

# **Local Plan Regulation 19 representations in document order**

## **Comments on Section 5: Place Shaping Policies: Goudhurst**

# **Local Plan Regulation 19 representations in document order**

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

## Comment

Consultee	Julie Davies [REDACTED]
Email Address	[REDACTED]
Company / Organisation	CPRE Kent
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	CPRE Kent [REDACTED]
Comment ID	PSLP_561
Response Date	28/05/21 11:24
Consultation Point	Policy PSTR/GO 1 The Strategy for Goudhurst parish ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	CPRE Kent
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
PSTR/GO1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Yes
Is sound	Yes

Complies with the Duty to Cooperate

Don't know

#### Question 4a

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

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

#### Question 5

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

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

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

CPRE Kent notes the neighbourhood plan that will presumably be “made” before the draft Local Plan is submitted/approved. We agree with the Council's decisions on the sites not to be allocated.

#### Question 7

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

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

No, I do not wish to participate in examination hearing session(s)

#### Future Notifications

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

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

## Comment

Consultee	Margaret Arger & Robin Oakley ( [REDACTED] )
Email Address	[REDACTED]
Company / Organisation	Staplehurst Parish Council
Address	Parish Office Staplehurst TN12 0BJ
Event Name	Pre-Submission Local Plan
Comment by	Staplehurst Parish Council ( Margaret Arger & Robin Oakley - [REDACTED] )
Comment ID	PSLP_1321
Response Date	03/06/21 09:34
Consultation Point	Policy PSTR/GO 1 The Strategy for Goudhurst parish ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Staplehurst Parish Council
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

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

Policy PSTR/GO 1 The Strategy for Goudhurst parish

*[TWBC: for comments relating to STR/CRS 1, STR/HA 1, PSTR/BE 1, PSTR/FR 1, PSTR/GO 1, PSTR/SA 1 and TP 6 - please see Comment Numbers PSLP\_1315, PSLP\_1317-1318, PSLP\_1320-1322 and PSLP\_1325]*

**Question 4a**

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

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

#### Question 5

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##### Introduction

Tunbridge Wells Borough borders the southern edge of Staplehurst parish and includes Frittenden, Cranbrook and Sissinghurst and Goudhurst parishes. Other parishes in the borough where development might affect Staplehurst are Hawkhurst, Sandhurst, & Benenden. We have concentrated on the numbers of dwellings which it is proposed to permit within the borough and we have commented where appropriate. We have also commented on a number of highways and transportation matters in the plan. Where two figures are quoted for the number of dwellings which might be permitted in a parish these are minimum and maximum e.g. 161 – 170.

Goudhurst 25-25 Goudhurst has poor road access which is unsuitable for heavy goods vehicles. The nearest railway station is Marden (5.2 miles) with Staplehurst, Frant and Etchingam between 7.2 and 9.1 miles away. Again, library, adult learning social care would be provided at Cranbrook Community Hub.

#### Question 7

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

For office use only

**If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box.** Not Stated

## Comment

Consultee	Ms Alison Burchell [REDACTED]
Email Address	[REDACTED]
Company / Organisation	NHS Kent and Medway Clinical Commissioning Group
Address	[REDACTED] [REDACTED] Ashford [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	NHS Kent and Medway Clinical Commissioning Group [REDACTED]
Comment ID	PSLP_1559
Response Date	04/06/21 09:16
Consultation Point	Policy PSTR/GO 1 The Strategy for Goudhurst parish ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	NHS Kent and Medway Clinical Commissioning Group
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy PSTR/GO 1 The Strategy for Goudhurst parish	
Paragraph Number: 5.536	

*[TWBC: this representation has been input against Policies AL/RTW 8, AL/RTW 15, STR/CRS 1, AL/HA 5, STR/SS 3, PSTR/HO 1, PSTR/BM 1, STR/SS 1, PSTR/GO 1 and AL/HO 3– see Comment Numbers PSLP\_1550, PSLP\_1551, PSLP\_1552, PSLP\_1553, PSLP\_1556, PSLP\_1568 PSLP\_1570, PSLP\_1554, PSLP\_1559 and PSLP\_1569]*

#### Question 4

**Do you consider that the Local Plan:**

Is legally compliant	Don't know
Is sound	Yes
Complies with the Duty to Cooperate	Yes

#### Question 4a

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

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

#### Question 5

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

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

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

I can confirm that the CCG has been engaged in the local plan development process in order to assess implications for primary medical care provision. The impacts are set out in the IDP and will be regularly reviewed and updated in line with the CCG's GP Estates Strategy. The following comments are provided on specific policies in relation to general practice provision for completeness.

##### **Goudhurst**

**5.536 The IDP identified that the GP practice serving Goudhurst (the practice that serves the Horsmonden/Lamberhurst/Brenchley/Matfield/Goudhurst cluster area) will require new practice premises to serve this area.**

Comment: To clarify the CCG has not identified a need for a new premises requirement for Goudhurst. It is a separate general practice and has a separate catchment area to Howell Surgery where a potential need was originally identified and detailed in the IDP. This information provided by the CCG in the IDP has been misinterpreted and can be updated to further clarify this point. The reference to 'cluster areas', now Primary Care Networks, is simply recognising that practices work in a network with other practices.

#### Question 6

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



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

The following point should be removed from the Local Plan as it is a misinterpretation of the information provided by the CCG detailed in the IDP. See comment above in Section 5.5.536 **The IDP identified that the GP practice serving Goudhurst (the practice that serves the Horsmonden/Lamberhurst/Brenchley/Matfield/Goudhurst cluster area) will require new practice premises to serve this area.**

#### **Question 7**

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

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

No, I do not wish to participate in examination hearing session(s)

#### **Future Notifications**

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

No, I do not wish to be notified of future stages of the Local Plan

# Supporting Information File Ref No: SI\_156

## Comment

Consultee	Strategic Planning ( [REDACTED] )
Email Address	[REDACTED]
Company / Organisation	Kent County Council (Planning and Environment)
Address	Invicta House County Hall MAIDSTONE ME14 1XX
Event Name	Pre-Submission Local Plan
Comment by	Kent County Council (Planning and Environment) ( Strategic Planning - [REDACTED] )
Comment ID	PSLP_2213
Response Date	04/06/21 16:56
Consultation Point	Policy PSTR/GO 1 The Strategy for Goudhurst parish ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Files	<a href="#">Kent County Council-full representation.pdf</a>
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Kent County Council (Growth, Environment & Transport)
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	Policy PSTR/GO 1 The Strategy for Goudhurst parish

[TWBC: see attached full representation, which has been input against the following: Section 1 (PSLP\_2164), Section 2 (PSLP\_2168), Section 3 (PSLP\_2169), Policies STR1 (PSLP\_2170), STR2 (PSLP\_2171), STR4 (PSLP\_2172), STR5 (PSLP\_2174), STR7 (PSLP\_2175), STR8 (PSLP\_2176), Section 5 (PSLP\_2177), Section 5: Royal Tunbridge Wells (PSLP\_2178), Policies AL/RTW1 (PSLP\_2180), AL/RTW5 (PSLP\_2181), AL/RTW7 (PSLP\_2183), AL/RTW14 (PSLP\_2184), AL/RTW17 (PSLP\_2185), AL/RTW21 (PSLP\_2187), STR/SO1 (PSLP\_2188), AL/SO1 (PSLP\_2190), Strategic Sites (PSLP\_2192), STR/SS1 (PSLP\_2193), STR/SS2 (PSLP\_2195), STR/SS3 (PSLP\_2196), STR/PW1 (PSLP\_2199), AL/PW1 (PSLP\_2200), STR/CA1 (PSLP\_2201), AL/CRS1 (PSLP\_2202), AL/CRS2 (PSLP\_2203), AL/CRS3 (PSLP\_2204), AL/CRS4 (PSLP\_2205), AL/CRS6 (PSLP\_2206), AL/CRS7 (PSLP\_2207), STR/HA1 (PSLP\_2208), PSTR/BE1 (PSLP\_2209), PSTR/BI 1 (PSLP\_2210), PSTR/BM1 (PSLP\_2211), PSTR/FR1 (PSLP\_2212), PSTR/GO1 (PSLP\_2213), PSTR/HO1 (PSLP\_2214), AL/HO1 (PSLP\_2215), PSTR/LA1 (PSLP\_2216), AL/LA1 (PSLP\_2217), PSTR/PE1 (PSLP\_2218), AL/PE4 (PSLP\_2219), PSTR/RU1 (PSLP\_2220), PSTR/SA1 (PSLP\_2221), AL/SA1 (PSLP\_2222), PSTR/SP1 (PSLP\_2223), EN1 (PSLP\_2224), EN3 (PSLP\_2225), EN4 (PSLP\_2226), EN5 (PSLP\_2227), EN8 (PSLP\_2228), EN9 (PSLP\_2229), EN10 (PSLP\_2230), EN12 (PSLP\_2231), EN13 (PSLP\_2232), EN14 (PSLP\_2233), EN18 (PSLP\_2234), EN19 (PSLP\_2235), EN20 (PSLP\_2236), EN25 (PSLP\_2237), EN26 (PSLP\_2238), H1 (PSLP\_2239), H3 (PSLP\_2240), H7 (PSLP\_2241), ED1 (PSLP\_2242), ED2 (PSLP\_2243), ED3 (PSLP\_2244), ED4 (PSLP\_2245), ED5 (PSLP\_2246), ED6 (PSLP\_2247), Town, Rural Service, Neighbourhood, and Village Centres (PSLP\_2248), Policies TP1 (PSLP\_2249), TP2 (PSLP\_2250), TP3 (PSLP\_2251), TP4 (PSLP\_2252), TP5 (PSLP\_2253), TP6 (PSLP\_2254), OSSR1 (PSLP\_2255), Appendix 4 (PSLP\_2256) and Evidence Base (whole Plan) (PSLP\_2257)

#### Question 4a

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

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

#### Question 5

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

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

#### Public Rights of Way

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

#### Question 6

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

#### **Question 7**

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

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

#### **Question 7a**

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

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

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

#### **Future Notifications**

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

# **Local Plan Regulation 19 representations in document order**

**Comments on Section 5: Place  
Shaping Policies: Goudhurst: Policy  
AL/GO 1: Land east of Balcombes Hill  
and adjacent to Tiddymotts Lane**

## Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Southern Water Services Plc
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Southern Water Services Plc [REDACTED]
Comment ID	PSLP_1212
Response Date	03/06/21 15:31
Consultation Point	Policy AL/GO 1 Land east of Balcombes Hill and adjacent to Tiddymotts Lane ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Southern Water
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
<b>Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.</b>	
Policy AL/GO 1 Land east of Balcombes Hill and adjacent to Tiddymotts Lane	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Yes

Is sound	Yes
Complies with the Duty to Cooperate	Yes

#### Question 4a

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

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

#### Question 5

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Southern Water is the statutory wastewater undertaker for Goudhurst. Our assessment has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required, which may affect the site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.

#### Question 6

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

In consideration of the above, we recommend the following criterion for Policy AL/GO 1

Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purposes.

#### Question 7

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

No, I do not wish to participate in examination hearing session(s)

## Future Notifications

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



# **Local Plan Regulation 19 representations in document order**

**Comments on Section 5: Place  
Shaping Policies: Goudhurst: Policy  
AL/GO 2: Land at Triggs Farm,  
Cranbrook Road**

# Supporting Information File Ref No: SI\_31

## Comment

Agent	Mr David Bedford [REDACTED]
Email Address	[REDACTED]
Company / Organisation	DHA Planning Ltd
Address	Eclipse House Eclipse Park MAIDSTONE ME14 3EN
Consultee	Mr David Masters [REDACTED]
Address	Eclipse House Eclipse Park MAIDSTONE ME14 3EN
Event Name	Pre-Submission Local Plan
Comment by	Mr David Masters [REDACTED]
Comment ID	PSLP_483
Response Date	26/05/21 09:28
Consultation Point	Policy AL/GO 2 Land at Triggs Farm, Cranbrook Road ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.8
Files	<a href="#">PSLP_481-483_DHA Planning for D Masters.pdf</a>
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Mr D Masters
Question 2	
Agent's Name and Organisation (if applicable)	DHA Planning
Question 3	

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

Policy

### Question 3a

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

Policy AL/GO 2 Land at Triggs Farm, Cranbrook Road

### Question 4a

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

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

### Question 5

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#### 1.1 Introduction

1.1.1 These representations have been prepared by DHA Planning on behalf of Mr D Masters in respect of the Tunbridge Wells Borough Council Regulation 19 pre-submission Local Plan consultation.

1.1.2 Mr Masters owns Triggs Farm, Goudhurst, which is identified as an allocation for potential residential development within the pre-submission Local Plan (Policy AL/GO 2).

1.1.3 The site is located within the High Weald Area of Outstanding Natural Beauty (which washes over the whole village). However, it benefits from outline planning permission for the erection of 12 dwellings granted at appeal in January 2019.

1.1.4 Based on the current national and local planning context, we agree with the Council that the site to be suitable for formal allocation and we consider there to be a sound basis to allow development within the High Weald Area of Outstanding Natural Beauty ('AONB'). However, we consider the proposed policy requires modification for the reasons we set out within this representation.

#### 1.7 Policy AL/GO 2 – Land at Triggs Farm, Goudhurst

1.7.1 By way of context, the land within our client's control covers an area of 1.49 ha. It constitutes an established detached dwelling (Kestrel) located within the limits to built development (LBD) and a larger cornfield situated adjacent, but outside of, the LBD boundary on the eastern fringe of Goudhurst.

[TWBC: for site location plan see full representation attached].

1.7.2 Kestrel is a large detached property. The property is broadly set at 90 degrees to the road frontage. The former cornfield where the majority of new homes are proposed is directly accessible via an existing private road and adjoins the rear boundaries of four detached properties (Merredene, Daintree, Scotney and Holly House). It extends to approximately 4 ha, albeit the allocation has been restricted to a much smaller area given the need to respond to the topography of the area.

1.7.3 South of the field is Triggs Farm, whilst to the east is Paynetts Farm. Both consist of a range of existing and converted agricultural buildings, including the listed Triggs Farmhouse.

1.7.4 Immediately west of the proposed entrance to the field is an electrical substation building. Beyond this is the sports pitch associated to Goudhurst and Kilndown Church of England School.

1.7.5 Goudhurst benefits from good access to a range of shops and services within the village centre and excellent links to nearby towns that offer enhanced employment, retail and leisure facilities. Furthermore, the site sits immediately east of Goudhurst and Kilndown Church of England Primary School.

1.7.6 Having regard to this context, proposed policy AL/GO 2 states:

*'This site, as defined on the Goudhurst Policies Map, is allocated for residential development providing approximately 12 (11 net) dwellings, of which 40 percent shall be affordable housing.(1) Development on the site shall accord with the following requirements:1. Provide a new vehicular access onto Cranbrook Road, to include the demolition of the dwelling 'Kestrel';2. Development to be focused towards the flatter northern part of the site, on the area identified for residential use on the site layout plan;3. Regard to be given to existing hedgerows and mature trees on site, with the layout and design of the development protecting those of most amenity value, as informed by an arboricultural survey and landscape and visual impact assessment;4. The development shall take account of landscaping on-site and ensure provision of landscape buffers as indicated on the site layout plan;5. An archaeological desk-based assessment is required for the site;6. The development to be informed by an ecology assessment, to be submitted with the planning application;7. Contributions are to be provided to mitigate the impact of the development, in accordance with Policy PSTR/GO 1'.*

#### Response

1.7.7 Our client supports the general thrust of the policy requirements, which largely reflects the current planning approval (reference 17/02765/OUT dated 16 August 2017 - illustrative layout below) but we seek modification to the detailed criteria and are concerned about the lack of engagement on the proposed allocation.

*[TWBC: see approved illustrative layout in full representation attached].*

1.7.8 Owing to the compelling housing need, we consider the below drawing provide an illustrative indication of how an alternative scheme could potentially be adapted to deliver a higher number of small units, with increased additional affordable housing and with no demonstrably greater impact on the AONB. We therefore consider the site allocation capacity should increase to 20 homes.

*[TWBC: see intensified scheme in full representation attached].*

1.7.9 Based on 12 homes (11 net), with 40% affordable provision, we are also concerned about the practicality of delivering 4 affordable units on site. Whilst the owner continues to explore all opportunities to secure a suitable Affordable Housing partner, this represents a significant challenge owing to the manner in which affordable units are managed. Four units, of which only two will be social rental, results in significant management costs that we understand to be prohibitive to stock acquisition. Based on this context, there should be recognition in the emerging policy that Affordable Housing may need to be provided in a more flexible tenure such that a developer may self deliver without needing to dispose of the homes to an Affordable Housing provider or by way of a commuted payment if it can be evidenced that an Affordable Housing partner cannot be secured.

1.7.10 Finally, we consider that the allocation is too prescriptive in respect of the proposed access. As part of the successful appeal, access was to be derived via the western edge of the property Kestrel. However, opportunities continue to be pursued in respect of the upgrading of the existing vehicle access track and making this safe. The benefit of this is that it would improve safety for all of those users that currently are served by the existing arrangement, including the properties to the north of the cornfield. For such a benefit to be achieved, it would require modification of the proposed wording.

1.7.11 In summary, the site is suitable, available and deliverable for development and is actively being promoted by our client. However, we object to the lack of dialogue and engagement in formulating the detailed criteria of the policy. Furthermore, to be a sound and deliverable allocation the yield of the allocation the wording should be amended as follows:

*'This site, as defined on the Goudhurst Policies Map, is allocated for residential development providing approximately 20 dwellings, of which 40 percent shall be affordable housing.(1) Development on the site shall accord with the following requirements:1. Provide a safe access onto Cranbrook Road;2. Development to be focused towards the flatter northern part of the site, on the area identified for residential use on the site layout plan;3. Regard to be given to existing hedgerows and mature trees*

on site, with the layout and design of the development protecting those of most amenity value, as informed by an arboricultural survey and landscape and visual impact assessment;4. The development shall take account of landscaping on-site and ensure provision of landscape buffers as indicated on the site layout plan;5. An archaeological desk-based assessment is required for the site;6. The development to be informed by an ecology assessment, to be submitted with the planning application;

7. Contributions are to be provided to mitigate the impact of the development, in accordance with Policy PSTR/GO 1'

**1.8 8. Affordable housing to be provided on site, unless demonstrated that no suitable Affordable Housing provider can be secured. In such an event, there shall be a flexible approach to the Affordable Housing tenure so that it can be delivered without the need for an Affordable Housing provider, such as Shared Equity or First Homes or the onsite affordable may be replaced by a commuted sum towards provision off site** Summary and Conclusions

1.8.1 This representation has been prepared on behalf of Mr D Masters in response to the Tunbridge Wells Borough Council Pre-Submission Local Plan Consultation. The purpose being to provide comment on the Council's proposed development strategy and the associated policies.

1.8.2 In this respect, we support the aspiration to meet housing need in full and consider that a dispersed growth strategy represents the optimum means to achieve this. Furthermore, we support the inclusion of our client's site in Goudhurst, but the detailed policy requires modification if the site is to be deemed deliverable.

1.8.3 We trust the contents of this representation are clear and hope that the comments are useful in guiding the forthcoming stage of the plan making process.

[TWBC: DHA's representation on behalf of Mr D Masters has been split into three separate areas: PSLP\_481 - Vision and Objectives, PSLP\_482 - Section 4: The Development Strategy, and PSLP\_483 - Section 5: Goudhurst Policy AL/GO 2. For full representation see attached]

## Question 6

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

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

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

1.7.10 Finally, we consider that the allocation is too prescriptive in respect of the proposed access. As part of the successful appeal, access was to be derived via the western edge of the property Kestral. However, opportunities continue to be pursued in respect of the upgrading of the existing vehicle access track and making this safe. The benefit of this is that it would improve safety for all of those users that currently are served by the existing arrangement, including the properties to the north of the cornfield. For such a benefit to be achieved, it would require modification of the proposed wording.

1.7.11 In summary, the site is suitable, available and deliverable for development and is actively being promoted by our client. However, we object to the lack of dialogue and engagement in formulating the detailed criteria of the policy. Furthermore, to be a sound and deliverable allocation the yield of the allocation the wording should be amended as follows:

*'This site, as defined on the Goudhurst Policies Map, is allocated for residential development providing approximately 20 dwellings, of which 40 percent shall be affordable housing.(1) Development on the site shall accord with the following requirements:1. Provide a safe access onto Cranbrook Road;2. Development to be focused towards the flatter northern part of the site, on the area identified for residential use on the site layout plan;3. Regard to be given to existing hedgerows and mature trees*

on site, with the layout and design of the development protecting those of most amenity value, as informed by an arboricultural survey and landscape and visual impact assessment;4. The development shall take account of landscaping on-site and ensure provision of landscape buffers as indicated on the site layout plan;5. An archaeological desk-based assessment is required for the site;6. The development to be informed by an ecology assessment, to be submitted with the planning application;

7. Contributions are to be provided to mitigate the impact of the development, in accordance with Policy PSTR/GO 1'

**1.8 8. Affordable housing to be provided on site, unless demonstrated that no suitable Affordable Housing provider can be secured. In such an event, there shall be a flexible approach to the Affordable Housing tenure so that it can be delivered without the need for an Affordable Housing provider, such as Shared Equity or First Homes or the onsite affordable may be replaced by a commuted sum towards provision off site**

#### **Question 7**

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

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