

Tunbridge Wells Borough



Tunbridge Wells Borough Council

Authority Monitoring Report 2019/20

February 2021



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1.0 Introduction

- 1.1 This Local Plan Authority Monitoring Report (AMR) monitors progress in relation to:
- a) the **Planning Context** that serves to highlight key demographic, social, economic and environmental characteristics of the borough, with a commentary on the extent to which any changes over the last year or so bear upon planning policy aims;
 - b) **Local Plan preparation**, having regard to the timetable and milestones set out in the programme previously set out in the Local Development Scheme (LDS);
 - c) the preparation and making of **Neighbourhood Development Plans** in the borough;
 - d) actions undertaken in plan-making to meet the '**Duty to Cooperate**' on strategic matters;
 - e) the **effectiveness of Core Strategy policies** and the extent to which they are successful in achieving the Council's strategic aims for the borough; and,
 - f) the **updating and refinement of monitoring frameworks** that will be used to assess the sustainability of, as well as the effectiveness of, policies in the new Local Plan.
- 1.2 This AMR is split into sections, dealing with each of the above areas of interest in turn.
- 1.3 This AMR, in conjunction with the Council's Housing Monitoring Reports ([see Monitoring Information](#)), fulfils the Council's obligation to produce an AMR containing the above information at least annually and to make it publicly available ([see Regulation 34 of the Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#)). It relates to the period 01 April 2019 to 31 March 2020 as it coincides with the statistical monitoring period, although in some cases data and commentary is added relating to more recent events where this is considered to be helpful.
- 1.4 In future years, it is intended that the AMR will be published as soon as the annual monitoring data, including for housing land and development, is available, which is normally anticipated to be around mid-year.

2.0 Planning Context

2.1 This section reviews ‘contextual Indicators’ that relate to the wider social, environmental and economic conditions prevalent within the borough and which provide a broad framework against which to assess the appropriateness of planning policies.

2.2 Reviewing these indicators also fulfils the requirements of Section 13 of the Planning and Compulsory Purchase Act 2004, which states:

‘Survey of area

(1) The local planning authority must keep under review the matters which may be expected to affect the development of their area or the planning of its development.

(2) These matters include—

- (a) the principal physical, economic, social and environmental characteristics of the area of the authority;*
- (b) the principal purposes for which land is used in the area;*
- (c) the size, composition and distribution of the population of the area;*
- (d) the communications, transport system and traffic of the area;*
- (e) any other considerations which may be expected to affect those matters;*
- (f) such other matters as may be prescribed or as the Secretary of State (in a particular case) may direct.*

(3) The matters also include—

- (a) any changes which the authority think may occur in relation to any other matter;*
- (b) the effect such changes are likely to have on the development of the authority’s area or on the planning of such development.’*

2.3 In this AMR, a wide variety of contextual indicators are considered and grouped across three broad subject areas:

- **Communities & Housing**
- **Economy & Business**
- **Environment**

Communities and Housing

2.4 Key indicators are regarded as being around the population size, its age range and spatial distribution, as well as projections for changes in these. Insofar as planning is primarily concerned with the land use implications of meeting people’s evolving

needs, information about household characteristic is also reviewed. Relating to this is information about the affordability of homes, as well as wider measures of prosperity/deprivation.

Borough Profile

- 2.5 Tunbridge Wells borough lies in the south west of Kent, bordering East Sussex to the south. It covers an area of 326 square kilometres. The borough borders the local authorities of Sevenoaks, Tonbridge & Malling, Maidstone and Ashford in Kent; and Rother and Wealden in East Sussex.
- 2.6 The main town is Royal Tunbridge Wells. Together with Southborough it forms the 'main urban area', but has a separate, smaller town centre. The towns/settlements of Paddock Wood, Cranbrook, and Hawkhurst also serve a wider rural hinterland, with a range of more local services.

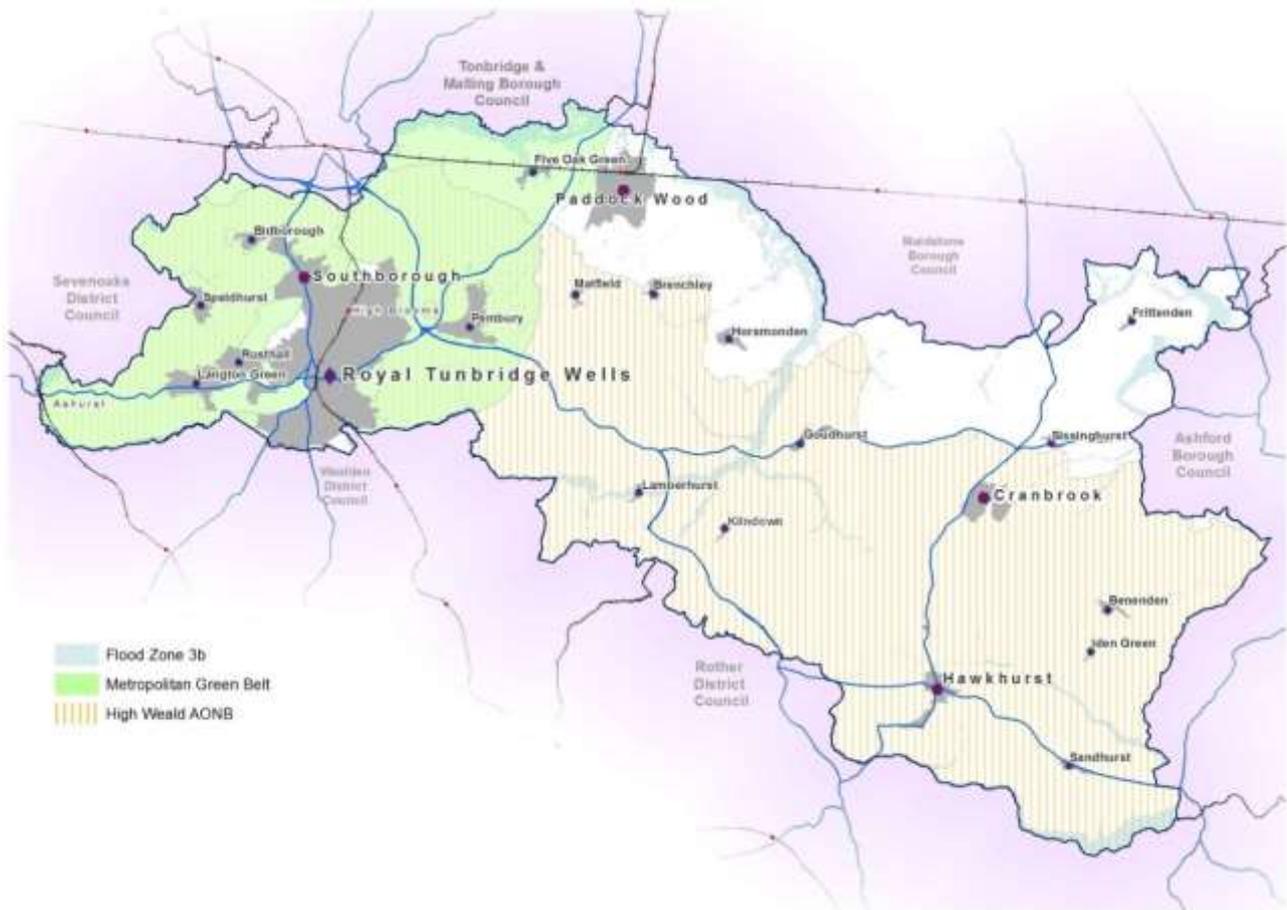


Figure 1: Borough Overview Map

Population

Table 1: Population Projection for Tunbridge Wells Borough 2020-2040 (Source: ONS, 2018-Based Projections)

Data	2020	2024	2028	2032	2036	2040
Population	118,848	120,547	121,741	122,869	124,242	125,803

2.7 The projections in **Table 1** are those produced by the Office of National Statistics (ONS; [see ONS 2018 Population Projections for Local Authorities: Table 2](#)), using 2018-based data. They suggest that the borough’s population is likely to increase by 6,955 (approximately 5.9%) over a 20-year period 2020-2040. The forecast also provides a breakdown of the population forecast by gender.

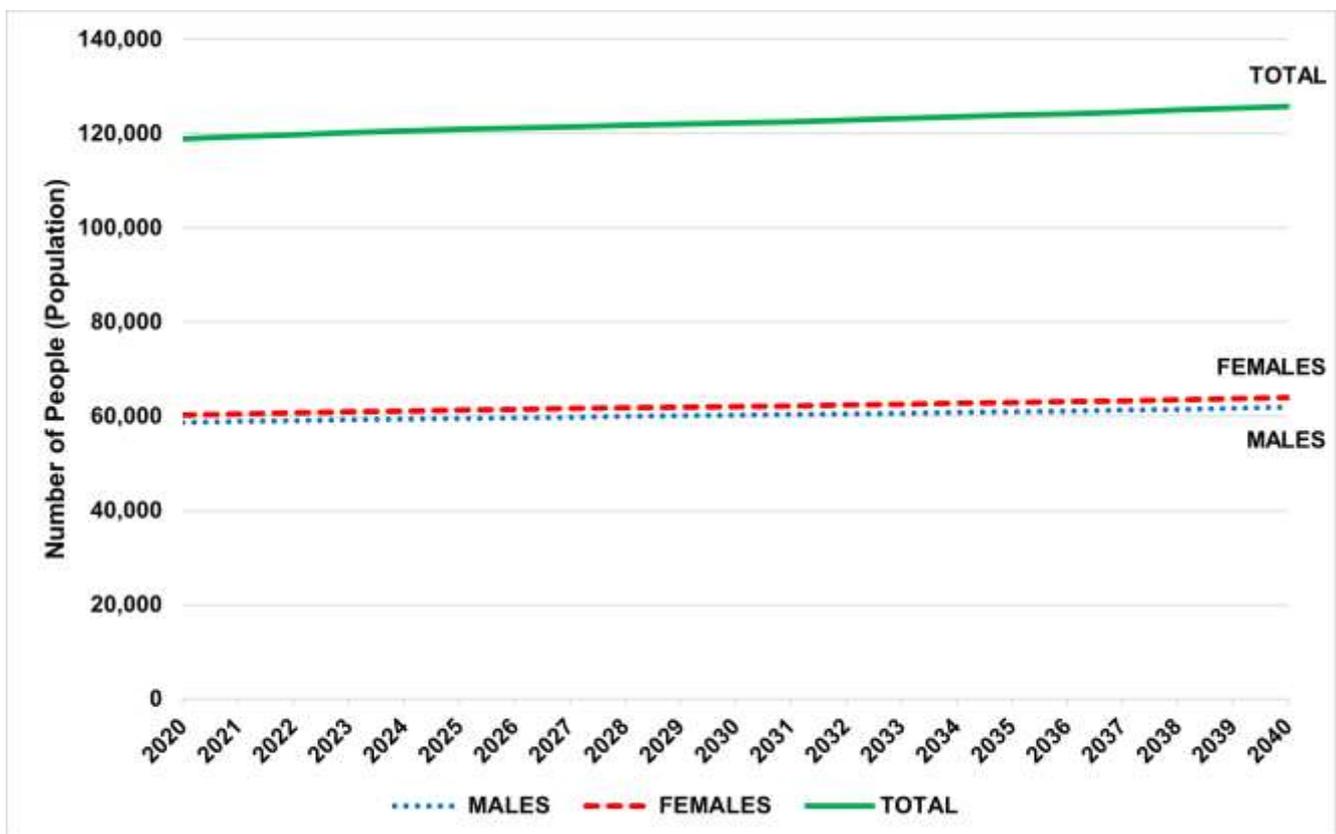


Figure 2: Population Projection by Gender for Tunbridge Wells Borough 2020-2040 (Source: ONS, 2018-Based Projections)

2.8 As shown in **Figure 2**, there are very slightly more females than males currently within the borough of Tunbridge Wells (1,552 more females than males in 2020). This gap is predicted to increase to around 2,041 individuals by 2040.

Age Structure

2.9 From the borough population by age ([see ONS 2018 Population Projections for Local Authorities: Table 2](#)), it can be seen that the overall size of the population between 15-64 years of age is predicted to decrease by around 1% between 2020 and 2040 and the child population (0-14) is set to decrease by around 11%. These are relatively modest decreases when compared to the increase of 43.3% in the age 65 and over years category. **Figure 3** below illustrates this trend towards an ageing population.

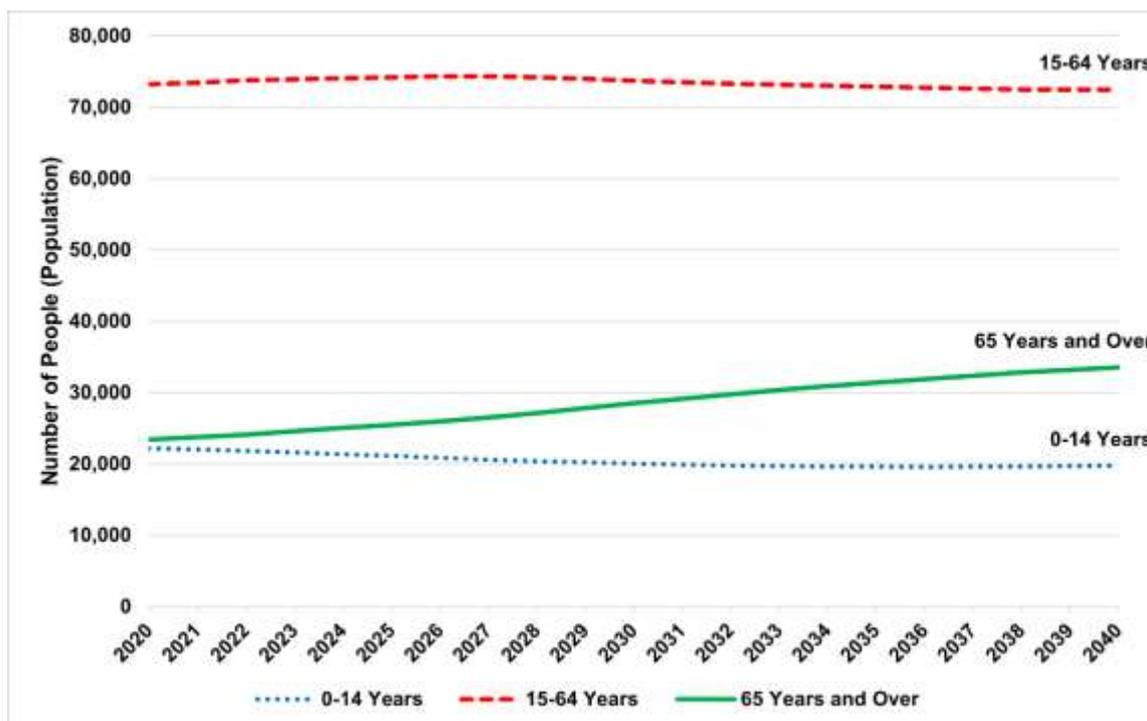


Figure 3: Population Projection by Age for Tunbridge Wells Borough 2020-2040 (Source: ONS, 2018-Based Projections)

Household Projections

2.10 **Table 2** below shows that, based on past trends and future estimates, a 12.9% increase in the number of households in the borough is anticipated over a 20-year period to 2040.

Table 2: Household Projections for Tunbridge Wells Borough 2020-2040 (Source: ONS, 2018-Based Projections)

Data	2020	2024	2028	2032	2036	2040
Households	49,872	51,306	52,686	53,960	55,177	56,314

2.11 The above figures are based on the most recent, ONS 2018 Household Projections ([see ONS 2018 Household Projections for England](#)). However, it should be noted

that the projected increase in households up to 2040 based on the latest 2018 data is much lower than the projected increase in the previous 2014 Household Projections which are the figures to be used in calculating the objectively assessed need via the standard method unless required otherwise by the Government. This is further explained in the Planning Practice Guidance (see [Housing and Economic Needs: paragraph 005 Reference ID: 2a-005-20190220](#)) which states that ‘*the 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes*’. It is further added that ‘*any method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method as set out in [paragraph 60 of the National Planning Policy Framework](#) ... it is not considered that these projections provide an appropriate basis for use in the standard method*’ (paragraph 015 Reference ID: 2a-015-20190220).

- 2.12 The upcoming Pre-Submission Local Plan will therefore be expected to seek to meet housing need based on the 2014-based household projections as calculated via the Standard Method. The Regulation 19 Housing Needs Assessment and Housing Supply and Trajectory Topic Papers will explain in more detail how this need is calculated.
- 2.13 Projections are also available, albeit over a somewhat longer timeframe, between 2018 and 2043, of changes in types of household (see [ONS 2018 Household Projections for England](#)). As presented in **Table 3**, these show clear trends in increases in the number of one-person and 2 or more person households, as well as a relatively small decrease in the number of households with two and three or more dependent children.

Table 3: Projected Household Composition for Tunbridge Wells Borough 2018-2043 (Source: ONS, 2018-Based Projections)

Category of Households	2018	2043	% Change
One Person Households: Female	7,779	10,073	29.5%
One Person Households: Male	6,918	8,258	19.4%
Total: One Person Households	14,697	18,331	24.7%
Households with One Dependent Child	5,816	5,819	0.05%
Households with Two Dependent Children	5,595	5,357	-4.3%
Households with Three or More Dependent Children	2,623	2,496	-4.8%
Other Households with Two or More Adults	20,392	25,158	23.4%

Ethnic composition

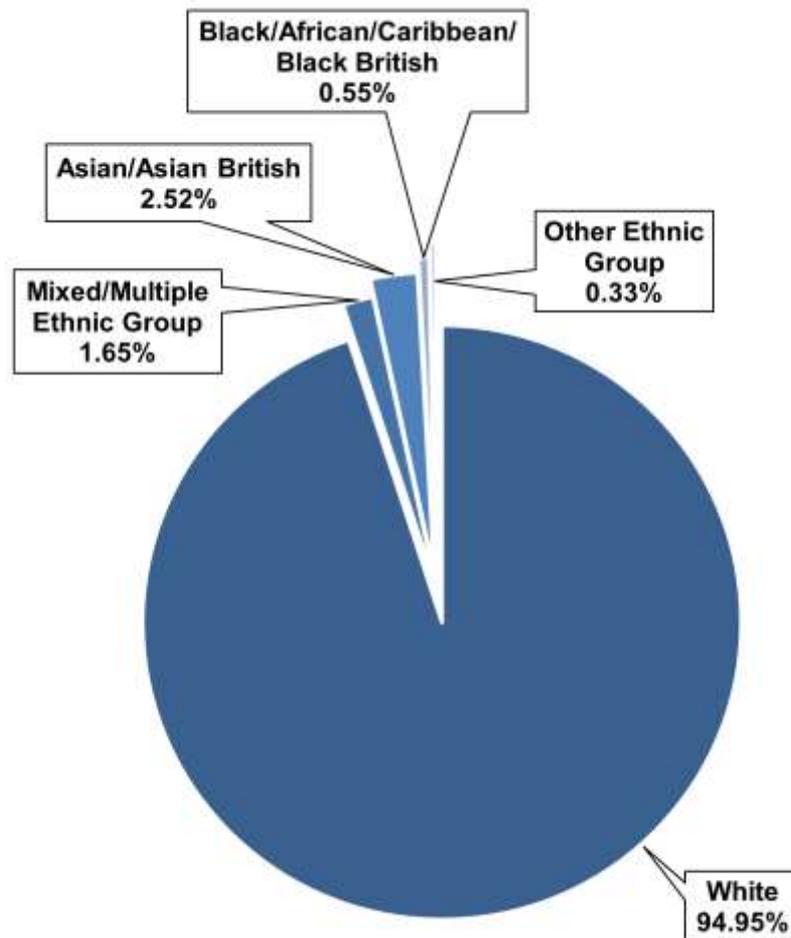


Figure 4: Tunbridge Wells Ethnic Composition as at 2011 Census (Source: ONS, 2012)

2.14 As shown in **Figure 4**, in 2011, 94.95% of the population was classified as White, which is slightly lower than in the 2001 Census at 97.53% (ONS, 2012; [see 2011 Census: Key Statistics for Local Authorities in England and Wales](#)).

Deprivation

2.15 The Index of Multiple Deprivation (IMD) provides a weighted average figure for the levels of deprivation in an area (MHCLG, 2019: [see English Indices of Deprivation](#)). It is reported at the spatial scale of Lower Super Output Areas (LSOAs). The IMD consists of six separate 'domain' indices, which are weighted as follows in order to arrive at an overall IMD value: Education, Skills Training 13.5%, Employment 22.5%, Crime 9.3%, Health Deprivation & Disability 13.5%, Barriers to Housing and Services 9.3%, Income 22.5%, and Living Environment 9.3%.

2.16 Based on their IMD value, it is possible to rank all LSOAs across the country with a view to assessing relative deprivation. **Table 4** identifies the 2015-2019 difference in

IMD rankings across the borough by number of LSOAs, and **Figure 5** shows where the LSOAs in Tunbridge Wells fall within the overall national ranking of LSOAs in 2019; the lower the percentage, the more deprived an area is. One LSOA, in Sherwood ward, falls within the 0-20% most deprived category; five LSOAs (in the Broadwater, Southborough and High Brooms, Rusthall and Sherwood wards) fall within the 20.01-40% most deprived category. There has been a small decline in the 60-100% least deprived categories across the borough, with more areas now scoring <60%.

Table 4: 2015-2019 Difference in IMD Rankings Across the Tunbridge Wells Borough by Number of LSOAs (Source: MHCLG, 2019)

		No. of Lower Super Output Areas		
Level of Deprivation	Percentage	2015	2019	Change
Most Deprived	0.00-20.00	1	1	0
	20.01-40.00	3	5	+2
	40.01-60.00	13	15	+2
	60.01-80.00	21	18	-3
Least Deprived	80.01-100.00	30	29	-1

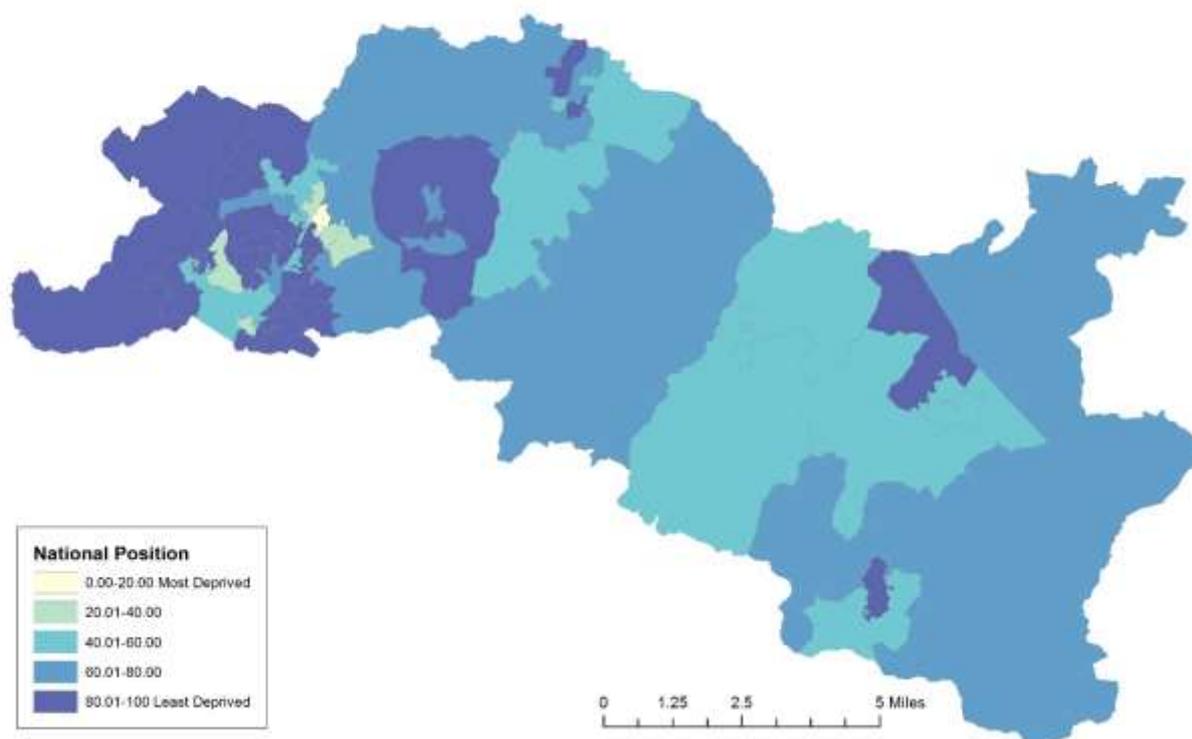


Figure 5: 2019 IMD Scores Across the Tunbridge Wells Borough (Source: MHCLG, 2019)

School Provision Across the Borough

2.17 **Figure 6** illustrates the number of pupils currently on roll as well as the capacity of schools at both primary and secondary level (KELSI, 2020; see [Facts and Figures](#)). The dashed lines represent the space availability (%) at both primary and secondary schools across the borough.

2.18 **Figure 6** shows that, while the number of pupils on roll has increased over the last few years, the availability of places has been able to keep up with demand. There has generally been an increase in the availability of primary school places within the borough over the previous 8 years. However, while secondary school availability has gradually fallen, it still remains at around 6%, albeit had a relatively large decrease from 9.93% in 2019 to 6.24% in 2020, although this reflects a higher increase in the number of pupils on roll in 2019 and 2020 than the average in the preceding 6 years. However, it should be noted that while this presents the borough-wide position, there may be local variations.

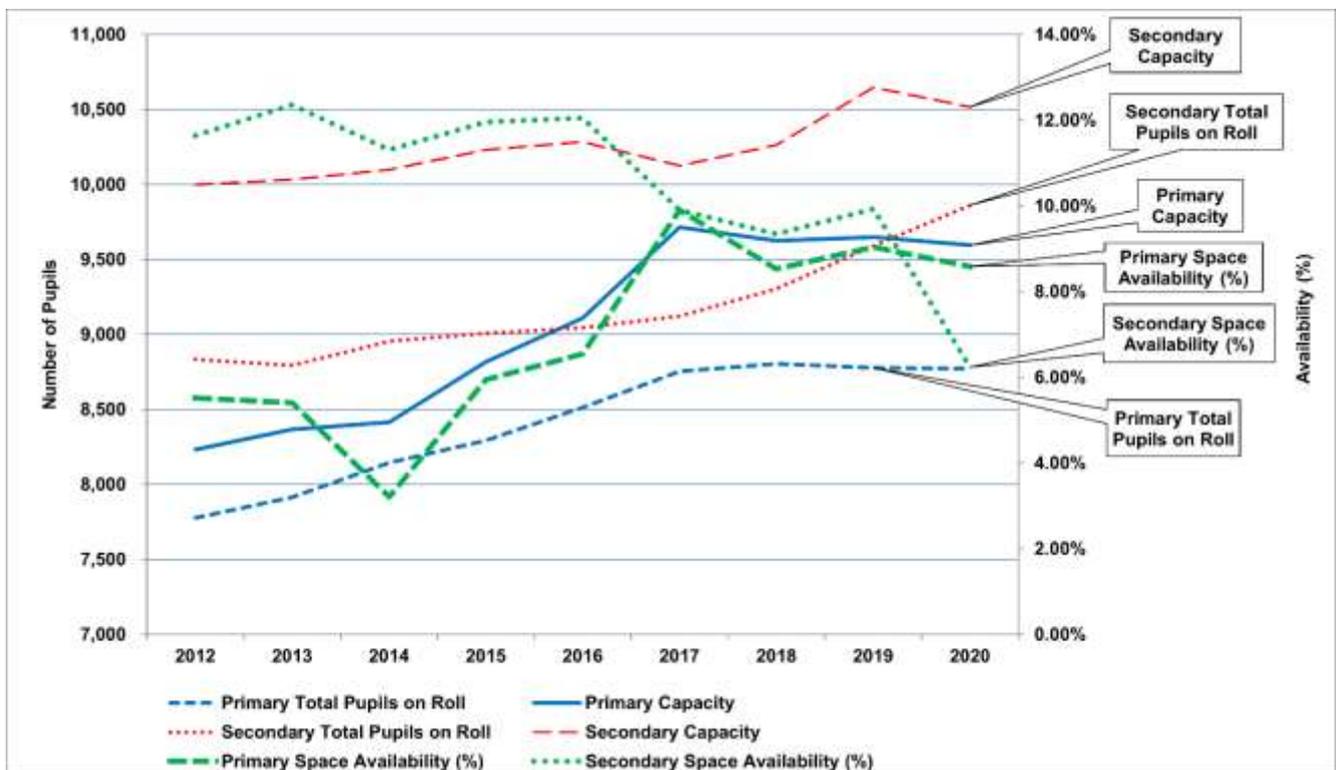


Figure 6: School Provision Across the Borough (Source: KELSI, 2020)

Crime

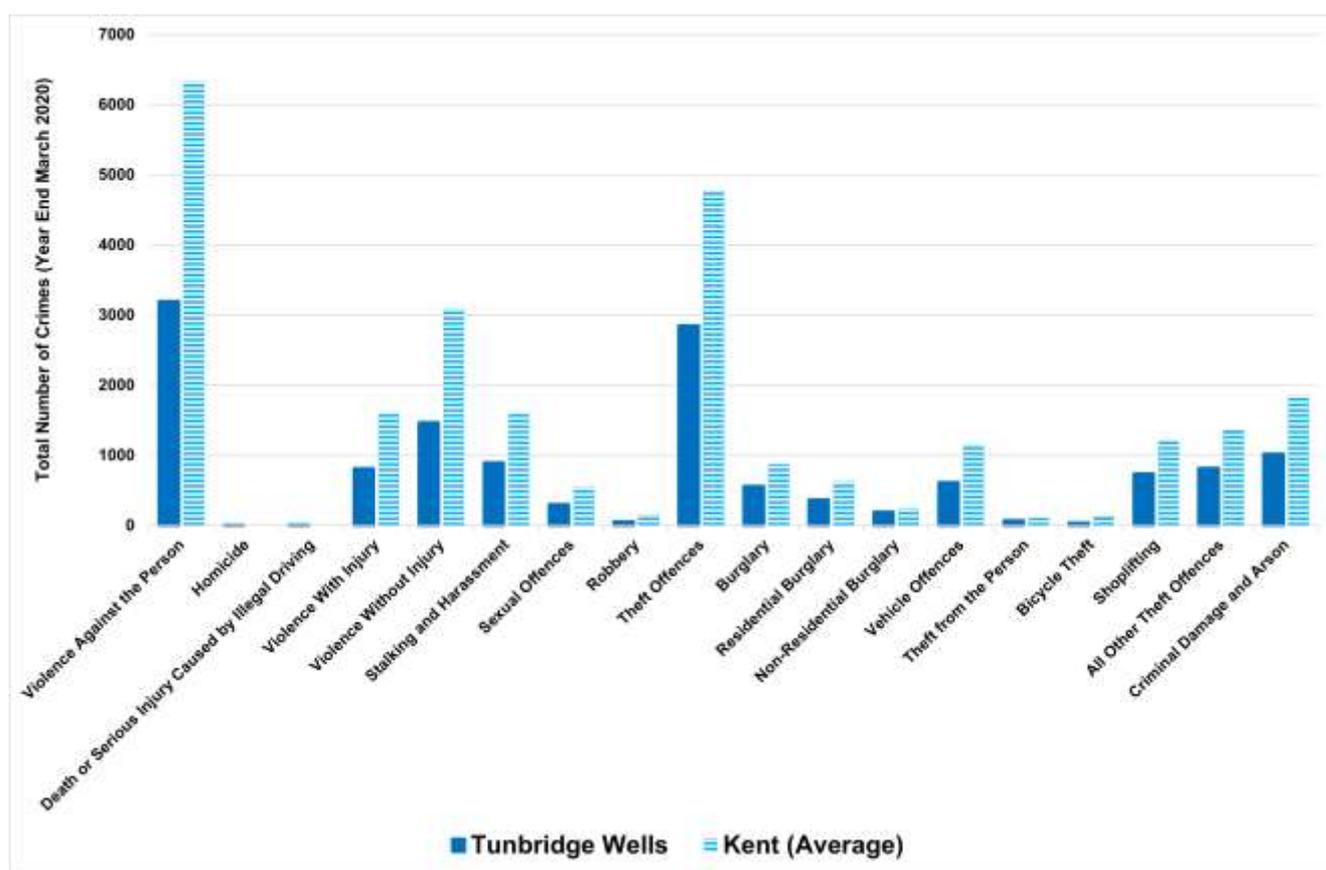


Figure 7: Level of Crime Across the Borough, Year Ending March 2020 (Source: ONS, 2020)

2.19 The borough experiences a lower level of crime than the average found across the county of Kent (in most cases around half the average). **Figure 7** illustrates the differences in crime rates between Tunbridge Wells and the Kent average (ONS, 2020; [see Recorded Crime Data by Community Safety Partnership Area](#)). It can be seen that differences exist across all crime types.

House Prices

2.20 **Figure 8** below shows average house prices across Tunbridge Wells, Kent and South-East England by quarter from January 2006 to September 2020 (HM Land Registry, 2020; [see UK House Price Index](#)). It shows that Tunbridge Wells borough continues to have higher average house prices than the rest of Kent and South-East England. It also shows that average house price trends in all three areas have followed a similar pattern. Since March 2006, the average price of a house in Tunbridge Wells has increased by £160,111; an increase of 68%. Comparatively, increases of 65% (£119,248) and 65% (£132,569) have been seen across Kent and South-East England respectively.

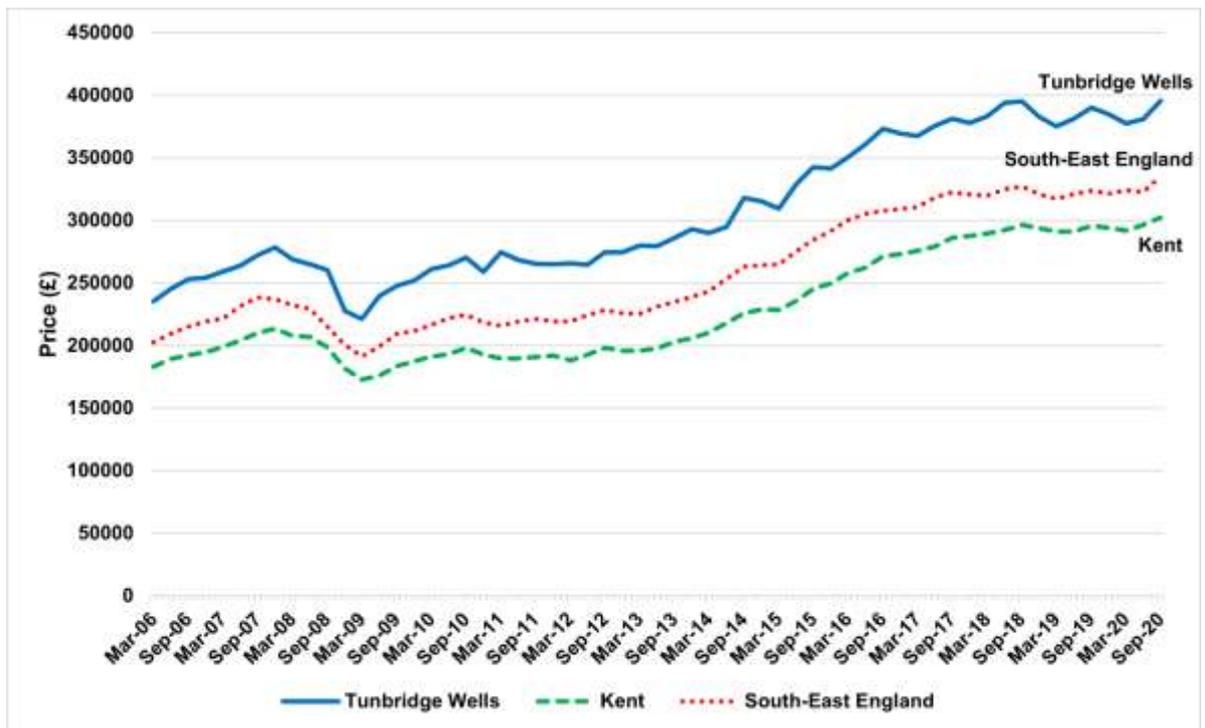


Figure 8: Average House Prices in Tunbridge Wells Borough, Kent, and South-East England (Source: HM Land Registry, 2020)

2.21 **Figure 9** shows that the higher relative house prices in the borough applies across all house types as at September 2020 (HM Land Registry, 2020; [see UK House Price Index](#)).

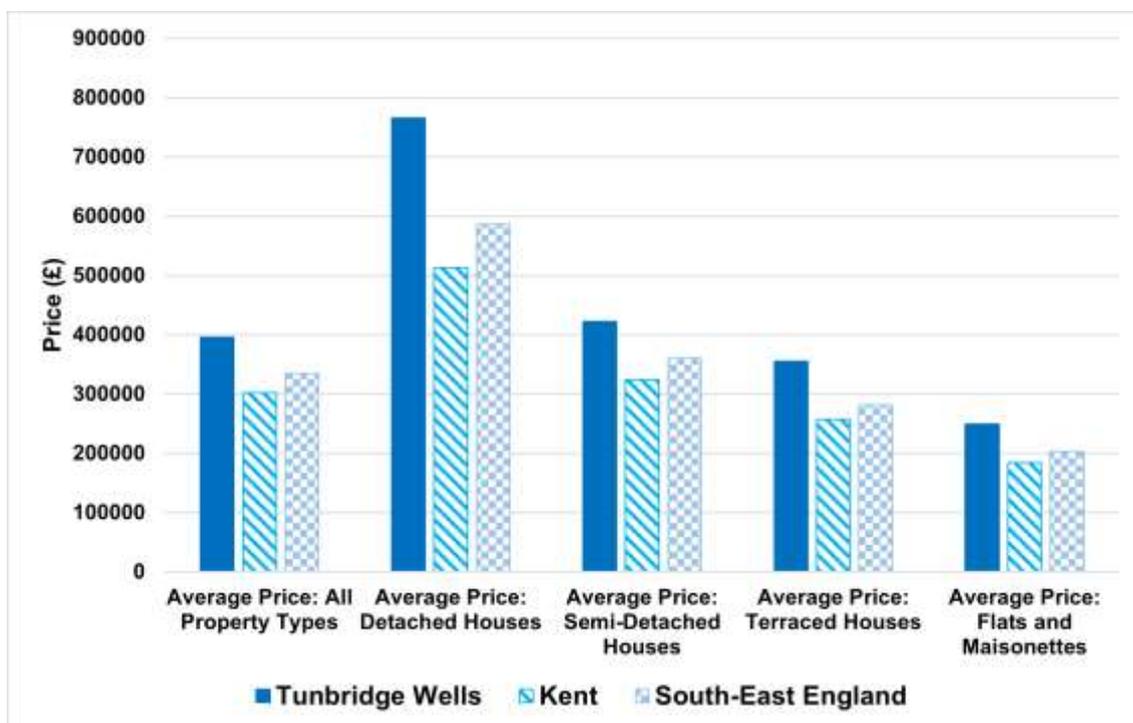


Figure 9: Average House Prices by Dwelling Type in Tunbridge Wells Borough, Kent, and South-East England as at September 2020 (Source: HM Land Registry, 2020)

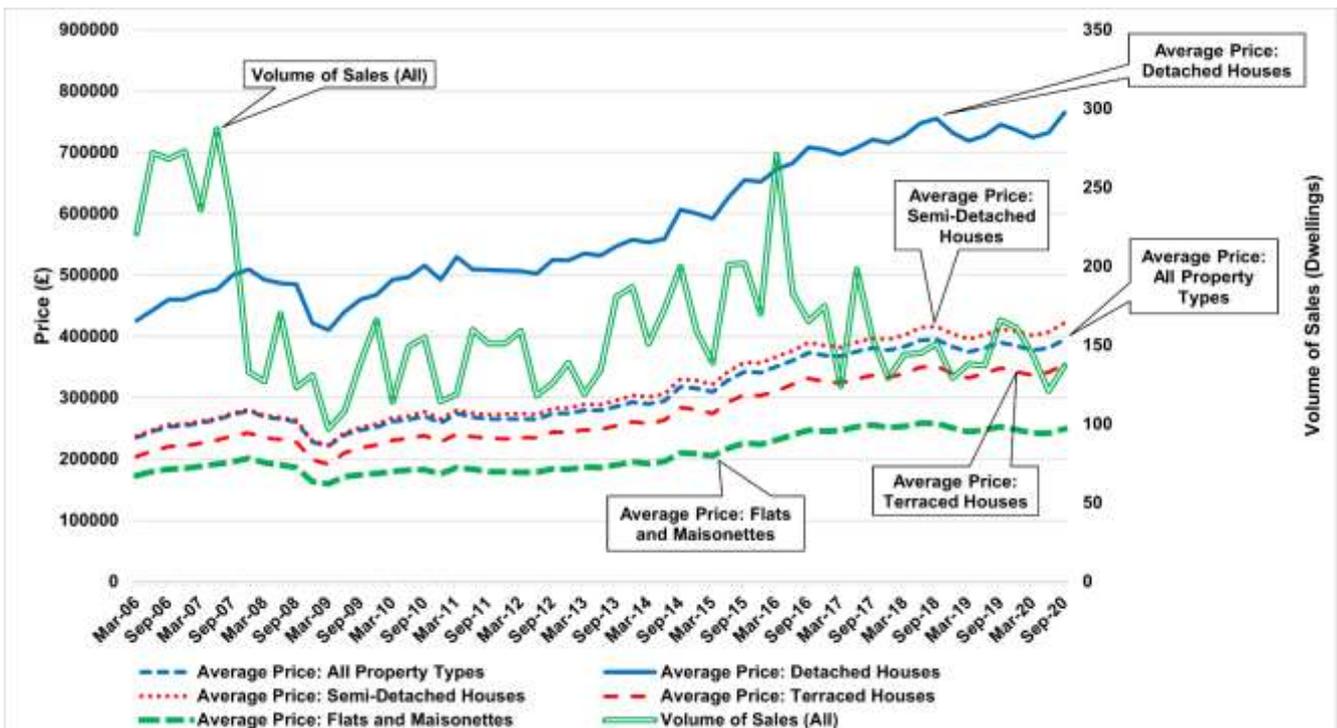


Figure 10: House Prices by Dwelling Type, and Volume of Sales in Tunbridge Wells Borough (Source: HM Land Registry, 2020)

2.22 **Figure 10** shows that, following a fall in average house prices for all types of dwelling around the end of 2008, all types have experienced a rising trend in average prices (HM Land Registry, 2020; [see UK House Price Index](#)). The largest increase was in the price for detached dwellings, which was 79.76% higher in September 2020 than in March 2006. In terms of the volume of sales, **Figure 10** also shows that there has been a fall of 38% in average sales between March 2006 and September 2020. This can clearly be seen as a continuing legacy of the 2008 fall despite a peak in 2016.

Dwelling Stock

2.23 **Figure 11** shows that, as at 31 March 2019, Tunbridge Wells Borough has a slightly higher overall percentage of household spaces in flat/maisonettes, detached, and semi-detached dwellings compared to the percentage for England, South-East England, and Kent, accounting for approximately 73% of the total dwelling stock in the borough (KCC, 2020; [see Strategic Commissioning Statistical Bulletin, August 2020; Housing Stock 2019: Kent Local Authorities](#)). However, the borough has a lower overall percentage for terraced housing (19%) and Bungalows (6%) compared to the percentage for England, South-East England, and Kent.

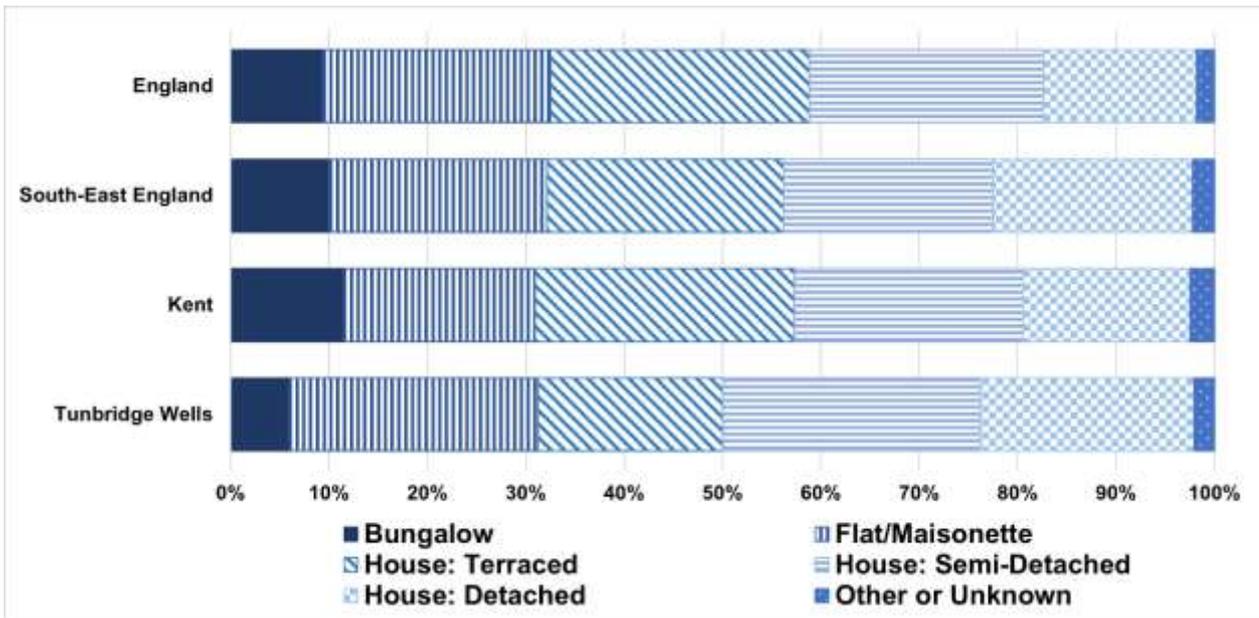


Figure 11: Dwelling Stock by Dwelling Type as at 31 March 2019 (Source: KCC, 2020)

2.24 As shown in **Figure 12**, in terms of tenure balance, as at 01 April 2019 approximately 85.85% of the dwelling stock within the Borough is owner occupied or private rented accommodation, which is higher than the average for England at 82.6%, but less than that for Kent at 86.74% (MHCLG, 2020; [see Live Tables on Dwelling Stock \(Including Vacants\)](#)). The majority of the remaining stock in the borough is owned by Private Registered Providers (14.04%). Only 0.11% of the dwelling stock in the borough is owned by the Local Authority, compared to 4.54% and 6.5% in Kent and England respectively.

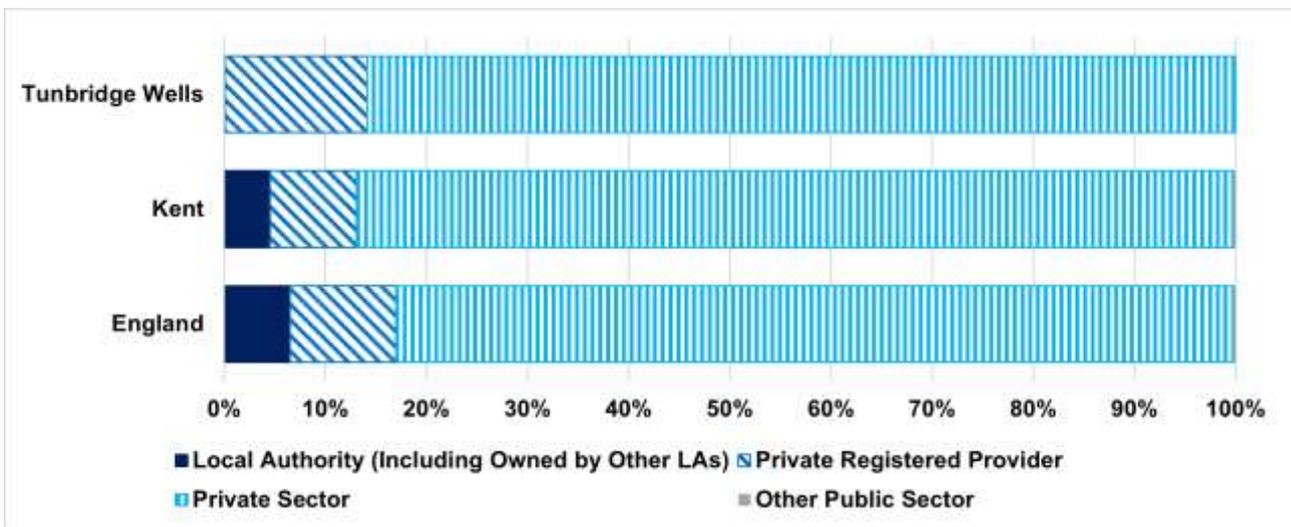


Figure 12: Dwelling Stock by Tenure as at 01 April 2019 (Source: MHCLG, 2020)

2.25 **Table 5** shows the annual increase in the dwelling stock in Tunbridge Wells borough, Kent, and England over the last 5 years (KCC, 2020; [see Strategic Commissioning Statistical Bulletin, August 2020; Housing Stock 2019: Kent Local Authorities](#)). This indicates a similar level of increase at 4.5% for both Tunbridge Wells and England, and slightly higher at 5.2% for Kent.

Table 5: Total Dwelling Stock as at 31 March 2019 (Source: KCC, 2020)

Area	2015	2016	2017	2018	2019
Tunbridge Wells	49,440	49,880	50,340	50,790	51,340
Kent	650,000	656,760	663,970	672,010	678,860
England	23,543,000	23,733,000	23,950,000	24,172,000	24,414,000

Housing Affordability

2.26 Affordability ratios provide an important indication of the level of housing affordability in an area, measured at the ratio of house prices to annual workplace-based earnings; therefore, generally, the lower the ratio, the more housing is considered affordable in relation to incomes. **Figure 13** shows that in 2019, the lower quartile affordability ratio was 11.88 in Tunbridge Wells, representing a 16% increase since 2006, from 10.24 (ONS, 2020; [see House Price to Workplace-Based Earnings Ratio](#)). Indeed, the relative affordability of homes in Kent as a whole has followed a similar negative trend in both absolute terms and relative to the rest of England, albeit has remained below the ratio in Tunbridge Wells. This trend is likely to largely reflect the relative economic strength of London and its housing market.

2.27 As shown in **Figure 14**, for the median house price to median gross annual workplace-based earnings ratio, a very similar pattern can be identified, with Tunbridge Wells' affordability ratio being worse off than both the County and Country. Indeed, in 2019, the median affordability ratio was 12.48 in Tunbridge Wells, representing 25.8% increase since 2006, from 9.92. This therefore means that, in relative terms, those in Tunbridge Wells on median incomes have seen increasing housing unaffordability than those on lower quartile incomes since 2006.

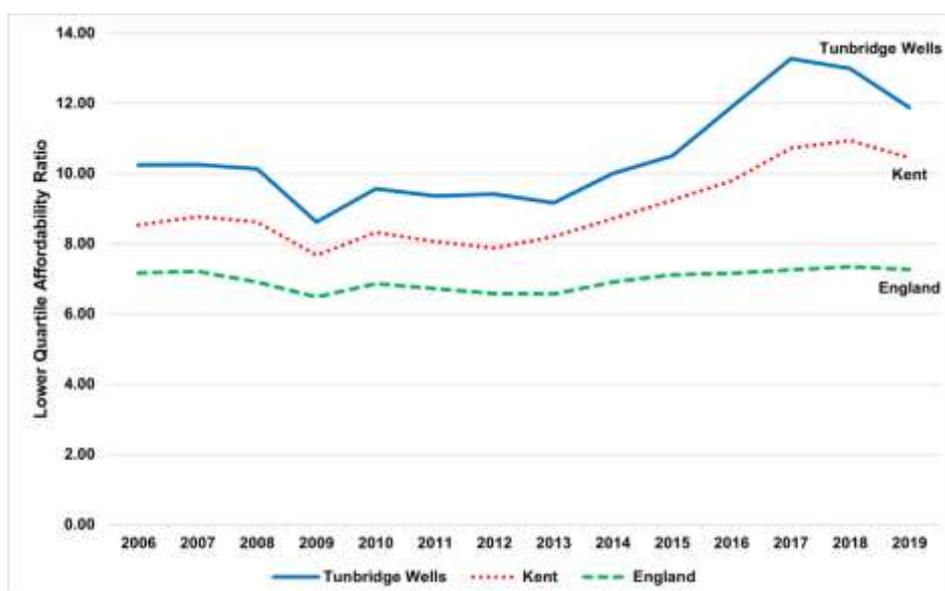


Figure 13: 2006-2019 Ratio of Lower Quartile House Prices to Lower Quartile Gross Annual (Where Available) Workplace-Based Earnings in Tunbridge Wells, Kent, and England (Source: ONS, 2020)

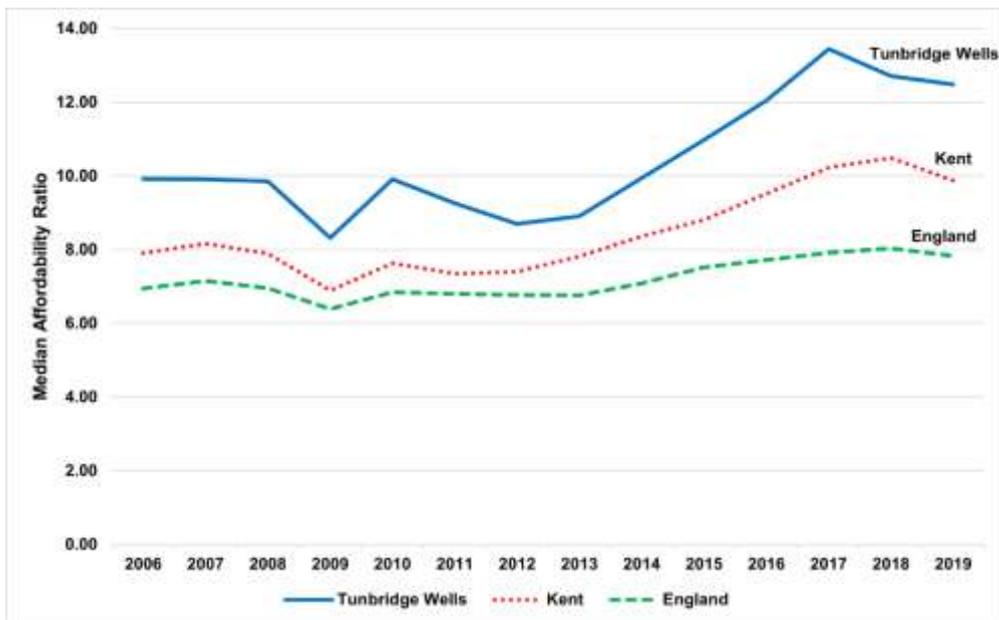


Figure 14: 2006-2019 Ratio of Median House Prices to Median Gross Annual (Where Available) Workplace-Based Earnings in Tunbridge Wells, Kent, and England (Source: ONS, 2020)

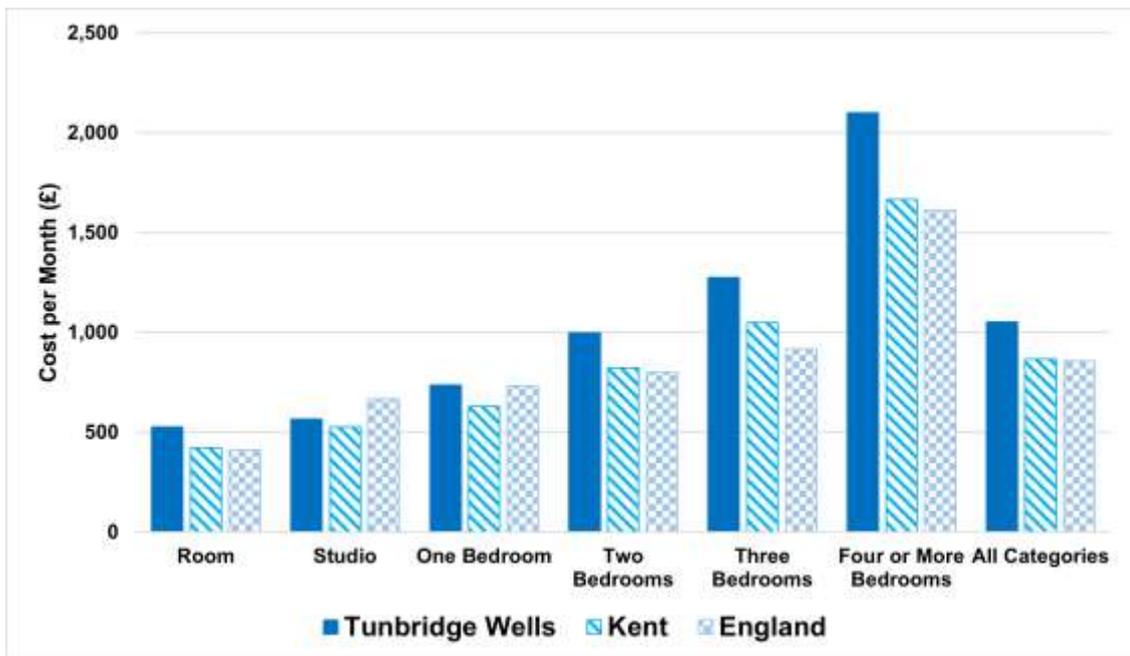


Figure 15: Mean Monthly Private Rent in Tunbridge Wells, Kent, and England for 01 April 2018 – 31 March 2019 (Source: VOA, 2019)

2.28 **Figure 15** shows that it is also more expensive to rent all types of property in Tunbridge Wells borough with the exception of studio flats when compared with Kent and England figures, with the mean rent for all dwelling types in Tunbridge Wells being 21.1% higher than in Kent, and 22.6% higher than in England (Valuation Office Agency (VOA), 2019; [see Private Rental Market Summary Statistics: April 2018 to March 2019](#)). The largest difference between Tunbridge Wells and Kent is found on four or more bedroomed properties, where the mean/average monthly private rent is 25.9% greater in Tunbridge Wells than in

Kent. On the other hand, the largest difference between Tunbridge Wells and England is found on three bedroomed properties, where the mean/average monthly private rent is 39.3% greater in Tunbridge Wells than in England.

Economy and Business

2.29 The data in this sub-section is obtained from NOMIS (2020; [see Labour Market Profile – Tunbridge Wells](#)). **Figure 16** shows that the number of people in Tunbridge Wells borough who are economically active (i.e. those in work or actively seeking work) has fluctuated significantly from April 2004 – March 2005 to April 2019 – March 2020, having overall only increased by 100 people from 56,500 to 56,600. The percentage of the population in the borough that are economically active has likewise fluctuated over the same period, although has decreased from 82.5% to 79.7%.

2.30 As shown in **Table 6**, the total number of jobs has also increased in the borough from 59,000 in 2011 to 65,000 in 2019, and likewise job density (measured as a ratio of total jobs to population aged 16-64) has increased from 0.82 to 0.91 suggesting that there have been an increase in employment opportunities for the 16-64 age group in absolute and relative terms. As shown in **Table 7**, although there is no data on the number of employee jobs prior to 2015, the number of employee jobs has decreased from 61,000 in 2015 to 51,000 in 2019, suggesting that there may have been an increase in the number of self-employment (as the number of total jobs decreased by only 8,000 in the same period).

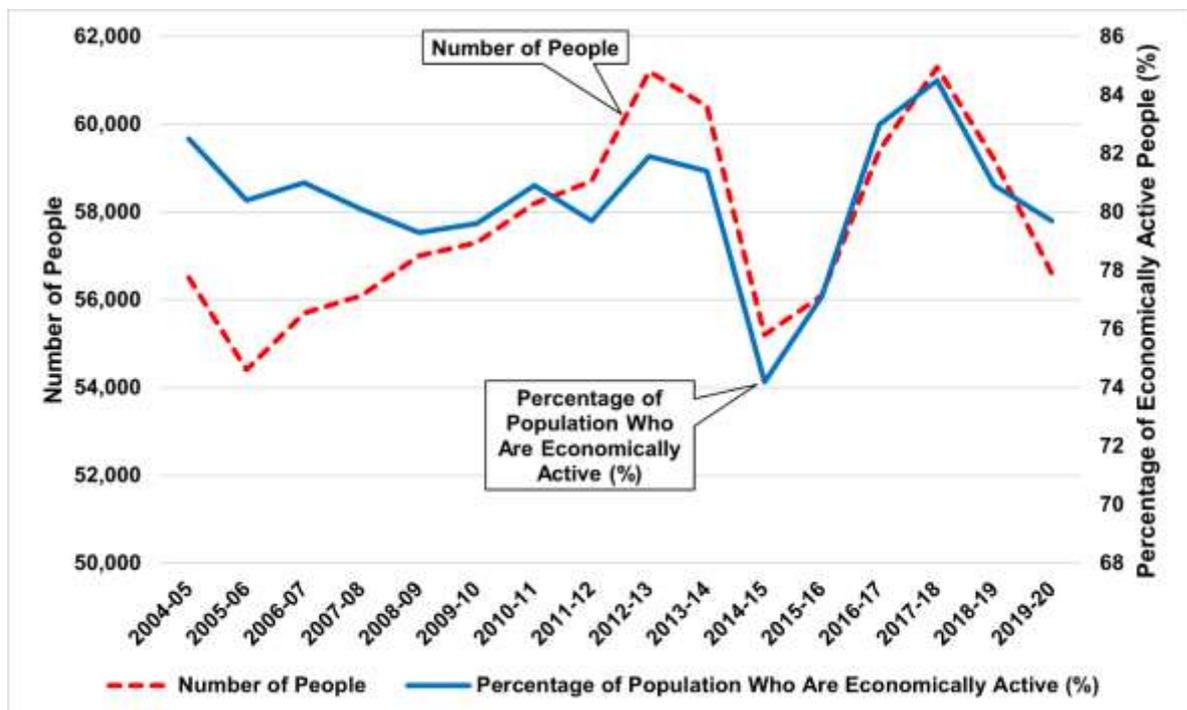


Figure 16: Number of Economically Active People Aged 16 and Over, and Percentage of Economically Active People Aged 16-64 in Tunbridge Wells Borough as at Each April-March Period (Source: NOMIS, 2020)

Table 6: Total Number of Jobs and Job Density in Tunbridge Wells Borough 2011-2019 (Source: NOMIS, 2020)

	2011	2012	2013	2014	2015	2016	2017	2018	2019
Total Jobs	59,000	56,000	57,000	65,000	73,000	66,000	65,000	62,000	65,000
Job Density	0.82	0.78	0.8	0.91	1.02	0.92	0.90	0.86	0.91

Table 7: Employee Jobs in Tunbridge Wells Borough 2011-2019 (Source: NOMIS, 2020)

Employee Jobs	2011	2012	2013	2014	2015	2016	2017	2018	2019
Total Employee Jobs	N/A	N/A	N/A	N/A	61,000	53,000	51,000	50,000	51,000

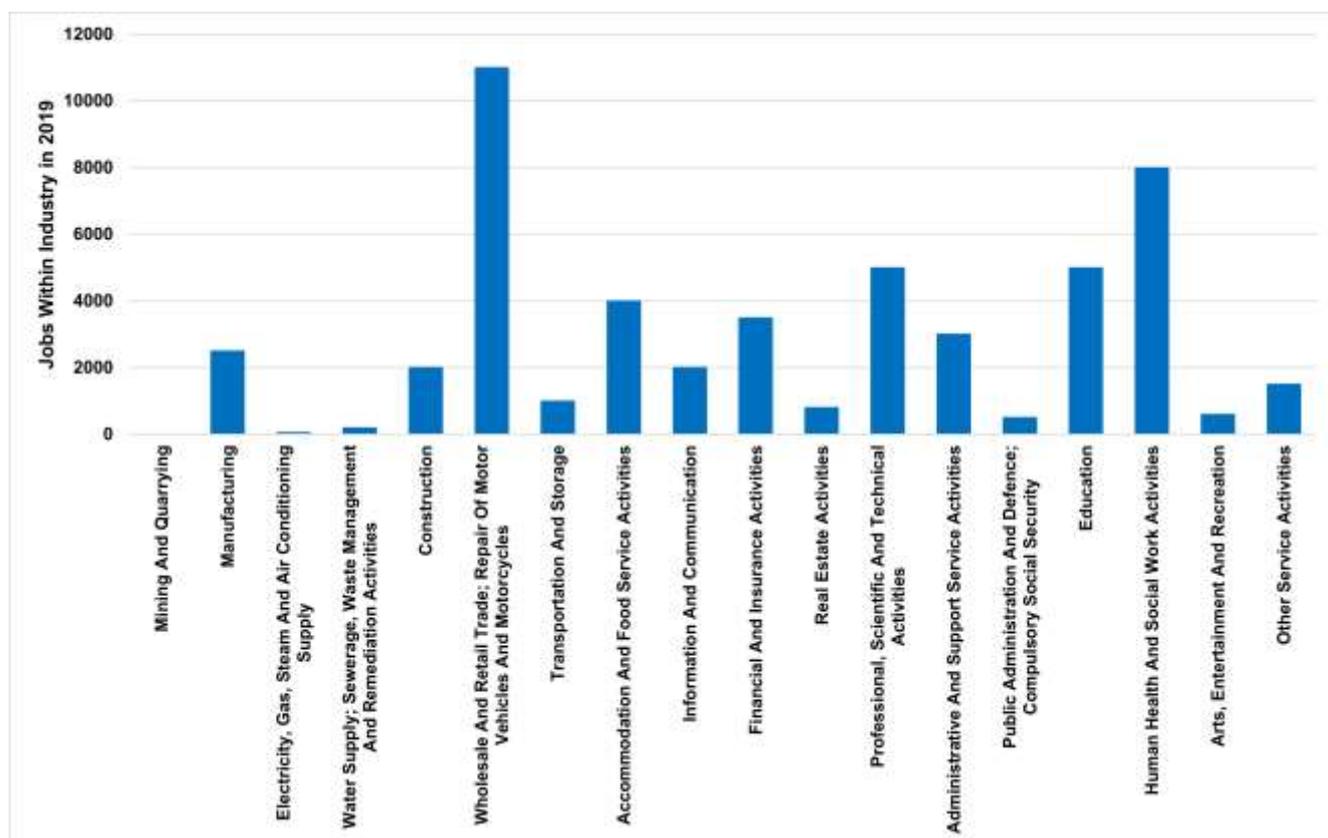


Figure 17: Employee Jobs Within Tunbridge Wells Borough by Industry in 2019 (Source: NOMIS, 2020)

2.31 **Figure 17** provides an overview of the makeup of jobs across the borough. As such, it is evident that the largest industries in the borough are wholesale and retail trade and human health and social work activities.

Unemployment

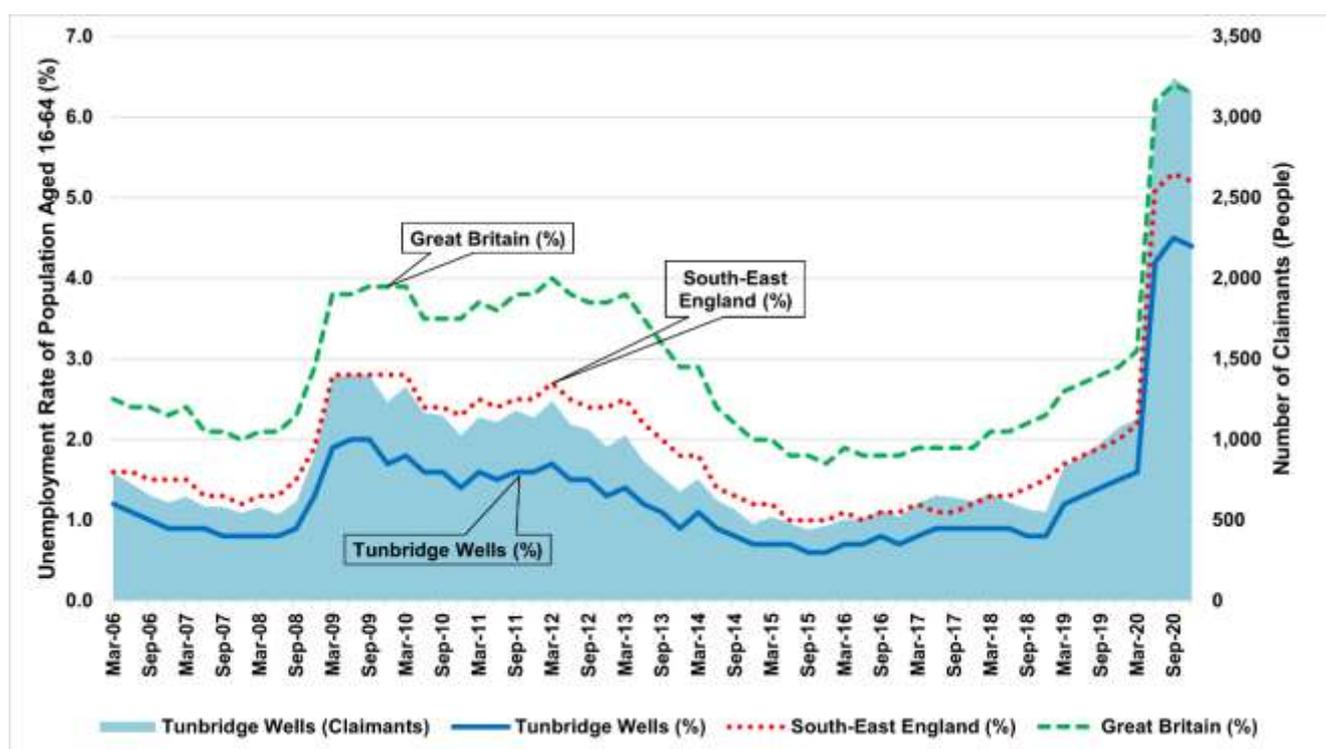


Figure 18: Unemployment Rate of Population Aged 16-64 (%) and Number of Claimants in Tunbridge Wells, South-East England, and Great Britain by Quarter From March 2006 – December 2020 (Source: NOMIS, 2020)

2.32 **Figure 18** illustrates the trends in unemployment rates of the population aged 16-64 and the number of benefit claimants across the Tunbridge Wells borough, South-East England, and in Great Britain (NOMIS, 2020; [see Labour Market Profile – Tunbridge Wells](#)). This shows that, while unemployment in Tunbridge Wells has fluctuated since March 2006, it was largely the same/following previous trends as at March 2020, albeit showing a notable increase in unemployment rates and the number of benefit claimants in the borough since December 2018. However, reflecting the impact of the 2020 Covid-19 pandemic on the economy and government-imposed national lockdowns, unemployment rates and the number of claimants rose significantly above any previous rate/number in this period at all three area levels from March 2020 to December 2020, and may likely continue to increase as the economy goes into recession. However, throughout the March 2006 – December 2020 period, the unemployment rate in Tunbridge Wells consistently remains lower than both the rate found in South-East England and Great Britain overall.

Businesses

2.33 **Table 8** illustrates that, between 2011 and 2020, there was a 17.5% increase in the number of enterprises in the borough (NOMIS, 2020; [see Labour Market Profile – Tunbridge Wells](#)).

Table 8: Total Number of Enterprises in Tunbridge Wells Borough 2011-2020 (Source: NOMIS, 2020)

Year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Tunbridge Wells	5,385	5,600	5,555	5,755	6,115	6,225	6,335	6,365	6,420	6,330

Table 9: Median Gross Weekly Pay for Full Time Workers From 2006-2020 (Source: NOMIS, 2020)

Year	Tunbridge Wells (£)	South-East England (£)	Great Britain (£)
2006	433.3	469	444.8
2007	489.7	481.9	459.3
2008	474.1	500.9	479.1
2009	463.5	513.3	489.9
2010	483	523.8	500.3
2011	488.7	529	500
2012	555.1	536.6	507.9
2013	513.7	536.6	517.6
2014	521.1	541.7	520.4
2015	517.9	552	528.5
2016	523.9	565.4	540.1
2017	514.8	574.9	552
2018	536.4	589.1	570.2
2019	564	614	587
2020	563.2	608.6	586.7

2.34 As shown in **Table 9**, the average (median) gross weekly pay for full time workers in Tunbridge Wells has been lower than both the average within South-East England and the average found across Great Britain since 2013. However, it should be added that the value presented is the median earnings in pounds for employees working in the area and therefore does not take into account those who live within the borough but commute elsewhere for work.

Environment

- 2.35 Both the natural and built environment of the borough are of high quality. Nearly 70% of the borough designated as High Weald Area of Outstanding Natural Beauty (AONB) is of national significance, and all areas have distinct landscape and environmental characteristics much valued by residents, with commons, village greens, and parks providing important spaces and links to the countryside.
- 2.36 Also, around 22% of the western part of the borough surrounding Royal Tunbridge Wells, Southborough, Pembury and other villages, and abutting the western edge of Paddock Wood, is Green Belt, which contributes significantly to the discrete identity and setting of settlements.
- 2.37 Together, the AONB and Green Belt cover 75% of the borough, with substantial overlaps. **Figure 1** shows the extent of the AONB and Green Belt in the borough.
- 2.38 The borough supports a network of biodiversity sites, including 10 Sites of Special Scientific Interest, 60 Local Wildlife Sites, 16 Sites of Local Nature Conservation Value, 13 Roadside Nature Reserves, and four Local Nature Reserves.
- 2.39 There is also an extensive network of public rights of way which provides public access to many parts of the borough, supporting the natural and built environment as an important public recreation and amenity resource, and with potential to enhance health and wellbeing.
- 2.40 In addition, the historic environment is intertwined with the evolution of the landscape, in terms of the rural setting of both assets and settlements, and as a determinant of the historic pattern of economic and agricultural activities and uses.

Historic Environment

- 2.41 The borough is rich in historic features, and has a significant breadth of designated and non-designated heritage assets, including listed buildings, conservation areas, scheduled ancient monuments, historic parks and gardens, agricultural buildings and farmsteads, historic routeways, medieval field patterns, and ancient woodland. The features of the historic environment fall under themes that are particular to the borough, and are identified in the borough's [Historic Environment Review](#).
- 2.42 The borough contains 2,248 buildings of architectural or historic interest, which make a significant contribution to the quality and distinctiveness of the local environment. The borough also contains 27 conservation areas, within which the combination of the buildings, spaces, and landscape is of great importance in creating the distinctive character of the area.

Natural Environment

- 2.43 Reference should be made to the Council's recently published a report, Biodiversity Evidence Base for Draft Local Plan – Regulation 18 Consultation, September 2019,

which brings together baseline information on biodiversity to inform the Local Plan process ([see Biodiversity Evidence Base for Draft Local Plan](#)). This document will be updated in due course for the Regulation 19 Pre-Submission Local Plan.

- 2.44 The report includes the latest information on the condition of the 29 units in the 10 Sites of Special Scientific Interest (SSSIs) in the borough. This is summarised in **Table 10** below. It shows 79.31% of SSSI units to be in either favourable or unfavourable recovering condition.

Table 10: SSSIs in Tunbridge Wells - Condition of Units (Source: Natural England, 2019)

Condition	Percentage of SSSI Units
Favourable	65.52%
Unfavourable Recovering	13.79%
Unfavourable No Change	6.9%
Unfavourable Declining	13.79%

- 2.45 Local Wildlife Sites (LWS) are non-statutory sites which are identified and designated locally. The proportion of LWS in positive management for the reporting period April 2017 – March 2018 was 48% (29/60), set against a county figure of 43% (193/454). A number of sites previously counted as being in management are now excluded due to having finished and not renewed their Woodland Grant Scheme or Environmental Stewardship agreements.

Table 11: Proportion of LWS in Positive Management

Year	Tunbridge Wells	Kent (Excluding Medway)
2017/2018	29/60, 48%	193/454, 43%

Flood Risk

- 2.46 The Borough Council has commissioned and published both a Level 1 and 2 Strategic Flood Risk Assessment (SFRA) as part of the preparation of the Local Plan. The flood zones mapped within these Assessments have been endorsed and adopted by the Environment Agency. The following figures are based on the mapping of residential properties across these newly calculated flood risk zones.

Table 12: Area of Flood Risk Within the Borough (Source: TWBC Monitoring, 2021)

Flood Zone	Residential Properties (2021)	Non-Residential Properties (2021)
Flood Zone 2	816	107
Flood Zone 3	1,006	138

Energy Use

- 2.47 **Table 13** and **Table 14** are produced from data obtained from the Department for Business, Energy and Industrial Strategy (BEIS, 2020; [see Total Final Energy Consumption at Regional and Local Authority Level: 2005 to 2018](#)). Table 13 shows that in all sectors, energy consumption (measured in Gigawatt Hours (GWh)) within Tunbridge Wells borough decreased by 283GWh/12% over the period 2005-2018, with the largest decrease in energy consumption seen in the Industrial & Commercial sector (-139GWh/-21.2%). However, only a minimal decrease in energy consumption is seen in the Transport sector, having only decreased by 18 GWh/3%. Despite vehicles and other means of transport having become more energy efficient over recent years, it is entirely possible that there has been an overall increase in the number of journeys via private transport taken which therefore increases the energy consumption in this sector. Overall, however, the decrease in energy consumption in the borough illustrates that improvements have been made to more sustainable and efficient energy consumption practices.
- 2.48 **Table 14** shows that use and consumption of all fuel types, with the exception of Bioenergy and Wastes (reflecting the increasing trend of using renewable resources as a sustainable source of energy), has also decreased within Tunbridge Wells borough over the period 2005-2018, with the largest decrease seen for Gas, having decreased by 208GWh/22.3%, with the smallest percentage decrease seen in use of Petroleum Products (-69GWh/-8.5%), likely reflecting the increasing trend toward using private transport despite more energy efficiency in this sector.

Table 13: Energy Consumption Measured in Gigawatt Hours (GWh) by Sector within Tunbridge Wells Borough 2005-2018 (Source: BEIS, 2020)

Year	Industrial & Commercial	Domestic	Transport	All Sectors
2005	654	1106	606	2367
2006	638	1095	613	2346
2007	604	1074	633	2311
2008	589	1056	610	2255
2009	571	1005	595	2170
2010	574	1031	583	2188
2011	564	963	587	2114
2012	571	977	571	2119
2013	554	977	568	2099
2014	547	956	584	2086
2015	541	971	589	2101
2016	510	965	599	2074
2017	516	971	588	2075
2018	515	980	588	2084
2018-2005 Difference	-139	-126	-18	-283

Table 14: Energy Consumption Measured in Gigawatt Hours (GWh) by Fuel Type within Tunbridge Wells Borough 2005-2018 (Source: BEIS, 2020)

Year	Coal	Manufactured Fuels	Petroleum Products	Gas	Electricity	Bioenergy and Wastes	All Fuels
2005	21	9	821	934	555	27	2367
2006	20	9	823	926	540	28	2346
2007	19	8	829	902	525	28	2311
2008	23	9	797	872	520	34	2255
2009	26	5	773	814	515	37	2170
2010	28	6	778	796	532	48	2188
2011	28	6	750	754	534	41	2114
2012	30	6	737	756	536	54	2119
2013	34	6	729	740	526	63	2099
2014	29	6	740	723	527	60	2086
2015	23	6	753	731	522	67	2101
2016	22	6	762	712	499	72	2074
2017	20	7	754	721	503	71	2075
2018	18	7	752	726	504	76	2084
2018-2005 Difference	-3	-2	-69	-208	-51	50	-283

CO2 Emissions

2.49 **Table 15** is produced from data obtained from BEIS (2020; [see Emissions of Carbon Dioxide for Local Authority Areas](#)). This **Table** illustrates that CO2 emissions, measured in kilotonnes (Kt), have fallen across all sectors in Tunbridge Wells borough over the period 2005-2018, with the largest percentage decrease seen in the Industry and Commercial sector (-121.6Kt/-50%). Per capita emissions also fell by 2.7 tonnes over the same period. Overall, and including the increasing offsetting of CO2 emissions in the Land Use, Land Use Change, and Forestry Net Emissions (LULUCF) sector, there has been a significant decrease in the level of CO2 emissions in the borough over the period 2005-2018, decreasing by 247.3Kt/37.3%.

Table 15: Tunbridge Wells Borough CO2 Emissions by Sector Measured in Kilotonnes (Kt), and Per Capita Measured in Tonnes (t) 2005-2018 (Source: BEIS, 2020)

Year	Industry and Commercial Total	Domestic Total	Transport Total	Land Use, Land Use Change, and Forestry Net Emissions	Total	Per Capita Emissions (t)
2005	243.1	288.9	179.4	-48.6	662.8	6.3
2006	243.7	292.1	176.6	-50.6	661.8	6.2

Year	Industry and Commercial Total	Domestic Total	Transport Total	Land Use, Land Use Change, and Forestry Net Emissions	Total	Per Capita Emissions (t)
2007	228.4	285.3	181.6	-51.2	644.0	5.9
2008	227.7	286.5	170.5	-52.3	632.3	5.7
2009	207.4	261.1	164.0	-52.3	580.2	5.1
2010	220.6	281.4	161.7	-53.1	610.5	5.4
2011	209.1	245.8	161.7	-53.9	562.7	4.9
2012	224.3	266.1	157.7	-54.5	593.5	5.1
2013	208.5	259.0	156.3	-56.2	567.6	4.9
2014	179.3	219.2	160.3	-55.9	502.9	4.3
2015	161.2	214.0	164.3	-57.4	482.2	4.1
2016	136.1	200.7	169.4	-56.6	449.6	3.8
2017	125.7	187.0	166.6	-58.1	421.2	3.6
2018	121.5	186.7	165.6	-58.4	415.5	3.5
2018-2005 Difference	-121.6	-102.2	-13.7	-9.8	-247.3	-2.7

Energy Efficiency of Dwelling Stock

2.50 Energy Performance Certificates (EPCs) for new homes are used to show the energy efficiency of domestic buildings, based on a rating of A to G, with A being the most energy efficient and G being the least energy efficient. Since 2011, 27,364 dwellings in Tunbridge Wells borough have had an EPC (MHCLG, 2020: see [Live Tables on Energy Performance of Buildings Certificates](#)). Amongst these dwellings, the trends shown in **Table 16** can be seen. This generally shows that, in Tunbridge Wells borough over the period 2011-2019, there has been a positive trend of an increase in A or B ratings (+78%), while there has been a decrease in the number of F or G ratings (-61%), indicating that existing and new domestic properties are improving in energy efficiency.

Table 16: Energy Efficiency of All Existing and New Domestic Properties in Tunbridge Wells Borough 2011-2019 (Source: MHCLG, 2020)

Data	2011	2012	2013	2014	2015	2016	2017	2018	2019
Number of Dwellings Given EPC Ratings of A or B	282	93	166	232	523	396	264	438	502
Number of Dwellings Given EPC Ratings of F or G	306	238	178	192	293	165	145	172	119
Most Common Rating	D	D	D	D	D	D	D	D	D

Commentary

- 2.51 The above review of a range of key contextual indicators shows that over recent years there have been some changes which may have implications for the future planning, as well as service delivery, across the borough.
- 2.52 There will be expected increases in population and households over the upcoming Local Plan period (2020-2038), but this will be a population that is ageing, with by far the greatest increases in those people aged 65+. This correlates with the predicted increase in the number of one person households. Although this has been a known trend for some time, planning for older and single person households will need to be, and has been, carefully reviewed for the new Local Plan.
- 2.53 Across the borough, there is a lower than national rate of deprivation; however, there have been recent decreases in the IMD score, with more of the borough falling within the middle to top rather than the highest IMD score tiers. Although still relatively less deprived, the lower scores highlight a need not to be complacent and to consider further policies to prevent a further decline in the IMD scores found across the borough, including in relation to local job opportunities.
- 2.54 The degree of household change is uncertain, as more recent projections suggest a lower level of growth than the earlier, 2014-based, projections (albeit these are still used by Government in the calculation of local housing need, as part of the Standard Method). Notwithstanding this, houses prices across the borough continue to be higher than the Kent and South-East England averages. Also, on the whole, homes are becoming less affordable. This suggests, firstly, that there is a case, on affordability grounds, for agreeing with the Government's favoured earlier projections, since a greater supply of homes should help slow house price growth. Secondly, while existing local planning policies are supportive towards affordable housing, the worsening affordability of homes suggests that they should be reviewed through the new Local Plan to see if more can be done to ease the situation.
- 2.55 Unemployment within the borough increased significantly following the recession around 2008, then gradually reduced back to pre-recession levels, but has now significantly increased over twice the level of unemployment caused by the 2008 recession due to the Covid-19 pandemic and its impact on the economy. However, there are now more enterprises in the borough, albeit decreasing slightly from 2019 to 2020. Of note, people that work within the borough are paid less than the average across South-East England and Great Britain. Therefore, continued policy support for local business growth appears to be well justified.
- 2.56 The environmental quality across the borough has largely improved since 2011, with falls in both energy usage and CO2 emissions across the borough. However, in the context of the now agreed 'climate emergency', future planning policies should provide for further CO2 reduction.

3.0 Local Plan Preparation

- 3.1 The Council is currently preparing a new Local Plan to guide development in the borough through a new growth strategy up until 2038. The Plan will also allocate sites for development and will provide general Development Management policies to guide development. This new Local Plan will supersede the 'saved' policies of the 2006 Local Plan, the 2010 Core Strategy, as well as the 2016 Site Allocations Local Plan.
- 3.2 In 2017, a 'Regulation 18' consultation on an '**Issues and Options**' document was undertaken in order to gauge the views from residents, businesses, consultees and infrastructure providers on how growth should be delivered within the borough over the Plan period, as well as on the currency of adopted policies. The consultation ended in June 2017.
- 3.3 A revised Local Development Scheme (LDS) was published in April 2018, reflecting the need to give further consideration to a range of growth options, including new settlements. Although the April 2018 Local Development Scheme aimed to bring the Draft Local Plan to further 'Regulation 18' public consultation in June 2019, that timetable was delayed. This was due to a combination of the work required to bring together a full draft Local Plan for organisations and the public to contribute to and comment on.
- 3.4 Within the 2019/2020 monitoring year, a 'Regulation 18' public consultation on a full Draft Local Plan was undertaken from September to November 2019, as reflected within an updated LDS.
- 3.5 Initially planned to run for six weeks from 20 September 2019 to 01 November 2019, the consultation was extended to 17:00 on 15 November 2019 in response to requests to allow more time to absorb and fully contribute to the complex new Draft Local Plan and substantial evidence base.
- 3.6 A substantial response was received to that consultation. Comments are published on the Local Plan website. As at February 2021, the Council is currently preparing to undertake a Regulation 19 consultation on the Pre-Submission Local Plan, due to take place in Spring 2021. Any further updates to the Local Plan timetable will be input into a future review of the LDS.

The Local Development Scheme (LDS) sets out details of the planning policy documents that the Council has adopted or is currently preparing, and those it intends to prepare. The LDS provides information to interested parties to help them participate in the plan-making process. The current LDS came into effect in February 2021 and updated the LDS approved in June 2020 which introduced programmes/timetables for additional SPDs but did not change the Local Plan programme.

[View the LDS](#), setting out the detailed Local Plan timetable.

4.0 Neighbourhood Development Plans (NDPs)

- 4.1 The Localism Act 2011 introduced Neighbourhood Planning as a way of passing decision-making to a more local level. This allows local communities the option of producing their own Neighbourhood Development Plan (NDP; more commonly referred to simply as a Neighbourhood Plan), as well as Neighbourhood Development Orders or Community Right to Build Orders for their local area.
- 4.2 An NDP may contain a vision, aims, site allocations for new development and/or policies for conserving and improving existing amenities and facilities.
- 4.3 NDPs need to be in general conformity with the strategic policies set out in local planning policy documents and have regard to national policy.
- 4.4 There is a formal procedure for producing NDPs and, if 'made' (adopted) after successful examination and a local referendum, an NDP will form part of the statutory development plan for the area.

Neighbourhood Plans Within Tunbridge Wells Borough

- 4.5 The first step in producing an NDP is for the local community to apply to the Borough Council for the designation of their area as a Neighbourhood Area. The Borough Council then consults on the application for Neighbourhood Area status. If the Borough Council confirms the application following consultation, then the local community can begin to draft the NDP.
- 4.6 As at February 2021, since the end of the last monitoring year (i.e. 31 March 2019), there has been progress made on a number of NDPs in the borough, including the approved designation of Capel and Pembury as Neighbourhood Areas. Progress of the NDPs within these parish areas can be seen in **Table 17**.

Table 17: Neighbourhood Development Plans Within Tunbridge Wells Borough as at February 2021

Parish	Stage
Benenden	Independent Examination commenced in February 2021
Brenchley and Matfield	Working on pre-Regulation 14 pre-submission draft Plan
Capel	Designation approved February 2020. Looking at funding measures to appoint a consultant to assist in preparing the Plan
Cranbrook & Sissinghurst	Undertaken Regulation 14 consultation, which closed mid-December 2020
Goudhurst	Undertaken Regulation 16 consultation, which closed late February 2021
Hawkhurst	Neighbourhood Plan made, and modified April 2020

Parish	Stage
Horsmonden	Working on pre-Regulation 14 pre-submission draft Plan
Lamberhurst	Independent Examination commenced February 2021
Paddock Wood	Working on pre-Regulation 14 pre-submission draft Plan, TWBC has discussed alignment of masterplanning and NDP timetables.
Pembury	Designation approved July 2020
Sandhurst	Area designated

- 4.7 For up-to-date information on the progress of neighbourhood plans in the borough, [see the Neighbourhood Plans page of the Council's website.](#)

5.0 Duty to Cooperate

- 5.1 The Duty to Co-operate was introduced in the Localism Act 2011, the effect of which is to place a legal duty on Local Planning Authorities to co-operate with neighbouring authorities, County Councils and other prescribed bodies when planning for sustainable development. The Duty requires on-going, constructive collaboration and active engagement between Local Planning Authorities and their neighbours, as well as other statutory bodies such as Natural England, Historic England and the Environment Agency, throughout the preparation process of all development plan documents. This is in addition to statutory consultations.
- 5.2 This is a formalisation of established good practice, through which the Council liaises with a number of groups including Neighbouring Local Planning Authorities, Town and Parish Councils, statutory consultees, and infrastructure/service providers on an on-going basis.
- 5.3 The National Planning Policy Framework promotes 'statements of common ground' between Local Planning Authorities. There has been progress on these during the year, and up to date. This is set out in the Council's 'Duty to Cooperate Statement' produced in support of the merging Local Plan.
- 5.4 Perhaps the prime strategic matter at present is the capacity of the borough, as well as neighbouring authorities, to meet housing needs. This is subject to ongoing assessment through the preparation of the new Local Plan. At present, it is likely that it is possible to meet its local housing need under the Standard Method, but not the uncapped housing need figure or to contribute to meeting wider housing needs. Of note, dialogue with Sevenoaks District Council is continuing to clarify whether it will be meeting its own need.

6.0 Effectiveness of the Core Strategy (2010) Policies

6.1 This section reviews the monitoring framework from the adopted [Core Strategy \(2010\)](#). It provides an assessment of the currency of indicators and, where possible, a commentary on them across the eight borough-wide Core Policies. Where other, new local indicators are needed in monitoring the performance of the Core Strategy policies, these are also considered.

Core Strategy Monitoring Framework

6.2 **Table 18** displays indicators from the Core Strategy (2010) Monitoring Framework, whether they have been successfully monitored in this Report and, where monitored, the performance over the period 01 April 2019 to 31 March 2020.

Table 18: Core Strategy (2010) Monitoring Framework Overview Over Period 01 April 2019 to 31 March 2020

Core Policy	Indicator	Target	Monitored
1 – Delivery of Development	Core Indicator: Housing completions	300 dwellings pa	474 dwellings (2006/07 – 2019/20 average of 347 dwellings; 2014/15-2019/20 5-year average of 495 dwellings)
	Local Indicators: CP1 a) Percentage of all new development/ redevelopment within LBD	65%	Yes monitored – 81.2% (completions)
	Local Indicators: CP1 b) Percentage of all new development/ redevelopment on PDL	65%	Yes monitored – 56.3% (completions)
2 – Green Belt	Local Indicator: CP2 a) Retention of Green Belt	No development in Green Belt other than as identified in Town Centre Area Action Plan or Allocations DPD, or that which is in accordance with PPG2	Table 20 shows that 56 C3 dwellings have been permitted in the Green Belt during the period 01 April 2019 to 31 March 2020. All except 1 of these applications were redevelopments/conversions of existing brownfield sites/on previously development land where it was considered that the

Core Policy	Indicator	Target	Monitored
			proposals were in accordance with NPPF Green Belt policy and there has been no deviation from the Local Plan. The 1 exception (19/01586/OUT for 5 dwellings) constituted 'limited infilling in villages' within the Green Belt and therefore also accords with the provisions of NPPF (paragraph 145). There was 1 other application (19/02992/FULL for 2 dwellings) where the Green Belt overlapped with the site boundary, however no development was proposed in the Green Belt part of the site (located beyond the garden).
	Local Indicator: CP2 b) Maintenance of long-term land reserve	Developable land identified beyond 2026	All three sites have now been permitted with AL/GB2 Knights Wood and AL/GB3 Land at Hawkenbury Farm (off Hawkenbury Road/Maryland Road) currently under construction.
3 – Transport Infrastructure	Local Indicators: CP3 a) Completion of Infrastructure Projects	Completion of Key specific projects identified through Plan	Yes – Outcome found under Core Policy 3 section
	Local Indicators: CP3 b) Number of Travel Plans approved	Travel plans will be secured for appropriate development schemes in accordance with PPG13 (2001) (Superseded)	Not recorded, but required for major developments
	Contextual Indicator: TP1: Movement across outer and inner Royal Tunbridge Wells and Southborough cordons by different modes of transport	N/A	See Transport Strategy Review Context and Way Forward

Core Policy	Indicator	Target	Monitored
	Contextual Indicator: TP2: Journeys taken from Tunbridge Wells Railway station	N/A	See Transport Strategy Review Context and Way Forward
4 - Environment	AMR Core Indicators: Change in areas of biodiversity importance	Monitoring of priority habitats	Yes – outcome found in Core Policy 4 section
	Local Indicators: CP4 a) Implementation of Kent BAP & LBAP	As per Kent BAP and LBAP targets	Yes – BAPs implemented
	Contextual Indicators: E1: Number of listed buildings	N/A	Yes monitored – see Environment contextual indicators section
	Contextual Indicators: Number of Conservation Areas	N/A	Yes monitored - see Environment contextual indicators section
5 - Sustainability	AMR Core Indicators: E1) Number of planning permissions granted against Environment Agency advice	No development with unacceptable effect on groundwater surface water or water quality; and no development in areas at high risk from flooding will be permitted contrary to EA advice or without measures acceptable to the EA to protect it and prevent the increased risk of flooding elsewhere	Yes – all applications refused, satisfactory conditions applied, or an EIA was not required
	AMR Core Indicators: E3) Renewable Energy Generation	As per renewable energy SPD	Yes – there has been a net increase in renewable energy generation
	AMR Core Indicators: H6) Design Quality	30% Good or Very Good Quality, increasing over plan period	No – data not available
	Contextual Indicators: Air quality at monitoring station	N/A	Yes – see Sustainability Core Policy 5 section
	Contextual Indicators: Household waste per capita	N/A	No
	Contextual Indicators:	N/A	No

Core Policy	Indicator	Target	Monitored
	Number of applications with Low Emissions Strategies		
	Contextual Indicators: Number of developments meeting different CfSH/BREEAM levels	CfSH – all new housing to be zero-carbon by 2016	No – data not available
	Contextual Indicators: Energy use per household	N/A	Yes – see Sustainability contextual indicators section
6 – Housing Provision	AMR Core Indicators: H4: Net additional gypsy and traveller pitches	Target to be set by South East Plan	Yes – see Core Policy 6 Section
	Local Indicators: CP6 a) New homes built on previously developed land	65%	56.3%
	Local Indicators: CP6 b) Completion of Infrastructure Projects	Completion of specific projects	Yes – average affordable housing provided across the borough at greater than 70 units per year
	Contextual Indicators: H1: Average house prices by type	N/A	Yes - see Community and Housing contextual indicators section
	Contextual Indicators: H2: Percentage of homes built of different types and sizes	N/A	Yes/No – see Community and Housing contextual indicators section for information on dwelling type and size data
	Contextual Indicator: H3: Percentage of homes built at densities owe than 30 dwellings per hectare	N/A	Yes – see Core Policy 6 section
		AMR Core Indicators: BD1) Total amount of additional employment floorspace by type	Meet targets to be set out within the South East Plan. Targets to be confirmed by the TCAAP and Allocations DPDs
	AMR Core Indicators: BD2) Total amount of employment floorspace on previously developed land by type	Meet targets to be set out within the South East Plan. Targets to be confirmed by the TCAAP and Allocations DPDs	Yes – see Core Policy 7 section

Core Policy	Indicator	Target	Monitored
7 – Employment Provision	AMR Core Indicators: BD3) Employment land available by type	Meet targets to be set out within the South East Plan. Targets to be confirmed by the TCAAP and Allocations DPDs	Yes – see Core Policy 7 section
	AMR Core Indicators: BD4) Total amount of floorspace for ‘Town Centre Uses’ within the defined Town Centres	Meet targets to be set out within the South East Plan. Targets to be confirmed by the TCAAP and Allocations DPDs	Yes – see Core Policy 7 section
	Local Indicators: CP7 a) Net gain/loss of tourist accommodation	483 new hotel bedrooms	No – but new Premier Inn (110 bedrooms) opened in Royal Tunbridge Wells in 2020, as well as 8 additional rooms with extant planning permission at the Queens Inn in Hawkhurst (18/02717/FULL). Covered by Hotel Capacity Study (2017) on the Council’s website
	Contextual Indicators: ED1) Economic activity rates	N/A	Yes – see Economy and Business Context section
	Contextual Indicators: ED 2) Employee jobs within the borough by sector	N/A	Yes – see Economy and Business Context section
	Contextual Indicators: ED 3) Unemployment Levels	N/A	Yes – see Economy and Business Context section
	8 – Retail, Leisure and Community Facilities Provision	AMR Core Indicators: BD 4) Total amount of floorspace for Town Centre uses within the defined Town Centres	N/A
Local Indicators: CP8 a) Retention of Community Services		No net loss of community facilities in neighbourhood or village centres	Yes – see Core Policy 8 section
Local Indicators: CP8 b) Retention/Provision of Recreation Open Space		Retention/provision of adequate recreation open space	Yes – see Core Policy 8 section

Core Policy	Indicator	Target	Monitored
	Local Indicators: CP8 c) Amount of new retail floorspace provided	26,236 sqm of net comparison floorspace by 2017; provision of a convenience supermarket at Southborough	Yes – see Core Policy 8 section
	Local Indicators: CP8 d) Completion of Infrastructure Projects	Completion of Key Specific Projects identified	Yes – see Core Policy 8 section
	Contextual Indicators: Eligible Open Spaces Managed to Green Flag Award Standard	N/A	Yes – see Core Policy 8 section

Review of Core Policy Indicators

Core Policy 1: Delivery of Development

Housing Delivery Target – 300 dwellings per annum is the Core Strategy requirement 2006-2026.

6.3 As shown **Table 19**, 474 dwellings were built in the 01 April 2019 – 31 March 2020 monitoring year, giving an average over the Plan period, from 2006 to date, of 347 dwellings per annum. In the last five years (since 2014/15), the average has increased to 495 per annum.

Table 19: Net Additional Dwellings Complete by Monitoring Year (Source: TWBC Monitoring, 2020)

Year	Total Net Completions
2006/2007	517
2007/2008	517
2008/2009	411
2009/2010	104
2010/2011	315
2011/2012	212
2012/2013	-5
2013/2014	-16
2014/2015	323
2015/2016	447
2016/2017	461
2017/2018	537
2018/2019	554
2019/2020	474

Year	Total Net Completions
2006/07 – 2019/20 Average	347
2014/15 – 2019/20 5- Year Average	495

CP1 – Local Indicator CP1a Percentage of all new development/redevelopment sites within Limits to Built Development

Target - 65% of sites within the LBD

2019/20: 81.2% of net new units were built within the LBD (Source; Housing Monitoring, 2020).

CP1 – Local Indicator CP1b Percentage of all new development/redevelopment sites on previously developed land

Target – 65% of all new development on PDL

2019/20; 56.3% of net new units were built on PDL (Source; Housing Monitoring, 2020).

Core Policy 2: Green Belt

- 6.4 The Metropolitan Green Belt within Tunbridge Wells borough extends around the built-up area of Royal Tunbridge Wells and Southborough. The detailed boundaries of the Green Belt are established in the 2006 Local Plan through Policy MGB1.
- 6.5 Areas of long-term land reserve within the Green Belt (the areas of Rural Fringe), are set out in Local Plan Policy RF1 and within the 2016 Site Allocations Local Plan (SALP) Policies AL/GB1, AL/GB2 and AL/GB3.

a) Retention of Green Belt

Objective: To protect the open character of the Green Belt and encourage only those types of development that will preserve this openness.

Targets: No development within the Metropolitan Green Belt will be permitted other than that which is in accordance with the relevant policies in the NPPF, the 2006 Local Plan and 2016 SALP.

In order to meet this objective (to retain the Green Belt) the Council monitors planning applications that were granted permission by the Council or on appeal by a Planning Inspector, to assess whether the issue of Green Belt development has been addressed in line with national guidance and local policy. **Table 20** provides this assessment for the 2019-2020 monitoring year.

Table 20: Planning Applications Approved Within the Green Belt in Monitoring Year 01 April 2019 - 31 March 2020 (Source: TWBC Monitoring, 2020)

Application Number	Proposal	Net Dwellings	Comments Regarding Impact on Green Belt
18/02324/FULL	Redevelopment of the existing car park and construction of 9no. dwellings with associated parking, access and landscaping works	9	<i>'Officers consider that the proposal constitutes 'complete redevelopment of previously developed land', within the Green Belt and therefore accords with the provisions of NPPF paragraph 145. Some "definitional" and "specific" harm arises from the development due to the greater height and scale of the buildings and the residential encroachment. The benefits created by the development are considered to clearly outweigh the harm. Significant weight is proposed to be given to the factors set out above as 'Very Special Circumstances'. In this instance they are considered to outweigh the specific and the definitional harm to the openness of the Green Belt'</i>
18/03798/PNQCLA	Prior Notification- Change of use of part of a redundant agricultural building and land within the curtilage into a residential dwelling.	1	N/A – Green Belt commentary out of the remit of a prior notification under class Q.
18/03858/PNQCLA	Prior Notification- Change of use from agricultural building to two residential dwellings	2	N/A – Green Belt commentary out of the remit of a prior notification under class Q.
19/00043/FULL	Demolition of existing commercial buildings and construction of five residential dwellings, plus conversion and alterations to the existing Mill Building to form a new residential dwelling. Construction of a new garage, car port and bin store along with associated landscaping	5	<i>'The proposed development is considered to be acceptable in principle and would preserve the openness of the Green Belt. The proposed development is considered [to] not have any greater impact on the openness of the Green Belt than the existing developed site'</i>
19/00070/FULL	Proposed change of use and conversion of existing disused agricultural building into residential	1	<i>'The creation of private gardens and residential curtilage can potentially cause significant harm to the character and appearance of the site. However, the curtilage has been kept relatively tightly</i>

Application Number	Proposal	Net Dwellings	Comments Regarding Impact on Green Belt
	use and associated car parking		<i>around the building and is not considered to be excessive or unduly large. The garden is also proposed to be largely over the footprint of the parts of the building to be removed. Appropriate boundary treatments are also proposed in the form of post and rail fencing. The proposed creation of a residential curtilage, is considered, on balance, to have a neutral impact upon the AONB and openness of the Green Belt'</i>
19/00127/FULL	Change of use from office (Class B1) to residential (Class C3)	1	<i>'The creation of private gardens and residential curtilage can potentially cause significant harm to the character and appearance of the site. However, the curtilage is not considered to be excessive or unduly large and the existing boundary treatments are to be maintained. The proposed creation of a residential curtilage is not considered to be harmful to the openness of the Green Belt'</i>
19/00200/FULL	Demolition of former commercial buildings; conversion of listed barn into B1 offices; conversion and extension of stable (inc workshop) and former granary to create new dwellings; rebuilding and remodelling of Dutch Barn as a dwelling; erection of a terrace of three dwellings with associated parking, landscaping, cycle and refuse stores	6	<i>'The proposed development is considered to be acceptable in principle and would preserve the openness of the Green Belt. The proposed development is considered [to] not have any greater impact on the openness of the Green Belt than the existing developed site'</i>
19/00429/PNQCLA	Prior Notification for the Change of Use of a Building and Land within its Curtilage from an Agricultural Use to a Use falling within Class C3 (Dwellinghouse) and Building Operations	1	N/A – Green Belt commentary out of the remit of a prior notification under class Q.

Application Number	Proposal	Net Dwellings	Comments Regarding Impact on Green Belt
	reasonably necessary to convert the building.		
19/00723/PNQCLA	Prior Notification for the change of use of a building and land within its curtilage to a use falling within Class C3 (Dwellinghouse) and Building Operations reasonably necessary to convert the building.	1	N/A – Green Belt commentary out of the remit of a prior notification under class Q.
19/01430/PNQCLA	Prior Notification for the Change of Use of a Building and Land within its Curtilage from an Agricultural Use to a Use falling within Class C3 (Dwellinghouse) and Building Operations reasonably necessary to convert the building;	1	N/A – Green Belt commentary out of the remit of a prior notification under class Q.
19/01586/OUT	Outline (Access Not Reserved) - Residential development of five detached houses	5	<i>'Officers consider that the proposal constitutes 'limited infilling in villages' within the Green Belt and therefore accords with the provisions of NPPF paragraph 145'</i>
19/01595/FULL	Change of use and conversion of barn to two dwellinghouses, including the provision of garden areas and all associated landscaping	2	<i>'The proposal would be reusing an existing building which is located on an area of existing hardstanding. No extension to the building is proposed and a modest sized curtilage is included which will be located within the existing area of hardstanding. It is considered that the proposal will not have a significant impact on the openness of [the Green Belt]'</i>
19/01676/PNQCLA	Prior Notification for the Change of Use of a Building and Land within its Curtilage from an Agricultural Use to a Use falling within Class C3 (Dwellinghouse) and Building Operations	1	N/A – Green Belt commentary out of the remit of a prior notification under class Q.

Application Number	Proposal	Net Dwellings	Comments Regarding Impact on Green Belt
	reasonably necessary to convert the building		
19/01696/FULL	Proposed conversion and change of use of agricultural barn (Barn A) into four residential units (comprising 3 no 3-bed units and 1 no 2-bed unit) with associated parking and garden space - demolition of one bay (south end) of the barn.	4	<i>'The proposal would be reusing an existing building which is located on an area of existing hardstanding. No extension to the building is proposed and a modest sized curtilage is included which will be located within the existing area of hardstanding. It is considered that the proposal will not have a significant impact on the openness of the Green Belt'</i>
19/02425/PNOCLA	Notification for Prior Approval for a Proposed Change of Use of a building from office use (Class B1(a)) to 4 No. flats (Class C3) For its prior approval to: - Transport and highways impacts; - Contamination risk; - Flooding risks; - Impacts of noise from commercial premises on the intended occupiers of the development	4	N/A – Green Belt commentary out of the remit of a prior notification under class O.
19/02535/FULL	Redevelopment of site to provide 8 dwellings including alterations to site access and realignment of access road	8	<i>'Officers ... consider that the proposal constitutes 'complete redevelopment of previously developed land', within the Green Belt and therefore accords with the provisions of NPPF paragraph 145. ... The benefits created by the development are considered to clearly outweigh the harm. Significant weight is ... given to the factors set out above as 'Very Special Circumstances'. In this instance they are considered to outweigh the specific and the definitional harm to the openness of the Green Belt'</i>
19/02737/FULL	Conversion and extension of disused machinery shed	1	<i>'Certain forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not</i>

Application Number	Proposal	Net Dwellings	Comments Regarding Impact on Green Belt
	into a two bedroom dwelling		<i>conflict with the purposes of including land within it. This includes the re-use of buildings provided that the buildings are of permanent and substantial construction. The subject building is an existing, permanent construction and therefore complies with this criterion'</i>
19/02992/FULL	Development of 2 new dwellings to land rear of Galen and associated access drive	2	N/A – 'Area beyond garden'
19/03602/FULL	Conversion of two industrial sheds into a two bedroom residential property. Demolition of a third industrial shed.	1	<i>'The proposal would be reusing an existing building which is located in the corner of a field with an existing access and area of hardstanding. A minor extension to the building is proposed and a modest sized curtilage is included which will include a hedging boundary and an area for biodiversity enhancements. It is considered that the proposal will not have a significant impact on the openness of the Green Belt'</i>

6.6 **Table 20** shows that 56 C3 dwellings have been permitted in the Green Belt during the period 01 April 2019 to 31 March 2020. All except 1 of these applications were redevelopments/conversions of existing brownfield sites/on previously development land where it was considered that the proposals were in accordance with NPPF Green Belt policy and there has been no deviation from the Local Plan. The 1 exception (19/01586/OUT for 5 dwellings) constituted '*limited infilling in villages*' within the Green Belt and therefore also accords with the provisions of NPPF (paragraph 145). There was 1 other application (19/02992/FULL for 2 dwellings) where the Green Belt overlapped with the site boundary, however no development was proposed in the Green Belt part of the site (located beyond the garden).

b) Maintenance of Long-Term Land Reserve

Objective: Maintain a long-term development land reserve

Core Strategy Policies: CP2

Site Allocations Local Plan: AL/GB4

Targets: Developable land identified beyond 2026

- 6.7 Three sites designated as Rural Fringe by Local Plan Policy RF1 'Rural Fringe' have been allocated for development in the adopted SALP:
- Speldhurst Road, former allotments (AL/GB1)
 - Home Farm, Sherwood Park and Greggs Wood (AL/GB2 'Knights Wood')
 - Hawkenbury Farm, Hawkenbury Road (AL/GB3)
- 6.8 Policy AL/GB4 in the SALP replaced Policy RF1 in the 2006 Local Plan. Three sites are designated to fulfil the function of a long-term land reserve under Policy AL/GB4 in the SALP:
- Culverden Down
 - Grange Road Allotments, Rusthall
 - North Farm Tip
- 6.9 All three of these sites (AL/GB1 – 3) have now been permitted with AL/GB2 and AL/GB3 currently under construction.

Core Policy 3: Transport Infrastructure

CP3 Key Infrastructure Schemes

A21 – the dual carriageway down to the Pembury Roundabout has been completed, future routes are proposed to be protected by Local Plan policies.

Park and Ride – further work commissioned on Park & Ride (completed June 2018 ([see the Tunbridge Wells Park and Ride Feasibility Study](#))). The proposed site (Woodsgate Corner, Pembury) is no longer suitable and is now a proposed allocation for specialist housing for older people and others with care needs (up to 80 C3 extra care units or up to 120 C2 residential care home/nursing care units) in the Pre-Submission Local Plan.

North Farm Estate – these works have now been completed and link up with the new A21 scheme.

Borough Transport Strategy – a new transport strategy review has been published ([see Transport Strategy Review Context and Way Forward](#))

Parking Strategy – Strategy published in 2016 and is being reviewed through preparation of the Local Plan.

Core Policy 4: Environment

Local Indicator CP4a: Monitoring of Habitats and land-cover analysis

- 6.10 Habitat monitoring not been updated since last monitored in 2012. Even so, while there have clearly been some changes since then, it is reproduced in **Table 21** as a useful indication of the respective forms of land cover (KCC, 2021: [see Kent Habitat Survey 2012 Report](#)).

Table 21: Habitat Cover Analysis (Source: KCC, 2012)

Habitat Type	Tunbridge Wells Borough, 2012/13 (Percentages)	Kent County Area, 2012/13 (Percentages)
Built-up Areas	3.2	4
Boundary and Linear Features	2.8	3
Improved Grassland	37.5	30
Arable and Horticulture	26.2	35
Broadleaved, Mixed, and Yew Woodland	18.1	11
Coniferous Woodland	2.6	1
Neutral Grassland	7.1	7
Orchard	1	<1
Standing Open Water	1	1
Other (see Biodiversity Evidence Base)	0.5	10

Core Policy 5: Sustainable Design and Construction

Local Indicator E1: Permissions Granted Contrary to Environment Agency Advice

Objective: To make efficient use of resources by the application of sustainable design principles and to mitigate and adapt to climate change

Targets:

- No development that would have an unacceptable effect on the quality or potential yield of groundwater, the quality within, or supply to, surface water features will be permitted
- No development in areas at high risk from flooding will be permitted without measures to protect it and prevent the increased risk of flooding elsewhere

Table 22: EA Objections to Applications on Flood Risk Basis 2019-2020 (Source: EA, 2020 and TWBC Monitoring, 2020)

Planning Reference	Application Type	EA Comment	Application Result
19/00840/FULL	Residential - Minor	PPS25/TAN15 - Request for FRA/FCA, Risk to life and / or property, Unsatisfactory FRA/FCA Submitted	Application Permitted – EA objection withdrawn provided a flood risk assessment condition is included (conditions 5-7)
19/01444/ENVSCR	Residential - Minor	Unsatisfactory FRA/FCA Submitted	EIA Not Required
19/01722/FULL	Residential - Minor	Unsatisfactory FRA/FCA Submitted	Application Refused; Appeal Dismissed and or Notice Upheld
19/01826/FULL	Residential - Minor	PPS25/TAN15 - Request for FRA/FCA, Unsatisfactory FRA/FCA Submitted	Application Permitted – EA objection withdrawn; consideration that FRA submitted is acceptable.

Planning Reference	Application Type	EA Comment	Application Result
			Requested that a condition is to be added to any approval (condition 3)

6.11 **Table 22**, showing Environment Agency (EA) objections to planning on the basis of flood risk 2019 to 2020, is based on data obtained from the EA (2020: [see Environment Agency Objections to Planning on the Basis of Flood Risk](#)) as well as from TWBC monitoring (2020). This indicates that within 2019-2020, the EA objected to only 4 applications, 2 of which the objections were later withdrawn subject to conditions attached to approvals. The other applications were either refused (1), or an Environmental Impact Assessment was not required (1).

Local Indicator E3: Renewable Energy Generation

Objective: To make efficient use of resources by the application of sustainable design principles and to mitigate and adapt to climate change

Targets: All development (either new build or conversion) with 10 or more residential units or a site area over 0.5ha, or non-residential development with a floorspace of 1,000sqm or a site area over 1.0ha, should incorporate renewable energy technology on site to reduce predicted CO2 emissions by at least 10%

6.12 Renewable energy installations and capacity data is monitored nationally by the Department of Business, Energy and Industrial Strategy (BEIS). Trends in Tunbridge Wells borough are shown in **Table 23** (BEIS, 2020: [see Renewable Energy Statistics](#); also [see Renewable Energy Planning Database Quarterly Extract](#)). This indicates that the number of sites producing renewable energy has continually increased over the period 2014-2019. The capacity (MW) has also generally increased over the same period, despite a small decrease from 2018 to 2019. Overall, however, the total electricity generated (MWh) has continually increased, as has the number of operational renewable electricity generation and storage projects with a capacity of 150KW and over (albeit no new projects in 2019).

Table 23: Renewable Energy Installations, Capacity, Electricity Generated, and Number of Operational Renewable Electricity Generation and Storage Projects in Tunbridge Wells Borough 2014-2019 (Source: BIES, 2020)

Data	2014	2015	2016	2017	2018	2019
Total Number of Sites Producing Renewable Electricity	979	1,240	1,290	1,325	1,373	1,404
Capacity (MW)	4.7	35.6	41.0	41.1	41.5	40.8
Total Electricity Generated (MWh)	4,161	30,987	42,071	42,824	45,095	45,367
Number of Operational Renewable Electricity Generation and Storage Projects (>150kW)	0	2	3	4	5	5

Local Indicator H6: Design Quality

Objectives: To make efficient use of resources by the application of sustainable design principles and to mitigate and adapt to climate change

Targets: 30% of major residential applications to be categorised as 'Good' or 'Very Good' under Building for Life criteria

6.13 There is no monitoring data in relation to Building for Life criteria, although they are largely incorporated into the Council's design policies and guidance.

Air Quality

6.14 An Air Quality Management Area (AQMA) was initially declared in Tunbridge Wells in 2005, based on exceedances of the Air Quality Strategy annual mean objective for nitrogen dioxide (NO₂). The AQMA was extended in 2011 and adjusted at the end of 2018 as part of updating this action plan. The pollutants monitored in the AQMA are nitrogen dioxide (NO₂) and PM₁₀ (particulate matter less than 10 microns diameter).

Objective: To make efficient use of resources by the application of sustainable design principles and to mitigate and to adapt to climate change

Targets:

- 30% of major residential applications to be categorised as 'Good' or 'Very Good' under Building for Life criteria
- Completion of Key Specific Projects Potential expansion of AQMA

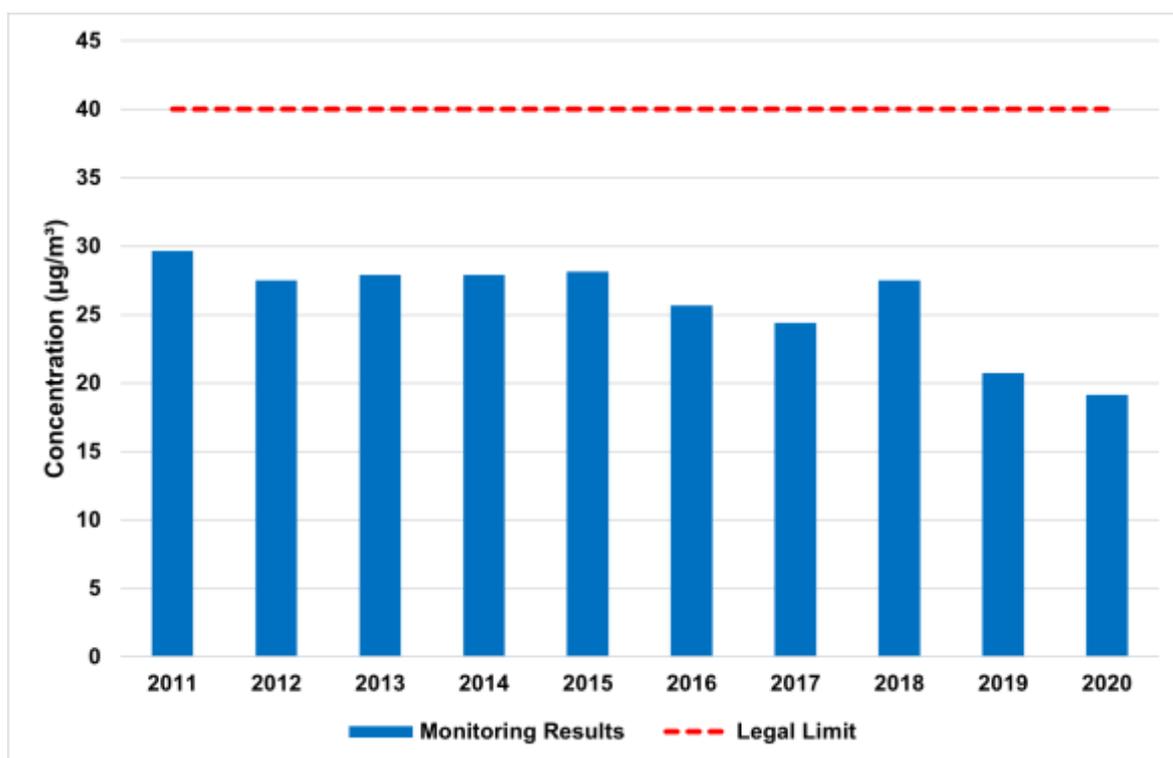


Figure 19: Annual Mean PM10 Monitoring Results for Tunbridge Wells A26 Roadside Monitoring Station 2011-2020 (Source: Kent Air, 2021)

- 6.15 **Figure 19** illustrates the levels of PM10 have not exceeded the legal limits ([see European Commission Air Quality Standards](#)) specified over the monitoring period 2011-2020 for the Tunbridge Wells A26 Roadside Monitoring Station (Kent Air, 2021: [see Monitoring Site Summary](#)).
- 6.16 **Figure 20** shows the number of exceedences (against the exceedence limits: [see European Commission Air Quality Standards](#)) based on 24-hour mean PM10 monitoring results from across the borough over the monitoring period 2011-2020 for the Tunbridge Wells A26 Roadside Monitoring Station (DEFRA, 2021: [see Data Archive](#)).

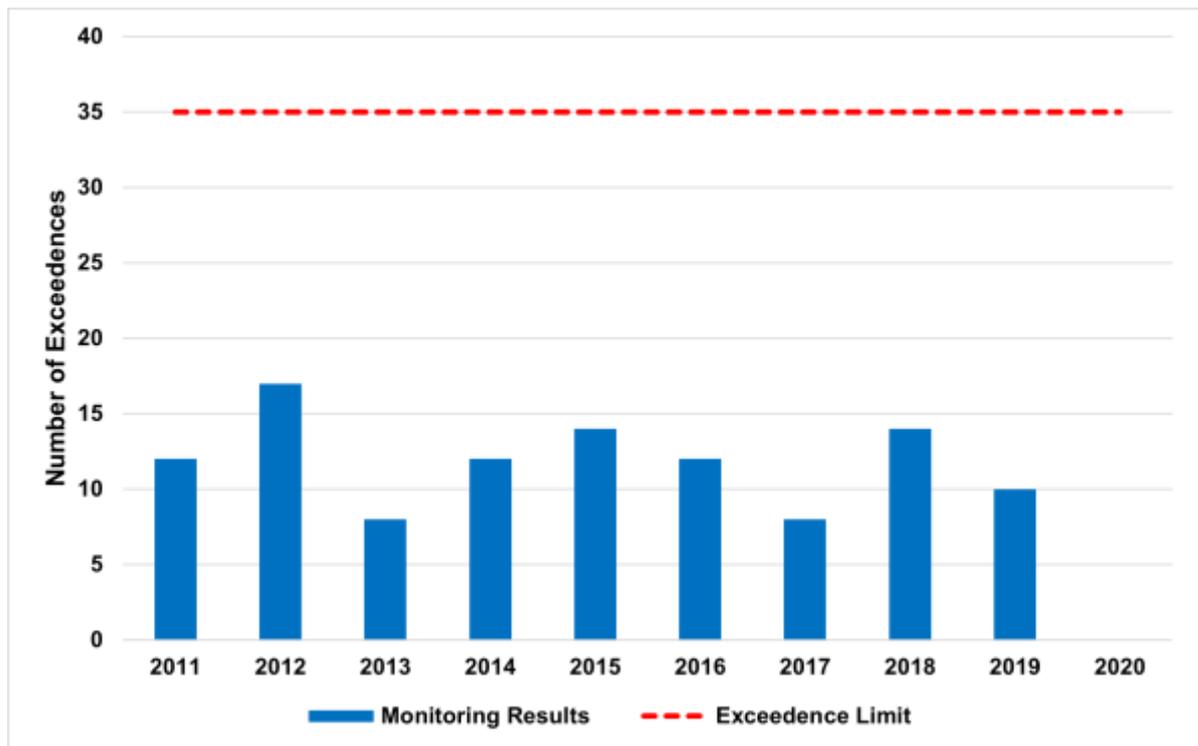


Figure 20: Number of Exceedences Based on 24-Hour Mean PM10 Monitoring Results for Tunbridge Wells A26 Roadside Monitoring Station 2011-2020 (Source: DEFRA, 2021)

- 6.17 As **Figure 20** illustrates, the 24-hour mean PM10 rate has not been exceeded within the monitoring period, with the peak number of exceedences, in 2012, still remaining under half the exceedence limit, and with no exceedences in 2020
- 6.18 **Figure 21** shows the annual mean NO2 monitoring results across all monitoring stations in the Tunbridge Wells borough (TWBC Monitoring, 2020: [see latest Tunbridge Wells Annual Status Report](#)). Although some individual monitoring stations have exceeded the legal limit in each year ([see European Commission Air Quality Standards](#)) as found in Table A.3 of the latest Annual Status Report (see link above), the overall annual mean NO2 has stayed below this limit as the majority of the monitoring points have fallen below the legal limit.

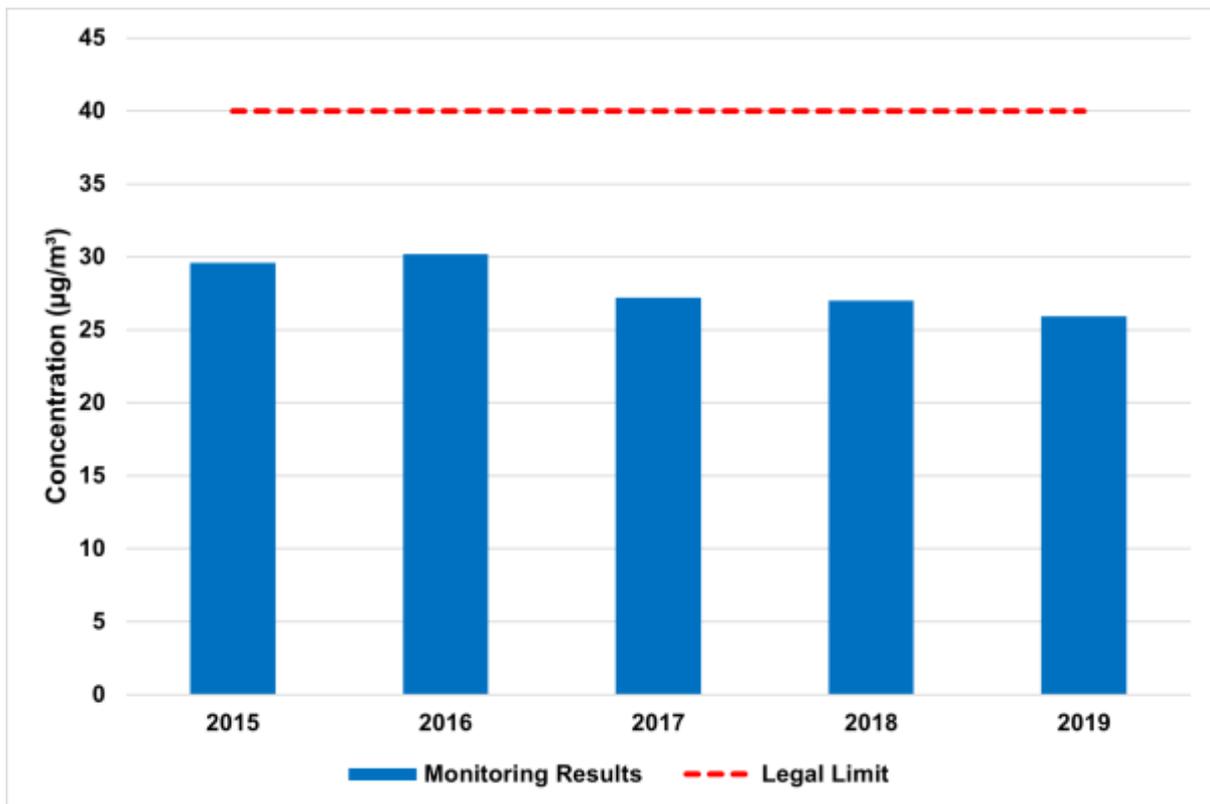


Figure 21: Annual Mean NO2 Monitoring Results Across Tunbridge Wells Borough Monitoring Stations 2015-2019 (Source: TWBC Monitoring, 2020)

Ultra-Low emissions vehicles (ULEVs) registered within the borough

(Ultra-low emission vehicles (ULEVs) are vehicles that emit less than 75g of carbon dioxide (CO₂) from the tailpipe for every kilometre travelled. In practice, the term typically refers to battery electric, plug-in hybrid electric and fuel cell electric vehicles)

Table 24: ULEVs Registered Within the Tunbridge Wells Borough 2011-2019 (Source: DfT/DVLA, 2020)

	2011	2012	2013	2014	2015	2016	2017	2018	2019
Number of ULEV Cars Registered	N/A	65	105	175	370	638	1020	1404	1,846

6.19 **Table 24** shows the number of ULEVs registered within the Tunbridge Wells borough over the period 2011-2019 (DfT/DVA, 2020: [see Statistical Data Set: All Vehicles \(VEH01\): Ultra-Low Emissions Vehicles \(ULEVs\)](#)). This indicates that the number of ULEVs registered in the borough has continued to increase over recent years at an increasing year-on-year rate.

Waste and Recycling

Table 25: Waste and Recycling in Tunbridge Wells Borough 2014/15-2018/19 (Source: DEFRA, 2020)

Year	Total Collected Waste (Tonnes)	Collected Waste Sent for Recycling, Composting, or Reuse (Tonnes)	Collected Waste Not Sent for Recycling (Tonnes)
2014/15	46,375	21,649	24,726
2015/16	46,201	21,024	25,177
2016/17	45,700	22,422	23,278
2017/18	44,557	21,514	23,043
2018/19	42,909	20,477	22,432

6.20 **Table 25** is based on data obtained from DEFRA (2020: [see Statistical Data Set: ENV18 – Local Authority Collected Waste: Annual Results Tables](#)). This shows that the total collected waste (in tonnes) has continually decreased in the borough over the period 2014/15-2018/19 at an increasing year-on-year decline. While the level of waste sent for recycling/composting/reuse and waste not sent for recycling have both decreased (reflecting the overall decrease in total waste), the total level of waste recycled has declined less than the total not recycled, indicating that recycling is increasing in relative terms.

Core Policy 6: Housing Provision

Five Year Housing Land Supply

- 6.21 Housing completion figures are provided in relation to Core Policy 1 – Delivery of Development. Please see the Council’s website for detailed information on the Five-Year Housing Land Supply and the Housing Delivery Test ([see Monitoring Information](#)).
- 6.22 The Five-Year Housing Land Supply Statement contains information on all sites and planning permissions that contribute to the land supply while the Housing Delivery Test Action Plan addresses how the Council intends to support future housing delivery across the borough.

Dwellings Completed on PDL

- Core Strategy Target of 65% on PDL between 2010 and 2026; 2019-20 = 56.3%

Local Indicator H4; Net Additional Traveller Pitches

Target: None set

- 6.23 Between 01 April 2017 and 31 March 2020, there have been 2 net additional pitch completions. Between 01 April 2020 and December 2020, there were 8 net additional Gypsy and Traveller pitches across a number of sites which had extant planning permission (i.e. were not completed, with the exception of 1 site which was a retrospective permission).

6.24 The Pre-Submission Local Plan will aim to plan for 31 additional pitches over the Plan period (to 2038) that will meet the outstanding Gypsy and Traveller Accommodation Assessment need (GTAA, 2018: [see Tunbridge Wells Borough Council Gypsy and Traveller Accommodation Assessment](#)). This outstanding need is based on the need of 32 pitches over the GTAA period 2017-2037, plus 1 additional year to reflect the Local Plan period to 2038 (equating to 1 additional pitch). This totals a need of 33 pitches; however, once completions (2) are deducted, the outstanding need is for 31 pitches. This need will be met primarily through expansion, intensification, and/or regularisation of existing sites, as well as through a new site allocation and new site submission. Further details will be provided in the Local Plan and Housing Topic Papers as part of the Local Plan evidence base.

Affordable Housing Completions

Local Indicator H5: Gross Affordable Housing Completions (Source: TWBC Affordable Housing Completions)

Target: 70 affordable units per annum

Table 26: Gross Affordable Housing Completions (Source: TWBC Monitoring, 2020)

Year	Affordable Homes
2006/07	107
2007/08	53
2008/09	64
2009/10	17
2010/11	96
2011/12	85
2012/13	36
2013/14	14
2014/15	221
2015/16	108
2016/17	139
2017/18	61
2018/19	72
2019/20	70
Average	81.64 per annum

6.25 As shown in **Table 26**, on average, the target of Policy H5 to achieve 70 affordable units per annum has been met over the monitoring period. This helps to ensure that housing remains accessible and affordable to local residents.

Local Indicator H8: Percentage of Completed Dwellings at less than 30 per hectare, between 30 and 50 per hectare and over 50 per hectare

Objective: To provide for the housing needs of all people with a range of house types

Targets: To be identified through the Local Development Framework in the relevant DPD

6.26 In the most recent monitoring year (01 April 2019 – 31 March 2020), the following densities were achieved on site:

Table 27: Approximate Housing Density Achieved On-Site (Completions) in Monitoring Year 01 April 2019 – 31 March 2020 (Source: TWBC Monitoring, 2020)

Density	2019/20 Completions
Less than 30 dph	150 dwellings* (31.65% of total completions)
Between 30 and 50 dph	161 dwellings (33.97% of total completions)
Greater than 50 dph	163 dwellings (34.39% of total completions)

*This figure may be disproportionate due to larger sites including extensive areas for landscaping, etc.

6.27 As indicated in **Table 27**, over 68% of all dwellings completed in 2019/20 were found on sites that achieved densities of 30+ units per hectare. It should be noted however that these are gross densities based on the area relating to the planning permission (so includes non-developable areas, such as for open space/landscaping, and/or roads (including access roads) which is particularly relevant for the larger sites). As such, in future it would be useful to review net densities further, particularly on larger sites.

Self-Build and Custom Housebuilding

6.28 Since 01 April 2016, the Council, as the Local Planning Authority, has a statutory responsibility to keep a Self-Build and Custom Housebuilding Register for the borough, allowing people who wish to build their own home to register their interest. The Council is expected to permit, within 3 years, an equal number of serviced plots to those on the Register as at 30 October each year.

6.29 On 25 June 2020, Tunbridge Wells Borough Council's Cabinet approved the proposal to implement a local connection test to the Council's Self-Build and Custom Housebuilding Register. This resulted in the splitting of the Register into two parts. Part 1 lists all those people on the Register who meet the local connection test criteria, and Part 2 lists all those people on the Register who do not meet the local connection test criteria. The Council contacted all those people on the Register to update their details accordingly, and in accordance with the Regulations removed all those who did not respond or who requested to be removed from the Register.

6.30 As of the end of the last base period (31 October 2020), there are 134 registrations on the Register; 108 are placed on Part 1, and 26 are placed on Part 2. It is the need of those on Part 1 which the upcoming Local Plan will need to plan for. While the Council does not have a monitoring mechanism in place to monitor self/custom build schemes, the Council carried out a survey between 27 May – 22 June 2020 whereby all agents and applicants of single dwelling completions between 01 April 2016 – 31 March 2019 were contacted as a means of determining the proportion of these considered to be self/custom build. The results of this survey indicated that approximately 50% of single dwelling completions are self/custom build. Applied to

completions between 01 April 2016-31 March 2020, this equates to approximately 120-125 self/custom build completions. There are also approximately 180 extant single dwelling permissions as at 01 April 2020 (where approximately 90 could be considered self/custom build).

- 6.31 While numbers remaining on the Register from previous base periods following the implementation of the local connection test represents those who have not yet had their need met (i.e. 108 on Part 1), the upcoming Local Plan, due to be adopted in 2022, will aim to meet both this existing need of 108 (Part 1), as well as projected forward to the end of the Plan period (31 March 2038) based on the average number of registrations per month. Further details of this will be provided in the Council’s Regulation 19 Pre-Submission Local Plan and Housing Topic Papers, due to be published prior to the Regulation 19 consultation in March 2021.

Core Policy 7: Employment Provision

Local Indicator BD1: Total Amount of Additional Employment Floorspace - by type

Objectives of indicator: To provide good quality employment land to contribute to strategic and local requirements

Target: Maintain overall amount of floorspace in the borough

Table 28: Permitted Employment Floorspace Across the Tunbridge Wells Borough for Monitoring Year 01 April 2019 – 31 March 2020 (Source: TWBC Monitoring, 2020)

Data	B1a	B1b	B1c	B1 Total	B2	B8
Gain (sqm)	2,322	0	0	2,322	340	1,749
Loss (sqm)	2,118	178	493	2,789	1,747	1,416
Net (sqm)	204	-178	-493	-467	-1,407	333

- 6.32 During the monitoring year 01 April 2019 – 31 March 2020, there have been losses across the varying types of employment floorspace. The loss of B1 (Business) uses have primarily come from the conversion of offices to dwellings. There have also been large losses in B2 (General Industrial) uses, although this includes an individual permission (19/02382/FULL) to change from B2 (-1,392 sqm) to B8 (+928 sqm) hence the increase in B8 (Storage or Distribution) floorspace.
- 6.33 Acknowledging the issue of office loss, a Town Centre Office Market Review was produced in March 2018. The conclusions of the report included that 22% of the office space existing at May 2013 has been lost through change of use to residential via Permitted Development Rights and a further 22% is at risk. As a result of the findings in this report, a number of Article 4 Directions were served on Office accommodation across Tunbridge Wells by the Council. The service of an Article 4 Direction removes Permitted Development Rights from the properties in question and means that any proposal to change the use to residential at that site would now require full planning permission and be subject to assessment and consideration against relevant national and local planning policy.

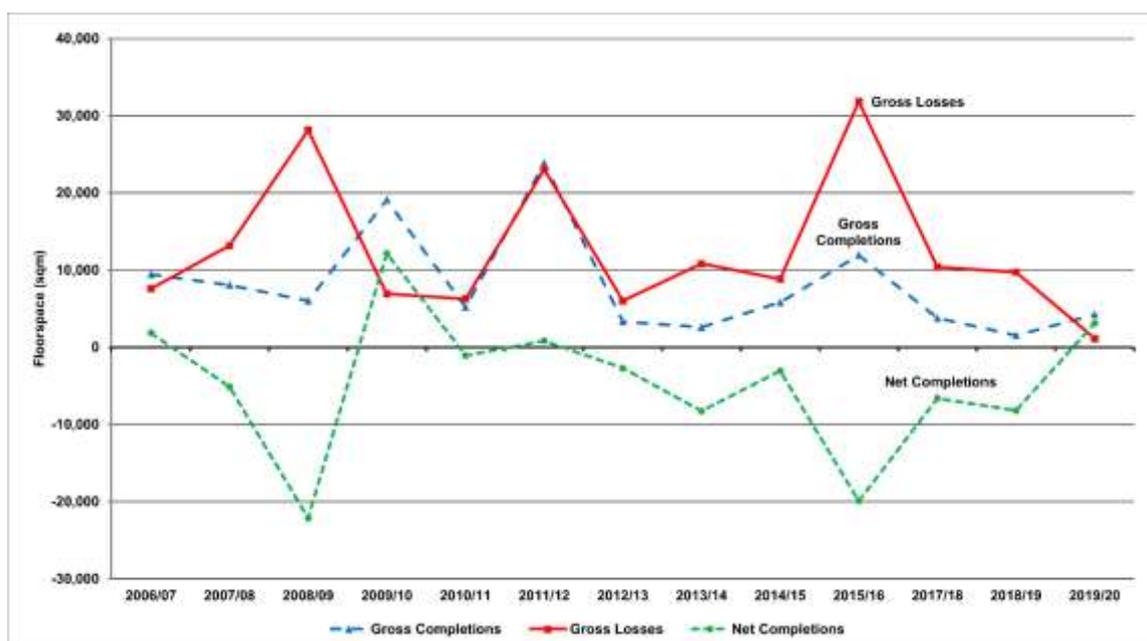


Figure 22: A2/B1-B8 Total Floorspace Completed (sqm) (Source: TWBC Monitoring, 2020)

6.34 As **Figure 22** illustrates, the 2019/20 monitoring year saw a net gain in employment floorspace completions (more gains than losses) for the first time in the borough since 2011/12. It is hoped that the implementation of Article 4 directions and both the policies and allocations contained within the new Local Plan will encourage further net gains in employment floorspace and prevent any further losses.

Local Indicator BD2: Total Amount of Employment Floorspace on Previously Developed Land (PDL) – by type

Objective: To conserve finite, non-renewable resources such as land, energy, water, soil and air quality

Targets: >45% on PDL

Table 29: Gross Employment Floorspace Permitted on Previously Developed Land in Monitoring Year 01 April 2019 – 31 March 2020 (Source: TWBC Monitoring, 2020)

Data	B1a	B1b	B1c	B1 Total	B2	B8
Total Gross Gain (sqm)	2,322	0	0	2,322	340	1,749
Gross Gain (sqm) on PDL	2,322	0	0	2,322	340	1,749
Gross Gain on PDL %	100%	N/A	N/A	100%	100%	100%

6.35 **Table 29** illustrates the above target of >45% on PDL was met across the borough for the monitoring year 01 April 2019-31 March 2020, with 100% (gross; i.e. not including losses in **Table 28**) of all new B1a (not including B1b and B1c as there were no permissions in these categories), B2, and B8 permissions located on PDL (as all permissions included either conversions, extensions, internal/external alterations, demolitions, and/or changes of use on/to existing buildings). This ensures the best use of available land across the borough.

Local Indicator BD4: Total Amount of Floorspace for 'Town Centre Uses' within defined Town Centre boundaries

Objective: To provide good quality employment land to contribute to strategic and local requirements

Target: Maintain overall amount of employment floorspace in the borough

Table 30: Permitted Floorspace for 'Town Centre Uses' in Town Centres and Outside Town Centres in the Tunbridge Wells Borough During Monitoring Year 01 April 2019 – 31 March 2020 (Source: TWBC Monitoring, 2020)

Data	A1	A2	B1a	D2
Town Centre Gross Permissions (sqm)	399	489	1,915	146
Town Centre Gross Losses (sqm)	2,141	209	884	80
Town Centre Net Total (sqm)	-1,742	280	1,031	66
Outside Town Centre Gross Permissions (sqm)	178	45	407	0
Outside Town Centre Gross Losses (sqm)	2,274	179	1235	340
Outside Town Centre Net Total (sqm)	-2,096	-134	-828	-340
Total Gross Permissions (sqm)	577	534	2,322	146
Total Gross Losses (sqm)	4,415	388	2,119	420
Net Total (sqm)	-3,838	146	203	-274

6.36 As **Table 30** illustrates, based on new permissions in the 01 April 2019-31 March 2020 monitoring year, there has been substantial floorspace loss of A1 uses within defined Town Centres across the borough, despite A2, particularly B1a, and D2 uses seeing gains (albeit there still remaining a net overall loss in floorspace). Outside Town Centres, however, all use classes have seen loss, including greater losses for A1 uses. From this, it is evident that a new approach to Town Centres Uses within the defined Town Centres is required in the new Local Plan.

Local Indicator BD5: Amount of employment land (B1-B8) lost to residential development

Objective: To provide good quality employment land to contribute to strategic and local requirements

Target: No target set, to be established through DPD

Table 31: Employment Land Lost to Residential Based on Permissions During Monitoring Year 01 April 2019 – 31 March 2020 (Source: TWBC Monitoring, 2020)

Data	Area (ha)
Residential to Employment Gross Permissions	0.04
Employment to Residential Gross Permissions	0.69
Net Loss of Employment Land to Residential	0.65

6.37 From **Table 31**, it can be seen that the amount of employment land lost to residential has increased, from 0.44 hectares in the 2018/19 monitoring year to 0.65 hectares in the 2019/20 monitoring year. The Article 4 Directions will be important in managing any further loss of employment land across the borough. Regard should also be given to the [Sevenoaks and Tunbridge Wells Economic Needs Study 2016](#) that was produced to inform the new Local Plan.

Core Policy 8: Retail, Leisure & Community Facilities Provision

Local Indicator CP8a: Retention of Community Services

Objective: To resist the loss of community facilities and provide additional facilities as necessary

Targets: No net loss of community facilities in neighbourhood centres and village centres

6.38 As part of a review of Centres across the borough, several changes are being proposed to Neighbourhood and Village Centres in the Pre-Submission Local Plan. These can be seen in **Table 32**.

Table 31: Pre-Submission Local Plan Proposed Changes to Centres in Tunbridge Wells Borough

Centres	Status in Pre-Submission Local Plan	Reason
Primary Regional Town Centre		
Royal Tunbridge Wells	Retained	Facilities still present and area still acting as a Primary Regional Town Centre
Town Centre		
Cranbrook	Retained	Facilities still present and area still acting as a Town Centre
Paddock Wood	Retained	Facilities still present and area still acting as a Town Centre
Southborough	Retained	Facilities still present and area still acting as a Town Centre
Rural Service Centre		
Hawkhurst	Retained	Facilities still present and area still acting as a Rural Service Centre
Neighbourhood Centre		
Broadmead	Removed	Limited facilities now present at Broadmead centre
Hawkenbury	Retained	Facilities still present and area still acting as a Neighbourhood Centre
High Brooms	Retained	Facilities still present and area still acting as a Neighbourhood Centre
North Southborough	Retained	Facilities still present and area still acting as a Neighbourhood Centre
Rusthall	Removed	Redefined as a Village Settlement as facilities still present
Sherwood	Retained	Facilities still present and area still acting as a Neighbourhood Centre
Showfields	Retained	Facilities still present and area still acting as a Neighbourhood Centre

Centres	Status in Pre-Submission Local Plan	Reason
Silverdale	Retained	Facilities still present and area still acting as a Neighbourhood Centre
St Barnabas	Retained	Facilities still present and area still acting as a Neighbourhood Centre
St John's	Retained	Facilities still present and area still acting as a Neighbourhood Centre
St Peter's	Retained	Facilities still present and area still acting as a Neighbourhood Centre
Knights Wood	New	Area deemed to be serving as a Neighbourhood centre within new Knights Wood development
Within Paddock Wood including land in east Capel	New	A new neighbourhood centre will be designated as part of the extension of Paddock Wood and east Capel, to be defined through the masterplanning process and the resultant Supplementary Planning Document
Tudeley Village	New	A new neighbourhood centre will be designated at the new Tudeley Village, which is expected to include a village centre, as well as a number of smaller neighbourhood centres, to be defined through the masterplanning process and the resultant Supplementary Planning Document
Village Settlements (previously Village Centres)		
Benenden	Retained	Facilities still present and area still acting as a Village Settlement
Bidborough	Retained	Facilities still present and area still acting as a Village Settlement
Brenchley	Retained	Facilities still present and area still acting as a Village Settlement
Five Oak Green	Retained	Facilities still present and area still acting as a Village Settlement
Frittenden	Retained	Facilities still present and area still acting as a Village Settlement
Hawkhurst (The Moor)	Removed	Now has relatively few services which are consolidated in the settlement centre itself
Horsmonden	Retained	Facilities still present and area still acting as a Village Settlement
Iden Green	Removed	Limits to Built Development removed from settlement due to limited facilities and transport links, therefore the Village Settlement boundary (as designated by LBD) has also been removed
Kilndown	Removed	Limits to Built Development removed from settlement due to limited facilities and transport links, therefore the Village Settlement boundary (as designated by LBD) has also been removed
Lamberhurst	Retained	Facilities still present and area still acting as a Village Settlement
Langton Green	Retained	Facilities still present and area still acting as a Village Settlement
Matfield	Retained	Facilities still present and area still acting as a Village Settlement

Centres	Status in Pre-Submission Local Plan	Reason
Pembury	Retained	Facilities still present and area still acting as a Village Settlement
Rusthall	New	Facilities present and area acting as a Village Settlement (redefined from Neighbourhood Centre)
Sandhurst	Retained	Facilities still present and area still acting as a Village Settlement
Sissinghurst	Retained	Facilities still present and area still acting as a Village Settlement
Speldhurst	Retained	Facilities still present and area still acting as a Village Settlement
Tudeley Village	New	As per the provisional defined Limits to Built Development boundaries

6.39 As shown in **Table 31**, there have been some changes to Neighbourhood and Village Centres across the borough since they were designated through the 2006 Local Plan, while no changes have been proposed to Primary Regional Town Centre, Town Centres, and Rural Service Centre. Notably, the Pre-Submission Local Plan has renamed Village Centres to Village Settlements, as there are no defined village ‘centres’ as such. Village Settlements are defined by the Limits to Built Development boundary.

6.40 With regard to losses/gains, while the Pre-Submission Local Plan proposes the removal of two neighbourhood centres and 3 Village Settlements, there are 3 new Neighbourhood Centres and 2 new Village Settlements proposed. Therefore, overall, the aim of resisting loss of these facilities has been achieved.

Local Indicator CP8b: Amount/Retention/Provision of Recreation Open Space

Objective: To provide, retain and, where necessary, improve a range of leisure, recreational and cultural facilities

Targets: Retention/provision of adequate open space

6.41 As part of the evidence base produced to support the new Local Plan, the Borough Council commissioned an evidence base document that explores the provision of Open Space available across the borough. The data provided within this report will act as a baseline for future monitoring of Open Space provision across the borough ([view the Open Space Study](#)).

Local Indicator CP8c: Amount of New Retail Floorspace Provided

Objective: To provide new retail and leisure facilities according to the approach set out in the Core Strategy

Targets: 26,236sqm of net comparison floorspace by 2017; provision of a convenience supermarket at Southborough

6.42 A number of sites have been allocated in the Site Allocations Local Plan (2016) to meet the retail need, including a proposed scheme at Royal Victoria Place and through the redevelopment of the former cinema site, both in Royal Tunbridge Wells. The level and locations of retail need have been subsequently reviewed through new retail and leisure studies.

Local Indicator CP8d: Completion of Infrastructure Projects

Targets: Completion of key specific projects

Table 32: Completion of Key Infrastructure Projects (Source: TWBC, 2020)

District General Hospital	Complete
Completion of allocations for sports pitches and other recreational facilities	Planning application pending for expansion of existing recreational facilities through the provision of additional sports pitches, together with associated additional car parking provision, 'ball stop' fencing and ground works at Rusthall Recreation Ground (21/00068/FULL); also see Playing Pitch Strategy 2017-2033 (2017)
Completion of allocations for children's play spaces	Provided as part of relevant schemes

Local Indicator LS4: Royal Tunbridge Wells Town Centre Uses within the Primary Shopping Areas

Table 33: Royal Tunbridge Wells Town Centre Uses (Source: TWBC, 2019)

Character Area	Retail Frontage			Vacant Units	
	A1 (%)	Non A1 (%)	Target Non A1 (%)	Total Number of Vacant Units	% of Total Units
1 – Royal Victoria Place/Market Square/Ely Court	No longer monitored	No longer monitored	No longer monitored	No longer monitored	No longer monitored
2 – Calverley Road (West)	80%	20%	15%	6	17%
3 – Monson Road/Camden Road	69%	31%	15%	9	10%
4 – Calverley Road (East)	66%	34%	30%	4	13%
5 – Grosvenor Road/Goods Station Road	77%	23%	30%	1	3%
6 – Mount Pleasant Road (North)	42%	58%	40%	3	13%
7 – Mount Pleasant Road (North)	64%	36%	40%	6	12%

Character Area	A1 (%)	Non A1 (%)	Target Non A1 (%)	Total Number of Vacant Units	% of Total Units
8 – Vale Road/Grove Hill Road	62%	38%	40%	3	9%
9 – High Street/Castle Street/Chapel Place	66%	34%	45%	7	6%
10 – The Pantiles/Union Square	64%	36%	45%	4	6%

- 6.43 **Table 34** shows the percentage of each Character Area Frontage falling within Use Class A1 (retail shops). This is based on data obtained by the Council for the 2018/19 monitoring year. This shows that 4 of the character areas exceed the Local Plan 2006 threshold for their respective areas; although, the Council has recently taken a more flexible approach towards change of use in light of the economic climate in recent years. A new approach to changes of use within the Character Areas is being proposed in the new Local Plan.
- 6.44 As at 2018/19, the number of vacant units within Royal Tunbridge Wells Town Centre remained relatively low, with Calverley Road (West) having experienced the highest vacancy rate of 17%.
- 6.45 However, it should be noted that this data was not monitored for the 2019/20 year primarily as the Covid-19 pandemic and associated national lockdowns had closed a number of shops, mostly temporarily, which would have provided an inaccurate record (e.g. on the total number of vacant units). Despite this, the Council commissioned Nexus Planning to undertake a ‘Tunbridge Wells Retail, Commercial Leisure & Town Centre Uses Study Update’ which will be published as part of the Pre-Submission Local Plan evidence base. This includes Town Centre health checks carried out in August 2020 of all the key centres (i.e. Royal Tunbridge Wells, Paddock Wood, Southborough, Cranbrook, and Hawkhurst) which has considered the diversity of uses, vacant street level property, retailer representation, pedestrian flows, etc.. However, due to Covid-19 restrictions, it is likely that this will be reviewed in 2021.

Commentary

Core Policy 1: Delivery of Development

- 6.46 Performance has been strong during the monitoring year in terms of the location of development, being mostly with the defined Limits to Built Development, showing that the spatial strategy is being followed. The proportion of housing development on previously developed land has slipped a little below the 65% target, derived from the earlier Core Strategy, but this should be seen in the context of the relatively high level of housebuilding. Furthermore, it is considered that this target is no longer realistic in the context of the far higher (more than double) local housing need target derived from the Government’s ‘Standard Method’, which will require substantial

greenfield sites to be identified. Therefore, the target is proposed to change in the Pre-Submission Local Plan to achieving the Council's annualised windfall sites allowance (see **Appendix 1**).

- 6.47 Overall, the policy, in conjunction with the Housing Provision policy CP6 (see below), is clearly delivering the scale of housebuilding sought by the Core Strategy.
- 6.48 The main issue with regard to the housing target in the Core Strategy is that it is now itself out-of-date. This is because, as per the Planning Practice Guidance (PPG, 2019: [see Housing Supply and Delivery; Paragraph: 003 Reference ID: 68-003-20190722](#)), '*where strategic policies are more than 5 years old, or have been reviewed and found in need of updating, local housing need calculated using the standard method should be used in place of the housing requirement*'. Hence, while housing delivery is successful in relation to the Core Strategy's targets, the Standard Method approach for identifying need will provide the starting point for looking at provision in the new Local Plan.

Core Policy 2: Green Belt

- 6.49 The Core Strategy gives high regard to the protection of Green Belt. Monitoring records shows that only 19 housing schemes were permitted in the Green Belt during the period 01 April 2019 to 31 March 2020, providing for a total of 56 dwellings. All except one of these applications were redevelopments/conversions of existing brownfield sites/on previously development land where it was considered that the proposals were in accordance with NPPF Green Belt policy and there has been no deviation from the Local Plan. The one exception (19/01586/OUT for 5 dwellings) constituted 'limited infilling in villages' within the Green Belt and therefore also accords with the provisions of NPPF (paragraph 145). There was one other application (19/02992/FULL for 2 dwellings) where the Green Belt overlapped with the site boundary, however no development was proposed in the Green Belt part of the site (located beyond the garden). In summary, it is considered that the NPPF and Local Plan Green Belt policies are being applied effectively.
- 6.50 In relation to the discrete target relating to the maintenance of a long-term land reserve, it is noted that all three identified sites have now been permitted. Hence, this policy provision has essentially been fulfilled.

Core Policy 3: Transport Infrastructure

- 6.51 This promotes key transport projects and measures (aside from accessible development locations), to promote sustainable transport, notably through the adoption of travel plans. It is noted that the A21 Tonbridge to Pembury dualling has been completed and is now fully operational. Works to link North Farm Estate to the improved A21 have also been completed, providing good strategic access.
- 6.52 In relation to Park and Ride, the further work commissioned (completed June 2018) found that the proposed site facility at Woodsgate Corner in Pembury was not financially viable without considerable subsidy, so is not currently being pursued.

Notwithstanding this, the publication of a 2019 '[Transport Strategy Review Context and Way Forward](#)' report demonstrates a continuing overall commitment by the Borough Council to take a proactive role in transport matters.

- 6.53 Development Management practice, supported by Kent County Council Highways, is to secure travel plans for larger development schemes.

Core Policy 4: Environment

- 6.54 Local indicators focus on biodiversity; these show that SSSIs are generally in satisfactory or improving condition. While reviews of ecological designations are only periodic, the Council has produced a comprehensive report on the state of the borough's biodiversity resources. This is available online. It also shows that the Council is an early implementer of the new national approach to achieving net gains in biodiversity, which will be further developed as the Local Plan progresses.
- 6.55 The rich historic environment continues to be closely monitored to ensure its conservation. An additional Conservation Area was also designated at Warwick Park within the 2018/19 monitoring period.

Core Policy 5: Sustainability

- 6.56 This policy has a number of threads. Where data is available, it gives positive results. It shows a high regard to the Environment Agency's comments on planning applications that may impact on flood risk. Recognising that flood risk is a particularly important issue in parts of the borough, the Council has also commissioned a Level 1 and 2 '[Strategic Flood Risk Assessment](#)' (2019), which has recently been published online as part of the Local Plan's evidence base.
- 6.57 Requirements for renewable energy generation set out in the Core Strategy have been carried forward through the adopted Renewable Energy Supplementary Planning Document ([see Supplementary Planning Documents](#)) initially published in 2007 and updated in 2019, and are now well established in Development Management practice. Both the number of sites producing renewable energy and the amount of generation continue to increase.
- 6.58 Most recent air quality monitoring shows a notable improvement in the vicinity of the designated Air Quality Monitoring Area along the A26. Further monitoring results are needed before determining that this is a longer-term improvement.
- 6.59 In terms of air quality, the levels of particulate matter are well below prescribed limits, while average NO₂ levels are also below the relevant limits, although there are still some exceedances at individual monitoring stations.
- 6.60 Looking forward, monitoring of sustainability issues can be further developed (see Section 7).

Core Policy 6: Housing Provision

- 6.61 Actual housing completions are reported under Core Policy 1, while the Council's latest [Five-Year Housing Land Supply Statement](#), covering the period 01 April 2019 to 31 March 2020, shows that there is not currently five years' supply of deliverable housing sites inclusive of a 5% buffer when measured against the Standard Method housing target (currently at 4.83 years). This is despite the fact that delivery has well exceeded the adopted Core Strategy target.
- 6.62 Achieving fewer dwellings per annum than the Standard Method target may also have further implications for future housing land supply requirements (namely the buffers to be applied to the requirement) based on the new Housing Delivery Test (HDT). In accordance with paragraph 73/215 (and footnote 39/7 respectively) of the [NPPF](#) (2019), if delivery over the past 3 recorded years falls below 85% of the housing requirement, a 20% buffer is required for the five-year housing land supply requirement and, if below 75%, a presumption in favour of sustainable development applies.
- 6.63 The latest HDT results (MHCLG, 2021: [see Housing Delivery Test: 2020 Measurement](#)), covering the period 01 April 2019 – 31 March 2020, indicate that Tunbridge Wells has delivered 85% against this requirement, and is therefore required to produce only a [Housing Action Plan](#) which sets out the actions that it will take to increase delivery. More significantly, the Council is progressing a new Local Plan which will bring forward additional site allocations for residential development that will aim to meet the Standard Method housing target and any appropriate buffer.
- 6.64 In relation to gypsy and traveller pitches, the outstanding need for pitches will be met primarily through expansion, intensification, and/or regularisation of existing sites, as well as through a new site allocation and new site submission. The Council will provide further details in the upcoming Pre-Submission Local Plan and Housing Topic Papers as part of the Local Plan evidence base.
- 6.65 The proportion of new homes built on previously developed land, being 56.3%, against a target of 65% has been commented on under CP1. It should be added though that the Council will continue to seek to maximise brownfield and urban housing potential through Local Plan allocations and any suitable windfall developments.
- 6.66 Affordable housing provided across the borough exceeded the target of 70 units per year (on average over the period 2006/07-2019/20), although it is noted that affordability has decreased in recent years as evidenced by the increasing affordability ratio for the borough. This will be considered in developing the new Local Plan affordable housing policy.
- 6.67 It is worth also noting that over 68% of homes completed in 2019/20 were built at densities of more than 30 dwellings per hectare. The potential for more, higher density schemes (primarily in accessible, urban/brownfield locations) will be considered as part of the new Local Plan.

Core Policy 7: Employment Provision

- 6.68 The business indicators generally show positive trends, although the recent increases in unemployment are a concern. The need to continue to provide a good mix of strategic and local business sites and premises is clearly important in supporting employment opportunities across the borough. While there has been an apparent overall net loss of office space to residential, this needs to be taken into account when determining windfall allowances but is noted that there are still gross completions which provides an indication of continued demand for employment land and premises.
- 6.69 The tourism sector is important locally, with increases in the number of new hotel bedrooms. Further information is in the [Hotel Capacity Study](#) (2017) on the Council's website.

Core Policy 8: Retail, Leisure and Community Facilities Provision

- 6.70 Of particular note are the changes in facilities at local Centres, which has been considered in the context of the development of the spatial strategy for the new Local Plan.
- 6.71 National trends in retail floorspace have been reflected locally, with a clear need to provide realistic forecasts of likely floorspace requirements moving forward.

7.0 Updating and Refinement of Monitoring Frameworks

- 7.1 Key to effective monitoring is the establishment of a baseline from which future monitoring activities can assess the performance of Local Plan policies.
- 7.2 **Appendix 1** details the proposed monitoring indicators for the new Local Plan, including whether this information is currently readily available to the Council and also who will be responsible for monitoring specific indicators.
- 7.3 The new monitoring framework was consulted on through the Draft Local Plan Regulation 18 Consultation, although has since been revised in **Appendix 1** for inclusion in the Pre-Submission Local Plan. This revision has taken into account comments and feedback received through this consultation. The Monitoring Framework may be further reviewed and/or amended following the Regulation 19 consultation and prior to examination and adoption.
- 7.4 In addition, the 2016 Sustainability Appraisal (SA/SEA) Scoping Report for the draft Local Plan identified 19 issues deemed pertinent to the borough that span the social, environmental and economic pillars of sustainable development. Therefore, the proposed SA/SEA monitoring framework is also set out, in **Appendix 2**, as a basis for future monitoring of key sustainability issues.

Appendix 1: Pre-Submission Local Plan Monitoring Framework

Policy No.	Policy	Target	Indicator	Source
Strategic Policies				
STR 1	The Development Strategy	To maintain at least a 5 Year Housing Land Supply	Number of years housing land supply at 31 March of each year	Tunbridge Wells Borough Council (TWBC)
		At least 85% of annual housing requirement built	Housing completions by a) Parish and b) borough	TWBC
		An annual increase in Local Jobs	Employment/Unemployment Figures	Kent County Council (KCC)
		New development permitted within Limits to Built Development	Number of (and percentage of total borough wide) additional housing units permitted on non-allocated sites within LBD	TWBC
STR 2	Place Shaping and Design	Support for policy at appeal	65% or more appeal decisions support TWBC conclusion on Policy STR 2	TWBC/PINS
STR 3	Brownfield Land	To meet the Council's annualised windfall contribution	Number of dwellings completed on windfall sites (mostly brownfield) as of 31 March of each year	TWBC
STR 4	Ensuring Comprehensive Development	Enabling policy with no specific target but progress to be regularly monitored	Enabling policy with no specific target but progress to be regularly monitored	N/A
STR 5	Infrastructure and Connectivity	Education; sufficient school places	Ratio of applicants per school place (borough wide)	KCC
		Connectivity; increased broadband coverage across the borough	Broadband Coverage (borough wide)	KCC
STR 6	Transport and Parking	Improved transportation provision across the borough	Proportion of new houses permitted within 800m of a bus stop within year	TWBC
		Improved parking provision across the borough	Number of off-street public car parking spaces within Borough as of 31st March of year	TWBC

Policy No.	Policy	Target	Indicator	Source
STR 7	Climate Change	Support for policy at appeal	65% or more appeal decisions support TWBC conclusion on Policy STR 7 (if relevant to appeal)	TWBC/PINS
STR 8	Conserving and enhancing the natural, built, and historic environment	Support for policy at appeal	65% or more appeal decisions support TWBC conclusion on Policy STR 8 (if relevant to appeal)	TWBC/PINS
STR 9	Green Belt	Protect Green Belt from inappropriate development	65% or more appeal decisions support TWBC conclusion on Policy STR 9 (if relevant to appeal)	TWBC/PINS
STR 10	Neighbourhood Plans	Neighbourhood Plans successful at examination	Number and percentage of Neighbourhood Plans progressed to referendum	TWBC
Place Shaping Policies (Strategic)				
STR/RTW 1	The Strategy for Royal Tunbridge Wells	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/RTW 2	The Strategy for Royal Tunbridge Wells Town Centre	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/SO 1	The Strategy for Southborough	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/SS 1	The Strategy for Paddock Wood and East Capel	Residential development in line with policy target	Housing Completions	TWBC

Policy No.	Policy	Target	Indicator	Source
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/SS 2	The Strategy for Paddock Wood Town Centre	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/SS 3	The Strategy for Tudeley Village	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/PW 1	The Strategy for the Parish of Paddock Wood	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/CA 1	The Strategy for Capel Parish	Residential development in line with policy target	Housing Completions	TWBC
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/CRS 1	The Strategy for Cranbrook and Sissinghurst Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
STR/HA 1	The Strategy for Hawkhurst Parish	Residential development in line with policy target	Housing Completions	TWBC

Policy No.	Policy	Target	Indicator	Source
		Employment floorspace development in line with policy target	Employment Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/BE 1	The Strategy for Benenden Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/BI 1	The Strategy for Bidborough Parish	Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/BM 1	The Strategy for Brenchley and Matfield Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/FR 1	The Strategy for Frittenden Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/GO 1	The Strategy for Goudhurst Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/HO 1	The Strategy for Horsmonden Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/LA 1	The Strategy for Lamberhurst Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/PE 1	The Strategy for Pembury Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/RU 1	The Strategy for Rusthall Parish	Residential development in line with policy target	Housing Completions	TWBC

Policy No.	Policy	Target	Indicator	Source
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/SA 1	The Strategy for Sandhurst Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
PSTR/SP 1	The Strategy for Speldhurst Parish	Residential development in line with policy target	Housing Completions	TWBC
		Delivery of identified infrastructure	Key infrastructure provided	TWBC
Environment and Design				
EN 1	Sustainable Design	Rejection of unsustainable design in planning applications	65% or more appeal decisions support TWBC conclusion on policy EN 1 (if relevant to appeal)	TWBC/PINS
EN 2	Sustainable Design Standards	Attainment of required score for relevant standard e.g. BREEAM	Grading of energy performance certificates	TWBC
EN 3	Climate Change Mitigation and Adaptation	Target Emission Rate 10% below Building Regulation requirement through 'fabric first' approach and a further 15% total energy reduction via renewable energy generating technology for major developments	Energy Calculations	TWBC
		Adherence to policy EN 3	65% or more appeal decisions support TWBC conclusion on policy EN 3 (if relevant to appeal)	TWBC/PINS
EN 4	Historic Environment	Protect historic environment	65% or more appeal decisions support TWBC conclusion on policy EN 4 (if relevant to appeal)	TWBC/PINS
EN 5	Heritage Assets	Protect heritage assets	Number of Listed Buildings "At Risk" as of 31 March of each year	TWBC/Historic England
			65% or more appeal decisions support TWBC conclusion on policy EN 5 (if relevant to appeal)	TWBC/PINS

Policy No.	Policy	Target	Indicator	Source
EN 6	Shop Fronts	High standard of shop front design and support of policy EN 6 at appeal	65% or more appeal decisions support TWBC conclusion on policy EN 6 (if relevant to appeal)	TWBC/PINS
EN 7	Advertisements	High standard of advertisement design and support of policy EN 7 at appeal	65% or more appeal decisions support TWBC conclusion on policy EN 7 (if relevant to appeal)	TWBC/PINS
EN 8	Outdoor Lighting and Dark Skies	Maintain current level of lighting in rural areas	No deterioration in dark skies mapping outside allocated areas	Campaign to Protect Rural England (CPRE)
Natural Environment				
EN 9	Biodiversity Net Gain	Net gains in biodiversity in developments	Number of biodiversity units lost or gained as part of major developments	TWBC/KMBRC/KNP
EN 10	Protection of Designated Sites and Habitats	No deterioration in condition of SSSIs	SSSI condition monitoring	Natural England
		Maintain percentage of land cover of designated sites	Monitoring of coverage of designated nature conservation sites	TWBC/KMBRC
EN 11	Ashdown Forest Special Protection Area and Special Area of Conservation	Achieve targets set out in the Strategic Access Management and Monitoring Strategies (SAMMS) projects	Implementation and monitoring of SAMMS projects	SAMMS Partnership
EN 12	Trees, Woodlands, Hedges, and Development	Strong protection of trees and hedges	65% or more appeals related to TPO works and protected and protected hedgerows dismissed	TWBC/PINS
EN 13	Ancient Woodland and Veteran Trees	Retention of Ancient Woodland and support of policy EN 13 at appeal	65% or more appeal decisions support TWBC conclusion on policy EN 13 (if relevant to appeal)	TWBC/PINS
EN 14	Green, Grey, and Blue Infrastructure	Increase in managed Green Infrastructure (GI)	Area of land controlled under Landscape and Ecology Management Plans (LEMPs)	TWBC
EN 15	Local Green Space	No loss of Local Green Space (LGS)	Quantity of LGS across the borough	TWBC
EN 16	Landscape Within the Built Environment	Retention of character of defined area and support of policy EN 16 at appeal	65% or more appeal decisions support TWBC conclusion on policy EN 16 (if relevant to appeal)	TWBC/PINS

Policy No.	Policy	Target	Indicator	Source
EN 17	Arcadian Areas	Protect the distinctive character of Arcadian areas and support of policy EN 17 at appeal	65% or more appeal decisions support TWBC conclusion on policy EN 17 (if relevant to appeal)	TWBC/PINS
EN 18	Rural Landscape	Protection of rural landscape	65% or more appeal decisions support TWBC conclusion on policy EN 18 (if relevant to appeal)	TWBC/PINS
EN 19	High Weald Area of Outstanding Natural Beauty (AONB)	Retention of essential character of High Weald AONB and support of policy EN 19 at appeal	65% or more appeal decisions support TWBC conclusion on policy EN 19 (if relevant to appeal)	TWBC/PINS
			Monitoring of the AONB Management Plan	High Weald AONB Unit
EN 20	Agricultural Land	Retention of 'best and most versatile' agricultural land	Hectares of 'best and most versatile' land which would be lost as a result of large-scale development on sites greater than 20 hectares	TWBC
Air, Water, Noise, and Land				
EN 21	Air Quality	Continued reduction in air pollution	Pollutant levels at key locations	Kent Air
EN 22	Air Quality Management Areas (AQMA)	Air quality below the level warranting an AQMA	Pollutant levels within AQMA	Kent Air
EN 23	Biomass Technology	N/A enabling policy	Number of biomass schemes permitted	TWBC
EN 24	Water Supply, Quality and Conservation	Support EA advice on flood risk and drainage matters	Measures within state of water in Kent reports	Environment Agency (EA)
		Water use at 110lpppd	Water use calculations	TWBC
EN 25	Flood Risk	Support EA advice on flood risk and drainage matters	Measures within state of water in Kent reports	Environment Agency (EA)
EN 26	Sustainable Drainage	Support EA advice on flood risk and drainage matters	Measures within state of water in Kent reports	Environment Agency (EA)
EN 27	Noise	Retention of tranquil areas	Tranquillity/noise maps	CPRE/Department for Environment, Food & Rural Affairs (DEFRA)
EN 28	Land Contamination	Proper regard to land contamination	65% or more appeal decisions support TWBC conclusion on policy EN 28 (if relevant to appeal)	TWBC/PINS

Policy No.	Policy	Target	Indicator	Source
Delivery of Housing				
H 1	Housing Mix	Periodic review of approved schemes in terms of proportion of dwellings of smaller 1-2 bed dwellings	To establish the proportion of smaller units	TWBC specific review TWBC Affordable Housing Government Returns
H 2	Housing Density	Effective use of available land having regard to local character	Net density of major residential developments	TWBC specific review
H 3	Affordable Housing	60% of affordable housing to be social rent	The tenure mix of individual sites	Planning records TWBC Affordable Housing Government Returns
H 4	Estate Regeneration	Housing to meet local needs through estate regeneration	Net change in affordable housing units	Planning records TWBC Affordable Housing Government Returns
H 5	Rural Exception Sites	At least 1 rural exception site to be approved every 5 years	Dwellings approved on rural exception sites	TWBC
Different Types of Housing Delivery				
H 6	Housing for Older People and People with Disabilities	To approve at least one specialised housing scheme every 2 years.	Additional yearly provision of specialised housing.	TWBC
H 7	Rural Workers' Dwellings	This is a permission policy. Target not applicable.	The number of rural workers dwellings approved	TWBC
H 8	Self-Build and Custom Housebuilding	To meet policy requirement on identified major site allocations	Proportion of dwellings on permitted schemes of identified major site allocations that are self/custom build	TWBC
H 9	Gypsies and Travellers	To meet the identified need of Gypsies and Travellers within the borough	The number of (net) additional Gypsy and Traveller pitches approved	TWBC
H 10	Replacement dwellings outside the Limits to Built Development	Policy Support of Policy H 10 at appeal	65% or more appeal decisions support TWBC conclusion on policy H 10 (if relevant to appeal)	TWBC/PINS

Policy No.	Policy	Target	Indicator	Source
H 11	Residential extensions, alterations, outbuildings, and annexes	Policy Support of Policy H 11 at appeal	65% or more appeal decisions support TWBC conclusion on policy H 11 (if relevant to appeal)	TWBC/PINS
H 12	Extensions to residential curtilages (domestic gardens) outside the Limits to Built Development	Policy Support of Policy H 12 at appeal	65% or more appeal decisions support TWBC conclusion on policy H 12 (if relevant to appeal)	TWBC/PINS
Employment Provision				
ED 1	The Key Employment Areas	Provision of new business floorspace	Floorspace of new build developments through permissions	TWBC
ED 2	Retention of existing employment sites and buildings	No net loss of business floorspace	Number of planning permissions for reuse or redevelopment of business (B class) sites for housing	TWBC
ED 3	Digital communications and Fibre to the Premises (FTTP)	Improved coverage of high-speed broadband across the borough	Broadband Coverage (borough wide)	KCC
ED 4	Rural Diversification	N/A - enabling policy	Number and type of changes of use of rural buildings	TWBC
ED 5	Conversion of Rural Buildings outside the Limits to Built Development	Net increase in business floorspace in converted rural buildings	Planning Records	TWBC
ED 6	Commercial and private recreational (including equestrian) uses in the countryside	Policy compliant equestrian development and support of policy ED 6 at appeal	65% or more appeal decisions support TWBC conclusion on policy ED6 (if relevant to appeal)	TWBC/PINS
ED 7	Retention of existing, and promotion of new, tourist accommodation and attractions	No net loss of tourism of sites or floorspace	65% or more appeal decisions support TWBC conclusion on policy ED7 (if relevant to appeal)	TWBC
Town, Rural Service, Neighbourhood, and Village Centres				

Policy No.	Policy	Target	Indicator	Source
ED 8	Town, Rural Service and Neighbourhood Centres, and Village Settlements Hierarchy	Hierarchy identified by policy but without specific targets, so no indicators identified		
ED 9	Defined Town and Rural Service Centres	Retain retail function of Town and Rural Service Centres	Retail floorspace permitted (net)	TWBC
ED 10	Sequential Test and Local Impact Test	Retain retail function of Town and Rural Service Centres	Retail floorspace permitted (net) above the impact threshold outside of defined centres	TWBC
ED 11	Primary Shopping Areas and Retail Frontages	Retain retail function of Town and Rural Service Centres	Retail floorspace permitted (net) above the impact threshold outside of defined centres	TWBC
ED 12	Retention of local services and facilities	No net loss of village shops and services	Planning application/appeal records for retail and service uses (Class A and Class D)	TWBC
Transport and Parking				
TP 1	Transport Assessments, Travel Plans, and Mitigation	Major developments supported by a Transport Assessment and Travel Plan	Percentage of relevant applications where Transport Assessment and Travel Plan secured	TWBC
TP 2	Transport Design and Accessibility	Policy compliance and support of policy TP 2 at appeal	65% or more appeal decisions support TWBC conclusion on policy TP 2 (if relevant to appeal)	TWBC/PINS
TP 3	Parking Standards	Application of parking standards and 65% support of policy TP 3 at appeal	65% or more appeal decisions support TWBC conclusion on policy TP 3 (if relevant to appeal)	TWBC/PINS
TP 4	Public Car Parks	No net loss of public car parking spaces	Number of off-street public car parking spaces within borough as of 31 March each year	TWBC
TP 5	Safeguarding Railway Land	No development permitted to prejudice railway routes and support of policy TP 5 at appeal	65% or more appeal decisions support TWBC conclusion on policy TP 5 (if relevant to appeal)	TWBC/PINS
TP 6	Safeguarding Roads	No development permitted to prejudice safeguarded routes and support of policy TP 6 at appeal	65% or more appeal decisions support TWBC conclusion on policy TP 6 (if relevant to appeal)	TWBC/PINS
Open Space, Sport, and Recreation				

Policy No.	Policy	Target	Indicator	Source
OSSR 1	Retention of Open Space	No net loss of identified open space areas or facilities and support of policy OSSR 1 at appeal	65% or more appeal decisions support TWBC conclusion on policy OSSR 1 (if relevant to appeal)	TWBC/PINS
OSSR 2	The Provision of Publicly Accessible Open Space and Recreation	Residential development to provide Open space in line with standards	Developments above open space threshold (20 dwellings) permitted with on-site open space provision	TWBC

Appendix 2: Pre-Submission Local Plan Sustainability Appraisal Monitoring Framework

SA Topic	SA Objective	Possible Monitoring Indicator	Source
Air	1. Reduce air pollution	Pollutant levels at key locations in the borough	Kent Air online database
Biodiversity	2. Protect and enhance biodiversity and the natural environment	<p>Number of developments generating adverse effects on sites recognised for biodiversity value (including local sites as well as Sites of Special Scientific Interest (SSSIs))</p> <p>Number of developments generating biodiversity enhancement including GI</p> <p>Deterioration in condition of SSSIs.</p> <p>Reduction in percentage cover of sites designated for nature conservation</p> <p>Biodiversity units lost or gained as a result of major development</p>	TWBC/ Natural England/TWBC/KMBRC
Business Growth	3. Encourage business growth and competitiveness	Floor space targets for new Local Plan.	TWBC

SA Topic	SA Objective	Possible Monitoring Indicator	Source
Climate Change & Energy	4.Reduce carbon footprint and adapt to predicted changes	Attainment of carbon reduction targets Grading of Energy Performance Certificates. Number of EV car registrations. Number of renewable energy schemes.	TWBC/KCC
Deprivation	5.Reduce poverty and assist with regeneration	3 yearly Indices of Multiple Deprivation (IMD) Report.	KCC Research and Intelligence Monthly Bulletin (deprivation and poverty)
Education	6.Improve educational attainment and enhance the skills base	Ratio of applicants to school places.	KCC Education Department
Employment	7.Facilitate and support employment opportunities	Monthly unemployment records.	KCC Research and Intelligence Monthly Bulletin (economy and employment)
Equality	8.Increase social mobility and inclusion	Number of accessible new homes	TWBC
Health	9.Improve health and wellbeing, and reduce health inequalities	3 yearly Indices of Multiple Deprivation (IMD) Report.	KCC Research and Intelligence Monthly Bulletin (public health)
Heritage	10.Preserve and enhance historical and cultural heritage assets	Number of designated heritage assets in the Borough. Number of Listed Buildings 'At Risk'.	TWBC

SA Topic	SA Objective	Possible Monitoring Indicator	Source
Housing	11. Provide sufficient housing to meet identified needs	5 year Housing Land Supply Housing Delivery Test	TWBC
Land use	12. Protect soils, and reuse previously developed land and buildings	MGB Allocation Summary Brownfield register	TWBC
Landscape	13. Protect and enhance landscape and townscape	Majors permitted per year in the AONB. Monitoring of the AONB Management Plan.	TWBC
Noise	14. Reduce noise pollution	Tranquillity maps Noise maps	CPRE DEFRA
Resources	15. Reduce the impact of resource consumption	% of relevant applications where demolition is avoided % of relevant applications where materials are sourced responsibly Safeguarding of mineral and waste assets	TWBC/KCC
Services and facilities	16. Improve access to and range of key services and facilities	Postcodes with superfast broadband. Distance from development to services and facilities	TWBC

SA Topic	SA Objective	Possible Monitoring Indicator	Source
Travel	17.Improve travel choice and reduce the need to travel by private vehicle	% of relevant applications where a Travel Plan is secured.	TWBC
Waste	18.Reduce waste generation and disposal	Household waste (kg/person) Household waste diverted from landfill (%)	TWBC Contracts Team
Water	19.Manage flood risk and conserve, protect and enhance water resources	Various metrics within 'State of Water in Kent' report. Water Use calculations	EA/TWBC