PSLP_2252), TP5 (PSLP_2253), TP6 (PSLP_2254), OSSR1 (PSLP_2255), Appendix 4 (PSLP_2256) and Evidence Base (whole Plan) (PSLP_2257)

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

Question 5

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

The County Council has set out its full response to the consultation in the attached Appendix. Comments are linked to relevant policies where appropriate.

Public Rights of Way

The County Council requests that the policy includes reference to the need for appropriate development contributions to be made towards improvements to the PRow network to provide Active Travel opportunities in the area.

Question 6

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The County Council has set out its full response to the consultation in the attached Appendix. Comments are linked to relevant policies where appropriate.

Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

Question 7a

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The County Council may wish to attend hearing sessions in respect of its statutory and non statutory functions.

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan