

Tunbridge Wells Borough



Tunbridge Wells Borough Council

Local Plan Development Strategy Topic Paper – Addendum

January 2024



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1.0 Introduction

- 1.1 Following Examination hearing sessions during March - July 2022, the Inspector wrote to the Council in November 2022 setting out his “[Initial findings](#)” on the [Submission Local Plan](#) (SLP).
- 1.2 The principal issues that bear upon the Local Plan’s overall development strategy related to:
 - Whether the assessment of sites in the Green Belt had been undertaken on a consistent basis ([Inspectors letter paragraphs 1 – 8](#));
 - the need for further consideration to be given to a range of issues in relation to the proposal for a new settlement at Tudeley Village (SLP allocation STR/SS 3), and to alternative ways forward, as posited by the Inspector ([Inspectors letter paragraphs 9 – 38](#));
 - the need to give further consideration to an option for strategic growth at Paddock Wood and land in east Capel that does not involve building on land within higher flood zones ([Inspectors letter paragraphs 39 – 52](#)).
- 1.3 In respect of proposed Green Belt releases that have been identified for release in the SLP policy STR 9, the Inspector notes that, while the proposed allocations were informed by three stages of assessment, other sites did not have the benefit of the same level of assessment in terms of Green Belt harms and potential mitigations. Therefore, he finds that a comparative assessment of reasonable alternatives at Stage 3 is necessary before a conclusion can be reached that “exceptional circumstances” exist to release sites from the Green Belt. This further assessment work has been undertaken and is reviewed in **Section B** below.
- 1.4 There are a number of issues raised by the Inspector with the both the Local Plan’s proposals for strategic growth, namely the substantial, “transformational” expansion of Paddock Wood and the creation of a new settlement on garden settlement principles at Tudeley to the west of Five Oak Green (referred to as “Tudeley Village”) The issues raised for each strategic growth location are considered in **Sections C** and **D** respectively below. They include re-evaluation of options arising from further investigation work that has been carried out; recommendations in respect of each location are presented.
- 1.5 Of course, the fact potential changes regarding the strategic growth locations have potentially significant implications for the Local Plan’s development strategy, not least having regard to the contribution they make, individually and collectively, to meeting housing needs.
- 1.6 The implications of options for alternative proposals for the strategic sites on the overall development strategy are set out in a concluding **Section H**, which follows sections relating to overall transport infrastructure (**Section E**), viability (**Section F**) and other matters raised in the Inspector’s letter which impact on the spatial strategy, notably in relation to sites at Hawkhurst (**Section G**).

- 1.7 Most critically, **Section H** sets out recommended revisions to the overall development strategy at Policy STR 1 of the Local Plan, and related broad changes to the strategic sites' policies, Policies STR/SS 1 and STR/SS 3, and some other policies highlighted by the Inspector, including consequential changes to the related Parish policies STR/CA1 and STR/PW1, and in relation to relevant Hawkhurst policies. Full details of suggested policy changes are set out at **Appendix C - G**.
- 1.8 For clarity, this Addendum to the Development Strategy Topic Paper does not consider the full range of modifications that may be required to the Local Plan. Rather, it is focussed on those matters raised by the Inspector that he believes need reviewing at this point to enable the examination to proceed.

2.0 Green Belt

Context – Existing Green Belt studies

- 2.1 The Submission Local Plan is supported by a series of Green Belt studies. The Green Belt Strategic Study (2016) [\[CD 3.93a\]](#), referred to as the Stage 1 study, identified areas - termed 'Broad Areas' - that clearly made a strong contribution to one or more of the five Green Belt purposes set in paragraph 138 of the National Planning Policy Framework (NPPF). It then considered the inner Green Belt boundary within those broad areas, identifying smaller assessment 'Parcels', that potentially were not making such a strong Green Belt contribution, for consideration as part of a Stage 2 Green Belt Study.
- 2.2 The Stage 2 Tunbridge Wells Green Belt Study (2017) [\[CD 3.93b\(i\)\]](#) comprised a more detailed and focussed review of 37 assessment parcels and 10 broad areas identified around settlements in the Strategic Study. Using a consistent approach of assessing their contribution to each of the five Green Belt purposes, as set out in the NPPF, it provided an overall rating of potential harm (to the Green Belt) that could result from release of the area or parcel, based on the highest level of harm from any one of the purposes.
- 2.3 The harm ratings for each purpose, and the overall harm (based on the highest rating), identified in the Stage 2 Green Belt Study were used to assist the Borough Council in coming to a view on potential allocations within the Green Belt. For full details of the methodologies, please refer to the original Green Belt Studies referenced above [\[CD 3.93a\]](#).
- 2.4 Those sites considered suitable for allocation in all respects, after taking all planning matters into consideration, were included within a Stage 3 Green Belt Study (2020) [\[CD 3.93c\]](#). The purpose of the Stage 3 study was to consider in more detail the potential harm to the Green Belt purposes of the release of these sites, and how Green Belt harm could be mitigated to inform planning policy and further masterplanning work.

Inspector's initial findings

- 2.5 The Hearing sessions for the Local Plan concluded in July 2022 and the Inspector's initial findings were issued in November 2022 [\(ID-012\)](#). The Inspector accepted that, given 22% of the borough is within the Metropolitan Green Belt, to deliver the development set out in the Plan, it was *"likely to require the use of some Green Belt land"* and that the Council's strategy was in principle *"reasonable and appropriate"* (ID-012 – paragraph 4).
- 2.6 The Inspector notes that Green Belt boundaries should only be amended in 'exceptional circumstances', adding *"Reaching that conclusion should be based on a thorough assessment process which includes an understanding of the likely impacts when compared with other site options, especially where the magnitude of harm from the two largest allocations is 'high'"* (ID-012 – paragraph 7). He found that the Council's Stage 3 study was *"a logical and sound way of considering where growth should take place"* (ID-012 – paragraph 5), but posed the question:

“If it is accepted that Green Belt land will be required, then why did the Council not carry out a comparative assessment of reasonable alternatives at Stage 3 in order to avoid, or at least minimise, harmful impacts where possible?” (ID-012 – paragraph 6).

2.7 The Inspector then concludes *that*:

“Further work is therefore necessary before a conclusion can be reached that exceptional circumstances exist to release the relevant site allocations from the Green Belt” (ID-012 – paragraph 8).

The Council's response

- 2.8 In its response to the Inspector dated December 2022 (Examination Document [TWLP-106](#)), the Council highlighted that the Local Plan development strategy and its component allocations drew on the Stage 2 Green Belt Study, taken alongside other evidence studies. It was also explained that, in assessing the suitability of sites for development, regard was given to their particular situation within the Green Belt when considering harm to Green Belt purposes, as well as having regard to the exceptional circumstances test.
- 2.9 At the same time, it is acknowledged that the Stage 2 Study does not provide a directly comparable harm assessment to that for the proposed allocations included in the Stage 3 Green Belt Study. The assessment of sites covered by the Stage 3 work benefited from an overall assessment of Green Belt harm, which the Stage 2 assessment did not explicitly provide. In addition, the assessment of proposed allocations within the Stage 3 Study is clearly site specific, which is not the case in respect of the reasonable alternatives that lay within larger parcels assessed at Stage 2.
- 2.10 Therefore, the need to provide a Stage 3 Green Belt Study for all reasonable alternatives within (or partly within) the Green Belt is accepted in order that, as the Inspector states, *the “likely impacts [of the proposed allocation sites] when compared with other site options”* on the Green Belt (ID-012 – paragraph 7) can be clearly compared. Only the reasonable alternative sites are required to be considered as part of this additional Green Belt work. It has not been necessary to re-run any other previous work or assess sites already included in the SLP, which have already been assessed.
- 2.11 To ensure consistency of approach the Council commissioned the same consultants, Land Use Consultants (LUC), to undertake this work, applying the same methodology as they did to the original Stage 3 work for the proposed allocations, with this further Stage 3 report presented as an ‘Addendum’ to the original report.
- 2.12 In concluding on what is considered to be a “reasonable alternative”, the Council has drawn upon the Sustainability Appraisal [[CD PS-013](#)] and site assessment work (contained in the Strategic Housing and Economic Land Availability Assessment (SHELAA) [[CD 3.77](#)]) to carefully consider what constitutes a ‘reasonable alternative’ for the purposes of the Stage 3 Study Addendum. In effect, such sites are those considered reasonable alternatives through the Sustainability Appraisal and SHELAA processes. As previously, it does not include strategic site options that are in both the Green Belt and the AONB, in line with the Development Strategy Topic Paper October 2021 [[CD](#)

[3.126](#) and the agreed position with Natural England that strategic development is not appropriate in the AONB.

The Green Belt Stage 3 Study Addendum (LUC, May 2023) [PS_035]

- 2.13 This Addendum study presents the findings of the additional analysis, and is set out as follows:
- Chapter 1 sets out the scope of the assessment and structure of the report.
 - Chapter 2 summarises the ‘reasonable alternative’ site options and the methodology for assessing the harm to the Green Belt purposes that would result from their release and development. It also sets out potential mitigation and variations in harm and sets out how this should be compared between the original Stage 3 study and this addendum.
 - Chapter 3 summarises the findings of the assessment, using maps and tables to illustrate harm ratings for both the Local Plan site allocations and the reasonable alternative site options.
 - Chapter 4 discusses the potential cumulative harm of Green Belt releases.
 - Appendix A presents the detailed assessments of Green Belt harm for the reasonable alternative site options.
- 2.14 The Addendum assesses a total of 71 sites with a SHELAA reference (see table 2.1 of the Addendum), which resulted in 79 parcels being identified with separate harm ratings (see table 3.1). The harm ratings identified in the addendum for the reasonable alternatives are presented alongside the harm ratings for the proposed allocations in the Submission Local Plan in Table 3.1 (page 23) and in map form in Figure 3.1 (page 30).
- 2.15 The Addendum also considers potential strategic harm (page 31) and sets out where there is the potential for significant cumulative impacts to occur in relation to particular Green Belt purposes.
- 2.16 The harm rating for the reasonable alternatives assessed varies from Low to Very High (as per the original Stage 3 Study) and, as with the original Green Belt Stage 3 Study of the proposed site allocations, the assessment of harm at Stage 3 sometimes differs to that found at Stage 2. The reasons for this are explained in the Addendum (at paragraphs 2.17 to 2.18) and include the differences in methodology between the two stages and the difference in scales used, as well as the change from assessing broad areas/parcels to assessing specific sites. These differences were noted and discussed during the Local Plan examination hearings (Matter 4, Issue 2, Question 4).

Analysis of the Stage 3 Addendum report

- 2.17 The results of the Green Belt Stage 3 Addendum study have been reviewed by Council officers to principally identify whether the Council’s approach to the allocation of sites might change as a result of the Addendum’s findings regarding reasonable alternatives.
- 2.18 The first step has been to compare the harm rating of sites in the Addendum with the relevant Stage 2 Study’s harm ratings. Where the harm rating in the Addendum was the same or higher than in the Stage 2 Study, no further work was considered necessary.

However, where the harm rating in the Addendum was lower than in the Stage 2 Study, those sites have been further reviewed.

- 2.19 All sites subject to further review have been re-appraised through the SHELAA process, drawing on the updated Green Belt harm rating. New 'SHELAA Addendum' sheets have been prepared for these sites.
- 2.20 Sites were also reviewed to determine whether it was necessary for them to be re-appraised through the Sustainability Appraisal (SA) process. It is considered that, in the context of considering "significant environmental effects", a full re-appraisal was not necessary where there was only an incremental change (i.e. one grade in the Green Belt harm rating scale). However, all sites with a fall of at least two increments of change in harm rating (e.g. *High* to *Moderate*, or *Moderate High* to *Moderate Low*), have been re-appraised.
- 2.21 The revised SHELAA sheets for all reviewed Green Belt sites (which include the revised summary from the SA where appropriate), are set out at in PS_036. An Addendum to the SA is published separately, as document PS_037.

Summary of findings

- 2.22 The overall findings of the review are that the conclusions in the original SA and SHELAA, that resulted in the sites identified as reasonable alternatives not being regarded as suitable for allocation, remain valid.
- 2.23 An important factor in reaching these conclusions is that there are often other reasons or combinations of reasons, sometimes including Green Belt harm, that led officers to conclude a site was not suitable as a potential allocation in the Local Plan.
- 2.24 In addition, with the obvious exception of the strategic sites, it can be seen that the Council has generally proposed those sites with least harm to the Green Belt. This is evident in Figure 3.1 in the Green Belt Stage 3 Addendum, which shows that the allocated sites (excepting the strategic sites) generally compare favourably in terms of harm rating with the reasonable alternatives in that they generally have lower harm ratings.
- 2.25 Notwithstanding this general finding, there are some sites at Five Oak Green where the harm, using the stage three methodology, is *Moderate to Low*, which is comparable in Green Belt harm terms to the allocated sites (Pages A-16 to A-57). There is a significant drop in harm for some of these sites as a result of being assessed at a site-specific level rather than as part of a larger parcel/ broad area. These are:
- RA/FG1-A Low-Moderate Harm
 - RA/FG2-B Low-Moderate Harm
 - RA/FG2-C Moderate Harm
 - RA/FG3-A Low Harm
 - RA/FG3-B Low-Moderate Harm
 - RA/FG3-C Moderate Harm

- RA/FG4-A Low Harm
- RA/FG4-C Moderate Harm

- 2.26 At the strategic level, some sites were not considered further (through the SHELAA process) due to the proposed development strategy for the Pre-Submission Local Plan and their proximity to the strategic allocations at Tudeley Village and Paddock Wood, and any consequent cumulative effect on the Green Belt (and/or coalescence concerns). These sites were previously found unsuitable through the SHELAA and SA work.
- 2.27 Consequently, a change in the development strategy in relation to proposed strategic development at Tudeley Village and Paddock Wood may lead to these sites being reconsidered for potential allocation in relation to their contribution to the Green Belt, although it is noted that there may well be other reasons why these sites may remain unsuitable. Further consideration of such sites would be best done as part of a Local Plan review.
- 2.28 The new Stage 3 Addendum Report does consider, under ‘Potential Strategic Harm’, the potential cumulative harm that may arise from the release of sites at Five Oak Green in combination with either STR/SS 1 (Paddock Wood) or STR/SS 3 (Tudeley) (page 33 bullet point 1 and page 34 bullet points 3 and 4). This may arise in respect of Purpose 2 ‘*to prevent major towns merging into one another*’, as these sites fall within the area that separates Paddock Wood from Tonbridge and/or in respect of Purpose 3 ‘*to assist in safeguarding the countryside from encroachment*’ as any remaining open land close to released areas may be less distinct from the new and existing urban areas. These considerations and the most appropriate approach to the now identified lesser Green Belt Harm to some sites at Five Oak Green is considered further in section H.

3.0 Review of the proposal for a new garden village at Tudeley

The Local Plan allocation

- 3.1 The Pre-Submission Local Plan proposes “Tudeley Village” as a new garden settlement, in Capel Parish, to accommodate approximately 2,800 new homes, of which some 2,100 are expected within the plan period (by 2038). It also anticipates up to some 10,000sqm of commercial and office floorspace, and associated infrastructure.
- 3.2 The proposal stems largely from the combination of the difficulties in identifying sufficient suitable sites in the borough to meet its local housing need, coupled with a recognition, as highlighted in the NPPF (paragraph 73), that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns.
- 3.3 Central to proposing a new settlement in this location is that it is reasonably close to Tonbridge, Paddock Wood and Royal Tunbridge Wells, would be of a size large enough to provide and support various facilities on the site, including retail, education, employment, health, and leisure, and capable of being planned in a coordinated, master-planned way, with a distinctive identity. Also, critically, it is beyond the High Weald Area of Outstanding Natural Beauty (AONB).
- 3.4 Of course, the site is located within the Green Belt, where national policy requires “exceptional circumstances” for such a proposal. In preparing the Local Plan, the Council concluded that this test was met, as set out in the earlier Development Strategy Topic Paper. ([CD 3.64](#))

Inspector’s Initial Findings

- 3.5 Notwithstanding the above conclusion, the Inspector is not convinced that the “exceptional circumstances” test has been met. While acknowledging that *“the principle of seeking to help meet housing needs through a high-quality, mixed-use new settlement is a reasonable and positive approach to take”*, he says that *“at this stage there remain significant and fundamental unanswered questions regarding the accessibility of the site by sustainable modes of transport, the ability to successfully mitigate against serious impacts on the highway network, the suitability and deliverability of the Five Oak Green bypass and the ability of the site to deliver housing at the rate and scale envisaged by the Plan.”* (Paragraph 36 of his [Initial Findings letter](#).)
- 3.6 Whilst acknowledging that *“It is clearly not necessary to have all the details of a site allocation agreed and resolved at the local plan stage”* and that *“sufficient safeguards can be put in place by development management policies”* (paragraph 37), the Inspector considers that the matters raised go to the heart of whether the site, and strategy for, Tudeley Village is justified and effective. He concludes by saying: *“I find that exceptional circumstances have not been demonstrated to justify removing the site from the Green Belt.”* (Paragraph 37.)
- 3.7 He goes on, at paragraph 96, to identify three options for the Borough Council to consider. *“They are:*

- *Provide additional information to justify the Tudeley Village allocation as submitted.*
- *Modify the submitted Plan by making significant changes to the Tudeley Village allocation, and in doing so, seek to overcome the soundness issues identified above.*
- *Delete the allocation from the submitted Plan.”*

3.8 The Inspector helpfully provides some thoughts on the implications of these options in subsequent paragraphs 97 - 99:

- *97. The first option is unlikely to be a quick or straightforward exercise. It would require further dialogue with key stakeholders, the preparation of substantial new evidence, consultation on that evidence and examination. There is also no guarantee that it would satisfactorily resolve the issues identified above or justify the scale and location of development proposed. It is not without risk. Similar issues would apply to the second option, and both could potentially add significant delays to the examination process.*
- *98. The third option would be to delete the allocation and make consequential changes to the Plan. The benefit of this approach is that it would deal with the soundness problems identified above, and subject to considering alternative secondary school provision, has already been tested as a possible outcome in the strategic sites masterplanning documents. It may negate the need for significant further work and potentially avoid lengthy delays to the examination process.*
- *99. One of the main consequences of deleting Tudeley Village is the impact on housing provision. The Plan envisages 2,100 dwellings coming forward over the plan period. In deciding how to proceed, the Council will therefore need to give further consideration to how best the Plan can still meet housing needs, having particular regard to the requirements in paragraph 68 of the Framework. It may be, for example, that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage.*

Review of the proposal in light of the Inspector's initial findings

3.9 It is noted, firstly, that the Inspector has not concluded that the proposal for a new settlement at Tudeley Village is inevitably unsound; rather, the submitted Local Plan is not sound due to a number of uncertainties that mean that the exceptional circumstances test is not met.

3.10 Therefore, the approach has been to review each of the issue areas raised, under the same headings used by the Inspector. This has included discussions with consultants and with relevant agencies, including Kent County Council (KCC) and Tonbridge & Malling Borough Council. In particular, transport consultants, Stantec has provided a “Red, Amber, Green (RAG) Assessment” [document PS_039], which essentially provides a commentary on the likelihood of being able to satisfactorily resolve a range of the Inspector's concerns. Also, advice has been taken from the Council's retained retail/commercial consultants in regard to matters relating to the provision of such space at Tudeley Village. Further work has also been done on bus infrastructure options, while housing delivery has been reconsidered by the Council itself.

3.11 In addition, discussions with the site promoters, The Hadlow Estates, have been taken into account.

Issue area A: Location and Accessibility

3.12 While the location of the proposed Tudeley Village has inherent potential merits in terms of its proximity to Tonbridge, Paddock Wood and Royal Tunbridge Wells, and being beyond the High Weald AONB, it still clearly requires a range of infrastructure, including that related to transport, to ensure that it is “sustainable”. While the proposals are regarded as very positive in terms of providing a “walkable neighbourhood” and proposing new “active travel” links beyond, the Inspector is concerned about:

- a) the attractiveness, and hence usage, of proposed pedestrian and cycle links, as well as the need to agree routes with Tonbridge & Malling Borough Council (TMBC) as part of a wider strategy to be effective,
- b) the fact that discussions on new bus infrastructure are still ongoing and, again, should benefit from collaboration with TMBC,
- c) the extent to which commercial floorspace is reasonable and will achieve the “internalisation” of trips, without detracting from existing centres,
- d) existing congestion in Tonbridge town centre, and
- e) the achievability of a 10% modal shift.

3.13 In summary, the main points to note are:

a) Potential for walking and cycling links:

3.14 The focus of walking routes is primarily on movements within the new community, to meet “walkable neighbourhood” criteria, through high quality masterplanning and layouts that promote pedestrian connectivity through the development.

3.15 Fundamentally, the potential for cycling, particularly to Tonbridge, is regarded as very good:

- the terrain is fairly level,
- Tonbridge town centre is a readily achievable 15 minutes cycle ride away, and
- the promoters control land to enable routes to connect to existing Highways.

3.16 While the Inspector raises questions about usage in bad/winter weather, it is understood that, with suitable cycleway design (and clothing), these are not major issues for people cycling, particularly those commuting such a short distance for work. Route safety may be improved by lighting and provision of “escape points” along the route, where practicable; encouraging its use for a variety of purposes, thereby maximising informal surveillance, is likely to prove most effective in this respect, as found across the country. Nevertheless, the above factors are borne in mind when estimating modal share - see also below.

3.17 While, not uncommonly, the local plan timetables for the Borough Council and TMBC do not align, liaison has been, and is, ongoing between the Councils. In fact, it is evident that, from initial work by TMBC on its LCWIP, that respective routes would connect in particular at the strategic points of the network such as Woodgate Way. This is to be expected, as both Councils engage with KCC, as the local transport authority, on such matters, which is also a partner in the production of the Tunbridge Wells LCWIP. Liaison will inevitably continue in the future as respective plans and proposals evolve, to ensure compatibility and effectiveness.

b) Rail and bus infrastructure:

3.18 Discussions have been undertaken with Network Rail to confirm whether it is possible to allocate a new railway station as part of the strategic development at Tudeley Village. Whilst the land is proposed to be safeguarded for a future station development so that some of the demands associated with the development could be met by a sustainable form of public transport, it has not been anticipated that this would be necessary within the lifetime of the plan. The Tudeley Village masterplan makes provision for a station to be accommodated in the future if this can be realised. There are also cost implications that would require external funding to support the delivery that are not part of the delivery expectations for SLP viability work. The overall Network Rail position is that the proposed growth in Tunbridge Wells borough does not require specific rail capacity interventions.

3.19 There has been substantive progress since the Local Plan hearing sessions, with the preparation of “Bus Study” [PS_058], by consultants WSP, jointly on behalf of Borough Council and KCC. A draft iteration of the Bus Study [PS_040] has been shared with TMBC. It presents options for upgrading the bus network on the Paddock Wood to Tonbridge corridor, the Paddock Wood to Tunbridge Wells corridor and the Tonbridge to Tunbridge Wells corridor. To achieve notably higher levels of modal share, services would need to be improved in accordance with ‘Bus Rapid Transport’ characteristics. Lesser improvements, with an increase to a 30-minute services on inter-urban routes, are expected to achieve a 5% modal share for bus travel, potentially up towards 10%.

3.20 Therefore, it is believed that this further work provides improved evidence that credible bus enhancements are practicable, subject to viability, to make bus travel an attractive alternative to the private car.

c) Commercial space and internalisation of trips:

3.21 Firstly, it is noted that the Local Plan policy STR/SS 3 is not prescriptive in terms of the scale of shops, services and employment uses; rather, it states that they “*should be of an appropriate scale to serve the new settlement*”. Hence, the principle is that they are local in nature and are of the level that should serve the new community on a day-to-day basis.

3.22 The supporting text anticipates up to 10,000sqm of commercial and office floorspace in community hub locations, while the supporting evidence base document (The Tunbridge Wells Retail, Commercial Leisure and Town Centre Uses Study 2021 ([CD. 3.86](#))) estimates capacity for some 1,900sqm convenience floorspace and some 1,000sqm of comparison good floorspace.

- 3.23 These figures are not considered to be inconsistent, because the 10,000sqm also allows for non-retail space, notably for office and other employment uses, as well as a range of service/leisure uses. Indeed, the site promoters have commissioned their own consultants, Marron Planning, to assess the commercial component and the appropriateness of the figures identified within the SLP. It helpfully breaks down the overall floorspace estimate into its component parts, which was not previously before the Inspector. The outcome of this, and of converting gross figures to net ones, is that the retail floorspace estimates in the Plan for Tudeley Village closely align with the Council's own consultants' figures, who also acknowledge an error in their 2021 Study which led to an under-estimation of comparison goods floorspace capacity.
- 3.24 In terms of the approach to, and level of, "internalisation" of trips, other consultants appointed by the site promoters have highlighted that this essentially relates to the walking and cycling infrastructure being embedded in the design approach, as well as drawing on the Council's own consultancy advice.
- 3.25 Marron have undertaken a high-level assessment of trade draw and impact to assess how this additional trade from beyond Tudeley will impact on surrounding centres. They estimate that the retained expenditure (from Tudeley residents) would total £20m and that a further £5m (20%) may be drawn from elsewhere.
- 3.26 Marron regards the proposed retail floorspace as proportionate to the role of the centre and that, even with 20% of trade being drawn from outside the new settlement, "*the level of impact on surrounding centres would be de-minimis.*" Furthermore the 20% (£5m) would be spread across existing commercial areas and not focused on just one single operation, therefore the impact through trade draw would be significantly lessened. They also, not unreasonably, point out that residents of the Tudeley Village would generate expenditure that would benefit the surrounding centres.
- 3.27 Overall, informed by the Council's own consultants, officers believe that, whilst it may be appropriate to produce more robust evidence to support certain assumptions on retail impact, the non-residential floorspace estimates are broadly appropriate, while other centres may benefit from spend generated by the new residents, particularly in terms of comparison goods.
- 3.28 Furthermore, as noted in introducing this issue, the policy does not specify actual floorspaces. In fact, paragraph 5.222 of the Submission Local Plan states: "*Evidence will be required to demonstrate that the level of floorspace sought within the village and the neighbourhood centres does not detract from the vitality and viability of other nearby centres.*"
- 3.29 It is concluded that the Inspector's queries about the notional floorspace capacities as part of the new settlement can be reasonably explained and that the impact on the vitality and viability of nearby centres can be shown to be, if anything, positive overall.
- 3.30 This does leave the question of the impact of the additional traffic movements between the new settlement and Tonbridge as a consequence of the land use make-up. This essentially relates to Tonbridge, which is discussed below.

d) Congestion in Tonbridge Town Centre:

- 3.31 The view of the Council's traffic consultants, as set out at the hearing sessions, is that congestion in Tonbridge town centre would not unduly suffer from the allocation of Tudeley Village. The impacts on Volume : Capacity Ratios (VCR) are small and, furthermore, these are prior to mitigations, which are identified as lowering the ratios in most cases, while the worst case, A26/B2260/A2014, junction is only a little over-capacity.
- 3.32 A further point of note is that the establishment of Tudeley Village, which is expected to facilitate a reduction in the need to travel by private car, would be in accordance with the recent DfT Circular 01/22 '*Strategic road network and the delivery of sustainable development*' ([gov.uk](https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development/strategic-road-network-and-the-delivery-of-sustainable-development)¹), which seeks to respond to climate change and net-zero ambitions by requiring consideration of sustainable transport options first, as well as a focus on locations that are or can be made sustainable.
- 3.33 It is acknowledged that there are a number of existing congestion issues in Tonbridge town centre and limited opportunities to increase capacity. However, the impacts should be judged in the context of the NPPF, in terms of whether there would be a 'severe' residual traffic impact on Tonbridge town centre. The Council's, and the promoters', position has been that there is no substantive evidence that the effects would be severe, although TMBC argued that they may be, especially if the modal shift (discussed below) is not as anticipated.

e) Modal shift:

- 3.34 The Council's transport modelling consultants, SWECO, identified a 10% modal shift, being the scale of reduction in car driver movements relative to baseline levels.
- 3.35 Given the fact that Tudeley Village will be laid out to encourage walking, cycling and bus patronage, allied to the eminent potential for cycling to Tonbridge (notwithstanding the Inspector's understandable expression of its limitations for some people), for access to the rail system, and with a strategic framework in place for cycling (the LCWIP) and one now at an advanced stage for buses, this level of modal shift is considered realistic for the strategic sites, although its application over the whole of the "core area", which includes RTW, Southborough, Pembury and other parishes to the NW of the borough, may be slightly optimistic. At the same time, the base option for bus use in the core area, being a 5% share, is lower than the 9% achieved in areas with good bus services, while application of the DfT's '[Propensity to Cycle](https://www.pct.bike/)' tool² suggests a level of up to 19% modal share for cycling.
- 3.36 Although additional modelling may be undertaken, this may still present difficulties in terms of TMBC agreeing assumptions for its growth, even though the Borough Council's transport consultants have referred to the assessments being "worst case"; also, the Tudeley Village promoters highlighted that Sweco says, in the sensitivity assessment of

¹ Department for Transport Policy Paper – Strategic road network and the delivery of sustainable development 23/12/22
<https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development/strategic-road-network-and-the-delivery-of-sustainable-development>

² Department for Transport Propensity to Cycle Tool <https://www.pct.bike/>

its Addendum 2 report, that trip rates have not been adjusted to take account of internalisation of trips. Furthermore, the average VCR results do not show significant over-capacity, although Tonbridge town centre is clearly busy. Also, in line with the latest Circular, this means giving more emphasis to managing demand.

3.37 Overall, the assessment in respect of the above matters is that:

- As regards cycle linkages, in the context of a local plan, there has already been considerable development of both a local cycle strategy and clear, deliverable proposals. While there is scope for further work in respect of route design/lighting/safety/land ownership, these are more detailed matters, that may be readily provided if necessary to address the Inspector's concerns.
- While an overall strategy for bus service improvements was still in development during the hearings, the progress of the Bus Study (now in final form) can be submitted and give the Inspector greater confidence in the contribution of bus patronage to overall trips (although this would need to be subject to viability assessment).
- While traffic impacts on Tonbridge Town Centre appear limited, and not severe, it is considered that the potential for agreement on this matter may be difficult and potentially protracted, so this does represent a risk to the acceptability of the proposal at present. At the same time, further certainty on proposed cycling and bus mitigations should help demonstrate the prospect of congestion not being such a significant concern.
- In light of the Inspector's uncertainty regarding the extent of likely modal shift, the level of 10% shift has been further considered. The scale and directness of new cycling routes, together with greater clarity on improved bus services, coupled with the establishment of internal routes (and services) in line with "walkable neighbourhood" principles, should give greater confidence that the envisaged 10% modal shift away from cars is achievable. At the same time, there will inevitably be some doubts about such an assumption until infrastructure is in place.

Issue Area B: The Five Oak Green Bypass

3.38 The Inspector asks a number of questions in relation to the suitability of, and programming of, the proposed Five Oak Green Bypass (FOGB). These are considered below, drawing on advice from the Council's consultants, Stantec [PS_ 039].

3.39 As context, the SLP position is that the bypass would be necessary to accommodate the traffic generated by the new settlement, when developed alongside the major expansion of Paddock Wood.

3.40 There are inter-related questions about air quality, road and pedestrian safety and noise arising from the siting of the proposed roundabout junction with the new bypass close to the existing primary school. While Stantec advises that suitably qualified expert advice be taken on each of these matters to provide comfort to the Inspector, its initial view is that:

- a) The positioning of the roundabout outside the school is unlikely to have any direct impact on pupils in terms of air quality, as it would be marginally further away than the existing carriageway, with scope for intervening planting. It also notes that while traffic flows following development should also be considered, as they could increase traffic/congestion, the impacts are likely to be well below legal limits. (The land is in the ownership of The Hadlow Estate, allowing for effective arrangements via detailed design.)
- b) The noise impacts are similar to those for air quality, with Stantec's acoustic specialists advising that there is unlikely to be any adverse noise impacts on pupils.
- c) Again, Stantec does not believe that the scheme would pose any significant issues in relation to road or pedestrian safety. It also identifies scope for some safety benefits that could be achieved subject to more detailed assessment.

- 3.41 A further issue for the Inspector is the limited information regarding the landscape impact of the bypass, which would lie within the setting of the High Weald AONB and likely involve significant engineering works, given the topography, including the need for a stream crossing. Impacts on flood risk, as well as on the Green Belt, also require consideration.
- 3.42 A provisional route for the FOGB has been prepared and forms the basis of the proposal in the Submission Local Plan. The FOGB would be broadly aligned parallel with the boundary of the AONB, and it is accepted that the 'AONB Setting Report' did not specifically consider the bypass. Moreover, there are environmental sensitivities and constraints upon the route, such that landscape advice from Stantec is that there is the potential for "significant" landscape and visual effects, including on the setting of the High Weald AONB, to remain after mitigation.
- 3.43 In terms of impacts on listed buildings, historic landscape character, landscape features, and views from public rights of way and other visual receptors, careful consideration would need to be given to alignment (including vertical alignment) and land take (to secure mitigation space). There is the potential for such treatments to reduce effects to being not significant.
- 3.44 Overall, the landscape and visual impact of the bypass is regarded as a significant risk to the acceptability of the FOGB at this point and therefore the acceptability of Tudeley Village.
- 3.45 In terms of deliverability of the bypass itself, the main questions raised are around the sources of funding, phasing arrangements (and related impacts on Five Oak Green) and the timescale involved given that land is in multiple ownerships.
- 3.46 Transport modelling indicated that the FOGB would not be needed until well into the plan period when the strategic sites were well underway. Advice was that the procedures necessary to promote a scheme, acquire land and construct the bypass would be readily possible within the necessary timeframe. The delay in the Local Plan does not change this position.

- 3.47 Regarding justification, the Council's transport modelling showed that both the FOGB and the Colts Hill Bypass (CHB)/Improvement scheme would be needed to serve the combined strategic sites at Tudeley Village and via the strategic growth at Paddock Wood and east Capel. It also concludes that the FOGB is primarily intended to serve the Tudeley Village allocation, while still noting that development of the Paddock Wood and east Capel sites would still have the potential to cause traffic harm on the B2017 in the centre of Five Oak Green. This recognised that other routes would exist for the Paddock Wood and east Capel (PWeC) sites to gain access to the A21 and Tonbridge (e.g., the A228, which would be upgraded along the Colts Hill section and onwards via Pembury).
- 3.48 The Tudeley Village promoters have argued that development at Paddock Wood contributes materially to the need for the FOG Bypass (and argue for cost sharing as a result). However, the same may be said of the need for A228 improvements.
- 3.49 As well as close liaison with KCC on the timescales, commercial property advice was originally sought from Carter Jonas on land costs that may be needed if land acquisition is required (with nine land ownerships being involved) the use of Compulsory Purchase Orders (CPOs).
- 3.50 In essence, the Council can provide evidence on its assumptions for programming and costings that have fed into the viability assessment. The timescale – which will need updating to take account of the pause in the examination process – allows for 5.25 years from adoption of the Local Plan to bypass opening. This includes allowance for scheme development/ gaining planning permission (1.75 years), preparation of CPO and related Orders (2.5 years, with some overlap with the planning consent process), procurement, and construction period (1 year). The planning and CPO processes would run in parallel with that for the Colts Hill Bypass, albeit that the latter has a longer construction period, so would start work earlier.
- 3.51 If Local Plan adoption were by end of 2024, then construction for the Five Oak Green bypass is anticipated by December 2029. While this is only a little ahead of the above trigger point of 2030/31, this date is based on the earlier Local Plan housing trajectory, which has inevitably slipped, so it is likely to be similarly later, thereby still leaving scope for potential delays in the acquisition and construction processes.

Issue Area C: Deliverability

- 3.52 Aside from deliverability of the bypass, the Inspector challenges the Council's, and promoters', estimates for the contribution that Tudeley Village would make to housing supply in the Plan period. There are two aspects to this: firstly, the lead-in time for such a scheme and, secondly, the likely build-out rate. These are reviewed in turn below.
- 3.53 Considerable references were made to a report by [Lichfields 'Start to Finish – What factors affect build-out rates of large scale housing sites?'](#) on the deliverability of large sites. In relation to sites of 2,000+ dwellings, it found that an average time of 8.4 years from validation of an outline application to first completion, with an average (median) period of 6.1 years to first detailed approval, and then 2.3 years to first completion of dwellings (Figure 4 of the Lichfields report).

- 3.54 The Lichfields report also highlights (p6) that there are significant variations around the average period to detailed approval, as the contexts and routes to permission can be very different. Logically, it should be a shorter period if a major site is included within a Local Plan and has already been subject to considerable work done to secure the allocation, as is the case here.
- 3.55 While the Inspector queries the experience of the landowner and the Council in dealing with such large schemes, this is regarded as more relevant to the approval period than to build-out rates, although there is the potential for the landowner to take a longer-term view on achieving returns on the increased land value, which may suggest a slower release of later phases.
- 3.56 The landowner/promotor has, not unreasonably, argued that, with suitable professional advice and resources to fund enabling infrastructure, there are potential benefits in such an approach, which it is agreed, is not uncommon.
- 3.57 As regards the Council's position, it has set up a Strategic Sites team of Planners specifically to progress such schemes and will have the experience, and momentum, of dealing with applications for strategic sites at Paddock Wood. It also has regular dialogue with the Homes and Communities Agency, which can provide guidance where necessary.
- 3.58 The site promoters themselves have acknowledged in a further submission to the Council, dated July 2023, that the timeframe for first house occupation has slipped due to the elongated Examination process. They set out the following revised timetable:
- *Inspectors Report (with Tudeley retained) – end Q4 2023*
 - *Local Plan Adoption – Q2 2024*
 - *Supplementary Planning Document complete – Q2 2024*
 - *Submission of Hybrid Planning application for Tudeley – Q3 2024*
 - *Committee - Q3 2025*
 - *Planning Permission (including S106) Issued – Q2 2026*
 - *Submission of Housebuilder RMA - Q2 2026*
 - *Start Phase 1 infrastructure works – Q2 2026*
 - *Approval of Housebuilder RMA - Q4 2026*
 - *First houses commence – Q1 2027*
 - *First occupations – Q3 2027*
- 3.59 The Council's assessment is that this is optimistic, for several reasons. The reasoning behind what is regarded as a more realistic timetable is set out below.
- 3.60 Firstly, with consultation on a proposed revised development strategy now not expected until late this year (beginning December 2023), hearing sessions would not be until

Spring (April/May) 2024, followed by consultation on Main Modifications (assuming the Inspector is happy to move to that stage following hearings into the strategy revisions) likely to be in June/July 2024, with an Inspector's Report in August/September 2024. This would mean that final adoption would probably not be until October - December 2024, some 4-9 months later than the promoters allow for.

- 3.61 As agreed, the allocation is subject to a requirement for a Supplementary Planning Document (SPD), the role of which is to elaborate on the Local Plan allocation, and thereby support effective delivery. The Council's [current LDS](#) anticipates that this would take nearly a year from receipt of a favourable Inspector's Report, assuming the preparatory work has progressed in parallel with the later stages of the Local Plan examination process. Allowance is made for the production of a 'Framework Masterplan' SPD, with consultation in Summer 2025 (based on the Inspector's Report in August/September 2024), and it being adopted in August 2025.
- 3.62 A hybrid planning application may well very shortly follow its adoption, say Autumn [October] 2025. While the promoter may be able to reduce this period, it is also considered consistent with the substantial amount of further preparatory work, over and above that for the Local Plan, required to submit an application, including a supporting full EIA and other supporting information on design coding, traffic modelling, infrastructure, etc. as well as drafting, though yet to be appointed housebuilders, of detailed proposals for the first phase.
- 3.63 The site promoters allow for 1.75 years from submission of the first (hybrid) application to approval (made up of 1 year to Committee and a further 9 months for the s106 Agreement), and 2.25 years to approval of Reserved Matters. Even with the additional time for Reserved matters, this is less than the 6.1 years average time according to the Lichfields' research.
- 3.64 It is accepted that the extent of preparatory masterplanning work for the allocation, as well as its acceptance in principle via the Local Plan and SPD, should expedite consideration. Even so, the complexity of such a major application and especially the necessarily multi-faceted associated s106 Agreement are still expected to more realistically take 12-15 months to Committee and a year to resolve the s106 Agreement. This would mean first detailed approval around Autumn 2027.
- 3.65 It is recognised that the promoter may advance this, particularly if there is early appointment of multiple housebuilders, who expedite survey and design work, but equally, there are a number of risks that could delay this.
- 3.66 Lichfields identify an average of 2.3 years post approval to first completion in the Lichfields' report, while the site promoters believe it could be only 15 months. Given the extent of accommodation and infrastructure works required, (even if not all needed for the first phase), first completions 2 years post- approval is regarded as achievable. Hence, this would be in the second half [say September/October] of 2029.
- 3.67 This timetable also appears more realistic in terms of undertaking the necessary design work and supporting environmental assessments for the FOG bypass, for which there is currently only an indicative route and no detailed design or consideration of landscaping

(and associated land) requirements, to provide the necessary reassurance that it will be delivered when needed.

3.68 The above suggested revised timescale is notably less optimistic than that presented in the Council's hearing statement on housing land supply [\(TWLP/038\)](#), which provided for first completions in 2025/26, some 4 years earlier.

3.69 In terms of build-out rates, the Lichfields report finds an (mean) average of 160 dwellings per annum (dpa) across 27 sites of 2,000+ dwellings, with an average of 4% a year. For six quoted sites, peak annual build-out rates are around the 15% of total output; it also gives evidence (p12) of higher rates being in years 5 - 10, after an initial "ramping up".

3.70 The report identifies a number of factors affecting lead-in times. Those relevant to Tudeley Village are all positive in terms of supporting higher rates:

- It is a greenfield site
- Multiple outlets are envisaged
- A relatively high proportion of affordable housing is required

3.71 While an intuitive expectation would be for higher build-out rates in higher demand (less affordable) areas, Lichfields found this not to be the case, being the reverse. However, it recognises that larger site sizes in less affordable areas may explain this result - which seems likely. Hence, it is not highlighted above.

3.72 The site promoters have consistently stated that they envisage a delivery rate of 165 dpa over the lifetime of the development, with 150 dpa initially, building up to 200 dpa. This is not dissimilar from the Lichfields average noted above.

3.73 Overall, a "safe estimate" is to have an initial 100dpa (essentially one completion/week) for the first 18 months, before ramping up fairly quickly, firstly to 150 dpa, then reaching a peak in year 5, say 200dpa and then holding steady. This gives an overall delivery period of around 17 years. Of note, 1,450 dwellings, averaging 165 dpa (a little under 6% dpa), comparable to the annual average found by Lichfields for large sites. The resultant estimate is:

Year	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39-45/46
Dwgs	0	50	100	150	150	200	200	200	200	200	1,450

3.74 Hence, the anticipated supply over the plan period to 2038 is estimated to be 1,450 dwellings, compared to the earlier estimate of 2,100 dwellings; that is some 650 dwellings less. Also of note, the build-out period would extend to 2046, on the basis of continuing completions of 200 dpa.

Overview and Conclusions

3.75 An important point to note in considering the way forward is that the Inspector does not say that he has considered all the matters and finds the proposal for a new settlement at Tudeley Village unacceptable in planning terms. Rather, he identifies a number of

areas where he is not satisfied that the evidence provided is sufficient to justify the proposal in the context of the needs for “exceptional circumstances” for development in the Green Belt, especially given that the development is assessed as resulting in ‘High’ harm to it.

3.76 At the same time, it is evident from the above review of the most recent information that there would need to be a wide range of further studies to provide the information that the Inspector is seeking. Not only would the commissioning, undertaking, collating, and reviewing of such work take many months, moreover, it may well still not be provide clear supporting evidence.

3.77 In order to recommend the most appropriate course of action, regard is also had to the following:

- a) It is clear that Tudeley Village, if retained in the Local Plan, would make a notably lesser contribution to housing supply in the short/medium term than previously anticipated;
- b) The breadth of concerns raised by the Inspector is considerable and it is possible that any remaining concerns following further evidence work may still lead the Inspector to conclude that the exceptional circumstances test is not met;
- c) Further delay in the Local Plan process would likely defer, or even prevent, the release of a number of proposed site allocations, most likely those in the Green Belt and AONB which are included within the current Submission Local Plan and are needed to contribute to boosting housing supply, and addressing the current shortfall in deliverable sites;
- d) Given the now extended Local Plan gestation period, the fact that certain elements of the evidence base would become dated if the Examination was delayed further, would itself add to either time/cost or risk of challenge;
- e) A Local Plan being examined in a year’s time may be seen as out-dated by – if not superseded by – the new planning system following introduction of the Levelling Up and Regeneration Bill/Act;
- f) The new planning system may involve fundamental changes to both the calculation of local housing needs and how such needs should be met, including in designated areas, such as in the Green Belt and AONBs.

3.78 If Tudeley Village is withdrawn from the Local Plan (the Inspector’s third option), it is found from the review of Green Belt alternative sites that those do not suggest any more appropriate site allocations that would provide any meaningful quantum of housing supply. Also, the Council is confident in its SHELAA site assessments and its site selection methodology generally. Hence, in this scenario (Tudeley Village withdrawn from the plan and Paddock Wood and east Capel reduced), the Local Plan would have to be pursued on the basis that it is only meeting housing needs for the next 10 years and will need to be subject to an early review. This option is considered further in the final section, alongside the merits of retaining some form of allocation.

4.0 Paddock Wood strategic growth

Strategy and Implementation

- 4.1 As part of the Council's strategy to deliver its housing need over the plan period, the significant expansion of Paddock Wood and land at east Capel is proposed by policy STR/SS1 with land allocated in the Submission Local Plan (SLP) to provide approximately 3,500 dwellings and roughly 11 hectares of employment land.
- 4.2 The majority of new housing would be to the east and west of the existing town, with employment to the north. Associated education, leisure, and retail facilities would also be delivered in a comprehensive masterplanned approach.
- 4.3 The expansion of the town of Paddock Wood would be delivered on garden settlement principles and be fully integrated within the existing town.
- 4.4 This strategic growth is based on extensive land parcels to the north, east, and west of the urban area of Paddock Wood, as shown on Site Layout Plan for Policy STR/SS1 in the Submission Local Plan. The SLP policy allocation area covers approximately 418 hectares in total. Land forming the western part of the allocation is located within Capel parish; the remaining land lies within the parish of Paddock Wood.
- 4.5 The SLP policy looks to ensure that the major expansion of Paddock Wood including land in east Capel ("PWeC") integrates with the existing town and does not adversely impact on the AONB which is 0.7 miles to the south. It would involve the release of land to the west (within Capel parish) from the Green Belt. Consideration is given to the opportunities that new development could provide for flood betterment to the west of the town.

Initial Findings of the Inspector

- 4.6 Paddock Wood is a town with a good range of services, employment premises and public transport provision. It is surrounded by some land which, uniquely for Tunbridge Wells, is outside the Green Belt and AONB. The Inspector therefore agrees with the Council in concluding that the strategy for growth at Paddock Wood represents a 'logical choice'.
- 4.7 The Council's approach to the planned growth at PWeC has relied on extensive work by David Local Associates in conjunction with the respective delivery partners through the Strategic Sites Working Group. The disposition of proposed development is contained in the form of a Structure Plan within the Strategic Sites Masterplanning and Infrastructure Study ([CD3.66](#)).
- 4.8 The Council anticipated that the Structure Plan would provide the basis for a standalone Supplementary Planning Document to cover the entirety of the PWeC allocation as a high level framework for development, together with a further three Framework Masterplan SPDs to cover each of the parcels of the settlement expansion; that latter would ensure that the development is consistent with adopted policy requirements, will deliver garden settlement objectives, and be consistent with neighbourhood

development plans of Paddock Wood Town Council and Capel Parish Council (paragraph 5.196 of the SLP).

- 4.9 Whilst it is still considered that the structure and clarity that would be provided by the framework of SPDs set out above would enable a comprehensive development to be progressed the Inspector has questioned whether the plan in its own right would be effective with such a reliance on SPD's.
- 4.10 In relation to the concerns that the Inspector has raised regarding growth at Tudeley (paragraphs 3.1 – 3.78 above), the consequential impact on development at Paddock Wood and East Capel also requires further consideration, in particular regarding secondary school education provision and other infrastructure.
- 4.11 The Inspector highlights paragraph 161 of the NPPF and the need to apply a sequential risk-based approach to the location of development. It states:
- “The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.”*
- 4.12 The Inspector has questioned the application of the sequential test in the strategy for development at PWeC in the SLP, and the appropriateness of delivering housing, and employment in areas of Paddock Wood that are at higher risk of flooding.

Review of the allocation in light of the Inspector's initial findings

- 4.13 In response to the query raised by the Inspector regarding the strategy for delivering a comprehensive development at PWeC it is accepted that the reliance on SPDs to deliver the strategic options in a comprehensive manner means that potentially less detail is provided within the policy itself, which could result in the Plan being less effective.
- 4.14 The Council considers that the work undertaken on masterplanning is thorough and extensive and, whilst under some circumstances, an SPD could take some time to draft, consult on, and adopt, meaning that the speed to which associated housing may come forward could be delayed, much of that work is in place and it is anticipated that the process of adoption of the SPD would keep pace with the adoption of the Local Plan in order that its adoption might be either aligned to the same timeframe or very soon afterwards.
- 4.15 Whilst the nature of SPD production relies on public consultation, it would already benefit from a policy direction that has already been agreed through the Local Plan. Swift delivery of SPDs is not uncommon and can be twin-tracked with later consultation on main modifications. Nevertheless, it has been accepted at the hearings that the policy itself (STR/SS1) may be modified (Appendix D) to only require a single overarching SPD, which would include the parameters for the scale, type and mix of uses permitted at each of the development parcels (aligned with each developer), and also identify strategic and site-specific infrastructure.

- 4.16 Further consideration is given below in relation to the various substantive matters raised by the Inspector, namely:
- a) Flood Risk and impacts on development, including housing capacity (and divergence from the Strategic Sites and Infrastructure Framework Study Option 3 identified by the Inspector)
 - b) Employment land - review of options
 - c) Education
 - d) Sports and recreation
 - e) Transport and other infrastructure

Flood risk and Housing

- 4.17 Following the local plan hearings held in April to July 2022, the August 2022 updates to the Planning Practice Guidance introduced a requirement to consider climate change impacts as part of the Sequential Test. This was a revised position to that incorporated within the previous flood modelling and mapping completed in December 2018, and consequently it was necessary to undertake a new assessment incorporating this consideration within the modelling work. The Council has considered this modelling and mapping for flow allowances of +27% and +37%, reflecting the Central and Higher central estimates of climate change.
- 4.18 Following discussions with the Council's Flood and Drainage consultant (JBA), it was agreed that further modelling should be carried out in order to assess the impact of this upon the flood extents for the Strategic Sites. This was carried out for the Paddock Wood streams and River Medway/River Teise with a third assessment combining the predictions for both models to understand the combined flood modelling impacts (PS_042, PS_043, and PS_044).
- 4.19 It was also the case that further updates were necessary to the baseline data in the form of rainfall statistics as well as bank and ground levels which were released following the 2018 modelling.
- 4.20 Firstly, the updated rainfall statistics change the rainfall depths that are applicable to the duration and return period of rainfall specified. The updated statistics, from what is known as the FEH22 rainfall model, were released in December 2022 by the UK Centre for Ecology and Hydrology. This data produced relatively small increases in rainfall depths for the 5% AEP and 3.3% AEP events, while more notable decreases in rainfall depths are noted for the 1% AEP and 0.1% AEP events.
- 4.21 Secondly, the ground level information which informs the elevation of the river bank lines and inline banks, and mesh elements was updated with the latest LIDAR Composite DTM data collected and made available by the Environment Agency on the Defra Data Services Platform. This latest data was collected in November 2018. The previous model data was collected in December 2011 (covering the majority of the model area, including Paddock Wood) and February 2009 (covering a smaller region of the model area, to the east and north of Paddock Wood). Generally, differences in

elevations are relatively minor within Paddock Wood. However, elsewhere differences in elevations are more notable, with the latest LIDAR data typically recording higher elevations than the older data. Given this, officers and the Council's consultants (JBA) considered it is appropriate to incorporate this updated elevation data within updated modelling. In terms of outputs, this refines the extent of flooding, and generally appears to produce a reduction in areas of flooding.

- 4.22 This updated flood modelling also incorporates +37%, reflecting a precautionary estimate of climate change applicable to the catchment from fluvial flooding as accords to the latest guidance. A +27% model for climate change was also prepared by the Council's consultants (JBA), although this did not offer greatly different results in most areas subject to housing development. There were however, some greater differences elsewhere across Paddock Wood and so in order to robustly outline the extent of development which could be delivered through the Strategic Sites, the +37% was considered to be a more appropriate and robust approach overall.
- 4.23 The results for the updated Paddock Wood streams and river modelling (Medway and Tiese) shows a greater extent of Flood Zone 2 and 3 land to the western side of Paddock Wood (within East Capel Parish). These two models were combined in order to provide an assessment of the fluvial flooding impacts upon the wider area of Paddock Wood. The extent of flooding in this area is more significant and extends significantly further south as a result of the updated base data described above together with the climate change allowance.
- 4.24 The flood assessments carried out have formed the basis of the updated Masterplanning work carried out and have fundamentally influenced the strategy for the Strategic Sites. As highlighted within para 129 above, The Inspector is clear in his initial findings letter in referencing para 161 of the NPPF, that development should not be allocated if there are reasonably available sites appropriate for the development at a lower risk of flooding.
- 4.25 The Inspector directly references a development strategy option which was investigated as part of the Strategic Sites Masterplanning and Infrastructure Study. It considered an option (Option 3) where all residential development is removed from Flood Zones 2 and 3. Option 3 was discounted because it represented an 'extreme' application of the sequential test and would impact on viability (it would result in around 610 fewer homes as stated within the original Masterplanning report). However, the Inspector's comments here are noted concerning the stance of national planning policy where if reasonably available sites appropriate for the development at a lower risk of flooding are available, sites at a higher risk should not be permitted or allocated.
- 4.26 The Council has considered this matter carefully and has reviewed the 'option 3' approach thoroughly. The change in flood risk boundaries from the updated flooding assessment has reduced the development capacity of the sites to the west of Paddock Wood (within Capel Parish), even when compared to the previous Option 3.
- 4.27 At this stage of masterplanning, a high-level approach has been adopted by the Council's masterplanning consultant, DLA. Given the flooding constraint outside of the development parcels, it is assumed attenuation of surface water is undertaken as close

to source as possible (following Sustainable Drainage System (SuDS) design principles), and given this, there is potential that such drainage features will be required within the development parcels themselves.

- 4.28 To account for this, the assumed average density will be dropped by 15%, from 35dph (as previously set out) to 30dph. However, it is recognised that the width of some development parcels represents the opportunity for higher densities depending upon the development mix and structure of these spaces designed by the developers. With this in mind, 32dph is reasonable in these areas and a total figure of up to 2,532 dwellings for the combined Strategic Sites is envisaged.
- 4.29 The original reduced development option of housing outside of flood zones 2/3 (Option 3) comprised 2,840 dwellings, which in itself was a reduction of 610 dwellings from the full-scale growth option progressed to examination (Option 1 – 3450 dwellings). The newly developed revised 'Option 3' would represent a further reduction of 308 dwellings from that original 'Option 3' and demonstrates the extent to which the development parcels have altered as a result of the updated flood modelling which has been undertaken.

Employment land – review of options

- 4.30 As part of a strategic release of sites to enable the “transformational” growth of Paddock Wood proposed under Policy STR/SS1, the Submission Local Plan allocates some 11.2 hectares of employment land, made up of two employment allocations, both to the north of the town, as identified at Table 5 following Policy STR1 in the SLP, being:
- *Land east of Maidstone Road - 6.6 ha*
 - *Land east of Transfesa Road - 4.6 ha*
- 4.31 The Inspector states that, along with the residential and community proposals, he does not consider the location of new employment uses in areas at higher risk of flooding is justified. (ID-012. para. 52). He also questions the justification for their redevelopment, “*given that the employment allocations are not linked to other parcels (i.e., they are coming forward in isolation by separate developers)*”. (ID-012. para. 49)
- 4.32 In response, further consideration has been given to the location of the proposed employment allocations, taking into account very recent flood risk modelling, and applying the sequential test accordingly. The relationship between the scale of employment land provisions and the amount of housing growth is also reviewed, in light of the above-mentioned reduced housing allocations, as is the policy expression of this relationship.
- 4.33 These assessments are set out in a separate additional Paper on ‘*Employment land provision at Paddock Wood*’ [PS_045]. In summary, the Paper:
- Uses the anticipated, reduced level of housing growth to estimate the broad scale of employment land needs at Paddock Wood, which are regarded as needing to be in the range 8 – 11-12 hectares, with the lower end being a proportional

reduction in strategic growth, while the upper end is based on a “self-containment” approach to jobs growth,

- Identifies and assesses potentially suitable sites, firstly in flood risk terms (the “sequential test”) and then also in relation to their deliverability and other factors affecting their suitability,
- Notes that updated flood modelling has increased the level of flood risk of the proposed SLP employment allocations such that they are now within a higher flood zone than previously understood (or will be during the plan period),
- Finds that there is no available and suitable land to meet local employment space needs in the low-risk flood zone (Flood Zone 1), although it does examine an option to the north-west of the town.
- Goes on to review land in Flood Zone 2 only and finds that land east of Transfesa Road Key Employment Area (4.25ha), albeit with slightly changed areas, is both suitable and available,
- Concludes that this land, together with the recently approved scheme at Swatlands Farm (4.27ha), would provide some 8.4 hectares of net developable employment land, which would be sufficient to meet likely needs over the first 10 years post-adoption, without recourse to land in higher flood risk areas (which means that some of the previously allocated sites are withdrawn).

4.34 The revised employment allocations would mean that the proposed expanded Key Employment Area would be drawn back to exclude Keylands Farm, but would include Swatlands Farm as a committed scheme and allocation of revised land to the east of Transfesa Road.

4.35 In terms of policy presentation, the progress on bringing forward development at Swatlands Farm, as well as the landowners’ promotion of the other sites is regarding as obviating the need for a policy control on the relative phasing of, housing and employment sites, although it is shown that the scale of employment provision is reasonably related to that for housing in Paddock Wood, whilst also acknowledging other sources of employment land supply.

Education infrastructure provision

4.36 The options that have been explored for proposed strategic housing growth at Tudeley Village are reviewed above at **section C**. One of the direct implications on pursuing a reduced housing number that would result in removing Tudeley Village from the plan entirely is the consequential impact on Paddock Wood and its ability to provide necessary infrastructure to meet the needs of additional housing proposed (at PWeC) in a revised growth scenario. What also must be taken into consideration both in terms of the level of infrastructure required will be the strategy for Paddock Wood itself and the objective to ensure that sequentially development comes forward in the safest way.

- 4.37 The implications for housing numbers at PWeC from more up to date flood risk analysis is set out above. The reduction in housing numbers to approximately 2,500 dwellings have a direct impact on the level of infrastructure necessary to support the new members of the community. In particular as highlighted by the Inspector [paragraphs 43-45 of the Initial Findings Letter] the delivery of secondary school provision was intended to be provided through the provision of a new standalone school as part of the Tudeley Village development with a 2FE Expansion of Mascalls Academy. The combined housing growth put forward in the SLP resulted in the need for a new 6 Form Entry (FE) secondary school. Furthermore, the growth of housing and expected secondary school pupil yield resulted in a need for a further 2FE, which could be accommodated at the existing secondary School at Paddock Wood, Mascalls Academy which would have seen expansion by 2FE. Therefore, the SLP growth in housing required 8FE of secondary school places in total.
- 4.38 Further assessment on the secondary school education provision on the basis of a reduced housing number (No Tudeley and reduced housing at PWeC) has subsequently been undertaken in conjunction with the Education Authority, Kent County Council. The estimated pupil yield from the aforementioned housing scenario would result in there being a demand for an additional 490 pupils to be accommodated in the secondary school education system locally. This does not necessarily mean all pupils would attend additional spaces provided for the development at PWeC, but the majority of the need is assumed to be met by such facilities.
- 4.39 KCC have confirmed that a yield of 490 pupils is equivalent to 3.27 FE. Under normal circumstances to deliver provision that meets the need of the predicted growth in secondary school pupils it is necessary to round-up rather than round-down these figures. However, there is some further consideration to the calculation on pupil yield which will be further reduced based on the quantity of smaller dwelling units (flats and 1 bedroom properties) that will be delivered as part of any future development. Hence the need is anticipated to be a full 3 FE of additional secondary school provision, which has been confirmed by the Education Authority.
- 4.40 Options have been considered by the Council as to how that 3 FE provision can be met. This assessment has considered whether the need can be met through existing Secondary Schools found locally (not just Mascalls Academy), or whether a standalone school is necessary.
- 4.41 The secondary school education system in West Kent is complex and whilst it is acknowledged that there will be some secondary school pupils from development at PWeC (and other sites in the Local Plan) that will attend either private schools or selective schools, KCC confirm that it is a requirement to plan for all of the anticipated pupils in the plan through places in the comprehensive system. The County Council will always seek to ensure there is a place for every child and it will not actively plan fewer places than are forecast to be needed.
- 4.42 In regard to the expansion of existing school sites to accommodate the 3 FE pupil yield, the main site most sustainably located for PWeC is Mascalls Academy, run by the Leigh Academies Trust (LAT). Mascalls Academy already has a PAN of 270, which is 9 FE,

and therefore the addition of a further 3 FE would result in a school of 12 FE in size which would result in the school being one of the largest in West Kent.

- 4.43 The County Council is not the Admission Authority for Mascalls Academy and has no legal interest in any of the land and property at the school. KCC confirm that the guideline site areas are for new schools that are designed and built in an efficient way, existing schools do not always benefit from having originally been built with expansion in mind. Therefore, it is not always possible for expansion on site to be provided without demolition and reprovision of existing accommodation. This is something which KCC have confirmed that the LAT are interested in, particularly given their previous representations to the Borough Council regarding disposal of land at the academy for residential development to fund modernisation of the academy.
- 4.44 The practicalities of expansion are therefore an important consideration. KCC confirm that it is not preferable for a secondary school to operate with odd numbers of classes as they do not tend to work from a curriculum and staffing perspective. Whilst LAT has stated that they are willing to consider expansion there would be other aspects to consider, such as parking and drop off and traffic and bus movements, including any off-site highway works. The County Council would expect the full cost of the expansion to be secured from s106 as the County Council cannot incur costs that would be solely attributed to growth and have indicated that they are agreeable to allow feasibility of the 3 FE expansion of Mascalls to be undertaken. The LAT have indicated that there is capacity, with additional land (currently in the ownership of one of the local developers) to expand to meet this need.
- 4.45 Setting aside the concerns of KCC regarding the expansion of secondary schools with odd numbers of intake years which will be reviewed as part of the Mascalls feasibility study, one way of accommodating the growth would be to accommodate the additional pupils by an expansion of Mascalls Academy and the remaining pupils at existing secondary schools, for example Mascalls Academy being expanded up to 10 – 11 FE and the remaining 1 – 2 FE being accommodated elsewhere.
- 4.46 The only other school in the Borough that could potentially accommodate any increase would be Skinners Kent Academy in Royal Tunbridge Wells. A 1 FE expansion would be necessary to accommodate the non-PWeC growth in the Local Plan. It is considered that it would be incredibly challenging to accommodate necessary additional buildings over and above this 1 FE expansion on that site i.e. expansion of 2-3 FE. The transport implications would also be more complex. The impact on the Pembury Road and Colts Hill junction of the A21 from the additional movements would need to be factored into the scheme and mitigated. Growth associated with the SLP and committed developments at North Farm/Kingstanding Way, Royal Tunbridge Wells already have mitigation committed for improvements to the Pembury Road.
- 4.47 Another alternative to find the 1-2 FE needed would be space in schools within Tonbridge outside of the Borough Council borough boundary. It is possible a 1-2 FE expansion within Tonbridge Town could be used to mitigate the additional Paddock Wood demand. However, at this stage, as Tonbridge and Malling Borough Council are yet to publish a Draft local Plan which sets out how they will as a Council meet the needs of the borough, it is not possible to identify secondary school places within

Tonbridge accurately. The Council have been advised that the TMBC site allocations at Tonbridge in the TMBC withdrawn Local Plan and other windfall schemes, would have consumed secondary school capacity in Tonbridge. TMBC advises that secondary schools at Tonbridge are already full due to current demand and demand that will arise from consented developments. There is potential to expand the following schools subject to feasibility and funding – Leigh Academy, Brook Street, Tonbridge (2-3 FE), Hugh Christie School, White Cottage Road, Tonbridge (1 FE). This could be provided on a temporary or permanent basis.

- 4.48 Whilst TMBC are early in the preparation of their plan, it is a safe assumption that as Tonbridge is the main urban area of the borough, a similar level of housing as with the withdrawn plan will be proposed within the town itself, meaning that the capacity for secondary school places would be used up and not available to pupils travelling from development at PWeC.
- 4.49 Therefore, the additional capacity within neighbouring schools is unlikely to represent a satisfactory level of additional secondary school space to accommodate the 3 FE need from a revised amount of housing at PWeC. The result would be that all of the 3 FE of pupil need would need to be accommodated at Mascalls, or alternatively, via a new standalone provision as part of the development.
- 4.50 The alternative to Mascalls expansion is therefore to try to accommodate the necessary secondary school provision as part of the development allocation in a new standalone facility. KCC have confirmed that a 4 FE Secondary School can be delivered, and then expanded at a later date from further growth anticipated beyond the 10 year period into a 6 FE (the minimum size secondary school that KCC would ultimately deliver). The minimum starting size for a secondary school would be 4 FE with appropriate expansion to 6 FE modelled into the development. In this scenario the 3 FE growth needed from growth at PWeC would be met by developer contributions and the remaining funding gap up to 4 FE would be met by the Education Authority to central government funding.
- 4.51 Masterplanning of the PWeC site in relation to the additional flood risk modelling has been undertaken and sets out how a standalone school could be accommodated within the development within the NW parcel (PS_046: 'Paddock Wood Strategic Sites Addendum' paragraphs 3.2 – 3.14).
- 4.52 Whilst the feasibility of how Mascalls Academy could accommodate the additional 3 FE is undertaken, the Council intends to safeguard the location of a new secondary school within the NW parcel of the allocation should it be needed.

Sports and Leisure provision

- 4.53 As with the revisions necessary for Education provision, the implications from the potential removal of the Tudeley Village allocation, in addition to the reduced level of developable land within Flood Zone 1 at PWeC and the need to deliver appropriate levels of secondary school education, means associated sport and leisure facilities also need comprehensive review.

- 4.54 The Strategic Sites Masterplanning and Infrastructure Report (2021) (document reference [CD 3.66](#)) prepared by David Local Associates highlights that the Infrastructure Delivery Plan sets out a list of indoor and outdoor sport and recreational items that are needed for the expansion at Paddock Wood and east Capel.
- 4.55 The SLP indicated that to meet the necessary growth associated needs for sport and recreation provision a mixture of infrastructure would be required. This was set out in policy STR/SS 1 and comprised a new sports and leisure hub, which could incorporate an indoor 25m swimming pool and indoor and outdoor sports facilities. Around 10 hectares of land was also to be safeguarded within the western parcel, to the south of the railway line and to the east of the A228 for this purpose. Sport and recreation infrastructure was to be secured either in kind (land) and/or financial, as set out in the Strategic Sites Masterplanning and Infrastructure Study.
- 4.56 Because of the revised approach to growth as set out above, a different strategy to deliver sports and recreation infrastructure whilst maximising housing growth on the safest land in Flood Zone 1 is required.
- 4.57 Clearly with a proposed reduced level of housing in the plan that takes account of the aforementioned matters raised with Tudeley Village and the Flood Risk matters in PWeC it would be reasonable to expect that a proportionate reduction in sports and leisure provision would be required.
- 4.58 The starting point for assessing the sport and leisure provision is the SLP position for a dedicated 'sports hub' facility in the southwest of the PWeC at set out in STR/SS 1 allocation which would have delivered the majority of the requisite provision for indoor and outdoor facilities. The sports hub would have been located to the western boundary of the PWeC growth area adjacent to the A228.
- 4.59 David Local Associates 'Paddock Wood Strategic Sites Addendum' paper [PS_046] sets out at paragraph 3.15 – 3.30 the review of existing facilities that has been undertaken of the existing facilities at Paddock Wood to establish the approach for provision of a revised level of facilities to support the strategic growth.
- 4.60 Following this assessment of existing facilities, it has been considered that an appropriate level of sport and leisure facilities can be accommodated within existing facilities, with some new pitch provision being delivered within the SW development parcel.
- 4.61 This approach satisfies the vast majority of provision set out in the original Structure Plan. Further intensification of use could occur, for example by the replacement of the grass football pitch with an artificial surface, which can be used for more hours each week, supporting greater levels of participation and provision.

Overview and Conclusions

- 4.62 The significant expansion of Paddock Wood and East Capel remains a logical option for the development strategy of the Local Plan, in that the town has a good range of existing services, employment premises and access to public transport provision.

- 4.63 The council has reviewed the matters of concern raised by the inspector, and those matters which require amendments to the SLP policy for the PWeC, in particular in regards to Flood Risk, Education, Sport and Leisure provision and Employment and have, as a result of further consideration on each matter concluded that a revised policy SS / STR 1 will be necessary in order to resolve all outstanding matters of soundness that have been raised, or that require to be resolved.
- 4.64 The main areas of consideration other than the detailed consequential impacts due to a reduced housing scenario would be the identification of 10 years housing land supply (this is discussed in some detail below paragraphs 11.1 – 11.22), and amendments to policy SS / STR 1. The revised policy is set out in **Appendix C** 'Changes to policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel'. This sets out a variety of changes which would seek to resolve the Inspector's queries raised at paragraphs 40 – 42 of the Initial Findings letter.
- 4.65 A draft rewritten policy can be found at **Appendix X** of this addendum paper, which seeks to reorganise much of the policy in a clearer fashion to make it more effective. To reduce the reliance on Supplementary Planning Documents for each of the individual development parcels, by allocating each parcel for development, setting out the scale type and mix of uses permitted. The draft policy will seek to make a distinction between the development principles affecting the entirety of the allocation, what masterplanning approach should be sought, and what shared strategic infrastructure will require contributions towards.
- 4.66 Individual areas of the development will then be specifically identified and allocated based on developer controlling ownerships. These allocations will identify the scale of development and what infrastructure will need to be delivered in each development parcel, furthermore the expectations that development will come forward in accordance with the strategic aims of the policy will be included. Each development parcel allocation will include the requirement for a masterplan to ensure that the development conforms with the Councils Structure Plan SPD that will be brought forward with the adoption of the local plan.
- 4.67 It is considered that these proposed changes to the policy will enable it to be effective in the determination of planning applications, by ensuring that strategic delivery of infrastructure will come forward at the right time ensuring that piecemeal development conforms with the strategic aims and objectives of the plan.

5.0 Transport related matters

- 5.1 The Pre-Submission Local Plan was supported by a [Transport Assessment, March 2021 \(CD 3.114\)](#). This was later supplemented and updated, by [Local Plan – Transport Assessment Addendum 2](#), October 2021 [PS-023], which included sensitivity testing sought by Kent County Council (as the local transport authority) and National Highways.
- 5.2 Both Transport Assessments used ‘Trip End Model Presentation Programme’ or TEMPro Version 7.2, (being that generally used for strategic transport modelling for local plans) for estimating background traffic growth. For the strategic sites, a 10% reduction in baseline (TRICS) trip rates was applied, in recognition of the scope for internalised and sustainable trips for such developments with ready access to facilities, such as primary school, local centre etc., as well as good provision of walking and cycling routes within them.
- 5.3 In addition, with the agreement of the national and county highways bodies, a 10% reduction on car (driver) trips with origins and destinations within an area regarded as a “*Sustainable Transport Zone*” (STZ) was also applied. This is the roughly triangular area from Tonbridge - Paddock Wood - Royal Tunbridge Wells (although the 10% reduction was not applied to trips contained within Tonbridge).
- 5.4 The proposed review of strategic development and associated growth as set out earlier in this paper has resulted in a review of the transport modelling evidence.
- 5.5 Fundamentally the approach to the further modelling remains the same as previously. However, it has been reviewed and updated, as set out in the recent Tunbridge Wells Stage 1 Technical Note [PS_047] produced by consultants Sweco on behalf of the Council. This includes:
- Review of robustness of the Baseline 2019 model in the wake of the Covid-19 pandemic and how flows within the model relate to observed data in 2022.
 - Assessment of NTEM/TEMPro 7.2 housing and growth factors against NTEM/TEMPro 8, and update of Local Plan reference case model as required.
 - Review of Paddock Wood zone loading to confirm accuracy in key junctions where traffic flows will be loading onto the network.
 - Review of Reference Case model network at Kippings Cross to ensure model network best represents existing conditions.
- 5.6 In regard to the use of NTEM/TEMPro version 7.2, which is based on 2014-based household projections, as opposed to version 8.0 which uses more up to date (lower) household projections and was released since the hearings concluded, the Council and Sweco were guided by National Highways and KCC as Highways Authority. In order that there is consistency within the modelling approach TEMPro version 7.2 has been used which has been critically analysed in the Tunbridge Wells Stage 1 Technical Note which Reviews the Strategic Model Methodology and of the local plan.
- 5.7 The transport modelling has undertaken a review of the wider road network surrounding the wider Paddock Wood area with the overall aim of improving or refining links where

and if required. These reviews primarily focus on the congestion, demand and routing around Paddock Wood and Kippings Cross, and identified existing committed transport schemes (both pre-existing and those that have come forward since the original model), based on planning permissions as of August 2023.

- 5.8 Updated information with regards to completed residential development and employment floor space informed the modelling reference case.
- 5.9 Updated information on Local Plan developments for the purposes of transport modelling was then factored in. This contained the latest Local Plan housing and employment development quantum as set out in this paper, with the most notable exclusion being the removal of Tudeley Village development which comprised 2,800 dwellings (2,100 during the plan period), and the reduction of dwellings at Paddock Wood and east Capel by approximately 1,000 dwellings. Nevertheless the local plan scenario tested still included a significant level of growth at PWeC and the wider Local Plan
- 5.10 Stage 2 of the modelling [PS_048] assessed hotspots junctions within the network based on the proposed growth scenarios, but without mitigation designed in or any reduction to accommodate reduced traffic flows based on the use of sustainable modes of transport. Scenario 1 comprised the full quantum of development in the current proposed and includes all pre-and post-2034 housing allocations into a single “10 year post-adoption” model run. Scenario 2 is the same as Scenario 1 but includes the additional allowance for further housing post-2034 to provide housing growth to meet the full 15-year housing need, based on a continuation of the revised strategy, and thus, the full “15 year post-adoption” (2038) model run.
- 5.11 The Stage 3 work continued in two parts. Part one assessed the respective reduction in traffic flows based on sustainable transport assumptions that have been discussed with consultants Sweco, National Highways and KCC Highways and are set out in the Sustainable transport Note [PS_053]. The level of detail which identifies the shift from car use to sustainable modes (public transport, cycling and walking) or modal shift is integral to sustainable development and the strategic growth being modelled.
- 5.12 It is considered that there is still strong justification based on the focus on sustainable transport measures, as contained in the local Cycling and Walking Infrastructure Plan (LCWIP) [[CD 3.115](#)] to be supported.
- 5.13 In regard to Paddock Wood, the town is fairly compact, relatively flat, with a concentrated town centre, where it is feasible that a majority of journeys could be via sustainable modes. Masterplanning work previously undertaken for the Pre-Submission Local Plan has been updated to reflect revisions that limit housing to Flood Zone 1. The masterplan envisages new developments being designed to operate on the principles of low traffic neighbourhoods, with good pedestrian and cycling grids and managed vehicle movements.
- 5.14 Recognising that the strategic sites are some 15 -20 minutes walking time from the town centre (see LCWIP, Figure 4-18), the street network is designed to allow a Town Bus loop to operate via bus gates at key points into them and connecting them to the town centre, northern employment area and railway station. Much of the highways and

transport infrastructure identified in the masterplanning work is expected to be provided as part of the development of the sites.

5.15 A draft 'Bus Feasibility Study' [PS_058] was prepared by consultants WSP for KCC and TWBC to support the Submission Local Plan. WSP has produced a further study to focus on the revised development at PWeC [PS_041]. A review of the original Bus Feasibility Study has also been undertaken based on the proposed revised development strategy (in addition to the Paddock Wood urban area study) [PS_040]. It has looked at the potential for revised housing allocation sites in relation to the following corridors:

- Tonbridge to Paddock Wood
- Paddock Wood to Pembury
- Pembury to Royal Tunbridge Wells
- Royal Tunbridge Wells to Tonbridge
- Tonbridge to Tunbridge Wells Hospital
- Tunbridge Wells Hospital to Pembury

5.16 On this basis a number of route/service improvement options have been assessed. Taking a, perhaps conservative, 5% modal share, this Option will considerably increase the frequency of the service on the Royal Tunbridge Wells (RTW) – Pembury – Paddock Wood corridor from one/hour to one/15 minutes. This would mean that there is a service with "Bus Rapid Transport" characteristics from RTW, to both Tonbridge and Paddock Wood.

5.17 The first Local Cycling and Walking Infrastructure Plan (LCWIP) focused on Royal Tunbridge Wells (RTW) – ([Document Reference 3.115a\(i\)](#)). This includes cycling and walking routes into RTW town centre from surrounding areas (e.g. Rusthall, Hawkenbury). No further amendments are thought to be necessary based on a revised growth scenario for the Local Plan.

5.18 In the event that Tudeley Village is not pursued in this Local Plan, but that there is still strategic growth, albeit somewhat reduced, of Paddock Wood, particular consideration is now given to the Paddock Wood – Pembury – Royal Tunbridge Wells corridor in terms of both bus and cycle routes.

5.19 The final stage of the Transport modelling (Stage 3, part two) reviewed the remaining hotspots, and determined where further mitigations were needed. This will inform concept designs/timings of the necessary infrastructure improvements.

5.20 It is recognised that under a lower growth scenario option for the local plan (No Tudeley Village and a reduction of houses at PWeC) there will still inevitably be impact on the highway network. Nevertheless factoring in a reasonable level of sustainable transport related modal shift away from car use, and the improvement of certain junctions and delivery of road infrastructure projects will ensure that the road network continues to function within capacity at respective pressure points, whilst allowing the growth to come forward.

6.0 Infrastructure

- 6.1 The planning Inspector in his Initial Findings letter has put forward a number of options with regards to Tudeley and raised some concerns which require addressing with regards to the growth proposed at Paddock Wood and land at east Capel.
- 6.2 The Submission Local Plan is supported by an Infrastructure Delivery Plan ([CD 3.142](#)) which set out an number of matter in regards to the development coming forward at that stage. This IDP has been informed through discussion and consultation with relevant service providers operating in the borough, alongside reviewing evidence and publications (such as management plans and strategies). It was published as a ‘Live Document’, updated to reflect relevant changes in information. It acknowledged that the live status of the document meant that there may be a requirement for it to be subject to further changes as information from various parties changed.
- 6.3 Work had also been undertaken with regards to the Strategic Sites Masterplanning and Infrastructure Study 2021, prepared in relation to the two Strategic Sites proposed in the Local Plan at Paddock Wood and east Capel, and Tudeley Village.
- 6.4 The proposed options assessed for Paddock Wood and land at east Capel look to assess whether the revised level of housing growth at Paddock Wood mean that the development is self-sustaining in terms of meeting its infrastructure needs.
- 6.5 As is set out above much of the focus of work has been to assess the needs generated from the revised amount of housing land at PWeC which has been reduced so that it is only delivered within Flood Zone 1 which would see a reduction in housing numbers from 3,590 – 2,592 (upper limit).
- 6.6 The main infrastructure demands are that infrastructure that was to be shared across Tudeley Village and PWeC would be delivered solely by PWeC in the scenario tested where Tudeley is removed from the plan. The work undertaken by the Council has sought to see secondary school provision, and sports and leisure provision delivered within the Paddock Wood and east Capel area within the proposed allocation. What is clear is that the infrastructure needs derived from the proposed revisions to the allocation and policy STR/SS 1 mean that less infrastructure is required.
- 6.7 The David Local Associates Paddock Wood Strategic Sites (Master planning) Addendum paper [PS_046] sets out at table 8 the Infrastructure Schedule for the policy, the location of the infrastructure and whether it is onsite or offsite, and the likely timeframe for delivery (short, medium, or long term). The table splits the infrastructure into different categories as follows:-

Strategic Transport – main junction improvements including Colts Hill Bypass, and including different Sustainable Transport elements covered by the LCWIP.

Utilities – electricity, gas, telecoms, water etc.

Education – 3 FE secondary provision (shared), and primary schools 2x 2 FE

Public Open – including allotments, general amenity space, children’s play areas and sports pitches.

Community provision – New health provision within the site and general provision, and sport and leisure provision including upgrading to existing facilities and the provision of new outdoor pitches.

- 6.8 The provision can be shown indicated broadly on Figure 14 of PS_046 in terms of its broad distribution at Paddock Wood and east Capel.
- 6.9 Discussions are ongoing with consultants Dixon Searle regarding the revised viability appraisal work, however delivery of the infrastructure associated with PWeC as set out in the David Lock Associates addendum paper is considered achievable.

7.0 Other matters

- 7.1 The Inspector raised questions about the appropriateness of two proposed allocations within Hawkhurst parish. These are considered below.

Land north of Birchfield Grove Hawkhurst

- 7.2 The Submission Local Plan Policy AL/HA 5 ‘Land to the north of Birchfield Grove’ allocates 0.79 hectares of undeveloped land located immediately north of Birchfield Grove for a medical centre and parking to serve this facility. This is to meet an identified need for a new medical centre at Hawkhurst to replace the two existing GP practices at Hawkhurst see IDP ([Core Document 3.142](#)).
- 7.3 As set out in the Inspector’s Initial Findings letter at paragraphs 72 – 76, the landowner of the site also owns the wider area of land between Birchfield Grove and Whites Lane, to the north, east and west of the area identified for the medical centre. During the hearing sessions, it was explained that a developer has an agreement to purchase the wider site. However, restrictions within the agreement between the landowner and developer mean that the developer can only purchase the site with the benefit of planning permission for housing on the remainder of the land to the north. Consequently, the SLP allocation for a standalone medical centre is unachievable.
- 7.4 However, paragraph 76 of the Inspector’s letter confirms that, in order to make the Plan sound, a site needs to be identified for the medical centre.
- 7.5 Subsequent work carried out by Council officers has confirmed that there is no other suitable site at Hawkhurst to deliver the new medical centre. Hence, further work has been carried out by officers to reassess the impacts of housing development in this location upon the wider area, including via consideration of a current planning application (22/02664, HYBRID Application - Outline Application (All matters reserved except access), for ‘Development of up to 70 homes with associated medical centre, parking and landscaping; Full planning application for creation of new country park’).
- 7.6 This has included an assessment of the ‘exceptional circumstances’ for major development in the AONB. Indeed, such an assessment was carried out in relation to a

similar mixed-use proposal for the site which was included as a proposed allocation site in the Regulation 18 Draft Local Plan - Site HA 4 Land at Fowlers Park. The Landscape work relating to that proposal can be found in the **Landscape and Visual Impact Assessment of Proposed Allocation Sites within the High Weald AONB – Hawkhurst section 6.7** (CD_3.96f_LVIA_Section-6.7-Hawkhurst-sites). It concluded a Medium to Medium-Low effect upon the AONB, while the Council concluded (as set out in the Distribution of Development Topic Paper for the Draft Local Plan –Regulation 18 Consultation, Appendix 3), that this was major development.

- 7.7 Whereas the Regulation 18 proposed allocation was for “*residential development (C3) providing approximately 100 dwellings, a medical centre or community facility, as indicated by the yellow hatched area on the draft Policies Map, and safeguarding land for future school expansion*”, the now proposed allocation is for approximately 70 dwellings as well as the medical centre and school expansion land. However, it is considered that the site remains major development in the AONB.
- 7.8 There are several factors that contribute to potential exceptional circumstances for the current proposal, notably:
- The provision of a Doctors surgery, which cannot be delivered without the housing /or on another site
 - The provision of land for future school expansion
 - A significant provision of green space and biodiversity net gain
- 7.9 The area of land to be safeguarded for education use, located immediately adjacent to Hawkhurst Church of England Primary School, within the south-western part of the site, will enable the school to expand at its current site by up to one FE to provide for the Hawkhurst/Sandhurst and Benenden education planning area. This expansion has been identified as necessary by Kent County Council Education (West Kent) to enable the delivery of growth proposed by the Local Plan within Hawkhurst and the surrounding areas.
- 7.10 On balance, having regard to above benefits, together with the level of landscape impact, and delivery of housing, and acceptability in heritage and other respects, it is proposed that the current Policy AL/HA 5 for Land north of Birchfield Grove be modified and effectively superseded by a revised policy that reflects the above proposals.
- 7.11 A suggested modified policy and related site layout plan are included in **Appendix F**. A SHELAA site assessment sheet for this revised site is included in PS_038.

Limes Grove

- 7.12 The Submission Local Plan Policy AL/HA 8 Site at Limes Grove (March's Field) reserves open land (site area 0.63 hectares), formerly used as woodyard, located to the north of the Station Road Business Park at Gill's Green for employment uses (E/B2/B8), *'to be released for development if monitoring indicates that other employment allocations have not come forward, or there is evidence that further employment*

provision is required in the eastern part of the borough, or potentially at the five-year review of the Local Plan’.

- 7.13 The [Inspector’s Initial Findings letter](#), at paragraphs 77 – 80, confirms that Limes Grove is a narrow country lane and that, in places, the visibility of oncoming traffic is limited. The width of the road is narrow and does not allow vehicles to pass. There is also no footpath to the main entrance of the Business Park, or to the bus stops on the A229.
- 7.14 The Inspector questions whether, having considered its access limitations, whether the site may be suitable for smaller, less-intensive, ancillary uses associated with the business park.
- 7.15 This prospect has been discussed further with Kent County Council (KCC) Highways. Three options have been considered and advice sought from KCC Highways:
1. *The provision of parking for the occupiers of the adjacent Hawkhurst Station Business Park, to provide 55 – 93 spaces.*
 2. *If the provision of 55 – 93 parking for the occupiers of the adjacent Hawkhurst Station Business Park is not supported by KCC Highways, is there a smaller scale of parking that would be supported?*
 3. *A small scale, less intrusive commercial use associated with the adjacent Hawkhurst Station Business Park, for example a B8 storage use.*
- 7.16 The car parking options were informed by proposals put forward for the site by planning application 20/00821/F (submitted March 2020) for the use and laying out as a car park (for 90 spaces) with a new access to Limes Grove; surfacing, landscaping, security low level lighting and CCTV, and pedestrian access to the Business Park along its existing emergency/service access drive to Limes Grove, which was subsequently withdrawn, following adverse comments from KCC Highways.
- 7.17 KCC Highways has provided advice on these three site options. This advice sets out that:

“Limes Grove is a narrow country lane, its width is insufficient for two vehicles to pass and visibility at its junction with the A229 Cranbrook Road is substandard. There is no footway along Limes Grove and no footway link to the nearest bus stops along the A229 Cranbrook Road.

The intensification of use of Limes Grove and its junction with the A229 by both traffic and pedestrians would be detrimental to highway safety and therefore the Highway Authority would not support any of the three options put forward for the allocation of the site in the Local Plan.

It is noted that the site was formerly used as a woodyard and I would question whether there is an extant use. If this is the case further consideration can be given bearing in mind the traffic generation associated with that extant use”.

- 7.18 Given this further advice received from the Highways Authority, it is clear that there is unlikely to be an appropriate use for this site associated with the adjacent business park that would be supported by the Highways Authority, including as parking provision to serve the Business Park.
- 7.19 It is also noted that there has been detailed research into the previous uses of the site, including use as a woodyard, and including investigation of historical aerial photographs and the outcome of a Tunbridge Wells Borough Council Planning Enforcement investigation in 2012 when it was evident that the previous timber storage use had long-since been abandoned.
- 7.20 As a consequence, it is considered that there are no extant uses applicable to the site, which would form a material planning consideration in decisions made about the continued allocation of the site in the Local Plan.
- 7.21 It is therefore proposed that this site allocation is deleted from the Plan.

8.0 Overview and Conclusions

- 8.1 The above sections setting out the further, refined Green Belt assessments, the consideration of issues raised by the Inspector in relation to the proposed garden settlement of Tudeley Village, and the implications if development at Paddock Wood is limited to the lowest flood zone provide the following headline conclusions:
- a) The further Green Belt assessments do not provide a basis for concluding that other previously rejected “omission sites” should come forward into the Local Plan, save for a couple of possible small-scale exceptions;
 - b) There remain areas of uncertainty regarding the impacts of Tudeley Village and its associated infrastructure, which mean that it cannot be adequately demonstrated that it will meet the threshold required for “exceptional circumstances” to justify its release from the Green Belt – the impact on which would be ‘High’. These relate to impacts on the setting of the AONB, the scale of housing deliverable within the plan period, residual uncertainties about the effectiveness of sustainable transport measures and, by implication, on the ability to satisfy local concerns about traffic in Tonbridge town centre;
 - c) Paddock Wood can accommodate major expansion without building homes within higher flood zones; while this will reduce the overall level of housing on the strategic sites by some 1,000 dwellings, it would still support the necessary improvements in local community and transport infrastructure; however, no reasonably available options exist for providing employment sites on the lowest flood risk land (Flood Zone 1), but there is enough land within the medium risk land (Flood Zone 2) adjoining the main Transfesa Road Key Employment Area, while avoiding high risk, Flood Zone 3 – which would involve some sites being deallocated and the boundary of that to the east of Transfesa Road amended.

9.0 Development strategy options

- 9.1 Therefore, new development strategy options, clearly distinct from those already appraised, are essentially those that stem from the reconsideration of the strategic site allocations for Tudeley Village and for Paddock Wood including land in east Capel (PWeC).
- 9.2 Of course, the cumulative, as well as individual merits, of options need assessment as part of the appraisal of potential new overall development strategy options, with a key consideration being the impact on housing land supply relative to identified needs.
- 9.3 The deletion of Tudeley Village would make such a substantial reduction in housing land supply that the Local Plan’s allocations would no longer be sufficient to provide for 15 years post adoption, all other things being equal. Therefore, for this scenario, and potentially others, to be capable of being found sound, there would be a need to commit to an early review of the Local Plan.
- 9.4 The development strategy options considered by officers, and which have been the subject to Sustainability Appraisal, are those presented below, as variations from the

Pre-Submission Local Plan (PSLP) in terms of housing delivery. For Paddock Wood, they include different options for the location (and scale) of employment land provision, these being Options 4, 5 and 6, notwithstanding that, when viewed purely in the context of Paddock Wood, the employment option forming part of Option 5 is preferred.

Option 1 – As PSLP, but with revised housing trajectory for Tudeley Village (SA Development Strategy Option number 14)

- 9.5 This option is essentially the development strategy for the PSLP, just updated to reflect the prospect of a longer timeframe for building out at Tudeley Village. Although this anticipates some 650 dwellings less in the plan period relative to the PSLP, taken together other factors affecting overall housing supply, it would still provide the means of meeting 15 years' supply of housing post adoption, with a buffer.

Option 2 – As PSLP, but with revised housing trajectory for Tudeley Village and housing contained wholly within Flood Zone 1 at Paddock Wood including land in east Capel (SA Development Strategy Option numbers 19A and 19B)

- 9.6 This option is as Option 1 above, but with a reduction in the housing growth at Paddock Wood to reflect the Inspector's initial findings regarding the sequential test in that no housing is proposed in Flood Zones 2 or 3. The reduction of c1,000 dwellings covered by Policy STR/SS 1 impacts on overall housing supply, but would still provide 10 (SA Option number 19A) /15 years' (SA Option number 19B) supply of housing post adoption, albeit with a reduced buffer.

Option 3 – As PSLP, but with no Tudeley Village (SA Development Strategy Option number 15)

- 9.7 This option deletes the proposal for a new settlement at Tudeley Village, but otherwise essentially retains the same distribution of development, including the SLP strategic site allocation at Paddock Wood including land in east Capel. This option would mean that there would be an extremely marginal 15-years' housing land supply post adoption and, of course, no buffer, so there may need to be a requirement to commitment to an early review of the Local Plan.

Option 4 – No Tudeley Village and reduced housing and employment growth at Paddock Wood including land in east Capel, both being sited on Flood Zone 1 (SA Development Strategy Option number 16)

- 9.8 This option deletes all the employment allocations adjacent to Transfesa Road Key Employment Area (KEA) at Paddock Wood, albeit one site now has planning permission, and relocates the employment provision to part of the residential area, assumed to be to the north-west of the town. It would result in a loss of some 150 dwellings relative to Options 5 and 6 below but may be somewhat more depending on the need for enhanced buffer areas.
- 9.9 This Option, as well as Options 5 and 6 below, would only provide a 10-years' housing land supply, so would be accompanied by a commitment for an early Local Plan review. Under this option (Option 4), the housing supply to meet the 10-year target is marginal, while neither is it substantial under the other two options.

Option 5 - No Tudeley Village and reduced housing and employment growth at Paddock Wood including land in east Capel, with all housing on Flood Zone 1, with employment land similar to the PSLP, but excluding land which is, or will be, within Flood Zone 3, while including land which would be within Flood Zone 2 (SA Development Strategy Option number 17)

- 9.10 The essential difference between this option and the above is that employment land at Paddock Wood is still focused as extensions to the Transfesa Road Key Employment Area. The actual areas differ somewhat from those put forward in the SLP, as it excludes land east of Maidstone Road (known as Keylands Farm) and some land east of Transfesa Road which is now expected to fall within Flood Zone 3 (based on upper-end climate change modelling). It includes land within Flood Zone 2 which can meet the 'exceptions test'.

Option 6 - No Tudeley Village and reduced housing and employment growth at Paddock Wood including land in east Capel, with all housing on Flood Zone 1, with employment land similar to the PSLP, but excluding some land which is, or will be, within Flood Zone 3, while still including one site (Keylands Farm) which would be within Flood Zone 3, as well as other sites within Flood Zone 2 (SA Development Strategy Option number 18)

- 9.11 This option is the same as Option 5 above, but with the additional employment site referred to above within Flood Zone 3. It provides an option with more employment land in the locality recommended in the Employment Needs Study, to reduce the need for out-commuting.

Option 7 – Defer the examination to review options for means of achieving a 15-year housing land supply (SA Development Strategy Option number 12)

- 9.12 In essence, this Option proposes a pause in the process. It will inevitably take some time to gather more, and updated, evidence and re-assess possible site allocation options (notwithstanding they will have recently been found unsuitable through the SHELAA process).

10.0 Consideration of development strategy options

- 10.1 Ahead of considering these options, it is pointed out that, of course, other distribution options that may provide the full 15-years' housing land supply were assessed as part of the formulation of the Pre-Submission Local Plan through rigorous consideration. However, there was not an obvious alternative strategy to the one proposed at the SLP stage. Furthermore, to seek to adopt any other fundamentally different option that requires the identification of a significant amount of additional land elsewhere for development is captured under Option 7.
- 10.2 Another point to highlight is that, while there is the possibility of progressing the Local Plan with less than 15 years' supply of housing land, such scenarios would still provide at least 10-years' housing supply, in line with paragraph 68 of the NPPF. Further to the updating of housing land need and supply, as set out further below, Options 3 - 6 are regarded as reasonable options as they would meet this threshold – while requiring a commitment to an early review, to maintain a longer-term continuity of land supply.

- 10.3 **In essence, the options centre around the decision about whether to retain Tudeley Village, and around the extent of growth at Paddock Wood including land in east Capel, as well as the relative merits of these, which will require an early Local Plan review, relative to undertaking further work now to seek to meet a full 15-years' housing land supply.**

Option 1 – As PSLP, but with revised housing trajectory for Tudeley Village (SA Development Strategy Option number 14)

- 10.4 This is essentially the SLP option, updated to reflect the prospect of a longer timeframe for building out Tudeley Village.
- 10.5 Its key merits are that, even with a delayed build-out, it would still provide the means of meeting 15 years' supply of housing post adoption, with a buffer. Furthermore, while there has been considerable local opposition to a new settlement at Tudeley Village, the more refined assessment of reasonable alternatives within the Green Belt has not identified any real alternatives to it. In essence, it was, and is, a reasonable option.
- 10.6 From a strategic perspective, Tudeley Village has much to commend it in terms of responding to NPPF paragraph 73, which states: "*The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements ...*" as is articulated in the Local Plan and its supporting documents.
- 10.7 Of course, the same NPPF paragraph adds that such new settlements (or significant extensions to existing villages and towns) should be "*... well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).*" In several of these respects, the Inspector has cast doubt on the robustness of the evidence base, including in relation to sustainable transport measures, traffic impacts, especially on Tonbridge Town Centre, the level of certainty of supporting infrastructure, and its deliverability, as well as landscape impact of the Five Oak Green Bypass, which is found to cause harm.
- 10.8 There is clearly doubt in the Inspector's judgement about whether there are 'exceptional circumstances' for the proposal that justify its development in the Green Belt – on which it will have a "*High*" harm if released from it. In response, as highlighted above, it is felt that a number of the concerns raised can be addressed, but it is accepted that some need further studies to provide more compelling evidence. However, this will take some time and there is still the prospect that the Inspector will still conclude that the new settlement at Tudeley Village is inappropriate, and that its Green Belt harm too is an overriding policy objection.
- 10.9 As part of this option, the proposals for Paddock Wood including land in east Capel are unchanged from the SLP. Not only has the Inspector already expressed considerable concerns about development in higher flood zones, which appear in conflict with the sequential flood risk test, the more recent flood modelling and mapping that has been undertaken increases the extent of medium and high-risk flood zones, essentially exacerbating the issue.
- 10.10 Therefore, while development in higher flood zones may be justified if it is necessary to meet development needs and there are no other reasonable alternatives, it is evident

that housing – which is a “more vulnerable” use in flood risk terms – could be restricted to the low-risk Flood Zone 1 – as considered under Option 2.

Option 2 – As PSLP, but with revised housing trajectory for Tudeley Village and housing contained wholly within Flood Zone 1 at Paddock Wood including land in east Capel (SA Development Strategy Option numbers 19A and 19B)

10.11 This option recognises the sequential test issue highlighted by the Inspector in relation to housing growth at Paddock Wood and east Capel (with no housing proposed in Flood Zones 2 or 3), while still promoting Tudeley Village, with a revised trajectory. Of particular note, the reduction of c1,000 dwellings covered by Policy STR/SS 1, even coupled with the deferral of construction at Tudeley Village, may (if the further work on housing need and supply set out below is accepted) have the clear merit of still providing 15 years’ supply of housing post adoption, albeit with a reduced/marginal buffer (SA Option number 19B).

10.12 This option is regarded as the means of addressing the Inspector’s legitimate concerns regarding the siting of housing at Paddock Wood which would still achieve the 15-years housing supply – if it is believed that there is confidence in, as well as merits of, continuing to promote Tudeley Village in the Local Plan.

10.13 In conclusion, this Option can be seen, objectively, as a potential development strategy, but officers’ judgement is that it still carries significant risks in pursuing at this time, for the reasons set out above – which needs to be weighed in the context of the need to have a Local Plan in place as soon as practicable, to provide the framework for and to promote sustainable growth to meet the identified housing needs.

Option 3 – As PSLP, but with no Tudeley Village (SA Development Strategy Option number 15)

10.14 By deleting the proposal for a new settlement at Tudeley Village but retaining the SLP strategic site allocation at Paddock Wood including land in east Capel (and otherwise retaining the same distribution of development), it can be shown (based on revising housing assessments) that this Option would be a means of potentially meeting 15-years’ housing land supply post adoption but would be extremely marginal.

10.15 Of course, the main issue would be the inclusion of development, especially housing, in Flood Zones 2 and 3 at Paddock Wood including land in east Capel which the Inspector is clearly not convinced of the merits of the arguments put forward at the hearings. It is unlikely that the need to achieve a 15-year housing land supply would carry enough weight to justify such a significant incursion into Flood Zones 2 or 3, especially when there are options to progress the Local Plan in other ways such as with 10 years of housing supply identified.

Options 4, 5 and 6 - No Tudeley Village and revised proposals for Paddock Wood including land in east Capel, with three sub-options:

- No housing or employment in FZ2/3 (Option 4) (SA Development Strategy Option number 16)

- No housing in FZ2/3, but some employment in FZ2 (Option 5 (SA Development Strategy Option number 17))
- No housing in FZ2/3, but some employment in FZ2/3 (Option 6) (SA Development Strategy Option number 18)

10.16 All these options aim to ensure that the Local Plan provides housing supply for 10 years and are subject to a requirement for an early review to maintain continuity of supply. They differ insofar as how employment is accommodated.

10.17 These options have already been explained in the context of the Paddock Wood at Section D above. As is set out above, while an option which involves setting aside some 5 hectares of Flood Zone 1 land is sequentially preferable, it is not favoured as it appears not to be available and, moreover, would restrict the range of uses, and form of accommodation that could be accommodated relative to the nature of market demand.

10.18 As part of this further, strategic consideration, the main additional factors are, firstly, that the reduction in housing supply under Option 4 (for employment purposes) would have a material effect on the level of housing supply in the Plan as a whole and, potentially on the sufficiency of a “buffer”. Secondly, while Option 6 provides more employment land in Paddock Wood itself, when consideration is given to overall employment land supply, notably the strategic allocation at Kingstanding Way, this is harder to justify given the flood risk issues in relation to land in Flood Zone 3 (being the former allocations at Keylands Farm, which was part of the SLP allocation for ‘Land east of Maidstone Road’, and the garden centre site).

Option 7 – Defer the examination to review options for means of achieving a 15-year housing land supply (SA Development Strategy Option number 12)

10.19 Insofar as this Option proposes a pause in the process, it will inevitably take some time to gather more, and updated, evidence and re-assess possible site allocation options (notwithstanding they will have recently been found unsuitable through the SHELAA process).

10.20 In practice, it would mean a considerable period prior to being able to put forward a revised, sound Local Plan. It has been regarded in the Sustainability Appraisal as being like a “No Plan” option, which unsurprisingly performs worst of all options.

10.21 There is, of course, a potential merit is awaiting the introduction of the new planning system, but this carries a lot of risks in itself – it is not clear what it will require or when it will be effective. The Government has indicated transitional arrangements which pursuing the current Local Plan would benefit from.

10.22 Of most importance, is the fact that the Borough would benefit from having an adopted, up-to-date Local Plan in place as soon as possible, to provide certainty for residents and investors alike, should the Council pursue the current Local Plan.

10.23 The differences between these development strategy options, which are presented in Table 26 of the SA Post Examination Addendum, Part 1 (Development Strategy and Strategic Sites) are marginal. In general, the reduction in housing numbers bring benefits to the SA Land Use objective as land take has lowered. Whereas, the altered

distribution of employment across the three Paddock Wood options (options 4, 5 and 6 above) all bring about improvements to the SA water score.

- 10.24 Across these three options for Paddock Wood, the SA Table 26 shows that there is merit to both SS 1 Revision A (Option 4) and SS 1 Revision B (Option 5). However, it should be noted that the SA does not take into account deliverability which may be less of a barrier for Revision B. SHELAA sheets for the alternative SA Paddock Wood Options SS 1 Revisions A - C as well as a revised development strategy option for Tudeley Village (SA Option SS3 A) are included in PS_38. A combined SA Option with both reduced growth at Paddock Wood and Tudeley Village is included in the SA document PS_037.

11.0 Housing need and supply

- 11.1 In order to inform the consideration of options, regard is given below to an updated assessment of housing needs, as well as the latest information on completions since the base date of the Local Plan (April 2020), outstanding planning permissions, and a revised windfall sites allowances.
- 11.2 This review is particularly relevant to options that would not provide enough land to deliver 15 years' supply of housing land, essentially to test whether they would deliver at least 10 years' supply.

Housing needs

- 11.3 The Local Plan covers the period from April 2020 and the local housing need, as calculated under the 'standard method', is based on the requirement at that date. i.e., 678 dwellings per year (dpa).
- 11.4 However, the PPG states that:

Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities.

However, local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination.

[Paragraph: 008 Reference ID: 2a-008-20190220]

- 11.5 Given that the Local Plan was submitted in November 2021, essentially just 2 years ago, this suggests that the housing need may be reviewed and be based on household projections for 10 years starting with the current year, that is April 2023. This shows a housing need that has fallen slightly to 667 dpa.
- 11.6 Adopting this latest housing need figure does not itself change the April 2020 base date of the Plan. This should be kept constant. Account will still be taken to any shortfall/surplus in housing completions since that time, measured against the current Standard Method figure.

Housing supply and windfall sites

- 11.7 In terms of housing supply, the most up-to-date information on completions and permissions is contained in the published '[Five-Year Housing Land Supply Position Statement, as at 1 April 2023](#)'.
- 11.8 Hence, it is proposed that the Local Plan be modified in terms of updating housing statistics to 1 April 2023, as well as modifying the local housing need figure, as noted above.
- 11.9 Housing completions for 2022/23 shows that there were 636 dwellings completed, just a little below the 678 dwellings pa annual requirement in the emerging Local Plan.
- 11.10 Of note, the data provides a total of 4 years' completion figures for windfall sites beyond that (up to 2018/19) that was available to inform the SLP. Therefore, it is considered appropriate to review the estimates.
- 11.11 Notwithstanding that completions within recent years have been affected by Covid 19, (which was recognised by DLUHC in its approach to the Housing Delivery Test, where the number of 'homes required' within the 2019 to 2020 year was reduced by a month and within the 2020 and 2021 year by four months (see [here](#)), the level of completions of windfall sites has actually continued at a high level over the last 4 years.
- 11.12 As the table below shows, completions on small sites (of less than 9 dwellings) have seen a consistently higher number of completions than the earlier average, of 122 dpa, that the Local Plan allowance is based on:

Year	Completions on Schemes of 9 or Less Units
2006/07	124
2007/08	155
2008/09	131
2009/10	100
2010/11	107
2011/12	76
2012/13	84
2013/14	48
2014/15	95
2015/16	145
2016/17	194
2017/18	158
2018/19	167
2019/20	81
2020/21	158
2021/22	152
2022/23	137
Average	124

11.13 To recap, the Local Plan includes a small sites windfall allowance of 80% below the previous annual average of dwelling completions (based on an average 122 dpa 2006 – 2019) for the period up to 2027 (i.e., 98 dpa), and then 80% below that (i.e., 78 dpa) for the final 7 years of the plan period, in recognition of longer-term uncertainties. In contrast, the average completions on small sites allowance have not fallen in the last four years, but have actually increased, with an average of 132 dpa.

11.14 Given the above information, with increased small windfall sites' development in recent years, the Local Plan windfall allowances may be too conservative.

11.15 On this basis, it is now considered reasonable to not discount the longer-term average of 120 dpa for small sites. Also, recognising that the average is holding steady and has actually increased by 10% (132/120dpa) in recent years, it is proposed to remove the previous further discounting for the last 7 years of the plan period. Consideration has also been given to likely increases in permitted development allowances.

11.16 For larger, 10+ dwelling schemes, an allowance was also included, based on 80% of previous incidence (excluding greenfield sites and those outside established LBDs), giving an annual allowance of 24 dpa (from an average of 30 dpa since 2011, when the Core Strategy was in place).

11.17 Again, monitoring over the last 4 years has shown a significant number of large windfall sites (similarly excluding existing and emerging site allocations, greenfield sites, sites outside the LBD, and proposed C2 schemes) coming forward, as below:

2019-20	49
2020-21	82
2021-22	32
2022-23	46
Total	209
Average	52

11.18 This is notably above the previous average of 30 dpa, which was also subject to a 20% reduction, to provide greater certainty over delivery.

11.19 Given the potential variability in relation to larger site windfalls, it now seems reasonable to conclude that the 30dpa estimate is used in the Local Plan without a 20% discount.

11.20 The net effect of these revised allowances for small and large site windfalls add 520 dwellings into the supply up to 2038, but it is regarded as a fair response to the latest data.

Housing requirements – Table 3 of the SLP

11.21 Table 3 of the Local Plan may be updated to an April 2023 base date for completions and permissions, as well as taking account of the current local housing need figure and revised windfall site allowances.

Table 3 - Housing Need and Supply 2020-2038

1.	Housing need 2020-2038	12,006	18 years x 667 pa
1a	Completions 2020-2023	1,842	See 5YHLS 2023
2.	Extant planning permissions at 1 April 2023	2,845*	See HS&T TP
3.	Windfall allowance small sites at 1 April 2023 (to 2038)	1,464**	See HS&T TP/BL TP
4.	Windfall allowance large urban sites at 1 April 2023 (to 2038)	360**	See HS&T TP/BL TP
5.	Outstanding SALP/Local Plan site allocations	592	See 5YHLS 2023
6.	Outstanding Benenden Neighbourhood Development Plan Site Allocations	68	See BNDP
7.	Minimum additional allocations to meet need (based on 667dpa to 2038)	4,835	= row 1 - rows (1a-6)

8.	Minimum total allocations (based on 667dpa to 2038)	5,495	Rows 5+6+7
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* Includes discounting for C2 permissions

11.22 Of note there have been 1,842 dwelling completed since April 2020. With provision for the update windfalls sites allowances, as well as the allocations contained in the made Benenden Neighbourhood Plan (akin to those previously in the submission Local Plan), the minimum additional allocations (over and above those already in the Site Allocations Local Plan) to meet need are 4,835 dwellings, or **5,495 dwellings** in terms of total allocations.

12.0 Conclusions on preferred development strategy option

- 12.1 The implications of alternative strategies, including in terms of their respective implications on housing land supply, are set out in detail above. From a housing land supply perspective, it is regarded that the Local Plan may go forward without Tudeley Village, but that it would inevitably be conditional upon a review within five years of the date of adoption, which would need to be clearly set out in the Local Plan.
- 12.2 The further work that has been carried out in reviewing options for the strategic growth of Paddock Wood has found that it can accommodate major expansion without building homes within higher flood zones, which reduces the overall level of housing on the strategic site by some circa 1,000 dwellings, but the resultant growth, for some 2,450 dwellings, is still capable of supporting the significant improvements in community and transport infrastructure.
- 12.3 It is important to continue the success of Paddock Wood in providing a strong economic role. This is strongly focused on the Transfesa Road Key Employment Area. It is found that, while land in that locality is subject to various levels of flood risk, there is a strong case for employment growth to still be accommodated on land adjoining it, avoiding Flood Zone 3, but within Flood Zone 2, given the lack of available and suitable alternatives (within Flood Zone 1).
- 12.4 The decision in relation to Tudeley Village is more nuanced. The more refined assessment of reasonable alternative Green Belt sites has not identified any more appropriate site allocations that would provide any meaningful quantum of housing supply.
- 12.5 In testing the assumptions underpinning the proposal for Tudeley Village, it is concluded that there remain a number of aspects that give rise to uncertainties regarding the allocation that cannot be resolved within the timeframe of the Local Plan. Such that there are inevitable risks associated with its retention and, indeed, with likely success of adoption of the Local Plan.
- 12.6 For these reasons, the above Option 5 is the recommended development strategy moving forward. This essentially corresponds to the Inspector's 'Option 3 (Delete the (Tudeley Village)' allocation from the submitted Plan.

12.7 In this scenario, the Local Plan would have to be pursued on the basis that it is only meeting housing needs for the next 10 years and will need to be subject to an early review. The implications of this option in housing land supply terms are considered below.

13.0 Updated housing land supply – Table 4 of the SLP

13.1 Table 4 of the SLP, which sets out the proposed allocations, can also be updated. In doing so, attention is drawn to the following:

- The largest change (aside from the removal of Tudeley Village) is the lower, but still significant, scale of growth at Paddock Wood including land in east Capel,
- For Royal Tunbridge wells, the lower figure largely reflects a lower yield from the Showfields site, which was agreed by the Council in the hearings, which is partially offset by an increased capacity at the former cinema site, reflecting a recent permission,
- For Hawkhurst, the increase reflects the proposed allocation at Birchfield Grove, in response to the Inspector's initial findings, as discussed under 'Other matters' above. It is a mixed-use allocation, including some 70 dwellings,
- The slightly lower figure for Horsmonden relates to the capacity of a site which was agreed by the Council to be somewhat lower than in the SLP, as discussed at the relevant hearing session last year, and following the submission and consideration of planning application reference 22/00296/outline for village hall and a residential development of up to 68 dwellings and associated infrastructure (which members of the Council's planning committee have resolved to grant, subject to completion of a S106 legal agreement).

13.2 It is noted that, while the Green Belt Stage 3 Addendum does not rule out some smaller housing sites at Five Oak Green, there are also other factors to be taken into account in determining their suitability; hence, it is proposed that they are further considered as part of the early Local Plan review.

Table 4 Distribution of housing allocations

Parish/Settlement	Local Plan allocations	
	Lower	Upper
Royal Tunbridge Wells	1,416 1,278	1,536 1,421
Southborough	42	42
Paddock Wood	3,932 2,877	4,032 3,035
<i>Strategic urban expansion*</i>	3,490 2,434	3,590 2,592
<i>Town centre</i>	30	30
Capel	2,100	2,100
Tudeley Village – new settlement	2,100	2,100
Cranbrook and Sissinghurst	453	467
<i>Cranbrook</i>	415	429
<i>Sissinghurst</i>	38	38
Hawkhurst	161 231	170 240
Benenden*	87 88	95
<i>Benenden*</i>	43 41	45
<i>East End*</i>	44 47	50
Bidborough	0	0
Brenchley and Matfield	56	60
Frittenden	25	30
Goudhurst	25	25
Horsmonden	240 230	320 290
Lamberhurst	25	30
Pembury	389	417
Rusthall	15	15
Sandhurst	20	30
Speldhurst	10	12
Sub-total	8,996 <u>5,764</u>	9,381 <u>6,209</u>
Allocations with existing planning permission (to be discounted to avoid double counting)	920 1,614	920 1,614
Total (with existing planning permission discounted)	8,076 <u>4,150</u>	8,461 <u>4,595</u>

13.3 It can be seen that:

- without making wholly new site allocations, the suggested modified development strategy, taking into account no Tudeley Village and housing at Paddock Wood scaled back to flood zone 1 land only, would generate a supply of 4,150 – 4,595 dwellings,
- with reference back to Table 3 above, this would be a deficit of 900 – 1,345 dwellings relative to the local housing need at 2038, of 5,495 dwellings

13.4 This confirms that this approach would not provide a 15-year' housing land supply.

13.5 The actual amount of housing land supply can be determined using an updated housing trajectory, drawing on the information in the recent [‘Five-Year Housing Land Supply](#)

[Statement', April 2023](#)³. Where ranges in housing numbers exist, the mid-point is taken. It shows that:

- A shortfall of 1,073 dwellings at the end of the plan period
- A surplus of 275 dwellings at the end of the 2034/35 monitoring year (i.e., at 10+ years after anticipated adoption)
- A 5-year housing land supply on adoption (assumed to be end of 2024, so taking the figure for the coming five years from 1 April 2025) of 6.13 years (under the Liverpool method, which spreads the surplus over the whole plan period, rather than just the next 5 years).

Implications for elements of housing need

Affordable housing

13.6 Insofar as Tudeley Village was expected to include 40% affordable housing, as per other greenfield sites, its removal is essentially proportional to the overall reduction in housing supply. It is clearly a matter to be monitored and updated information used to inform the Local Plan review.

Housing for Older People and People with Disabilities

13.7 The provision of housing for older people and people with disabilities is an important component of overall housing needs. The deletion of Tudeley Village would remove the provision for at least one sheltered and one extra care scheme that formed part of the policy requirement. The impact of this has been reviewed.

13.8 A particular issue at the hearings centred on the provision of extra care housing. Reviewing the Council's evidence, including that considered at a related s78 public inquiry, the relationship between need and supply, with no Tudeley Village, is set out below:

a) Need

13.9 There is no definitive methodology for assessing need. Alternative approaches are:

- Use of the Strategic Housing for Older People Analysis Tool (SHOP@). Based on 2018 (ONS) population projections of the number of people over 75 years of age by the end of plan period, this would equate to a gross need of some 431 extra care units in the borough over the period 2020 -2038, an increase of some **248 units** above the stock (of 183 units) in 2020.
- Kent County Council's forecasts for extra care housing based on its own more localised methodology for extra care accommodation with regulated care provision (which also includes allowances for a reduction in the residential placement

³ TWBC Five-Year Housing Land Supply Statement 2022/2023
https://tunbridgewells.gov.uk/data/assets/pdf_file/0004/452308/Five-Year-Housing-Land-Supply-Statement-2022-2023_Final.pdf

market and a smaller proportion of people choosing to stay in their own home). Projecting forward, indicates a gross need for extra care housing of some 342 units in 2038. Deducting the stock of 183 existing units in 2020 generates a net increase of **159 units** over the plan period (2020-38).

- A broader, market view of the scope of extra care housing, which can include “enhanced sheltered accommodation” and provide for residents with a range of different care needs. This has a prevalence rate of 45 per 1,000 people aged 75+. At this rate, the gross need for extra care accommodation in 2038 would be some 776 units based on the 2018-based ONS population projections. Deducting the current stock in 2020 generates a net need for **593 units** over the plan period.

13.10 The table below shows both the gross need for extra care (EC) housing during the plan period and the additional supply needed over the plan period taking account of the current (2020) provision 183 units.

<u>Prevalence rate</u>	<u>Gross EC need 2038</u>	<u>Net EC need 2022 - 2038</u>
<u>KCC model</u>	<u>342</u>	<u>159</u>
<u>25/1000 (SHOP@)</u>	<u>431</u>	<u>248</u>
<u>45/1000</u>	<u>776</u>	<u>593</u>

b) Supply

13.11 Sites with outstanding planning permission and specific site allocation policies for extra care housing (excluding Tudeley Village) are:

Site	Status	Units
Arriva Bus Depot, RTW	Planning permission; (Allocation AL/RTW 4) Under construction and nearing completion	89 units
St Michaels Burrswood, RTW	Planning permission (pp for certificate of lawful development)	72 units
Former Cinema site, RTW	Planning permission (pp) (Allocation AL/RTW 1)	166 units
Woodsgate Corner, Pembury	Allocation (AL/PW 6*)	80 units
Paddock Wood – Strategic Allocation (including East parcel)	Allocation (STR/SS 1)	c125 units

Paddock Wood – East parcel	Planning application pending consideration (70 bed care home or 60 extra care units)	60-70 units (form part of the above c125 units)
Total		c532 units

* The policy also allows for an alternative residential care scheme of c100 units)

13.12 It can be seen that the identified supply would meet the estimated need for extra care units using both the KCC and SHOP@ forecasting approaches. While the identified supply falls somewhat short of the 593 units using a higher 45/1,000 prevalence rate, the shortfall of 61 units is equivalent to only about 2 years' worth of need, which may be addressed through the Local Plan review, if further windfall sites do not come forward in the interim. Only one or two windfall schemes would be required to meet this shortfall of 61 units.

13.13 In sheltered accommodation, while the Local Plan proposes schemes on the strategic sites, this is to help create mixed, balanced communities. However, whereas extra care housing has a material cost differential due to the extent of care provision involved, this is not the case with sheltered housing, which is seen to compete in the open market for sites. Therefore, it is not anticipated that there would be a shortfall in provision, and not within the first 10 years of the plan period prior to review.

Self-build and custom house building:

13.14 The deletion of Tudeley Village would remove the proportion, 5%, that were proposed to be for self-build and custom house building. The impact of this on supply toward meeting identified need has been reappraised. On the basis of an early Local Plan review, need has been calculated for the first 10 years post-adoption; that is up to the end of the 2034/35 monitoring year, which is estimated to be for some 448 dwellings.

13.15 Having regard to the earlier survey findings regarding the proportion of single dwellings that are reported as being within the definition of self- and custom-builds, as well as the proposed allocations at Royal Tunbridge wells for elements of such housing, the overall supply by March 2035 is anticipated to be 469 dwellings. This can be seen to be a small "surplus" of 21 units, or nearly 5%.

13.16 Hence, there is no clear requirement to make further provision as part of site allocations elsewhere in the borough as part of this Local Plan – but only on the basis of it being subject to an early review. In fact, given that the surplus is quite marginal, and notwithstanding that the methodology excludes windfall schemes of more than 1 unit that may come forward, it would be appropriate to undertake further research on need and supply as part of that review.

14.0 Commitment to early review

- 14.1 The Council has clearly set out with the intention of producing a Local Plan that plans for a full 15 years. However, it is now faced with uncertainties not only in relation to having a sound Plan, but also in relation to the changing policy framework.
- 14.2 The above assessment, supported by the Sustainability Appraisal, concludes that, in the particular circumstances surrounding the way forward with the Local Plan, it is most appropriate to revise the development strategy as proposed. In this scenario, being found sound will inevitably be conditional upon a review within five years of the date of adoption.
- 14.3 As set out, this would have the key benefit of allowing the proposed allocations in the Local Plan to be adopted and, hence, provide a statutory 'development plan' context for bringing suitable sites forward, in a sustainable manner, to contribute to boosting housing delivery. Indeed, it can be seen that housing shortfalls are expected to occur towards the end of the plan period, which would be addressed via the review.
- 14.4 The fact that the change to the planning system, as well as to national planning policies, is imminent strengthens the case for this approach.
- 14.5 The thrust of the early review would be to maintain a continuity of housing land supply. Development management policies are regarded as robust for the longer term, but the proposed introduction of national development management policies, as well as a potential need for more robust planning and land use responses to climate change issues, points to a comprehensive review.
- 14.6 A further supportive factor is that, subject to the detailed provisions of the Levelling Up and Regeneration Act, it will enable a closer alignment with the plans of neighbouring authorities in the same housing and employment market areas, which are currently at an early stage of plan preparation.
- 14.7 A commitment to early review will need to be clearly set out in the Local Plan. A policy is expected to be required to properly demonstrate this. It should be along the lines of:
- Following adoption, the Council will undertake an early review of the Local Plan, which will include further investigation of ways of meeting identified housing needs for the period post 2034.***
- 14.8 This may be a freestanding policy or incorporated into Policy STR 1. For clarity, the latter is proposed as part of the suggested modifications to this policy below.

15.0 Proposed strategic policy revisions

15.1 To give effect to the proposed revisions to the development strategy, a number of modifications will be necessary, in particular to:

- Table 3 - Housing Need and Supply 2020-2038
- Figure 5 - Key Diagram
- Policy STR 1 - The Development Strategy
- Table 4 - Distribution of housing allocations
- Table 5 - Employment land allocations identified in the Local Plan
- Policy STR/SS 1 - The Strategy for Paddock Wood, including land at east Capel
- Policy STR/SS 3 - The Strategy for Tudeley Village (which would be deleted)
- Policy AL/HA 5 - Land to the north of Birchfield Grove
- Policy AL/HA 8 - Site at Limes Grove (March's Field), Gills Green, Hawkhurst (which would be deleted)

15.2 Specific suggested redrafting is included in **Appendices** below. **A summary of the proposed changes can be found in document PS_063 (Summary of Proposed Modifications to the Development Strategy, following Inspector's Initial Findings in November 2022).**

15.3 Of course, there would also be a number of related textural modifications, including to other related policies, for example the overarching parish strategic policies for Capel parish/Hawkhurst parish (policies STR/CA 1/STR/HA1), largely to reflect the evidence put forward in the preceding discussions on each of these matters and to reflect changes in scale of development. It is anticipated that these will be drafted following examination of the suggested modifications to the overall development strategy and dealt with through the Main Modifications stage of the examination process.

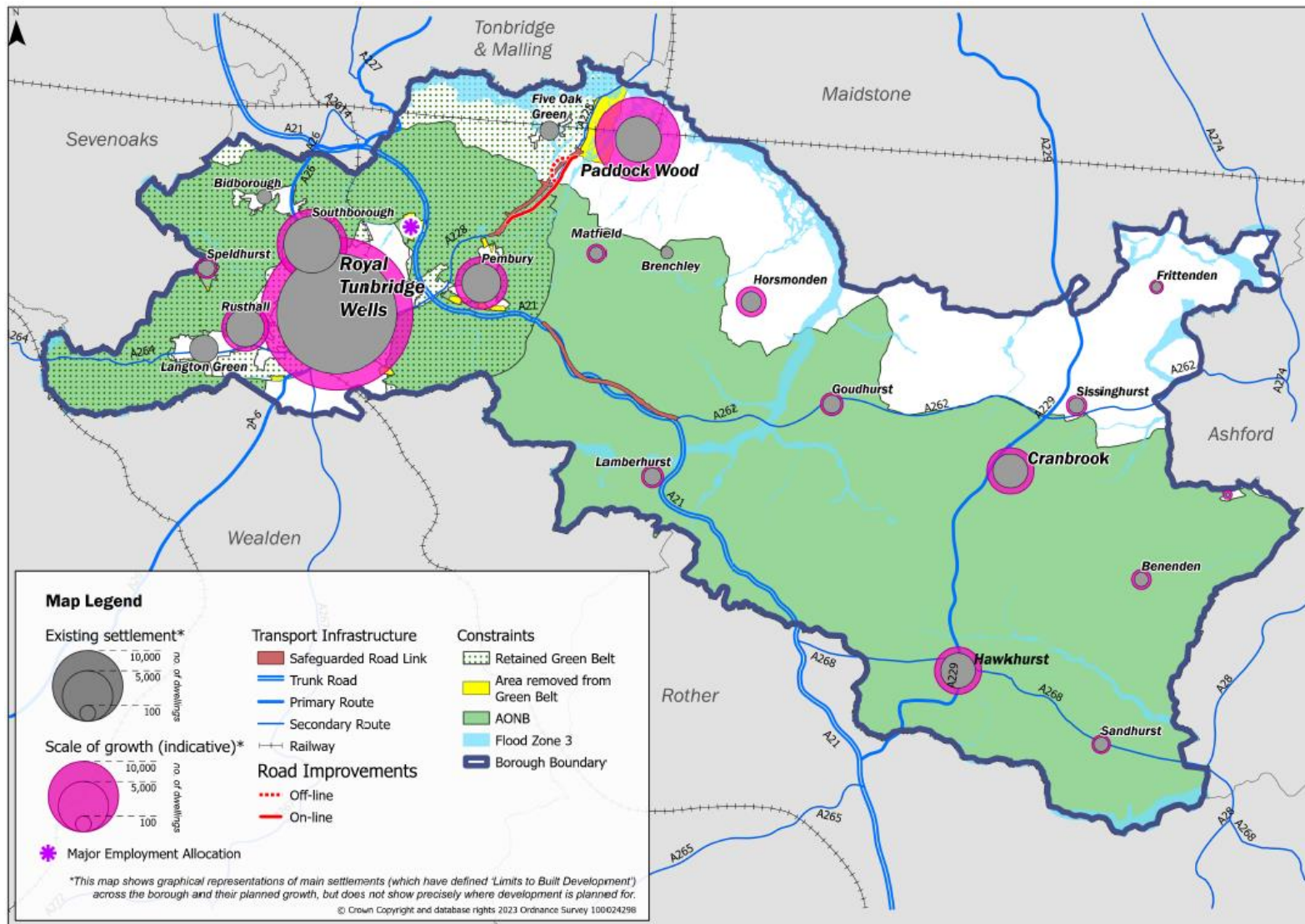
Appendices

Appendix A: List of Post Submission Evidence Base Documents

PS_035:	Green Belt Stage 3 Addendum report – Assessment of Reasonable Alternative Sites
PS_036:	SHELAA sheets for all reviewed Green Belt sites
PS_037:	Sustainability Appraisal Addendum
PS_038:	Sustainability Appraisal options SHELAA sheets
PS_039:	RAG Assessment – Access and Movement – Five Oak Green bypass
PS_040:	Tunbridge Wells Public Transport (PT) Feasibility Study Review
PS_041:	Paddock Wood Bus Service Options
PS_042:	River Medway and River Teise updated climate change Flood Zone modelling and mapping
PS_043:	Paddock Wood Streams updated present day and climate change Flood Zone modelling and mapping
PS_044:	Updated present day and climate change Flood Zone mapping
PS_045:	Employment land provision at Paddock Wood
PS_046:	Paddock Wood Strategic Sites (Master planning) Addendum
PS_046a:	Figure 5: Structure Plan for Paddock Wood (Framework Plan, drawing number TWBC-008 revision c)
PS_046b:	Figure 13: Land Use Budget for Structure Plan (drawing no. TWBC-009 revision c)
PS_046c:	Figure 14: Infrastructure Provision for Paddock Wood Sites (Infrastructure Plan, drawing no. TWBC 011 revision c)
PS_047:	TW Stage 1 Technical Note - Review of Strategic Model Methodology and Set Up for Local Plan
PS_048:	TW Local Plan Stage 2 Reporting
PS_049:	TW Local Plan Stage 3 Modal Shift Impact Reporting
PS_050:	RAG Assessment – Access and Movement – Colts Hill Bypass
PS_051:	Colts Hill Bypass Green Belt Assessment
PS_052:	Zone of Theoretical Visibility (ZTV) Colts Hill Bypass
PS_053:	Provisions for Sustainable and Active Travel
PS_054:	Development Strategy Topic Paper Addendum

PS_055:	Equalities Impact Assessment (EqIA)
PS_056:	Habitat Regulations Assessment (HRA)
PS_057:	Local Development Scheme (LDS)
PS_058:	Tunbridge Wells Bus Feasibility Technical Note
PS_059:	TW Local Plan Stage 3 Part 2 Outcomes
PS_060:	TWBC Local Plan Paddock Wood and east Capel Access and Movement Report
PS_061a:	Addendum to Local Plan Viability Assessment Main Report
PS_061b:	Appendix i Development Assumptions Overview – Tables 1 and 1a
PS_061c:	Appendix ii Updated Results – Table 2
PS_061d:	Appendix iii Appraisal Summaries
PS_062:	Updated Local Plan Housing Trajectory (Position as at 1 April 2023)
PS_063:	Summary of Proposed Modifications to the Development Strategy, following Inspector's Initial Findings in November 2022

Appendix B: Proposed changes to Key Diagram



Appendix C: Proposed changes to the Strategic Policies

Proposed changes to The Development Strategy section:

- a) Table 3: Housing Need and Supply 2020-2038
- b) Policy STR1: The Development Strategy
- c) Table 4: Distribution of housing allocations
- d) Table 5: Employment land allocations identified in the Local Plan

Table 3: Housing Need and Supply 2020-2038

1.	Housing need 2020-2038	12,006	18 years x 667 pa
1a	Completions 2020-2023	1,842	See 5YHLS 2023
2.	Extant planning permissions at 1 April 2023	2,845*	See HS&T TP
3.	Windfall allowance small sites at 1 April 2023 (to 2038)	1,464**	See HS&T TP/BL TP
4.	Windfall allowance large urban sites at 1 April 2023 (to 2038)	360**	See HS&T TP/BL TP
5.	Outstanding SALP/Local Plan site allocations	592	See 5YHLS 2023
6.	Outstanding Benenden Neighbourhood Development Plan Site Allocations	68	See BNDP
7.	Minimum additional allocations to meet need (based on 667dpa to 2038)	4,835	= row 1 - rows (1a-6)
8.	Minimum total allocations (based on 667dpa to 2038)	5,495	Rows 5+6+7

* Includes discounting for C2 permissions

Policy STR 1

Policy STR 1

The Development Strategy

The broad development strategy for Tunbridge Wells borough over the period 2020-2038, as shown indicatively on the Key Diagram (Figure 5), is to ensure that a minimum of 12,006 dwellings and 14 hectares of employment (use classes B and E) land are developed, together with supporting infrastructure and services.

To achieve this, the Local Plan:

1. Promotes the effective use of urban and previously developed (brownfield) land, having due regard to relevant Plan policies;
2. Looks to focus new development within the Limits to Built Development of settlements, as defined on the Policies Map, where proposals accord with other relevant policies of this Plan;
3. Provides for the growth of settlements, having regard to their role and function, constraints, and opportunities, together with the ~~development of two strategic sites, namely:~~
 - a) major, transformational expansion of Paddock Wood (including land at east Capel), following garden settlement principles and providing flood risk solutions; ~~and~~
 - b) ~~the creation of a new garden settlement: Tudeley Village between Paddock Wood and Tonbridge;~~
4. Includes an allowance for potential delays or non-delivery of sites;
5. Provides for a prestigious new business park to the north of North Farm/Kingstanding Way, Royal Tunbridge Wells, well connected to the improved A21;
6. Provides a framework for the preparation of a holistic Area Plan for Royal Tunbridge Wells Town Centre;
7. Provides for some reductions in the area of the Green Belt, notably for land in east Capel (adjacent to Paddock Wood) ~~the strategic sites~~ and around Royal Tunbridge Wells and Pembury, where exceptional circumstances warrant this, and where an effective long-term Green Belt is maintained;
8. Limits development within the High Weald Area of Outstanding Natural Beauty to that which can be accommodated whilst still conserving its key characteristics, this being mostly small-scale, only promoting larger proposals where exceptional circumstances are demonstrated;
9. Normally limits development in the countryside (being defined as that outside the Limits to Built Development) to that which accords with specific policies of this Plan and/or that for which a rural location is fully demonstrated to be necessary.

Following adoption, the Council will undertake an early review of the Local Plan, which will include further investigation of ways of meeting identified housing needs for the period post 2034.

Table 4: Distribution of housing allocations

Parish/Settlement	Local Plan allocations	
	Lower	Upper
Royal Tunbridge Wells	1,416 1,278	1,536 1,421
Southborough	42	42
Paddock Wood	3,932 2,877	4,032 3,035
<i>Strategic urban expansion*</i>	3,490 2,434	3,590 2,592
<i>Town centre</i>	30	30
Capel	2,100	2,100
Tudeley Village – new settlement	2,100	2,100
Cranbrook and Sissinghurst	453	467
<i>Cranbrook</i>	415	429
<i>Sissinghurst</i>	38	38
Hawkhurst	161 231	170 240
Benenden*	87 88	95
<i>Benenden*</i>	43 41	45
<i>East End*</i>	44 47	50
Bidborough	0	0
Brenchley and Matfield	56	60
Frittenden	25	30
Goudhurst	25	25
Horsmonden	240 230	320 290
Lamberhurst	25	30
Pembury	389	417
Rusthall	15	15
Sandhurst	20	30
Speldhurst	10	12
Sub-total	8,996 5,764	9,381 6,209
Allocations with existing planning permission (to be discounted to avoid double counting)	920 1,614	920 1,614
Total (with existing planning permission discounted)	8,076 4,150	8,461 4,595

Table 5: Employment land allocations identified in the Local Plan

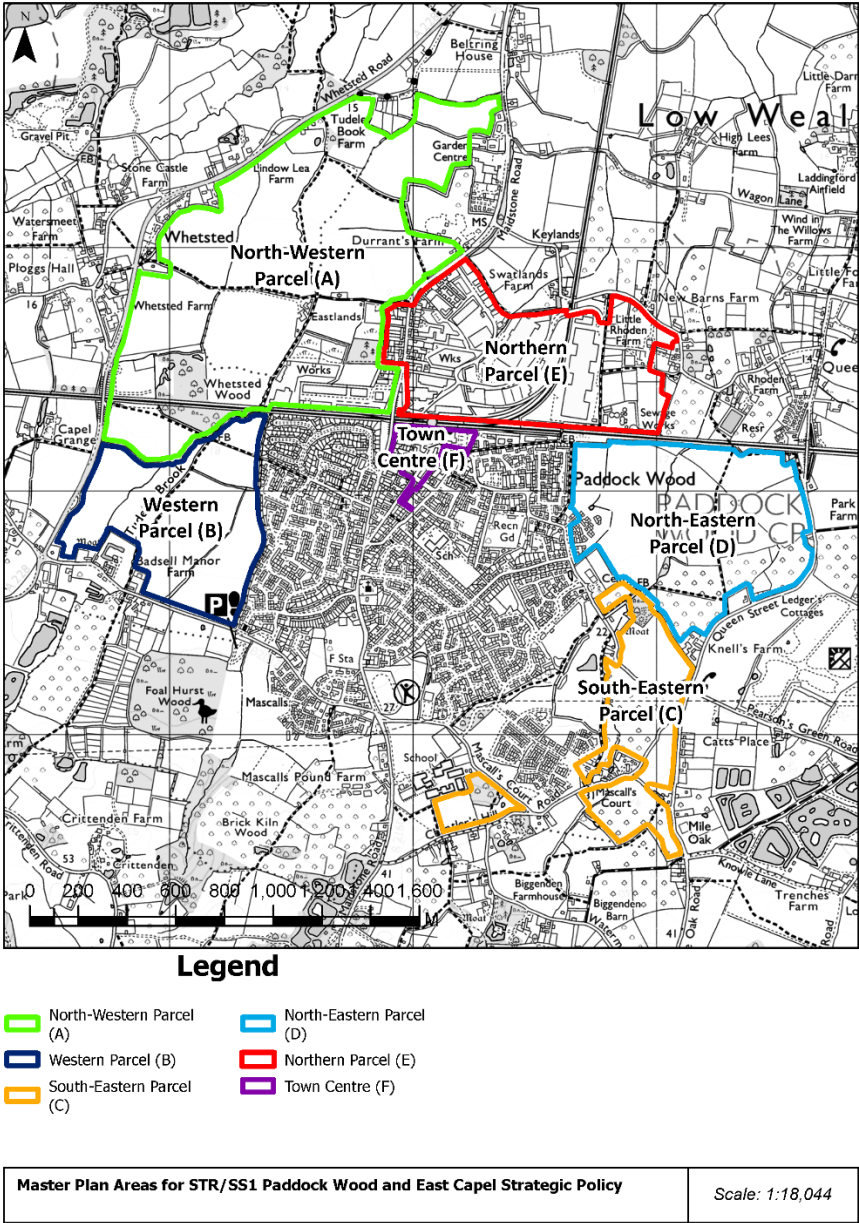
Site	Settlement/Parish	Policy Number	Net Developable area (ha)
Land adjacent to Longfield Road	Royal Tunbridge Wells	AL/RTW 17	13.4
Land east of Maidstone Road	Paddock Wood	STR/SS 1	4.27
Land east of Transfesa Road	Paddock Wood	STR/SS 1	4.25

Hawkhurst Station Business Park	Gill's Green	AL/HA 7	1.2
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Appendix D: Proposed changes to policy STR/SS 1: The Strategy for Paddock Wood, including land at east Capel

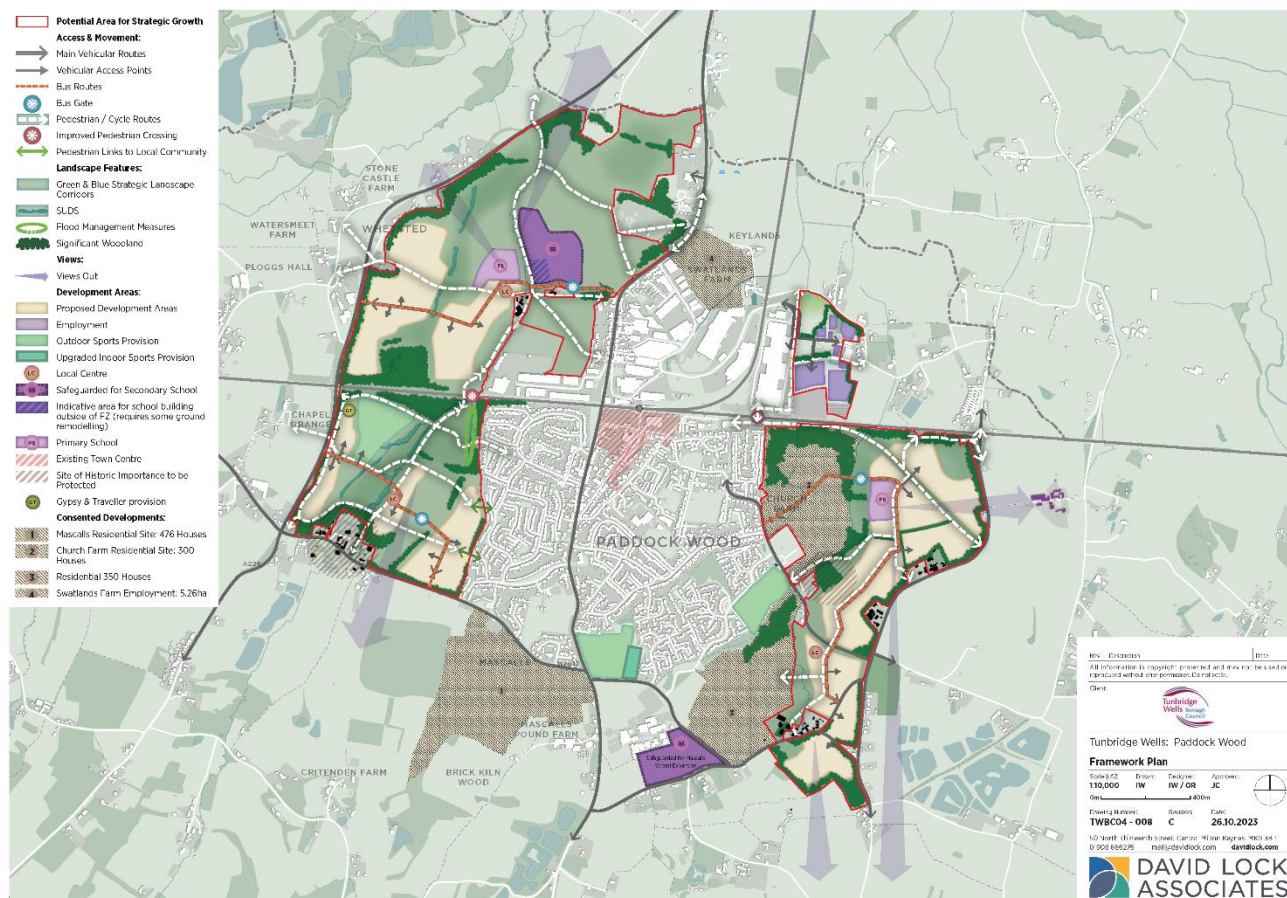
Deletion of original Map 27 Masterplan Areas, Map 28 Structure Plan, and policy wording for STR/SS 1 to be replaced with:-

Revised Map 27 Masterplan Areas



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Revised Map 28 Paddock Wood and East Capel Structure Plan (published with the permission of David Lock Associates Ltd)



Revised Policy Wording:

Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Development principles

1. The development strategy for Paddock Wood and east Capel in conjunction with Policies STR/PW 1 (the Strategy for Paddock Wood (parish) and STR/CA 1 (the Strategy for Capel parish), sets provisional Limits to Built Development for Paddock Wood and east Capel on the Policies Map (Inset Map 4) as a framework for the provision of an extended settlement over the plan period. This is facilitated through the release of Green Belt land to the west of Paddock Wood, with development to be carried out on each of the development parcels identified on Map 27 as follows;
 - A. North - Western parcel (edged in green);
 - B. South - Western parcel (edged in dark blue);
 - C. South - Eastern parcel (edged in yellow);
 - D. North - Eastern Parcel (edged in light blue); and
 - E. Northern parcel (edged in red);
 - F. Town Centre (edged in purple on Map 27 (Master Plan Areas) and dealt with by

2. The development as a whole shall deliver the following elements, (within the set allocations identified at Map 28);
3. Provide a mix of housing types, size, and tenure (in line with Policy H1) to ensure a balanced, inclusive, and accessible community, the exact mix to be agreed with the Local Planning Authority at the planning application stage in relation to each Parcel;
4. Make provision for accommodation to deliver mixed communities, including provision for those with different accommodation needs, including the needs of older people with at least one sheltered and one extra care housing scheme to the east and west;
5. Be of a high standard of design with particular attention to be paid to structural and detailed landscaping (to promote and deliver a continuous and homogeneous landscape approach to the allocation as a whole), layout, scale, height, detailed design, and massing to ensure that the development responds to local character and its overall setting. Planning applications for development should be informed by a landscape and visual impact assessment, biodiversity and heritage studies and the initial outline/hybrid applications should be assessed by a Design Review Panel, at least once at pre-application stage and once following submission of a planning application;
6. Incorporate zero and low carbon development, in line with the requirements of Policy EN 3, provide an exemplar scheme with climate change mitigation and adaptation measures and sustainable development principles in relation to the design, construction and operational stages;
7. Meet the informal and formal recreational needs of the development and provide areas of green and open space [as shown schematically on Map 28], and biodiversity objectives of Policy EN9 and which where possible integrates with neighbouring Parcels to ensure a consistent and legible functional and visual relationship between them;
8. Ensure that surface water runoff from the development will not exacerbate and so far, as possible and practicable improve flooding elsewhere. The drainage strategy should be implemented through the development to deliver the levels of storage, attenuation, and mitigation measures to reduce the incidence of flooding to adjacent residential areas in Paddock Wood;
9. Consider the potential for mineral deposits and make provision for any viably workable minerals to be extracted prior to development commencing on the site.
10. Have regard to the recommendations of the High Weald AONB Setting Study and the objectives of the High Weald AONB Management Plan, where deemed to fall within the setting of the AONB;
11. Provide walking and cycling linkages within and between each parcel, together with links to Paddock Wood town centre, existing and new employment areas, and surrounding countryside;
12. Where possible and practicable connect to and enhance the existing bridleways network;
13. The development proposals for the whole of the allocated area shall embed garden settlement principles. Proposals for each Parcel should give effect to this requirement and be guided by the Council's Structure Plan SPD for the whole of the allocation;
14. Proposals for the piecemeal development of individual sites in the Eastern and Western Parcels that do not conform to the above requirements as a whole will not be permitted; and
15. The development to be delivered to be in accordance with a Framework Masterplan

Masterplanning

The new development shall be delivered through a masterplan approach.

- i. All development proposals in relation to the Eastern and Western parcels shall be in accordance with an approved masterplan relating to each parcel that will respect the above requirements and take into account the Council's Structure Plan SPD. Where development parcels abut each other and developers have worked collaboratively on masterplanning, this will be supported where it meets the other aims and objectives in this policy. The masterplan shall be submitted to the Council for its approval as part of the initial application for planning permission in relation to (any part of) the relevant Parcel.
- ii. Each Masterplan shall show the intended overall design and layout of the development and the proposed distribution and location of uses across the Parcel including its functional links with neighbouring Parcels, the existing community of Paddock Wood and Paddock Wood Town Centre and surrounding land which shall accord with, be based upon and promote, garden community principles as required in para.2 above.
- iii. Demonstrate how heritage assets and their settings will be sympathetically integrated into the development and their significance respected;
- iv. Show all structural landscaping and indicative treatments to be provided (including boundary treatments);
- v. Incorporate a green and blue infrastructure (GBI) plan which is informed by a comprehensive wildlife and habitat survey and heritage and landscape character assessments. This should incorporate a scheme of management of communal spaces and green infrastructure within the eastern and western parcels including provision for management and funding, initial community and stakeholder involvement with amenity, landscape and biodiversity objectives for a period of 30 years from the completion of the development;
- vi. Show the proposed transport links, including access to the development and main internal highway links and all intended links within the site and to the surrounding footpath and cycleway and bridleway network, including proposed and potential footpath and cycleway and bridleway links to the wider area;
- vii. Show how development will safeguard, maintain and, where possible, enhance key views in and across the allocated site;
- viii. Provide for convenient and highly legible pedestrian and cycle links through the allocated site;
- ix. Show how the development will incorporate the full range of sustainable transport measures;
- x. Identify the locations and forms of the district and local centres, including the community and healthcare facilities to be provided within them as necessary;
- xi. Incorporate a parking strategy in accordance with policy TP3 in relation to each Parcel.
- xii. Proposals for employment development on the Northern Parcel shall be required to comply with the requirements of paragraph 8 (a), (b), (c) and (e) to (j) above.
- xiii. The masterplans for the Eastern and Western Parcels shall include a phasing and implementation plan which shall identify the phasing of development across the whole of the relevant Parcel to ensure that the development will be carried out in a manner

that co-ordinates the implementation and occupation of the development and the timely delivery of such necessary on and off-site infrastructure as shall be reasonably required to support the development and occupation of each Parcel and its proper integration with neighbouring Parcels and the timely provision of Parcel specific and shared infrastructure taking into account Table 11 of the Council's SSMS dated February 2021 as may be updated from time to time) or as may otherwise be reasonably required.

Strategic Infrastructure

The development shall be delivered in accordance with a phasing and implementation plan as approved which shall be required to be secured by conditions and/or s.106 obligations so as to ensure that:

- a) Development across the whole of the allocated site shall be capable of being integrated and phased and its impacts satisfactorily and mitigated;
- b) There are supporting facilities (including access to green and blue infrastructure, leisure and sporting facilities, shops, health, community and educational facilities) that will allow the early establishment of a self-sufficient and cohesive community with an appropriate level of supporting infrastructure provision;
- c) Occupiers have a range of sustainable travel options at their disposal, including access to bus services and the cycle and pedestrian links;
- d) Transport links and associated transport and highway improvements and the provision of new transport and highway infrastructure is provided when it is needed to support the development and mitigate potential off-site highway and other transport impacts;
- e) The delivery of necessary infrastructure shall be informed by ongoing discussions with relevant stakeholders, including Kent County Council and adjacent local authorities (Tonbridge & Malling and Maidstone Borough Councils) and other relevant statutory consultees and be kept under review throughout the planning stages of the development.

Save to the extent covered by CIL requirements (if any), development proposals in relation to all Parcels will be required to be supported by planning obligations that provide so far (as necessary and reasonable) either for

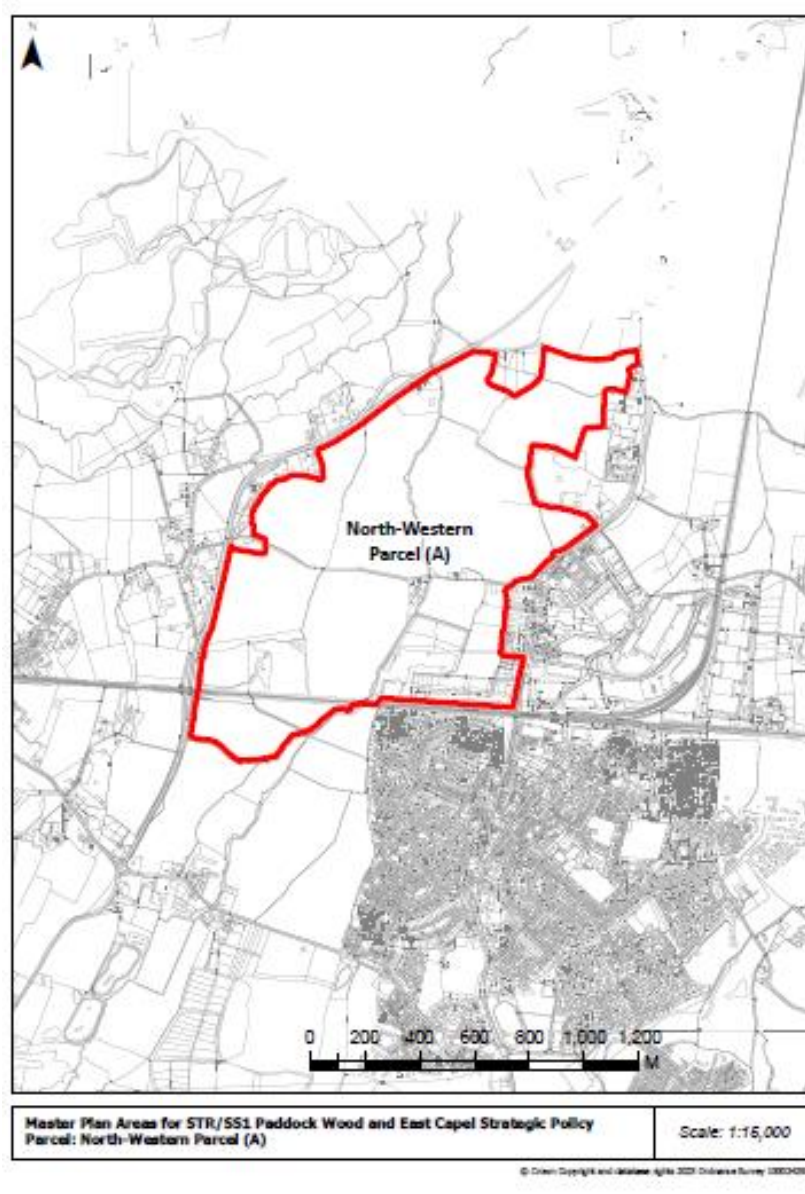
(1) the timely payment of proportionate contributions towards the carrying out and/or implementation of strategic and other necessary highway mitigation works and improvements, education and health provision and other necessary infrastructure as identified in the Council's Strategic Sites Masterplanning and Infrastructure Study as updated from time to time, and/or

(2) its actual provision, as appropriate. This will include the requirement to pay reasonable and proportionate contributions retrospectively towards such infrastructure to support the development as may have been forward funded through other sources where the provision of such infrastructure is necessary and reasonable. Where necessary and appropriate, the occupation of the development shall be regulated by reference to the completion or provision of any such infrastructure as may be necessary to support the development and its sustainability, to be determined by reference to evidence current at the point of determination.

- f) Sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool);

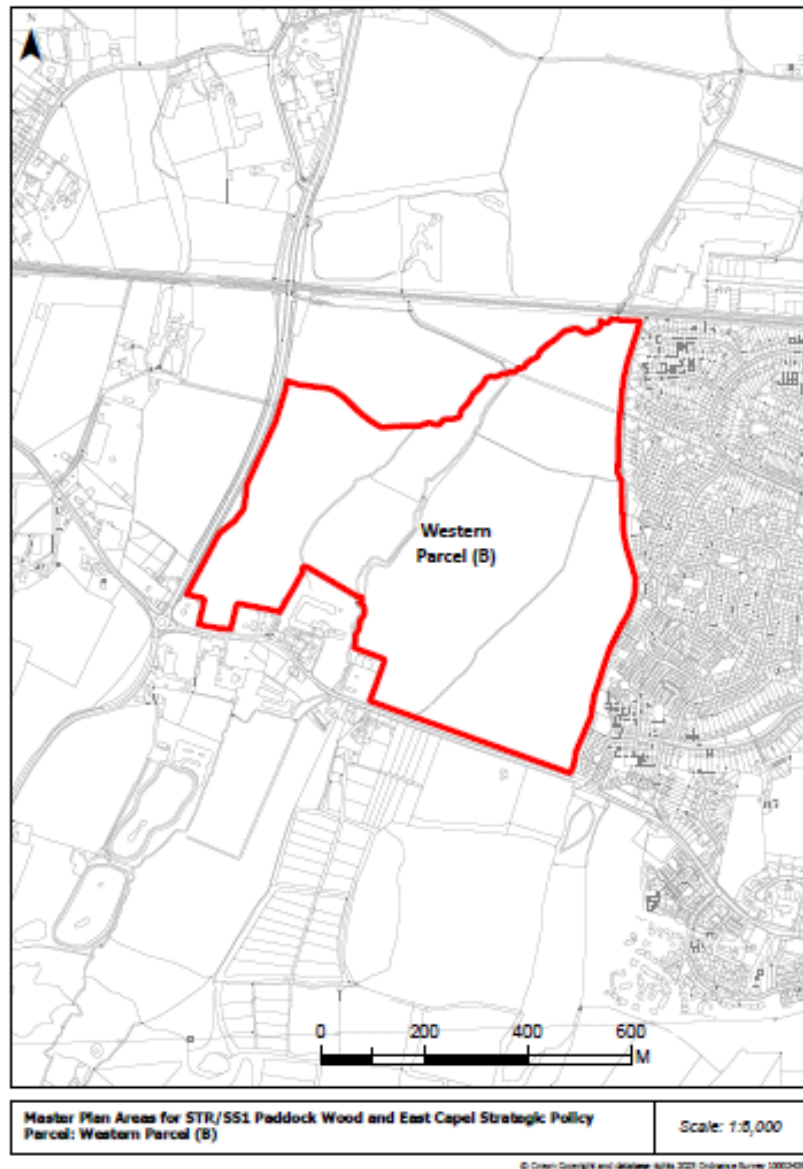
- g) Health provision split across one or all of the local centres;
- h) The delivery of secondary school provision equivalent to 3 Forms of Entry (3FE) within the North-Western development parcel, unless it is demonstrated that through feasibility studies that the provision can be delivered through other means such as expansion of existing secondary school provision;
- i) Cycle and pedestrian links across the development parcels and linking into the existing settlement including a north-south pedestrian and cycle bridge over the railway line linking the North-Western and South western parcels, linking neighbourhoods and providing access to community facilities;
- j) Contributions towards the improvement of the highway network including the Colts Hill Bypass and Kippings Cross.

New Development Parcel policies



Policy SS/STR 1(A) - North Western Parcel Requirements

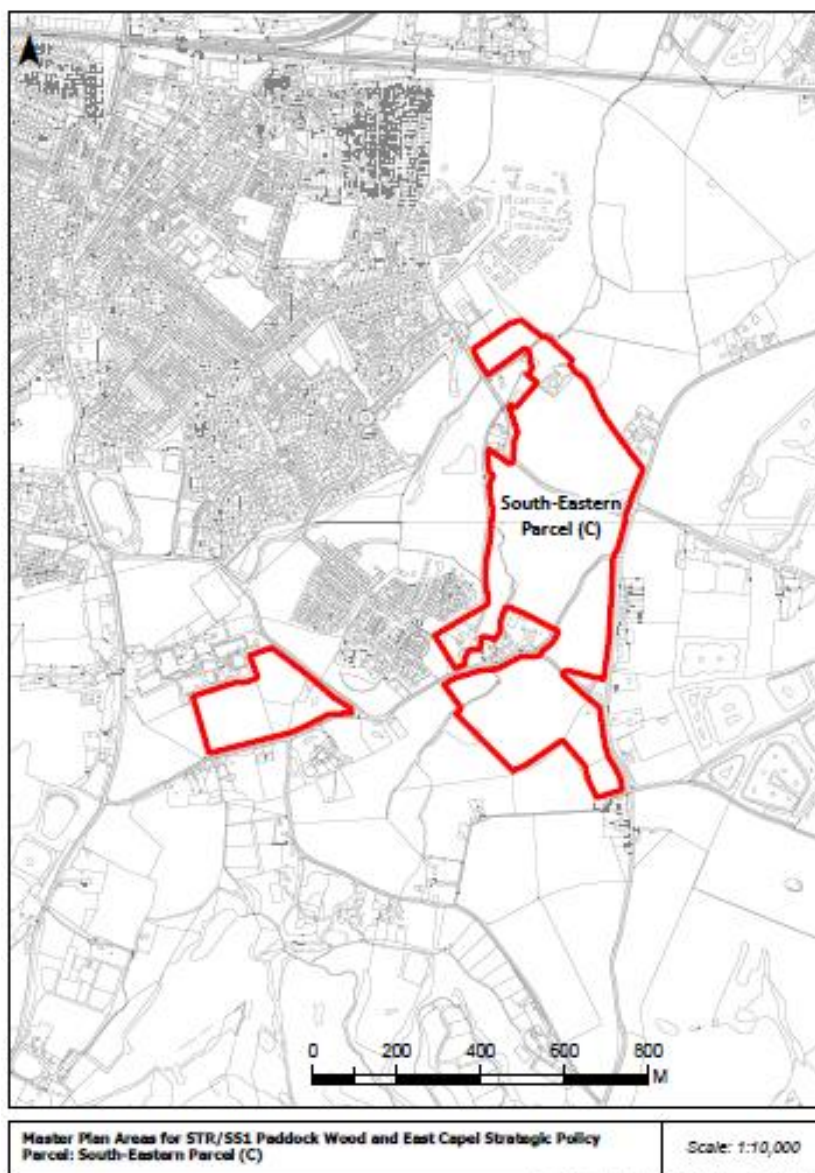
- i) A minimum of 770 dwellings, 40% of which shall be Affordable Housing in accordance with policy H3;
- ii) A mix of housing in accordance with policy H1.
- iii) A scheme designed with a landscape led approach;
- iv) A two-form entry primary school, safeguarded to enable expansion to three form entry;
- v) A three-pitch gypsy/traveller site (to include space for one mobile home and one touring caravan per pitch) to be accommodated on the North - Western parcel south of the railway line in accordance with policy H9;
- vi) Local centre providing up to 700sqm commercial floorspace (Class E(a) to (f)) in total;
- vii) Safeguarding of land for 4FE secondary school that has land available to expand to 6FE should it be required;
- viii) Provide walking and cycling linkages within the site connecting to adjacent development parcels, existing walking and cycling infrastructure including together with links to Paddock Wood town centre, existing and new employment areas, and surrounding countryside in accordance with policy TP 2;
- ix) Incorporate zero and low carbon energy production, in line with the requirements of policies EN 1 and EN 3;
- x) Provide appropriate areas of green and open space;
- xi) A Wetland Park within and to the north of the North-Western parcel to deliver flood water attenuation and new wetland habitat, allowing for informal recreation via a network of footpaths and boardwalks;
- xii) Phasing and contribution towards strategic infrastructure delivery as set out in STR/SS 1;
- xiii) Provision of appropriate water supply and access to wastewater treatment facilities, inclusion of conservation and control through use of Sustainable Drainage Systems, and the contribution to an overall flood risk reduction in accordance with policies EN 24, EN 25, and EN 26; and provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement.
- xiv) To provide compensatory improvements to the Green Belt;
- xv) Development to be delivered to be in accordance with a Framework Masterplan Supplementary Planning Document (SPD).



Policy SS/STR 1(B) – South Western parcel Requirements

- i. A minimum of 514 dwellings, 40% of which shall be Affordable Housing in accordance with policy H3;
- ii. A mix of housing in accordance with policy H1, to include sheltered accommodation provision in accordance with policy H6;
- iii. A scheme designed with a landscape led approach; 4.54 hectares of land for sport and leisure provision including outdoor pitches, changing facilities, and car parking;
- iv. Incorporate zero and low carbon energy production, in line with the requirements of policies EN 1 and EN 3;
- v. Provide appropriate areas of green and open space;
- vi. Provide walking and cycling linkages within the site connecting to adjacent development parcels, existing walking and cycling infrastructure including together

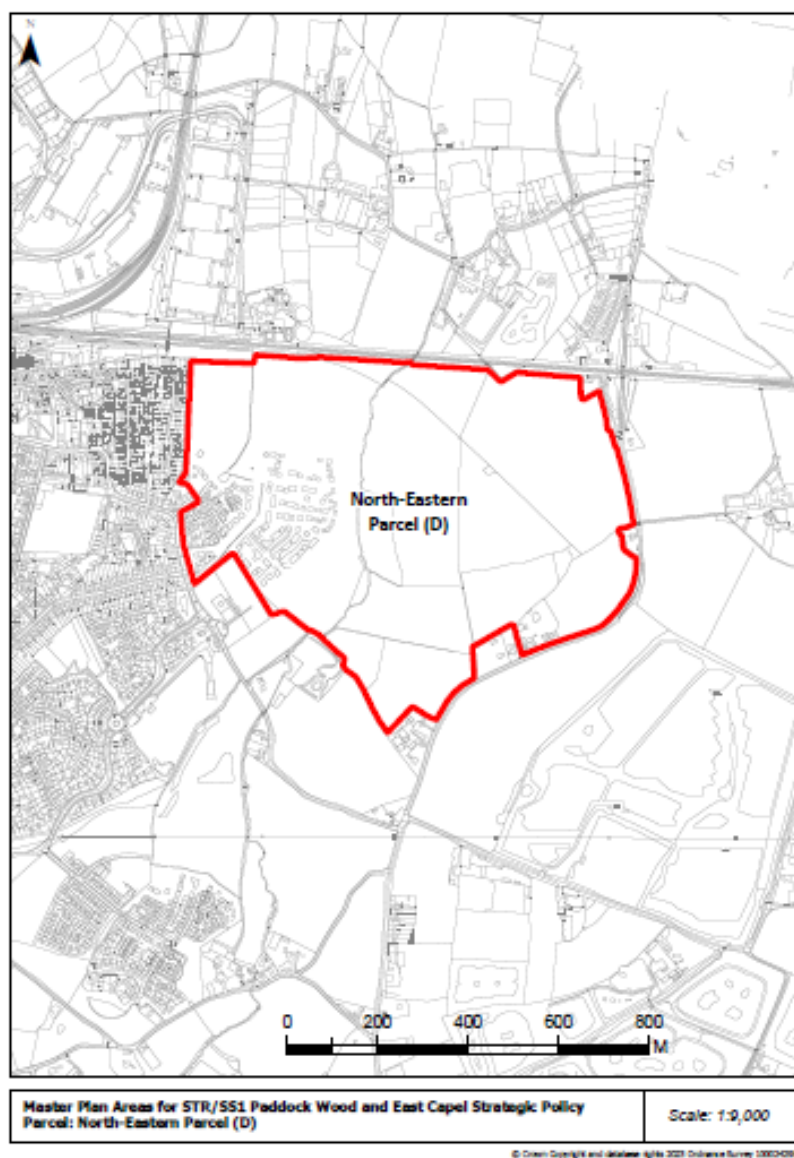
- with links to Paddock Wood town centre, existing and new employment areas, and surrounding countryside in accordance with policy TP 2;
- vii. Local centre providing up to 700sqm commercial floorspace (Class E(a) to (f)) in total;
 - viii. Incorporate zero and low carbon energy production, in line with the requirements of policies EN 1 and EN 3;
 - ix. Provide appropriate areas of green and open space;
 - x. A flood water attenuation area allowing for informal recreation via footpaths and boardwalks;
 - xi. Phasing and contribution towards strategic infrastructure delivery as set out in STR/SS 1;
 - xii. Provision of appropriate water supply and access to wastewater treatment facilities, inclusion of conservation and control through use of Sustainable Drainage Systems, and the contribution to an overall flood risk reduction in accordance with policies EN 24, EN 25, and EN 26; provision of flood attenuation features to enable the delivery of flood betterment to the north western area of the existing settlement.
 - xiii. To provide compensatory improvements to the Green Belt; and
 - xiv. Development to be delivered to be in accordance with a Framework Masterplan Supplementary Planning Document (SPD).



Policy SS/STR 1(C) – South Eastern Parcel Requirements

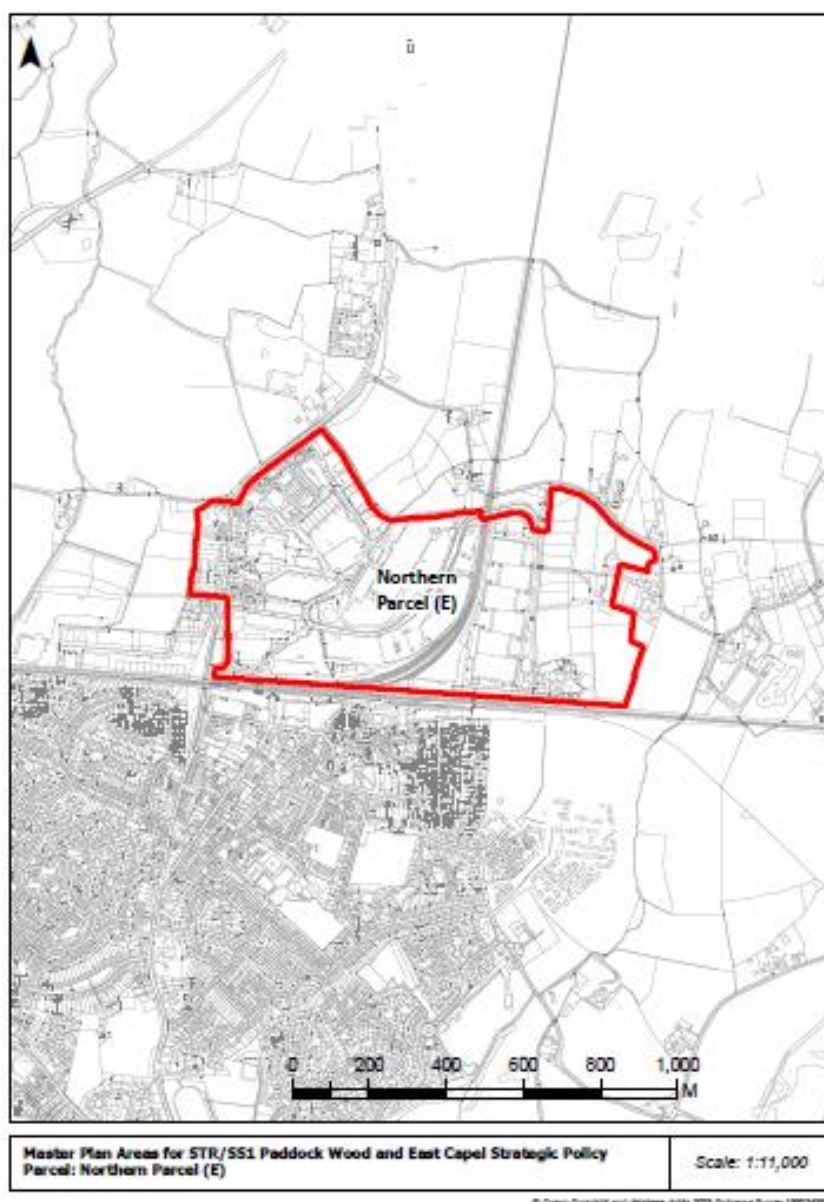
- I. A minimum of 560 dwellings, 40% of which shall be Affordable Housing in accordance with policy H3;
- II. A mix of housing in accordance with policy H1, to include specialist extra care accommodation for the elderly in accordance with policy H6;
- III. A scheme designed with a landscape led approach;
- IV. Provide walking and cycling linkages within the site connecting to adjacent development parcels, existing walking and cycling infrastructure including together with links to Paddock Wood town centre, existing and new employment areas, and surrounding countryside in accordance with policy TP 2;
- V. Safeguarding of land north of Chanters Hill for the possible expansion of Mascalls Academy if required.
- VI. Incorporate zero and low carbon energy production, in line with the requirements of policies EN 1 and EN 3;
- VII. Provide areas of green and open space;

- VIII. Shall demonstrate particular regard for the setting of the High Weald AONB;
- IX. Local centre providing up to 700sqm commercial floorspace (Use Class E(a) to (f)) in total;
- X. Incorporate zero and low carbon development, in line with the requirements of policies EN 1 and EN 3;
- XI. Phasing and contribution towards strategic infrastructure delivery as set out in STR/SS 1;
- XII. Provision of water supply and access to wastewater treatment facilities;
- XIII. Control of flood risk through use of Sustainable Drainage Systems, to facilitate a reduction in the overall flood risk of the site and surrounding area, in accordance with policies EN 24, EN 25, and EN 26; and
- XIV. Development to be delivered to be in accordance with a Framework Masterplan Supplementary Planning Document (SPD).



Policy SS/STR 1(D) – North Eastern Parcel Requirements

- i) A minimum of 600 dwellings, 40% of which shall be Affordable Housing in accordance with policy H3;
- ii) A scheme designed with a landscape led approach;
- iii) Land for a two-form entry primary school;
- iv) Provide walking and cycling linkages within the site connecting to adjacent development parcels, existing walking and cycling infrastructure including together with links to Paddock Wood town centre, existing and new employment areas, and surrounding countryside in accordance with policy TP 2;
- v) Incorporate zero and low carbon development, in line with the requirements of policies EN 1 and EN 3.
- vi) Phasing and contribution towards strategic infrastructure delivery as set out in STR/SS 1;
- vii) Provide areas of green and open space;
- viii) Development should make use of, and enhance, the Hop Pickers Trail;
- ix) Shall demonstrate particular regard for the setting of the High Weald AONB;
- x) Provision of water supply and access to wastewater treatment facilities;
- xi) Control of flood risk through use of Sustainable Drainage Systems, to facilitate a reduction in the overall flood risk of the site and surrounding area in accordance with policies EN 24, EN 25, and EN 26; and
- xii) Development to be delivered to be in accordance with a Framework Masterplan Supplementary Planning Document (SPD).



Policy SS/STR 1(E) - Northern Parcel Requirements

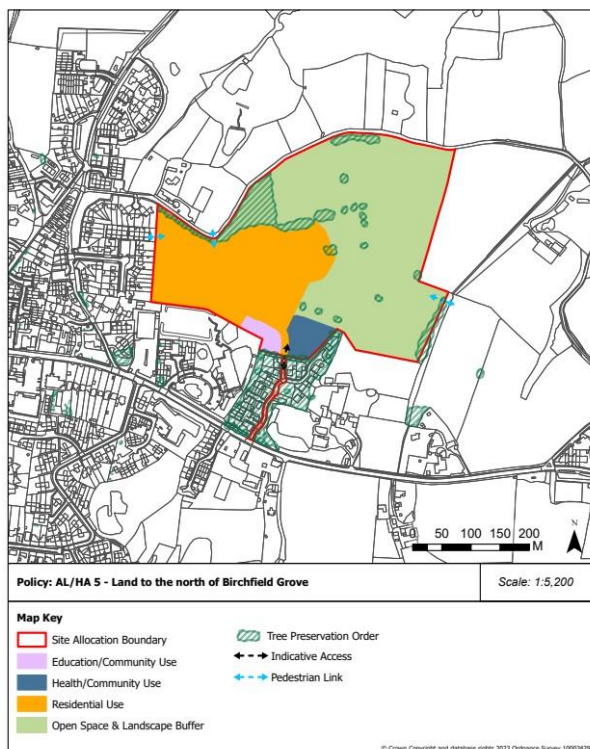
- i) A mix of employment uses on sites to the east of Transfesa Road to provide approximately 4.25 hectares of Class E (g), B2 and B8 employment uses–(these are Key Employment Areas and shall comply with paragraphs 4(c) to (f) and (h) to (j) policy ED 1.
- ii) The development allocation SS/STR 1(E) is in addition to the delivery of 4.27 hectares at Swatlands Farm that has Outline Planning Permission (ref: 22/01929/OUT).
- iii) Incorporate zero and low carbon energy production, in line with the requirements of policies EN 1 and EN 3;
- iv) Provision of appropriate water supply and access to wastewater treatment facilities, inclusion of conservation and control through use of Sustainable Drainage Systems, and the contribution to an overall flood risk reduction in accordance with policies EN 24, EN 25, and EN 26.

Appendix E: Proposed changes to policy STR/SS 3: The Strategy for Tudeley Village

Policy to be withdrawn.

Appendix F: Proposed changes to policy AL/HA 5: Land to the north of Birchfield Grove, Hawkhurst

Deletion of original Map 47 Site Layout Plan and policy wording for AL/HA5 to be replaced with:



This site, as defined on the Hawkhurst Policies Map, is allocated for approximately 70 dwellings, of which 40 percent shall be affordable housing, a medical centre and associated parking, an area of land to be safeguarded for future educational use, and open spaces and landscape buffers, as indicated on the site layout plan.

Development on the site shall accord with the following requirements:

1. Provision of vehicular access serving the site shall be from Birchfield Grove located to the south of the site, as supported by a Transport Assessment;
2. Proposals for the site shall include the provision of pedestrian links, linking the site to surrounding footways and Public Right of Way number WC187;
3. Proposals for the site shall include the provision of a pedestrian, cycle and emergency connection from the site into Whites Lane;
4. The design, layout and scale of development shall provide a suitable edge to the settlement, informed by a Landscape and Visual Impact Assessment (taking account of the AONB location of the site), which shall include details of height parameters and wireframe visualisations from a selected number of key viewpoints, ecological studies, and a heritage assessment (including archaeology and landscape heritage);

5. Regard shall 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 the Landscape and Visual Impact Assessment;
6. Proposals to take account of, and respond to, ancient woodland, Tree Preservation Orders and existing ponds on site, with the layout and design of the development protecting these as informed by an ecological survey. If it is justified that any protected trees are to be removed, these must be replaced by semi-mature specimens;
7. Proposals for the site shall include provision of, and adherence to, a Landscape and Ecological Management Plan to cover public spaces, retained and restored habitats, and if applicable, any retained agricultural land;
8. The spatial distribution of the different uses for which this site is allocated, shall reflect that shown indicatively on the site layout plan, and include a serviced plot for the medical centre;
9. Development proposals shall be informed by a Transport Assessment and ensure that impact upon the Hawkhurst crossroads junction (the A229/A268) and the Flimwell crossroads (the junction of the A21 and A268) shall not be severe. The Transport Assessment shall identify any highway mitigation measures needed to support development of the site;
10. Proposals for development of the site shall include the provision of significant amenity/natural green space, parks and recreation grounds, children's play space and youth play space in accordance with the requirements of Policy OSSR 2: Provision of publicly accessible open space and recreation;
11. Contributions are to be provided to mitigate the impact of the development, in accordance with Policy STR/HA 1.

Appendix G: Proposed changes to Policy AL/HAS 8: Site at Limes Grove (March's Field), Gill's Green, Hawkhurst

Policy to be withdrawn.

**If you require this document in another format,
please contact:**

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