

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
9-1	Richard Larkin				Other Matters		<p>Concern with regard to site 231 in Speldhurst (Langton Road, behind Ferbies) as set out below;</p> <ul style="list-style-type: none"> <li>inconsistency as Inspector has not mentioned TPO's on site whereas he has for site 123.</li> <li>Site requires a full Highways Study and refer to the RTW/Kent Highways 2016 report and subsequent TPO impacts.</li> <li>There should be building height restrictions on any new buildings on site.</li> <li>The deeds of Ingleside state that there is a restrictive covenant that no new dwellings can be built within a set distance from the end boundary of Ingleside Road - the Inspector should review these clauses.</li> <li>The site will be the first visual of housing when entering the village and therefore the development should be reflective of the village.</li> </ul>	<p>This site has been discussed at the earlier hearing session on <a href="#">Matter 7, Issue 6</a> (Speldhurst residential allocations) held on 6 July 2022. It is considered that this falls outside the scope of this consultation.</p>
19-1	Christopher Sims				Other Matters	<p>Site RTW 16 needs to be included as a proposed change because it was incorrectly named in the original consultation process. Site RTW16 is incorrectly named. The subject property is at Ramslye Farm TN3 9ET. It is not Spratsbrook Farm TN3 9EX. Spratsbrook Farm is in Wealden, and no part of the proposed development extends to Spratsbrook Farm.</p> <p>This fundamental and very basic error has not only caused confusion for local residents as to the exact position of the proposed development, but it is extremely possible that the statutory assessment process itself has been</p>	<p>The proposed amendments to the Local Plan are considered to be neither legally compliant or sound for the following reasons - The proposed changes do not exclude Ramslye Farm - Policy RTW16;</p> <p>The proposal does not take into account incorrect agricultural land classification.</p> <p>Does not take into account unique and historical classification of Ramslye Farm Changes to housing numbers which now discount Green Belt land.</p> <p>The importance of agricultural land as set out in the revised NPPF.</p> <p>The name of Site RTW16 is also wrong and it should be named as Ramslye Farm and not Spratsbrook Farm - these are different farms.</p> <p>The site should not be allocated as it has been incorrectly classified in the SHELAA as being in agricultural Land grade 4 when it is in fact grade 3a and 3b. If this had been corrected then the site would not have been allocated.</p>	<p>Policy AL/RTW16 – Land to the west of Eridge Road at Spratsbrook Farm was discussed at the hearing session on the 17 June 2022 and the Council's response is set out in <a href="#">Hearing Statement</a> Matter 7: Residential Site Allocations, Issue 1: Royal Tunbridge Wells and Southborough (Inspectors questions 10-16).</p> <p>A number of issues were raised by objectors at the Regulation 19 stage which were either considered within the Councils hearing statement or discussed at the hearing session, which include the issues re-iterated by objectors through this current consultation.</p> <p>In response to the comments raised in regard to the agricultural land classification – The SHELAA for the Regulation 18 and the Regulation 19 consultation versions of the Local Plan recorded the site as being Agricultural Land Classification Grade 4, Urban, based on the Provisional Agricultural Land Classification from Natural England. Whilst the comments received from objectors contend the land to be a higher value (Grade 3a and Grade 3b), this would not have affected the results as the <a href="#">SHELAA</a> recognises that the site is managed</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
						fundamentally hindered in reaching its conclusions because Ramslye Farm and Spratsbrook Farm are two very different farms in different uses and in different locations and different authorities. An examination of the relevant ordnance survey map will clearly illustrate this error.	The site immediately adjacent to this site within Wealden District is not being proposed to be allocated for any use.	<p>agricultural land but the land to be built on is not the best and most versatile.</p> <p>The grading set out in the SHELAA document is based on a dataset that has been used for all sites providing a consistent approach. This query was raised at the regulation 19 stage and so the opportunity to raise it again would have been at the hearing sessions. It was not queried by the Inspector at either the site selection hearing session or the specific site session as referred to above or raised again by the objectors who neither submitted a hearing statement on this matter nor attended the hearing session itself.</p> <p>In addition, any amendments proposed to this policy are not the subject of the current consultation in response to the Inspectors Initial Findings. Any changes in relation to this site and policy will be the subject of consultation as part of the 'Proposed Main Modifications consultation' and do not fall within the scope of this current consultation. There will be opportunity for comment through the 'Proposed Main Modifications' process.</p>
20-1	Adam Arnold				Other Matters		<p>Object to the planned building on the Ramsley Field for the following reasons;</p> <p>The Council commissioned a study of the fields which concluded that they were grade 3a/3b agricultural land and therefore not suitable for development. The Local Plan conflicts with this and has rated the field as grade 4 urban land.</p> <p>The fields are used by local residents for walking.</p> <p>The field is used for agricultural purposes.</p>	<p>Policy AL/RTW16 – Land to the west of Eridge Road at Spratsbrook Farm was discussed at the hearing session on the 17 June and the Council's response is set out in <a href="#">Hearing Statement</a> Matter 7: Residential Site Allocations, Issue 1: Royal Tunbridge Wells and Southborough (Inspectors questions 10-16).</p> <p>A number of issues were raised by objectors at the Regulation 19 stage which were either considered within the Councils hearing statement or discussed at the hearing session, which include the issues re-iterated by objectors through this current consultation.</p> <p>In response to the comments raised in regard to the agricultural land classification – The SHELAA for the Regulation 18 and the Regulation 19 consultation versions of the Local Plan recorded the site as being Agricultural Land Classification Grade 4, Urban, based on the Provisional Agricultural Land Classification from Natural England. Whilst the comments received from objectors contend the land to be a higher value (Grade 3a and Grade 3b), this would not have affected the results as the <a href="#">SHELAA</a> recognises that the site is managed</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								<p>agricultural land but the land to be built on is not the best and most versatile.</p> <p>The grading set out in the SHELAA documents is based on a dataset that has been used for all sites providing a consistent approach. This query was raised at the regulation 19 stage and so the opportunity to raise it again would have been at the hearing sessions. It was not queried by the Inspector at either the site selection hearing session or the specific site session as referred to above or raised again by the objectors who neither submitted a hearing statement on this matter nor attended the hearing session itself.</p> <p>In addition, any amendments proposed to this policy are not the subject of the current consultation in response to the Inspectors Initial Findings. Any changes in relation to this site and policy will be the subject of consultation as part of the 'Proposed Main Modifications consultation' and do not fall within the scope of this current consultation. There will be opportunity for comment through the 'Proposed Main Modifications' process.</p>
28-1	CPRE Kent on behalf of CPRE Kent	CPRE Kent	CPRE Kent		9 Development strategy options		<p>The amended Plan is considered to be legally compliant but not sound in regard to section 9 - Development Strategy Options, and CPRE raise the following;</p> <p>CPRE agree that there is the need for new development strategy options but is particularly concerned about the impact of the spatial strategy on protected landscapes and the High Weald AONB and the strategy should be reviewed.</p> <p>New duties under the Levelling Up and Regeneration Act 2023 place an active duty on LPA's in relation to conserving and enhancing the AONB.</p> <p>CPRE feel that the Council has good reasons for not meeting its housing requirement in full. Particular concern about Policy AL/CR3 - Crane Valley in Cranbrook and the resultant impact on the AONB.</p>	<p>The Council is aware of the change in the statutory duty towards protected landscapes that applies to LPAs brought in by Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023. In the absence of any further guidance for LPAs in how such a duty should be discharged, the Council agree that the revised duty which includes to 'seek to further' is an active duty, not a passive one. The Council has and continues to take an active role in seeking to "further the statutory purposes of the area" not only through decision making but also through its support for and contribution to partnerships and projects including to the High Weald AONB Management Plan and the High Weald National Landscape Partnership and the Kent High Weald Partnership.</p> <p>The Council has not seen anything to suggest that the change in the statutory duty would require the Council to reconsider the allocations in the AONB.</p> <p>The Councils approach to AONB matters was clearly set out and discussed at the previous hearing sessions under Matter 3 including:</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								<p>Issue 1 Spatial Strategy: <a href="#">TWLP 014 Matter-3-Issue-1 Spatial-Strategy.pdf</a>. In particular Question 8 “housing potential outside of the Green Belt and AONB” and Question 9 “impacts of Green Belt, AONB and flood risk on development”.</p> <p>Issue 2 Distribution of development. <a href="#">TWLP 015 Matter-3-Issue-2 Distribution-of-Development.pdf</a> In particular Question 6 “What is the justification for distributing new housing development to settlements within the High Weald AONB? How did the AONB designation influence the scale, type and distribution of housing development?”</p>
28-3	CPRE Kent on behalf of CPRE Kent	CPRE Kent	CPRE Kent		Other Matters		<p>Consider the amended Local Plan to be legally compliant but not sound in regard to Policy AL/SO2 - Land at Mabledon House and raise the following;</p> <p>The Inspector has raised a number of concerns in regard to the allocation for a luxury hotel and how the policy should be dealt with, however no detail has been forthcoming.</p>	<p>The Inspector has raised a number of concerns in regard to allocation Policy AL/SO2- Land at Mabledon House, which have been considered by the Council. <a href="#">Action Point 19</a> – Local Plan Examination Note for Inspector in response to Action Point 19 regarding Mabledon House, Southborough, provides further information on this matter.</p> <p>Any changes in relation to this site and policy will be the subject of consultation as part of the ‘Proposed Main Modifications consultation’ and do not fall within the scope of this current consultation. There will be opportunity for comment at that stage.</p>
40-1	Christopher Hodges				1 Introduction	Adhere to previous promises for infrastructure and flood defences.	Changes to the Borough Local Plan Submission Version (2020 - 2038) would make it Legally non-compliant and Unsound. Request to commit to the delivery of infrastructure and flood defences.	The Council does not consider the proposed changes to the Submission Local Plan, in response to the Inspectors initial findings letter to be unsound or non-legally compliant. Proposed growth is supported by the necessary infrastructure.
43-6	Ann Newman	n/a			5 Transport related matters	All walking/cycling routes established should be properly established as bridleways to allow the safe riding of horses on these paths. The local plan includes areas where there are still many horses kept and to exclude horses from the newly created paths to encourage safe cycling	<p>Transport -legally non-compliant/unsound:</p> <p>Don't forget horses in the area which contribute to leisure activities - all walking/cycling routes should be properly established as bridleways to allow the safe riding of horses on these paths.</p>	<p>Not all Public Rights of way are suitable to be used as bridleways but the Local Plan takes a positive approach to their provision and improvements most notably through:</p> <p>STR 6 Transport and Parking a) Active Travel</p> <p>“1. The provision of inter-settlement walking, cycling, electrical personal vehicle, and non-motorised user routes into the centres or key destinations within settlements, including through enhancing routes such as Public Rights</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
						etc would be wrong. The local roads are already incredibly dangerous to ride on and the plans will exacerbate this enormously. To avoid accidents include horses and properly establish the paths as rights of way so they remain for all time, at least leave a legacy for people of the future via a network of rights of way.		<p><i>of Way (including footpaths, bridleways, and byways) for users of non-motorised transport. This will include links to destinations outside the borough, including Tonbridge;</i></p> <p>And</p> <p>Policy TP 2 Transport Design and Accessibility "4. The existing public footway, bridleways, and Public Rights of Way networks should be safeguarded. Development should secure positive outcomes for these networks, adhere to good design principles, and contribute towards the delivery of Kent County Council's Rights of Way Improvement Plan objectives. Opportunities should be taken through development to enhance these networks, including improvements to signage, surfacing, and the creation of new path links that improve connectivity. Where appropriate, financial contributions for off-site Public Rights of Way improvements will be sought;"</p> <p>Specific reference was made to bridleways for a number of sites and in particular PE1, PE2 and PE3 at Pembury in support of improving a local bridleway.</p>
45-1	Peter Tavner				Other Matters	<p>It is up to the council to respond directly to the issues raised by the Inspector. To date they have not done so.</p> <p>However, I would suggest that the most obvious way to make the policy sound is to prohibit the construction of new buildings at Mabledon in favour of a smaller hotel centred around the existing buildings only, as implied by Paragraph 68 of the Inspector's response ("a different type of development to the one proposed by the site promoters")</p>	<p>The amended plan is unsound in regard to Policy ASL/SO2 - land at Mabledon House for the following reasons;</p> <p>The planning inspector states that the construction of new buildings is inappropriate development in the Green Belt and that allocating the site for development, but then requiring it to demonstrate very special circumstances does not represent an effective or justified policy.</p> <p>The Inspector has suggested that the Council could make the policy sound for example through prohibiting the construction of new buildings in favour of a smaller hotel. However the Council's response and amendments to the plan are silent on this issue and the inspectors comments. The Council needs to respond to the Inspector on this issue and would suggest that the policy is amended to prohibit construction of</p>	<p>The Inspector has raised a number of concerns in regard to allocation Policy AL/SO2- Land at Mabledon House, which have been considered by the Council. <a href="#">Action Point 19</a> – Local Plan Examination Note for Inspector in response to Action Point 19 regarding Mabledon House, Southborough, provides further information on this matter.</p> <p>Any changes in relation to this site and policy will be the subject of consultation as part of the 'Proposed Main Modifications consultation' and do not fall within the scope of this current consultation. There will be opportunity for comment through the 'Proposed Main Modifications' process.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							new buildings at Mabledon House and have a smaller hotel focused around the existing buildings only.	
61-1	Janet Sturgis	Hawkenbury Allotment Holders' Association			Other Matters		<p>The Plan is not sound for the following reasons;</p> <p>Concern over the potential widening of High Woods Lane in association with Policy AL/RTW19.</p> <p>The land is not vacant and not available for development as it is leased to Haha and used by the fully occupied allotments. Any development would impact on the 100 year old hedge.</p> <p>support the creation of football pitches for the towns youngsters but feel strongly that it should not be at the detriment to the elderly allotment holders.</p> <p>Also concerned that this proposal not clear and just added to a very long document.</p>	<p>Policy AL/RTW19 – Land to the north of Hawkenbury Recreation Ground was discussed at the hearing session on the 21 June 2022 and the Council's response is set out in <a href="#">Hearing Statement</a> Matter 7: Residential Site Allocations, Issue 1: Royal Tunbridge Wells and Southborough (Inspectors questions 39-46). Further to the Hearing Sessions, the Council produced <a href="#">Action Point 13</a> – Local Plan Examination Note for Inspector in response to Action Point 13 regarding Policy AL/RTW19 (Land at Hawkenbury) and AL/RTW22 (Land at Bayham West), in response to questions raised through the Hearing Sessions. This Action Point sets out further detail on the Sports Hub proposal and further supporting information as well as proposed amendments to the Policy and Supporting text.</p> <p>The amendments proposed to this policy are not the subject of the current consultation in response to the Inspectors Initial Findings. Any changes in relation to this site and policy will be the subject of consultation as part of the 'Proposed Main Modifications consultation' and do not fall within the scope of this current consultation. There will be opportunity for comment through the 'Proposed Main Modifications' process.</p>
63-2	Chantal Brooks	Brenchley and Matfield Parish Council			Other Matters	<p>Firm up the proposals for Kippings Cross, including with a LVIA, to establish which scheme should be preferred, with costings included in the Infrastructure Delivery Plan and an obligation on all developments at Paddock Wood and East Capel, Horsmonden and Matfield and Brenchley to contribute to them.</p>	<p>PS059- Local Junction Capacity Sensitivity Testing Technical Note, Part 8, Junction 35 Kippings Cross Roundabout – unsound.</p> <p>Proposals KX10 and KX11 - still require substantial working up and funding very unclear.</p> <p>Piecemeal development and viability could be issues. Not clear how changes would work/combine with PS058 Bus feasibility technical note and no LVIA's to assess impact on National Landscape. Therefore, risk development will go ahead without necessary improvements to Kippings Cross junction</p> <p>Solutions: Firm up Kippings Cross proposals (including a LVIA) to establish preferred scheme, with costings in the IDP and obligation on all developments at Paddock</p>	<p>The Council has undertaken a thorough review of the Kipping's Cross junction as part of its further transport related work has been undertaken as part of the councils response to the Inspectors Initial Findings letter. This is outlined in work undertaken by Sweco (PS_047, PS_048, and PS_049) where the road network as a whole has been re-assessed. Each planning application as it comes forward will have its own transport assessment and any changes in routing etc will be considered at the time.</p> <p><b>Stage 1</b> comprised a review of the previous strategic modelling methodology and a review of the baseline reference case including a review of the Kipping's cross junction in the model.</p> <p><b>Stage 2</b> was the undertaking of a new strategic model run of the reduced local plan growth</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							Wood, East Capel, Horsmonden and Matfield and Brenchley to contribute Use of CIL instead of S.106 and Highways Act S278, so every single development makes its own contribution to a larger pot for infrastructure improvement.	<p>scenario to establish its impacts on the highway network including Kipping's Cross.</p> <p><b>Stage 3 Part 1</b> comprised an analysis of the potential for sustainable transport interventions to encourage mode shift away from the car.</p> <p><b>Stage 3 Part 2</b> considers potential highway interventions to mitigate the traffic impacts of the Local Plan at the remaining hotspot locations identified in Part 1.</p> <p>The work indicated underlying issues with the junction in terms of queues and delays, and appropriate mitigation has now been considered. The council continues to work with National Highways and KCC about the likely effects of the growth having regard to wider network mitigation and modal shift scenarios. Further funding of highway mitigation will be secured through the S106 mechanism.</p>
67-1	Andrew Stanley				1 Introduction		Disappointed TWBC has decided to force through an amended version of a flawed plan rather than look at realistic alternatives.	The Council does not consider the Plan to be flawed. The proposed development strategy is realistic and will enable the Plan to be adopted sooner (as opposed to delaying the examination further through a further Call for Site for example), with an early review to seek ways of meeting the growth needs for the period after 2034.
67-5	Andrew Stanley				8 Overview and Conclusions		<p>Overview and conclusions - Unsound</p> <ul style="list-style-type: none"> <li>• TWBC has not reviewed all Green Belt options but more importantly it has not reviewed sites previously dismissed</li> <li>• Paddock Wood - To consider building in known flood zones (including zone 2 for industrial units) is madness. Around the country areas are flooding for the first time and others flooding every few years (was every 50 years)</li> </ul>	<p>The <a href="#">Inspectors initial findings</a> were very clear, where at para 6, specific reference is made to the 'all reasonable alternative' Green Belt sites needing a Stage 3 Green Belt assessment, not all Green Belt sites. In terms of other sites, the Council has not considered it necessary to review either non-reasonable alternative Green Belt sites or non-Green Belt omission sites. These have previously been assessed by the <a href="#">SHELAA</a> process, which has been considered at the earlier examination hearing session held on 27 May 2022 for Matter 5, Issue 1: Site Selection Methodology and dealt with in the Hearing Statement <a href="#">TWLP/021</a>.</p> <p>A revised series of flood modelling reports have been conducted (<a href="#">PS 042</a>, <a href="#">PS 043</a>, and <a href="#">PS 044</a>) based on updated present day and climate change for Paddock Wood. These have informed the revised masterplanning and housing calculations. This has resulted in all housing being planned for Flood Zone 1, following sequential testing employment in Flood Zone 2, and no development in Flood Zone 3.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
67-6	Andrew Stanley				10 Consideration of development strategy options		Disagrees that TWBC fully considered alternative options in preparing the Pre-Submission Local Plan with no adequate review following the inspector's initial findings.	Alternative options associated with the preparation of the Pre-Submission Local Plan are outside the scope of this consultation. The Council has appropriately reviewed the Submission Local Plan following the initial findings, as set out in the Development Strategy Topic Paper Addendum ( <a href="#">PS 054</a> ).
67-10	Andrew Stanley				Other Matters		General comment for the whole Local Plan Development Strategy Topic Paper – Addendum:  Unable to comment on whether the plan is legally complaint, but the plan is unsound.	This is noted. The Council disagrees that the Plan is unsound.
70-5	Dave Smith				2 Green Belt		Argue against the discretion of eroding Green Belt to meet housing target that is arbitrary and based on contentious data and assumptions.  Uphold proper planning from grass roots level then aggregate upwards, supported by clear and demonstratable evidence, and cautious to environment impact rather than tentative speculation.	The Development Strategy Topic Paper, October 2021 ( <a href="#">Core Document 3.126</a> ) explains how the development strategy for the Pre-Submission Local Plan was formulated (at Section 6.0), including consideration of alternative strategies, and consideration of exceptional circumstances for Green Belt release. An addendum to this topic paper has been prepared following the Inspectors initial findings, document <a href="#">PS-054</a> . It is considered that the Council's approach to the Green Belt accords with paras 145-148 of the NPPF, which has been considered at previous hearing sessions (Matter 3, Issue 4: Management of Development in the Green Belt). The revisions to the Submission Local Plan, subject of this consultation, are supported by appropriate evidence.
71-1	Caenwood Estates			DHA Planning	Other Matters		The proposed amendments to the Local Plan are considered to be neither legally compliant or sound in regard to Policy AL/RTW5, due to the following; <ul style="list-style-type: none"> <li>Whilst agree with the proposed approach set out, if the Inspector considers that he will need to reconsider alternative sites, additional land at Caenwood Farm is available.</li> <li>The entire 150 acre Caenwood site has been promoted to TWBC as a natural extension to Royal Tunbridge Wells.</li> <li>The level of harm to the Green Belt is comparable to the draft allocation and the Council should reconsider the site and the SHELAA conclusions.</li> <li>The wider site could provide for 280 units as opposed to the current 100</li> </ul>	The Councils approach to the revised strategy and consideration of alternative sites is set out within the Green Belt Stage 3 Addendum ( <a href="#">PS 035</a> ), the relevant SHELAA ( <a href="#">PS 036</a> ) sheet where appropriate and the Development Strategy Topic Paper Addendum January 2024 ( <a href="#">PS 054</a> ) .  Site allocation AL/RTW5 – Land South of Speldhurst Road and West of Reynolds Lane at Caenwood Farm, was discussed at the hearing session on the 17 June 2022 and the Council's response is set out <a href="#">in Hearing Statement</a> Matter 7: Residential Site Allocations, Issue 1: Royal Tunbridge Wells and Southborough (Inspectors questions 27-31)  The additional land being promoted at Caenwood Farm has been considered through the SHELAA process and the conclusions with



Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>provided for by draft allocation AL/RTW5.</p> <ul style="list-style-type: none"> <li>Number of benefits are set out which would be realised through the allocation of the wider site including in relation to road improvements, pedestrian and cycle routes, public park and amenity space and Public rights of way through the site linking to wider footpath network as well as compensatory improvements to the Green Belt.</li> <li>The site also allows scope for future additional phases of development up to 1,000 units in total.</li> <li>The site remains in single ownership and is quickly deliverable.</li> <li>Number of additional considerations set out including in relation to transport, landscape and visual effects, flood risk and ecology.</li> <li>Would welcome opportunity to discuss the masterplan for the wider site with officers.</li> </ul>	regards to its suitability remain the same irrespective of the updated Green Belt work. In addition, any amendments proposed to this policy are not the subject of the current consultation in response to the Inspectors Initial Findings. Any changes in relation to this site and policy will be the subject of consultation as part of the 'Proposed Main Modifications consultation' and do not fall within the scope of this current consultation. There will be opportunity for comment at the 'Proposed Main Modifications' Stage.
74-1		Vistry Group		DHA Planning	15 Proposed strategic policy revisions		<p>The proposed changes to the Local Plan are considered to be legally compliant and sound. In particular Vistry supports the following;</p> <p>The proposed allocation AL/PE3.</p> <p>The proposed changes to the Local Plan Strategy.</p> <p>If the Inspector considers that additional sites are needed to be identified, additional land at Pembury as set out would make an excellent candidate for further development.</p>	<p>This is noted.</p> <p>The additional land at Pembury promoted by this representation has already been assessed through the SHELAA process and found to be unsuitable as potential allocation in the Local Plan.</p>
74-2		Vistry Group		DHA Planning	9 Development strategy options		<p>The proposed changes to the Local Plan are considered to be legally compliant and sound and Vistry fully supports the approach proposed. if additional land is needed, Vistry would like to put forward SHELAA Site 190: Land south-east of Sandhurst Avenue, Pembury, for the following reasons;</p> <p>a 3.5 ha site comprising two agricultural fields between Sandhurst Avenue and the A21 dual carriageway. Site is in immediate proximity to existing residential development and land</p>	<p>This is noted.</p> <p>The additional land at Pembury promoted by this representation has already been assessed through the SHELAA process and found to be unsuitable as potential allocation in the Local Plan.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>proposed to be developed as part of Policy AL/PE3.</p> <p>Options for accessing the site from either the Hastings Road or from the Woodside Recreation Ground to the north.</p> <p>Consideration of the Green Belt rating - it is considered that potential mitigation measures could be appropriate and the site could be released or partly developed in conjunction with the land to the south as part of a comprehensive scheme.</p>	
79-2	Frank Kent				Other Matters		<p>No notice of and attempt in consulting the electorate ad residents, and difficulty in referencing to the documents in the report.</p> <p>Languages used to be clearer for ordinary public, e.g. what is “active travel”?</p>	<p>The documents consulted on build on/are mostly amendments to documents consulted on at earlier stages of plan-making. They are by their very nature often technical documents that can be difficult to understand. Throughout the consultation process TWBC officers have been available to assist anyone who might require assistance with understanding documents or more generally with understanding the consultation process, viewing documents etc.</p> <p>The consultation was publicised in a similar way to the Regulation 19 Pre-Submission Local Plan public consultation, explained in the Council’s Consultation Statement Part 1 (<a href="#">Core Document 3.134a</a>).</p>
81-1	Diane Russell	High Weald National Landscape (AONB) Unit			Other Matters		<p>Representation relates to objection to continued proposed allocation of site AL/CRS 3 (Turnden Farm) in the SLP.</p> <p>Noted the Inspector was silent on this allocation in his initial findings, but assuming this was due to a planning appeal relating to the site at the time. However, it is important that the site allocation is reconsidered having regard to the following policy/legislative changes (since the EiP hearings and the Inspector’s initial findings in 2022):</p> <ul style="list-style-type: none"> <li>• <u>Strengthened Section 85 duty of public bodies with regard to exercising functions affecting land in AONBs set out in the Levelling-Up and Regeneration Act 2023</u> - the Local Plan examination should conclude that the proposed allocation for major development in the High Weald AONB would not further the purpose of conserving and enhancing</li> </ul>	<p>This site and the implications of a potential appeal decision were discussed at a separate session on the very last day of the hearing sessions in 2022. The Council does not believe that the policy/legislative changes set out in the response alter the Councils position.</p> <p><b>In respect of the first bullet point:</b> The Council is aware of the change in the statutory duty towards protected landscapes that applies to LPAs brought in by Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023. In the absence of any further guidance for LPAs in how such a duty should be discharged, the Council agree that the revised duty which includes to ‘seek to further’ is an active duty, not a passive one. The Council has and continues to take an active role in seeking to “further the statutory purposes of the area” not only through decision making but also through its support for and contribution to partnerships and projects including to the High Weald AONB Management Plan and the High</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>natural beauty and therefore allocating the site for major development would not accord with the duty.</p> <ul style="list-style-type: none"> <li>• <u>Refusal in April 2023 by the Secretary of State of planning application 20/00815/FULL on the proposed allocation site - application (construction of 165 new dwellings and associated works) (Decision subsequently quashed and now subject to redetermination)</u> - the Local Plan examination should consider the SoS's comprehensive refusal of the planning application, identifying harm to the landscape and scenic beauty of the AONB and concluding exceptional circumstances did not exist to justify the proposed development in the AONB. This means that any alternative proposals for development would be extremely unlikely to overcome the restrictive nature of NPPF para 183 which presumes against major development in AONBs, nor demonstrate exceptional circumstances. This supports the position of deleting the proposed site allocation in the SLP.</li> <li>• <u>Clarity regarding housing requirement figures in protected landscapes given by the Secretary of State in his speech of 19 December 2023 "Falling back in love with the future" (to accompany publication of revised NPPF)</u> - This confirmed that, whilst the standard method of assessing housing need remains the basis on which communities should plan for new homes, it has always been advisory as a starting point for LPAs; and "The new NPPF now, more clearly, upholds the spirit of the original intention. Local authorities have the comfort of knowing that they need not re-draw the green belt or sacrifice protected landscapes to meet housing numbers." The HWNL Unit considers this clarification supports the position that meeting housing requirement figures should not be considered to</li> </ul>	<p>Weald National Landscape Partnership and the Kent High Weald Partnership.</p> <p>The Council has not seen anything to suggest that the change in the statutory duty would require the Council to reconsider the allocations in the AONB. The Council's approach to AONB matters was clearly set out and discussed at the previous hearing sessions.</p> <p><b>With regards the second bullet point:</b> An appeal decision was issued on 06 April 2023 and quashed on 06 October 2023. The Council advised the Inspector of the appeal decision and stated that "...having regard to the SoS's reasoning, it is not considered that the main reason upon which the SoS refused planning application, namely the impact of this proposal on the HWAONB, precludes the likelihood that alternative proposals for the development of the site for housing, capable of addressing the identified impacts, could come forward and be considered favourably against the constraint policies at national and local level demonstrating exceptional circumstances in accordance with NPPF paras. 176- 177." Therefore, the policy AL/CRS 3 remains part of the Council's development strategy for the SLP.</p> <p>The matter now sits with the SoS. There is no indication of when a fresh decision is expected.</p> <p><b>With regards the third bullet point:</b> The Council notes that there is no change in policy with regards NPPF para 183 and the statement referred to reflects a clarification and not a new position with regards the AONB. To suggest that this point is taken in isolation is incorrect. The NPPF needs to be read as a whole and the need to plan positively, boost housing supply and meet local needs are also in the NPPF.</p> <p>Specifically the Dec 2023 NPPF contains transitional arrangements (paragraph 230) such that the Tunbridge Wells PSLP is being examined under the previous version of the Framework.</p> <p>It is also noted that the SoS in his original appeal decision for this site (para26) "agrees with the Inspector that there is a clear need for both market and affordable housing in the</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>constitute ‘exceptional circumstances’ within the context of NPPF para 183.</p> <p>To ensure consistency with national policy relating to development in AONBs, recommended allocation AL/CRS 3 be deleted from the SLP.</p>	<p><i>Borough and that the proposed development would make a significant contribution to the delivery of both”.</i></p> <p>The Councils approach to AONB matters was clearly set out and discussed at the previous hearing sessions under Matter 3 including:</p> <p>Issue 1 Spatial Strategy: <a href="#">TWLP_014_Matter-3-Issue-1_Spatial-Strategy.pdf</a>. In particular Question 8 “housing potential outside of the Green Belt and AONB” and Question 9 “impacts of Green Belt, AONB and flood risk on development”.</p> <p>Issue 2 Distribution of development. <a href="#">TWLP_015_Matter-3-Issue-2_Distribution-of-Development.pdf</a> In particular Question 6 “What is the justification for distributing new housing development to settlements within the High Weald AONB? How did the AONB designation influence the scale, type and distribution of housing development?”</p> <p>Consequently, the Council believe that this allocation should remain in the plan.</p>
85-1	Barry John Richardson				Other Matters		<p>The amended plan in regard to Policy AL/RTW19 is not considered to be legally compliant or sound in regard to the following;</p> <p>Since the ownership of the verges and the lane is not known, the road widening or creation of passing places cannot be performed by the local authority.</p> <p>The TW football club would want to use the stadium for other purposes and would want autonomy of its use.</p> <p>Noise, light and vehicle pollution would all have an impact on people and wildlife.</p> <p>Concentration of football facilities into one hub will deny access to local facilities.</p> <p>concern over flooding and sewage pumping station being at capacity.</p> <p>Concern that plans have changed from those originally proposed to include a football stadium.</p>	<p>Policy AL/RTW19 – Land to the north of Hawkenbury Recreation Ground was discussed at the hearing session on the 21 June 2022 and the Council’s response is set out in <a href="#">Hearing Statement</a> Matter 7: Residential Site Allocations, Issue 1: Royal Tunbridge Wells and Southborough (Inspectors questions 39-46).</p> <p>Further to the Hearing Sessions, the Council produced <a href="#">Action Point 13</a> – Local Plan Examination Note for Inspector in response to Action Point 13 regarding Policy AL/RTW19 (Land at Hawkenbury) and AL/RTW22 (Land at Bayham West), in response to questions raised through the Hearing Sessions. This Action Point sets out further detail on the Sports Hub proposal and further supporting information as well as proposed amendments to the Policy and Supporting text.</p> <p>The amendments proposed to this policy are not the subject of the current consultation in response to the Inspectors Initial Findings. Any changes in relation to this site and policy will be the subject of consultation as part of the</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>Site is close to elderly population and sheltered accommodation.</p> <p>Vehicle parking is already a problem and will be made worse.</p> <p>Site is in agricultural use and adjoins ancient woodland.</p> <p>Is within AONB and natural Green Belt space.</p> <p>Also add that not against the provision of good sports facilities.</p>	'Proposed Main Modifications consultation' and do not fall within the scope of this current consultation. There will be opportunity for comment through the 'Proposed Main Modifications' process.
86-5	Charles Rosenmeyer				Other Matters		<p>Raises concern that TWBC should consult with Tonbridge and Malling Borough Council at every stage of the plan process not just at this late stage.</p>	<p>TMBC have been formally consulted on the proposed changes and has submitted a representation to the formal consultation. There has been ongoing Duty to Cooperate engagement with TMBC throughout the plan making process, as already considered through the Stage 1 Duty to Cooperate hearing session (Matter 1, Issue 1).</p>
90-2	Axiom Developments			DHA Planning	Other Matters		<p>The amended plan is considered to be legally compliant but not sound in regard to Land at Colebrooke Park, RTW and soundness of the revised strategy.</p>	<p>Noted.</p> <p>Following the Hearing sessions, <a href="#">Action Point 12</a> – Local Plan Examination Note for Inspector in response to Action Point 12 regarding the proposed changes to the Green Belt in the Submission Local Plan, at section 5, considers 'Land at Colebrook House.</p> <p>The subsequent amendments proposed in regard to this site are not the subject of the current consultation in response to the Inspectors Initial Findings. Any changes in relation to this site and policy will be the subject of consultation as part of the 'Proposed Main Modifications consultation' and do not fall within the scope of this current consultation. There will be opportunity for comment through the 'Proposed Main Modifications' process.</p> <p>In regard to the comments on the revised strategy and consideration of this site are dealt with in the response to Rep Numbers 90-1 and 90-3.</p>
91-5	Peter Rawlinson	Gleeson Developments Ltd			Other Matters		<p>Concerns over draft Policy EN17 Local Green Space (LGS) – also mentioned in Reg 19 representation – and object to the proposed LGS designation for 'Land at Pembury Road, Tunbridge Wells' (SHELAA ref 99):</p>	<p>The Councils approach to and policy for Local Green Spaces or the designations did not fall within the scope of matters that the Inspector had asked the Council to address in his initial findings.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<ul style="list-style-type: none"> <li>Not adhering NPPF paragraph 35 as in not being positively proposed, justified, effective or consistent with national policy to promote sustainable development</li> <li>Unnecessary and unjustified LGS designation underpinned by NPPF paragraph 101 that LGS should be '<i>consistent with local plans of suitable developments and complement investment in sufficient homes, jobs and other essential services</i>', and other inadequate virtues of accessibility, visual view/landscape</li> <li>Debateable support from the Town Forum/a Councillor/a single resident earlier with misleading purposes</li> </ul>	<p>The policy and designations were discussed at the previous hearing Sessions under Matter 13 Issue 5 (<a href="#">TWLP_072_Matter-13-Issue-5_Local-Green-Space-Final.pdf</a>).</p> <p>In particular response to Question 2 explained how sites came to be put forward and Question 3 was specifically about this site: "What is the justification for designating site 217? How is it demonstrably special to the local community?"</p> <p>In answering these questions the Council noted that "<b>all sites have been consulted on with local communities</b>, regardless of whether put forward initially by different sources".</p>
92-2	Greg Clark MP				15 Proposed strategic policy revisions		Concern that the time since the Inspectors letter was received and now has resulted in every settlement in the borough being placed in jeopardy of further speculative planning applications due to the fact that a new plan has not been drawn up but rather a holding document.	Following receipt of the Inspector's Initial Finding's letter, the Council has needed to undertake a number of complex studies to inform the Councils response to the initial findings. The proposed amendment to delete Tudeley Garden Village from the Local Plan could not be done without robust evidence to support it's removal from the Plan. To identify additional sites for allocation the Council considers that a further Call for Sites would be needed, resulting in a delay to the Local Plan examination and adoption of the Local Plan. A Local Plan review has the benefit of enabling the examination Local Plan to be adopted sooner, providing certainty for the first 10 years of the plan-period, the Council being able to demonstrate a 10 year housing land supply.
92-4	Greg Clark MP				Appendix A: List of Post Submission Evidence Base Documents		Concerned that local neighbourhoods have not been adequately involved in the preparation of this revised plan, particularly consideration of Neighbourhood Development Plans.	The Council has actively engaged with the parishes/neighbourhood plan groups throughout the production of neighbourhood plans (NDPs) and has had regard to the Submission Local Plan throughout this process. Independent Examiners have also considered the NDPs and their relationship with the emerging Local Plan when examining the NDPs. The Council has engaged with parishes throughout the plan-making process, as per the Consultation Statement [Core Document 3.134a and b] and Statement of Community Involvement [ <a href="#">Core Document 3.55</a> ]. It is noted that five of the nine made NDPs, have been made since the examination hearing sessions in 2022.

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								Discussions have been ongoing with PWTC on delivery of infrastructure at STR/SS 1.
96-1	Ian Kirkham				Other Matters		<p>Object in regard to Policy AL/RTW19 and raises the following;</p> <p>Strongly object to the Sports Hub and relocation of Tunbridge Wells Football Club to Hawkenbury with associated road widening.</p> <p>The site borders sheltered accommodation and a predominantly elderly population.</p> <p>The road is insufficient for this purpose and the plans to widen High Woods Lane will destroy the hedgerow and bring increased traffic, parking and emissions and impact on the allotment holders. If just passing places were introduced, it would not be sufficient.</p> <p>Concern also around drainage and the stream that runs across the road.</p> <p>Original plans for the sports hub were more modest and did not include floodlights or the relocation of TWFC to the site. Information has been withheld.</p> <p>Area already impacted by the recreation ground which would be made worse as well as anti-social behaviour.</p> <p>Reports by Kent FA that the hub is going to happen despite no consultation on this.</p> <p>Concern that the sports hub would be a niche project as a centre of football excellence rather than providing for the wider community.</p> <p>Local residents are unaware of the project or the scale of what is proposed.</p> <p>The document - Action Point 13 in relation to Hawkenbury is not widely available and makes no attempt to understand the substantial increase in noise, traffic movement and pollution as well as light pollution.</p> <p>The statement that TWBC owns the HAHA site and can proceed to widen the road does not take account of the fact that TWBC does not own the verges or hedgerows as stated by TWBC parking department during</p>	<p>Policy AL/RTW19 – Land to the north of Hawkenbury Recreation Ground was discussed at the hearing session on the 21 June 2002 and the Council's response is set out in <a href="#">Hearing Statement</a> Matter 7: Residential Site Allocations, Issue 1: Royal Tunbridge Wells and Southborough (Inspectors questions 39-46).</p> <p>Further to the Hearing Sessions, the Council produced <a href="#">Action Point 13</a> – Local Plan Examination Note for Inspector in response to Action Point 13 regarding Policy AL/RTW19 (Land at Hawkenbury) and AL/RTW22 (Land at Bayham West), in response to questions raised through the Hearing Sessions. This Action Point sets out further detail on the Sports Hub proposal and further supporting information as well as proposed amendments to the Policy and Supporting text.</p> <p>The amendments proposed to this policy are not the subject of the current consultation in response to the Inspectors Initial Findings. Any changes in relation to this site and policy will be the subject of consultation as part of the 'Proposed Main Modifications consultation' and do not fall within the scope of this current consultation. There will be opportunity for comment through the 'Proposed Main Modifications' process.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							consultations around parking restrictions on High Woods Lane.	
107-1	Juliet Andrew				Other Matters		<p>Concern that the Local Plan process is overwhelming and overly complicated and very little information provided to local residents.</p> <p>Also concerned that the social housing is being offered to people outside of the area rather than meeting local needs.</p>	<p>The documents consulted on build on/are mostly amendments to documents consulted on at earlier stages of plan-making. They are by their very nature often technical documents that can be difficult to understand. Throughout the consultation process TWBC officers have been available to assist anyone who might require assistance with understanding documents or more generally with understanding the consultation process, viewing documents etc.</p> <p>The consultation was publicised in a similar way to the Regulation 19 Pre-Submission Local Plan public consultation, explained in the Council's Consultation Statement Part 1 (<a href="#">Core Document 3.134a</a>).</p> <p>Regarding the concern that the social housing is being offered to people outside of the area rather than meeting local needs, Policy H3: Affordable Housing of the <a href="#">Submission Local Plan</a> (Core Document 3.128) includes a 'local connection cascade'. This has previously been considered at the Matter 8, Issue 3: Affordable Housing hearing session held on 16 June 2022, and in hearing statement <a href="#">TWLP/029</a> Question 6.</p>
113-2	Alan Chilvers	Residents of Golden Green Association & Keep Kent Green			Other Matters		<p>It has been over years since the examination began. Still concerned that decision makers continue to ignore TMBC, developers, CPRE, and local residents feedback and constraints.</p> <p>TWBC follow unjustified garden village principles regardless of the cost and destruction towns and villages.</p> <p>Understanding and navigating the intertwined nature of the documents is a challenge without any experience or training in planning.</p>	<p>Following receipt of the Inspector's Initial Finding's letter, the Council has needed to undertake a number of complex studies to inform the Council's response to the initial findings. The proposed amendment to delete Tudeley Garden Village from the Local Plan could not be done without robust evidence to support its removal from the Plan. Since receipt of the initial findings, the Council has continued to engage with TMBC and developers to help inform the Council's response to the initial findings. The Council has welcomed comments from local residents and others through this consultation, which will inform matters and issues to be discussed at future hearing sessions.</p> <p>The documents consulted on build on/are mostly amendments to documents consulted on at earlier stages of plan-making. They are by their very nature often technical documents that can be difficult to understand. Throughout the consultation process TWBC officers have been available to assist anyone who might require</p>



Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								assistance with understanding documents or more generally with understanding the consultation process, viewing documents etc.
121-1		Berkeley Homes	Isabella Tidswell	Lichfields	Other Matters		The amended Local Plan is considered to be sound and Berkeley Homes have set out further detail on the suitability of the Turnden site for residential development and the relevant planning history. It is further confirmed that the site remains available, achievable and suitable for development and the need for this allocation is now further increased due to the reduction of housing proposed in the amended Local Plan.	This is noted.
121-2		Berkeley Homes	Isabella Tidswell	Lichfields	15 Proposed strategic policy revisions		Berkeley Homes consider the amended plan to be legally compliant and generally support the amended Local Plan. The reduction in dwellings allocated, increases the need for the remaining allocations including the land at Turnden which is deliverable and has been considered to be acceptable through a public inquiry where the Inspector recommended that planning permission should be granted for development of the site.	This is noted.
134-1		National Highways (formerly Highways England)			1 Introduction		National Highways consider that the amended plan is not sound in the following regard; <ul style="list-style-type: none"> <li>The reduction in dwellings and employment land means that in comparison to the submitted plan, fewer person trips overall can reasonably be expected to be generated. However this also means a reduction in financial contributions towards mitigation would be expected. It is therefore necessary for consideration to be made of the evidence presented within the consultation documents (NH have listed those relevant) as to whether a credible premise has been put forward in terms of the ability of the updated allocations and other relevant funding mechanisms to mitigate the Plans impact. This concern has already been relayed to the Council through ongoing discussions.</li> <li>NH notes that the Council have committed to an early review of the plan, including consideration of sites to</li> </ul>	The points raised by National Highways are noted. Further technical work is being produced by TWBC consultants in order to resolved matters that have been raised by National Highways. TWBC is working positively with NH and KCC Highways on highways related matters.  Appropriate levels of Infrastructure provision and highway mitigation have been factored into the policy STR/SS 1 following on from work with masterplanners ( <a href="#">PS_046</a> ). This has been viability tested as part of the review process ( <a href="#">PS_061</a> ).

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>be delivered after 2034. It can therefore be assumed that the mitigation proposals to be put forward for the current Local Plan sites would principally be intended to mitigate impacts accruing from development taking place before 2034. This needs to be accounted for in the appraisal of the proposed timescales for the delivery of mitigation measures which needs to be demonstrated that this change fully meets the requirements of the 'justified' test.</p> <ul style="list-style-type: none"> <li>• NH recognise that TWBC have engaged with NH constructively, actively and on an ongoing basis on the transport evidence that has informed the proposed changes.</li> <li>• To summarise NH consider that the set of proposed changes that relate to or impact on the SRN and transport matters does not make the plan sound - primarily because certain pieces of transport evidence is not yet sufficiently detailed and is therefore not possible to determine whether the proposed mitigation measures supporting some of the proposed changes would be effective. Further work is also required to demonstrate that consistency with National Policy would be achieved.</li> <li>• However, a number of elements of work are on-going and at present NH have no reason to believe that the outstanding matters will not be resolved and NH are committed to working with TWBC and their consultants to achieve this prior to the main modifications consultation. These matters can then be included in the consultation process and NH would like any issues resolved ahead of any examination hearing sessions on these matters.</li> </ul>	
142-1	Emma Lester	Residents Against Ramslye Development			Other Matters		Consider that the amended plan is neither legally compliant or sound in regard to Policy AL/RTW16 - Land at Eridge Road at Spratsbrook Farm and have the following comments.	Policy AL/RTW16 – Land to the west of Eridge Road at Spratsbrook Farm was discussed at the hearing session on the 17 June 2022 and the Council's response is set out <a href="#">in Hearing Statement</a> Matter 7: Residential Site Allocations,

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>Proposed changes do not exclude Ramslye Farm from its proposed housing development and therefore does not take into account the incorrect agricultural land classification and the historical character of Ramslye Farm.</p> <p>Changes do not take account recent changes to housing numbers and discounting of Green Belt sites.</p> <p>Changes do not take into account latest guidance in the NPPF in relation to importance of high grade agricultural land.</p> <p>Site RTW16 is incorrectly named and should be called Ramslye Farm.</p> <p>land classification - the proposed changes do not apply the correct Agricultural Land Classification to the subject property which should be Grade 3a and Grade 3b as determined in a detailed land survey commissioned by Tunbridge Wells Borough in 2014. It is classified as Grade 4 urban classification from a Natural England desktop survey.</p> <p>If the correct land classification had been used, then the subject property would have been deemed unsuitable for development at the SHELAA stage in line with same conclusions that Wealden District have reached in their assessment of the adjoining site.</p> <p>Not clear why the site has been released from the Green Belt when the level of harm is similar to other sites which have not been released.</p> <p>There are also a number of other constraints which also apply to the site including - historic (iron Age Hill fort), have archaeological potential, ancient woodland, Conservation area and transport.</p> <p>Footpath adjacent to the site has been used for generations for access to the ancient High Rocks an any development would destroy this setting.</p> <p>Residents Against Ramslye Development would like this re-considered by the Inspector.</p>	<p>Issue 1: Royal Tunbridge Wells and Southborough (Inspectors questions 10-16).</p> <p>A number of issues were raised by objectors at the Regulation 19 stage which were either considered within the Councils hearing statement or discussed at the hearing session, which include the issues re-iterated by objectors through this current consultation.</p> <p>In response to the comments raised in regard to the agricultural land classification – The SHELAA for the Regulation 18 and the Regulation 19 consultation versions of the Local Plan recorded the site as being Agricultural Land Classification Grade 4, Urban, based on the Provisional Agricultural Land Classification from Natural England. Whilst the comments received from objectors contend the land to be a higher value (Grade 3a and Grade 3b), this would not have affected the results as the <a href="#">SHELAA</a> recognises that the site is managed agricultural land but the land to be built on is not the best and most versatile.</p> <p>The grading set out in the SHELAA documents is based on a dataset that has been used for all sites providing a consistent approach. This query was raised at the regulation 19 stage and so the opportunity to raise it again would have been at the hearing sessions. It was not queried by the Inspector at either the site selection hearing session or the specific site session as referred to above or raised again by the objectors who neither submitted a hearing statement on this matter nor attended the hearing session itself.</p> <p>In addition, any amendments proposed to this policy are not the subject of the current consultation in response to the Inspectors Initial Findings. Any changes in relation to this site and policy will be the subject of consultation as part of the 'Proposed Main Modifications consultation' and do not fall within the scope of this current consultation. There will be opportunity for comment through the 'Proposed Main Modifications' process.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							Please note this response was signed by 208 individuals instead of multiple duplicate responses, as agreed with the 'Residents Against Ramslye Development' group.	
153-1	Fernham Homes		Danielle Dunn		Other Matters	The site known as 'Land at Tolhurst Road' should be included in the Submission Local Plan as a residential site allocation.	<p>Para 2.28 - Legally non-compliant/unsound:</p> <ul style="list-style-type: none"> <li>TWBC's response to Inspector's findings fails to address why sites in Five Oak Green (FOG), now deemed acceptable in the SA (PS_036 and PS_037) and assessed as 'low harm' in the Stage 3 Green Belt Report (PS_035), are not being taken forward into the SLP as site allocations. This documentation confirms the site would be suitable for allocation in the Local Plan</li> <li>This representation relates to SHELAA site reference 143 - Land adjoining Tolhurst Road, FOG (omission site):</li> </ul> <p>In accordance with NPPF para 69, site could become available in first 5 years of Plan period (there are no legal or financial restrictions)</p> <p>NPPF Para 70 acknowledges small/medium sized sites can make an important contribution to meeting housing need and are often built-out quickly; also that land to accommodate at least 10% of need should be provided on sites no larger than 1 ha. Site 143 is less than 1ha</p> <p>Site suitable for housing development (21 units, including affordable), as a highly sustainable (good transport links) and logical extension to the settlement of FOG. The site is in Flood Zone 1.</p> <p>This omission site would contribute to TWBC's substantial housing requirements and should now be re-considered for inclusion in the SLP (for residential development) as a reasonable alternative. Failure to do so is unsound and legally non-compliant and the consultation is flawed.</p>	<p>The Development Strategy Topic Paper Addendum (<a href="#">PS_054</a>) at Section 2 paras 2.22 – 2.28 summarises the findings of the Stage 3 Green Belt Addendum (<a href="#">PS_035</a>) sets out the approach the Council has taken to sites at Five Oak Green, where reasonable alternative Green Belt sites have been assessed in the SHELAA review of Green Belt sites (<a href="#">PS_036</a>). At Section 3:Updated housing land supply para 13.2, the Development Strategy Topic Paper Addendum sets out that sites at Five Oak Green could be considered as part of a Local Plan review. The SHELAA site assessment sheet for site 143 Land at Tolhurst Road, Five Oak Green acknowledges the Low harm rating and that the site is suitable as a potential allocation. It further identifies that the site could be considered as part of the proposed Local Plan review. As set out in the original SHELAA main report (<a href="#">Core Document 3.77</a>) at para 1.3 the SHELAA is not an allocations document; it does not form Council policy but provides a technical assessment of the potential of sites for allocation for future land supply. As such, it informs the plan-making process, but its findings must be considered alongside the other evidence in determining site allocations to be included in the new Local Plan.</p> <p>If the Council were to seek to include additional site allocations at this stage, it would be necessary for the Council to first consider whether there are alternative Brownfield/non-Green Belt sites suitable for allocation in the first instance, which would be best done through a further Call for Sites, and consideration of an alternative development strategy for the borough as a whole, thereby delaying adoption of the Local Plan further. The Council submits that the most suitable way forward is to progress the Local Plan with a 10 year housing land supply, with a commitment to an early review of the Plan.</p> <p>The Council does not agree with the proposed modification put forward.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<ul style="list-style-type: none"> <li>Consultation documentation states sites have been addressed through an assessment set out in 'Section H' (PS_054, para 2.28) of the Local Plan Development Strategy Topic Paper – Addendum. However, there is no Section H, making the consultation flawed and unlawful.</li> <li>The proposed changes to the SLP (removal of Tudeley Village, reduction in residential development at Paddock Wood, and housing land supply limited to 10 years) are noted, but concerned SLP does not accord with NPPF para 22 (15 year plan period) and para 7(b) (developable sites or broad locations for growth should be identified for years 11-15 of the plan period).</li> </ul>	<p>For clarity, the references of sections A-H are as follows -</p> <p>Section B - 2.0 Green Belt pages 6 – 10</p> <p>Section C - 3.0 Tudeley – pages 11 - 23</p> <p>Section D - 4.0 Paddock Wood – pages 24 - 34</p> <p>Section E - 5.0 Transport – pages 35 - 37</p> <p>Section F - 6.0 Infrastructure – pages 38 - 39</p> <p>Section G - 7.0 Other Matters – pages 39 - 42</p> <p>Section H - 8.0 Overview and Conclusions onwards – pages 43 onwards</p> <p>The Inspectors Initial Findings Letter (document ref: <a href="#">ID-012</a>) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage' Paragraph 69 of the NPPF sets out that for when identifying land for homes planning policies should identify a sufficient supply and mix of sites 'where possible' for years 11-15 of the remaining plan period.</p>
162-3	Nichola Watters	Wealden District Council			Other Matters		<p>Other comments:</p> <p>Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA) - noted advice sought on HRA in relation to the revised development strategy and that no further negative impacts on recreational pressure and air quality would be incurred.</p> <p>WDC confirms they will continue to work with TWBC as part of the working group for the Ashdown Forest, and on revising an existing statement of common ground in relation to cross boundary issues (housing, economic development, infrastructure and natural environment) as both of their Local Plans progress, under the duty to cooperate.</p>	This is noted.
165-1	Wendy Owen and Milton Cartwright				Other Matters	We consider the Local Plan should go forward without Ramslye Farm site 137 / AL/RTW16 Land to the West of	It is considered that the proposed changes to the Local Plan in regard to Policy AL/RTW18 are neither legally compliant or sound and the following comments are made;	Policy AL/RTW16 – Land to the west of Eridge Road at Spratsbrook Farm was discussed at the hearing session on the 17 June 2022 and the Council's response is set out in <a href="#">Hearing Statement</a> Matter 7: Residential Site Allocations,

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
						<p>Eridge Road at Spratsbrook Farm.</p> <p>TWBC should draft a Policy which sets out how the order of development sites should be determined to minimise Green Belt sites from being developed needlessly or before absolutely necessary.</p> <p>Ramslye Farm site 137 / AL/RTW 16, like all Green Belt sites, should be reviewed and assessed in line with such a Policy. Failing this, an addition should be made to STR1 that has the effect of prioritising development of Brownfield and non-Green Belt sites so sites in the Green Belt are not developed until all other sites have been exhausted thus giving effect to the original planned development dates of 2035/36 and 2036/37.</p>	<ul style="list-style-type: none"> <li>The changes to the Local Plan as set out in the Topic Paper do not address the issues identified by Residents Against Ramslye Development in its regulation 18 and regulation 19 submissions in respect of the Ramslye Farm site.</li> <li>The assessment of Green Belt sites has not been undertaken on a consistent basis and that there are other reasonable sites that could be removed from the Green Belt that would cause less harm.</li> <li>Consider that the site is unsuitable for the following reasons; <ul style="list-style-type: none"> <li>Site was not included in the most recent Green Belt work and so full comparison cannot be made.</li> <li>Sites contribution to the Green Belt has been incorrectly assessed and its contribution is greater than stated.</li> <li>Landscape and visual value of the site is significantly greater than the Local Plan states.</li> <li>There are material errors and inconsistencies in the SA that makes the appraisal unsound.</li> <li>Insufficient weight has been given to infrastructure implications of developing the site and capacity of road network and primary healthcare services.</li> <li>Development of the site would contravene many of the policies set out in the plan.</li> <li>The case for exceptional circumstances required to remove the site from the Green Belt has not been made.</li> <li>The Broadwater ward is disproportionately impacted accounting for around 500 of the 1500 houses planned for RTW.</li> </ul> </li> <li>A spreadsheet is attached to the response which was submitted in response to the Regulation 18 Plan which identified a number of inconsistencies in the evidence base.</li> </ul>	<p>Issue 1: Royal Tunbridge Wells and Southborough (Inspectors questions 10-16).</p> <p>A number of issues were raised by objectors which were either considered within the Councils hearing statement or discussed at the hearing session, which include the issues re-iterated by objectors through this current consultation.</p> <p>In response to the comments raised in regard to the agricultural land classification – The SHELAA for the Regulation 18 and the Regulation 19 consultation versions of the Local Plan recorded the site as being Agricultural Land Classification Grade 4, Urban, based on the Provisional Agricultural Land Classification from Natural England. Whilst the comments received from objectors contend the land to be a higher value (Grade 3a and Grade 3b), this would not have affected the results as the <a href="#">SHELAA</a> recognises that the site is managed agricultural land but the land to be built on is not the best and most versatile.</p> <p>The grading set out in the SHELAA documents is based on a dataset that has been used for all sites providing a consistent approach. This query was raised at the regulation 19 stage and so the opportunity to raise it again would have been at the hearing sessions. It was not queried by the Inspector at either the site selection hearing session or the specific site session as referred to above or raised again by the objectors who neither submitted a hearing statement on this matter nor attended the hearing session itself.</p> <p>In addition, any amendments proposed to this policy are not the subject of the current consultation in response to the Inspectors Initial Findings. Any changes in relation to this site and policy will be the subject of consultation as part of the 'Proposed Main Modifications consultation' and do not fall within the scope of this current consultation. There will be opportunity for comment through the 'Proposed Main Modifications' process.</p>

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<ul style="list-style-type: none"> <li>• Three particular issues are highlighted as below;                             <ul style="list-style-type: none"> <li>○ <u>Green Belt - disagree with the Green Belt findings</u> - Concern with the methodology applied to the Green Belt work and the consideration and comparison against similar sites such as the TW Golf club and the site at Sandown Park. It is considered that there are assessment inconsistencies and a comparison has been carried out and photos submitted to demonstrate this point. It is considered that there are errors and inconsistencies which make the plan unsound and unlawful and Ramsyle Farm should be removed from the Local Plan.</li> <li>○ <u>Ramslye Farm Agricultural Classification</u> - Concern with the grading of the agricultural land of this site as being Grade 4, urban, from a Natural England desktop survey, when it should have been Grade 3a and 3b as identified in an ALC in October 2014 by consultants on behalf of TWBC. Despite highlighting this in previous representations and meetings, TWBC has failed to correct this error and it is considered that if the full ALC rating had been used, the Ramslye Farm site would have been deemed unsuitable for development at the SHELAA stage in line with Wealden DC's conclusion for the land on the other side of the county border. These errors are considered to make the plan unsound and unlawful and the site should be removed from the plan.</li> <li>○ <u>Heritage matters</u> - The setting of the scheduled ancient monument has not been fully taken into account and Ramsyle Farm contributes to the setting of it. Also on 2</li> </ul> </li> </ul>	

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
							<p>listed buildings and the mitigation is not adequate to preserve their setting.</p> <ul style="list-style-type: none"> <li>The inclusion of Ramslye Farm is contrary to a number of aims of the Local Plan, including the effective use of brownfield land, reduction in the area of Green Bely being built on and limiting development in the country.</li> <li>There appears to have been no analysis or consideration of the distribution of sites within RTW itself. The number of sites identified within Broadwater Ward is disproportionate and is concerning in respect of infrastructure.</li> <li>Considers that the Save Capel campaign has been successful, however feel that the Ramslye Farm site has suffered because it has not had the same resources to draw upon.</li> </ul>	
167-1		Bellway Homes Strategic	David Murray-Cox	Turley	Other Matters		<p>Bellway's main concern with the local plan is the allocation of land south of High Woods Lane under Policy AL/RTW19 for new sport and recreation provision, although the Council has no interest in the land and so the development of the currently permitted scheme and the proposed allocation for a new sports hub are not deliverable.</p> <p>If the land to the north of High Woods Lane were allocated for residential use, then Bellway would be willing to work with the Council to explore opportunities for bringing forward the approved recreational facilities in the area, which residential development on the northern site could help deliver.</p> <p>Bellway welcomes a number of changes to the Local Plan, however remain concerned that the deletion of Tudeley village and the consequential changes resulting in a land supply of only 1-10 years means the land does not make sufficient provision for housing land supply. Bellway also remain concerned about site AL/RTW19 for sports and recreation although the Council has no interest in the land.</p>	<p>Policy AL/RTW19 – Land to the north of Hawkenbury Recreation Ground was discussed at the hearing session on the 21 June 2022 and the Council's response is set out in <a href="#">Hearing Statement</a> Matter 7: Residential Site Allocations, Issue 1: Royal Tunbridge Wells and Southborough (Inspectors questions 39-46).</p> <p>Further to the Hearing Sessions, the Council produced <a href="#">Action Point 13</a> – Local Plan Examination Note for Inspector in response to Action Point 13 regarding Policy AL/RTW19 (Land at Hawkenbury) and AL/RTW22 (Land at Bayham West), in response to questions raised through the Hearing Sessions. This Action Point sets out further detail on the Sports Hub proposal and further supporting information as well as proposed amendments to the Policy and Supporting text.</p> <p>The amendments proposed to this policy are not the subject of the current consultation in response to the Inspectors Initial Findings. Any changes in relation to this site and policy will be the subject of consultation as part of the 'Proposed Main Modifications consultation' and do not fall within the scope of this current consultation. There will be opportunity for comment through the 'Proposed Main Modifications' process.</p>



Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
172-3		Rydon Homes	David Neame	Neame Sutton	Other Matters	3. Further allocations are needed in any event to enable the Council to demonstrate a 5-year housing land supply at the point of adoption and then to maintain a rolling 5-year housing land supply thereafter;	<p>Other Matters of Soundness - legally non-compliant/unsound:</p> <p>Consideration of Other Reasonable Alternatives:</p> <p>Given the shortfall in meeting local housing needs, TWBC has failed to take the opportunity to consider reasonable alternatives for site allocations in sustainable locations outside the Green Belt such as Cranbrook and Sissinghurst. These locations can make a valuable contribution towards meeting the minimum housing need over the whole Plan period (particularly promotion site at Angley Lane, Sissinghurst (Rydon)). This is another failure of the Plan as proposed to be modified.</p>	<p>The Inspectors Initial Findings Letter (document ref: <a href="#">ID-012</a>) identifies that a way forward could be 'that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage'. Paragraph 69 of the NPPF sets out that for when identifying land for homes planning policies should identify a sufficient supply and mix of sites 'where possible' for years 11-15 of the remaining plan period.</p> <p>TWBC considers that the revised development strategy consulted upon is acceptable and meets the exceptional circumstances test required by the NPPF (para 145 – 146) to release sites from the Green Belt. Both Green Belt and non-Green Belt sites have been robustly assessed. The Green Belt Stage 3 Addendum (<a href="#">PS_035</a>) and associated SHELAA sheets (<a href="#">PS_036</a>) demonstrate that there are no other reasonable alternative Green Belt sites suitable for allocation at this time – this is dealt with in more detail in the Development Strategy Topic Paper Addendum (<a href="#">PS_054</a>) at Section 2. Non Green Belt sites have been robustly assessed through the previous SHELAA and dealt with at previous hearing sessions – including the Site Selection Methodology Matter 5, Issue 1 session.</p>
183-1	David Haffenden				Other Matters		<p>Objects to the proposed sports hub at Hawkenbury for the reasons below, in addition to comments made previously on the 21/00300/FULL planning application.</p> <ul style="list-style-type: none"> <li>• 3000 seater stadium - Tunbridge Wells FC only get a tenth of this regularly, what else will it be used for?</li> <li>• The road widening would cause the loss of ancient hedges and some allotments.</li> <li>• The land would need considerable levelling at a high cost, and may have to involve an archaeological survey.</li> <li>• The land is clay and would cause drainage problems once levelled.</li> </ul>	<p>Policy AL/RTW19 – Land to the north of Hawkenbury Recreation Ground was discussed at the hearing session on the 21 June 2022 and the Council's response is set out in <a href="#">Hearing Statement</a> Matter 7: Residential Site Allocations, Issue 1: Royal Tunbridge Wells and Southborough (Inspectors questions 39-46).</p> <p>Further to the Hearing Sessions, the Council produced <a href="#">Action Point 13</a> – Local Plan Examination Note for Inspector in response to Action Point 13 regarding Policy AL/RTW19 (Land at Hawkenbury) and AL/RTW22 (Land at Bayham West), in response to questions raised through the Hearing Sessions. This Action Point sets out further detail on the Sports Hub proposal and further supporting information as well as proposed amendments to the Policy and Supporting text.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
								The amendments proposed to this policy are not the subject of the current consultation in response to the Inspectors Initial Findings. Any changes in relation to this site and policy will be the subject of consultation as part of the 'Proposed Main Modifications consultation' and do not fall within the scope of this current consultation. There will be opportunity for comment through the 'Proposed Main Modifications' process.
184-1	Cllr Kim Fletcher	Cranbrook and Sissinghurst Parish Council			Other Matters		<p>Cranbrook and Sissinghurst has the 4th highest number of expected houses in the Borough, but no thought has been given to the infrastructure the community will need to support the growth. Upgrades and investment is needed in schools, medical services, youth services and community facilities.</p> <p>The issues of the High Weald are ignored despite 50% of the Borough's electorate living in rural areas.</p>	<p>The SLP sets the strategy for Cranbrook and Sissinghurst which was covered by Issue 2 Distribution of development in the Hearings.. <a href="#">TWLP_015_Matter-3-Issue-2_Distribution-of-Development.pdf</a> In particular Question 6 "What is the justification for distributing new housing development to settlements within the High Weald AONB? How did the AONB designation influence the scale, type and distribution of housing development?"</p> <p>The levels of infrastructure and soundness of allocations was considered as part of the original hearings. In the inspectors Initial Findings policy AL/CRS 6 is referred to regarding a replacement community hall. Further information has been provided which indicates 30% affordable housing cannot be met on the site, and as such modification to the plan is proposed.</p>
186-1		Horsmonden Parish Council			Other Matters		Additional comment by Horsmonden Parish Council who wish to emphasise the Inspector's reference to the siting of the medical centre at the examination hearing session. The medical centre must be kept within the area designated for residential use, and not within the area for community space as outlined in the current planning application	SLP policy AL/HO3 sets out the expectations for the site including 'new health centre/doctors surgery'. Criterion 4 of the policy states 'Residential development shall be located on the areas identified for residential and doctors surgery use on the site layout plan, with the exact location of the surgery to be determined having regard to accessibility to the main village and services, and landscape impact;' Sites in Horsmonden were discussed as part of Matter 7 Issue 13 in the hearings on 05.07.22.
187-1		Rother District Council			Other Matters		<p>Legally compliant / sound</p> <p>Rother DC are content any emerging or evolving cross-boundary strategic matters were addressed in the Submission Local Plan.</p> <p>Rother DC also note they are about to commence consultation on the Regulation 18 version of its Local Plan 2020-2040, and will need to ask neighbouring authorities whether they can assist in helping Rother meet its unmet local housing needs.</p>	This is noted. TWBC will continue to engage positively with RDC, though notes that as the revised development strategy does not meet the full growth needs of TWBC that the Council is unlikely to be in a position to assist RDC in meeting unmet housing need from RDC.

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
189-1	Peter Tavner				Other Matters	<p>The Inspector's Initial Findings in Paragraph 68 gives an indication of what modifications could be made to make the policy sound, as follows: "The conversion of existing structures and the house could also presumably take place without the construction of new buildings. Another way of making the Plan sound might therefore be to support the principle of the uses proposed but within the exceptions permitted by national planning policy. This would potentially be a different type of development to the one proposed by the site promoters. It is therefore a matter which requires further consideration by the Council on the most appropriate way forward."</p> <p>Based on the Inspector's comments, I conclude that the following changes could make the policy sound:</p> <ul style="list-style-type: none"> <li>- Conversion of the existing building at Mabledon House <u>only</u> with no new buildings or extensions to Mabledon House</li> <li>- A smaller hotel with considerably fewer beds than the proposed 200</li> <li>- Ensuring that the 'footprint' of the new hotel (including patio area, swimming pool, other facilities) does not exceed that of the existing development.</li> </ul>	<p>AL/SO 2 - legally compliant but unsound</p> <p>The Inspector's response makes it clear that changes are required to AL/SO 2 to make it sound, however, PS_054 is silent on the policy.</p> <p>Based on the Inspector's comments, the following changes are required to make the policy sound:</p> <ul style="list-style-type: none"> <li>• Conversion of the existing building at Mabledon House <u>only</u> with no new buildings or extensions to Mabledon House</li> <li>• A smaller hotel with considerably fewer beds than the proposed 200</li> <li>• Ensuring that the 'footprint' of the new hotel (including patio area, swimming pool, other facilities) does not exceed that of the existing development.</li> </ul>	<p>The Inspector has raised a number of concerns in regard to allocation Policy AL/SO2- Land at Mabledon House, which have been considered by the Council. <a href="#">Action Point 19</a> – Local Plan Examination Note for Inspector in response to Action Point 19 regarding Mabledon House, Southborough, provides further information on this matter.</p> <p>Any changes in relation to this site and policy will be the subject of consultation as part of the 'Proposed Main Modifications consultation' and do not fall within the scope of this current consultation. There will be opportunity for comment at that stage.</p>

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to Other Comments and Comments Outside Consultation Scope

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Consultation Point	Proposed Modifications	Comment Summary	TWBC Response
191-1 (received after the close of the consultation)	Leisa And Jim Nichols				Other Matters		<p>Concerned about Policy AL/RTW 19 and the proposals for a sports stadium on High Woods Lane.</p> <p>The addition of a stadium would be unacceptable in the National Landscape (formally AONB), which is a haven for local walkers, runners and cyclists. The impact on ancient woodland, hedgerows and wildlife would be appalling. Residents would be affected by noise and light pollution as well as additional traffic. Also concerned about the impact on Hawkenbury Allotments with respect to access, security and the views over the woodland.</p>	<p>Policy AL/RTW19 – Land to the north of Hawkenbury Recreation Ground was discussed at the hearing session on the 21 June 2022 and the Council's response is set out in <a href="#">Hearing Statement</a> Matter 7: Residential Site Allocations, Issue 1: Royal Tunbridge Wells and Southborough (Inspectors questions 39-46).</p> <p>Further to the Hearing Sessions, the Council produced <a href="#">Action Point 13</a> – Local Plan Examination Note for Inspector in response to Action Point 13 regarding Policy AL/RTW19 (Land at Hawkenbury) and AL/RTW22 (Land at Bayham West), in response to questions raised through the Hearing Sessions. This Action Point sets out further detail on the Sports Hub proposal and further supporting information as well as proposed amendments to the Policy and Supporting text.</p> <p>The amendments proposed to this policy are not the subject of the current consultation in response to the Inspectors Initial Findings. Any changes in relation to this site and policy will be the subject of consultation as part of the 'Proposed Main Modifications consultation' and do not fall within the scope of this current consultation. There will be opportunity for comment through the 'Proposed Main Modifications' process.</p>